

Assignment and Report

| | | | | |
|--|--|--|-------------------------------------|-------------------------|
| 1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Norman Gene Pepper Pepper Tackle Dist. 12502 Dixie Highway Louisville, KY 40272, Jefferson | 2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) <p style="text-align: center;">775045-2014-0146-B1B</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">3. PERMIT/LICENSE NUMBER 461111018C34256</td> <td style="width: 33%;">4a. TARGET DATE 9/30/2016</td> <td style="width: 33%;">4b. TARGET HOURS</td> </tr> </table> 5. REQUESTED BY (SIGNATURE, TITLE AND DATE) <p style="text-align: center;">09/30/2016</p> | 3. PERMIT/LICENSE NUMBER 461111018C34256 | 4a. TARGET DATE 9/30/2016 | 4b. TARGET HOURS |
| 3. PERMIT/LICENSE NUMBER 461111018C34256 | 4a. TARGET DATE 9/30/2016 | 4b. TARGET HOURS | | |

6. ATF OFFICER(S) ASSIGNED

(b)(6) - Lead Investigator
 (b)(6) - Assigned Investigator
 (b)(6) - Assigned Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)

(b)(6), Area Supervisor, 05/17/2016

8. PURPOSE/SPECIAL INSTRUCTIONS

Reassigned to IOI (b)(6) on 5/17/2016

WC held in lieu of revocation on 11/23/2011. Recall inspection assigned on 1/3/2014. Please complete recall inspection no later than 09/30/2016.

Conduct recall compliance inspection in accordance with applicable provisions of ATF H 5030.2C and special instructions. Previous inspection disclosed violations resulting in a DIO held WC in lieu of revocation.

| 9. INSPECTION RESULTS | | | <input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC | | 10. TRAVEL EXPENSES (OPTIONAL) | |
|------------------------|----|----------------------------|---|---|--------------------------------|--|
| NO. OF VIOLATIONS | 5 | NO. OF REFERRALS | | | 2111 - PER DIEM | |
| NO. OF TECS CHECKS | 10 | NO. OF TECS HITS | | 1 | 2112 - P.O.A. | |
| NO. OF TAX ADJUSTMENTS | | \$ VALUE OF TAX INCREASES | | | 2113 - COMM. AIR | |
| | | \$ VALUE OF TAX DECREASES | | | 2114 - RENTAL CAR | |
| NO. OF ASSESSMENTS | | \$ VALUE OF ASSESSMENTS | | | 2115 - GPV EXPENSES | |
| NO. OF CLAIMS | | \$ VALUE OF CLAIMS | | | 2116 - MISC. | |
| NO. OF TAX PERIODS | | \$ VALUE OF TAXES VERIFIED | | | TOTAL \$ FOR INSP. | |

11. ATF OFFICER'S RECOMMENDATION

Submitted by (b)(6) - Industry Operations Investigator

Submitted on: 06/14/2016
 The current inspection disclosed five violations of the Gun Control Act which warrants a recommendation of Warning Letter due to the licensee failing to complete and/or report (b)(6) Multiple Handgun Sales Report during the inspection period which involved (b)(6) handguns. Warning Letter recommended. No recall requested. No referrals were submitted.

Violts WL ONLY and No Recall Inspection

| 12. TIME ACCOUNTING DATA | | | |
|---|--------------|-------------------------|--|
| ATF OFFICER'S NAME (MONTH, YEAR, HOURS) | (b)(6) | | |
| JUN 2016 | 27.00 | | |
| ATF OFFICER'S SUBTOTAL | 27.00 | ATF OFFICER'S SIGNATURE | |
| ATF OFFICER'S NAME (MONTH, YEAR, HOURS) | (b)(6) | | |
| JUN 2016 | 8.00 | | |
| ATF OFFICER'S SUBTOTAL | 8.00 | ATF OFFICER'S SIGNATURE | |
| ATF OFFICER'S NAME (MONTH, YEAR, HOURS) | (b)(6) | | |
| JUN 2016 | 7.00 | | |
| ATF OFFICER'S SUBTOTAL | 7.00 | ATF OFFICER'S SIGNATURE | |
| TOTAL HOURS | 42.00 | | |

Assignment and Report

| | | | |
|---|---|------------------------------|------------------|
| 1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Norman Gene Pepper Pepper Tackle Dist. 12502 Dixie Highway Louisville, KY 40272, Jefferson | 2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 775045-2014-0146-B1B | | |
| | 3. PERMIT/LICENSE NUMBER 461111018C34256 | 4a. TARGET DATE 9/30/2016 | 4b. TARGET HOURS |
| | 5. REQUESTED BY (SIGNATURE, TITLE AND DATE) 09/30/2016 | | |

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

ROV & Warning Letter mailed on 6/15/2016 along with PII to the FFLC.

Viols WL ONLY and No Recall Inspection

REVIEWED CONCUR SEE COMMENTS FINAL DISPOSITION

| | |
|---|---------------------------|
| SIGNATURE AND TITLE (b)(6) - Area Supervisor | REVIEW DATE 06/15/2016 |
|---|---------------------------|

ROUTING SEQUENCE AND DATE

- 1. _____
- 2. _____
- 3. _____
- 4. _____

CONTROL FILE POSTED DATE _____



U.S. Department of Justice
Bureau of Alcohol, Tobacco,
Firearms and Explosives

600 Dr. Martin Luther King Jr. Place, Suite 500
Louisville, Kentucky 40202

June 15, 2016

www.atf.gov

775045 (b)(6)
5300

**CERTIFIED MAIL/
RETURN RECEIPT REQUESTED**

Norman Gene Pepper dba Pepper Tackle Dist. (FFL # 4-61-34256)
12502 Dixie Highway
Louisville, Ky. 40272

Dear Licensee:

During a recent compliance inspection at your firearms business covering the period of June 7, 2016 to June 13, 2016, you were cited for violations of 27 Code of Federal Regulations, Part 478. A copy of the ATF Form 5030.5, Report of Violations, issued at the time of the inspection is enclosed.

The violations were fully explained to you by Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator (IOI) (b)(6). You indicated that you understood the requirements of the firearms laws and regulations. You further indicated that corrective actions would be taken to eliminate future violations.

The records you are required to maintain and the business operations you conduct are important to law enforcement in our continuing effort to reduce violent crime and protect the public. It is essential that you comply with all Federal laws and regulations that govern your firearms business. This is critical to carrying out our mission to protect the public and ensure that criminals do not gain access to firearms. ATF appreciates the efforts you and other industry members make in this area, and we look forward to continuing to work with you in that regard.

You are reminded that retention of your Federal firearms license is conditioned upon your compliance with Federal laws and regulations. Any future violations, either repeat or otherwise,

could be viewed as willful and may result in the revocation of your license. Please ensure that future compliance is achieved.

Should you have any questions regarding this matter, please contact IOI (b)(6) or myself at (502) 753-3500.

Sincerely yours,

(b)(6)

Area Supervisor
Louisville II Field Office

Enclosure

cc: Federal Firearms Licensing Center
Director, Industry Operations
File

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

| | | | | | | |
|--|---------------------------------------|--|--------------|-------------------|---------------------|-------------------|
| Name of Proprietor Norman Gene Pepper dba Pepper Teckle Dist. | Street Address 12502 Dixie Highway | City Louisville | State Ky. | ZIP Code 40272 | County Jefferson | Page 1 of 2 Pages |
| License/Permit/Registry Number (if any) 4-61-111-01-8C-34256 | Expiration Date 3-1-2018 | Date(s) or Period of Inspection 6-7-16 to 6-13-16 | | | | |

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

| Number | USC or CFR Citation | Nature of Violation | Corrective Action to be Taken (If not corrected immediately) | Date Corrections to be Made (If not corrected immediately) |
|--------|------------------------|--|---|---|
| 1 | 27 CFR 478.125(e) | Failure to properly maintain the acquisition and disposition record in (b)(6) instances. Licensee failed to record a firearm acquisition in the A & D record in (b)(6) instances. | The licensee was instructed to begin maintaining the A & D record accurately and in a timely manner. Licensee was instructed to make the appropriate corrections to the A & D record, which they did. | immediately |
| 2 | 27CFR478.124(c)(1) | Failure to obtain a properly completed ATF F4473 in (b)(6) out of 14 forms examined. A total of (b)(6) instance was found to be either missing, incomplete or incorrect. The following was found: In (b)(6) instance, Item 2 (2012 edition) was incorrect | Licensee was instructed to examine all ATF F4473s completed by purchasers to ensure that all required information is fully complete and correct. | immediately |
| 3 | 27CFR478.124(c)(3)(iv) | Failure to properly complete ATF F4473s. 14 forms were examined. Errors were found in (b)(6) instances on (b)(6) forms. The following was found: In (b)(6) instances, Item 21a (2012 edition) was blank. | Licensee was instructed to properly complete ATF F4473s. | immediately |
| 4 | 27CFR478.124(c)(4) | Failure to properly complete ATF F4473s. 14 forms were examined. Errors were found in (b)(6) instance on (b)(6) form. The following was found: In (b)(6) instance, Item 30 (2012 edition) was blank. | Licensee was instructed to begin completing ATF F4473 completely and accurately. | immediately |

I Have Received a Copy of This Report of Violations (Proprietor's signature and title)

| | | |
|--|------------------|-----------------|
| Signature and Title of ATF Officer (b)(6) | Signature IOI | Date 6-13-16 |
| | | Date 6-13-16 |

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

| | | | | | | |
|--|---------------------------------------|---|--------------|-------------------|---------------------|----------------------|
| Name of Proprietor Norman Gene Pepper dba Pepper Tackle Dist. | Street Address 12502 Dixie Highway | City Louisville | State Ky. | ZIP Code 40272 | County Jefferson | Page 2 of 2 Pages |
| License/Permit/Registry Number (if any) 4-61-111-01-8C-34256 | Expiration Date 3-1-2018 | Date(s) or Period of Inspection 6-7-16 to 6-8-16 | | | | |

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

| Number | USC or CFR Citation | Nature of Violation | Corrective Action to be Taken (If not corrected immediately) | Date Corrections to be Made (If not corrected immediately) |
|--------|---------------------|--|---|---|
| 5 | 27CFR478.126a | <p>Failure to complete/report a Multiple Handgun Sales Report when two or more handguns are transferred/sold to the same individual within five working days.</p> <p>The licensee failed to complete and/or report ^{(b)(3) (1)} Multiple Handgun Sales Report during the inspection period which involved ^{(b)(3) (1)} handguns. (^{(b)(3) (1)} 5-17-16)</p> | <p>The licensee was instructed to complete/report a Multiple Handgun Sales Report when two or more handguns are transferred/sold to the same individual within five working days. Licensee was instructed to report the unreported multiple sale.</p> | immediately |

FIREARMS INSPECTION REPORT

Name: Norman Gene Pepper
Trade Name: Pepper Tackle Dist.

UI#: 775045-2014-0146-B1B
FFL#: 4-61-111-01-8C-34256

Address: 12502 Dixie Highway
Louisville, Ky. 40272 Jefferson County

1 - Introduction

Inspection Profile:

On June 7, 2016, ATF IOI (b)(6) (lead), IOI (b)(6), IOI (b)(6) and SA/PIO (b)(6) along with three interns visited the business premise of Norman Gene Pepper dba Pepper Tackle Dist. for the purpose of conducting a Disposition Emphasis Recall Compliance Inspection on the Type 01 Federal Firearms License # 4-61-111-01-8C-34256 with an expiration date of March 1, 2018. Pepper Tackle Dist. is a sole proprietorship in which Norman Pepper is listed as owner/responsible person and (b)(6) is listed as office manager/responsible person. Norman Pepper stated (b)(6) (b)(6) was no longer employed by Pepper Tackle Dist. IOI Shartzter instructed Norman Pepper to submit a letter to the Licensing Center requesting to remove (b)(6) as a responsible person. Mr. Pepper stated he would do as instructed. Norman Pepper's identity was verified by Kentucky Driver's License (b)(6). Mr. Pepper was interviewed and the on-site inspection began. The inspection period is June 7, 2015 to present. Advance notice was not provided.

Business Profile:

Pepper Tackle Dist. primarily conducts retail sales of firearms at the business premise. The licensee stated he does not conduct pawn redemptions, gunsmithing activities, deal in consignments, conduct internet sales or sell firearms at gun shows. The business premise is a commercial storefront located in an urban area of Louisville, Ky. at 12502 Dixie Highway. A Type 01 FFL is the appropriate license for the type of business activity conducted. The licensee currently maintains approximately 175 firearms in inventory. This FFL did not acquire any firearms during the previous year. This FFL disposed (b)(4) firearms during the previous year. Handguns account for approximately (b)(4) of the business and long guns account for approximately (b)(4) of the business. New firearms account for (b)(4) of sales. The licensee's primary supplier for new firearms is (b)(4). Norman Pepper, Vicki Curtis and Delilah Hodges are the primary employees of Pepper Tackle Dist. who conduct firearm transfers/sales. NCIC did not disclose any of these employees were prohibited. Hours of operation are currently listed as Sunday to Saturday 9 am to 6 pm. Pepper Tackle Dist. also sells fishing bait and quail out of this location. Norman Pepper stated they have a farm on which they raise quail to be sold to hunting organizations.

FIREARMS INSPECTION REPORT

Name: Norman Gene Pepper
Trade Name: Pepper Tackle Dist.

UI#: 775045-2014-0146-B1B
FFL#: 4-61-111-01-8C-34256

Ownership and Control:

As previously stated, the business is a sole proprietorship in which Norman Pepper is listed as owner/responsible person and (b)(4) is listed as office manager/responsible person. Norman Pepper stated (b)(4) was no longer employed by Pepper Tackle Dist. IOI (b)(4) instructed Norman Pepper to submit a letter to the Licensing Center requesting to remove (b)(4) as a responsible person. Mr. Pepper stated he would do as instructed. Norman Pepper stated he owns 100% of the business. No changes in ownership/control reported. No hidden ownership is suspected.

Variance:

No variance requests were submitted as a result of this inspection.

2 - Recommendation

The current inspection disclosed five violations of the Gun Control Act which warrants a recommendation of Warning Letter due to the licensee failing to complete and/or report one Multiple Handgun Sales Report during the inspection period which involved two handguns. Warning Letter recommended. No recall requested. No referrals were submitted.

3 - Inspection History

Date of Inspection: 9/8/2010 to 7/20/2011
Type of Inspection: Compliance Inspection
UI#: 775045-2010-0306-B1B
Inspection Results: Five violations cited which resulted in a DIO WC being held in lieu of revocation.

1. 27 CFR 478.21(a)- The licensee failed to ensure that the transferor printed his name in Box 33 and recorded his title in box 35 of the ATF F 4473 in (b)(3) instance.
2. 27 CFR 478.124(c)(5)- The licensee failed to ensure that the transferor signed in Box 34 and dated the firearm transfer in Box 36 of the ATF F 4473 in (b)(3) instance.
3. 27 CFR 478.124(c)(3)(iv)- The licensee failed to record the date on which NICS was contacted in Box 21a of ATF F 4473 in (b)(3) instances.
4. 27 CFR 478.125(e)- The licensee failed to timely record the disposition of firearms in the Acquisition and Disposition Book in (b)(3) instances. The licensee failed to maintain an accurate Acquisition & Disposition Book. The inspection

FIREARMS INSPECTION REPORT

Name: Norman Gene Pepper
Trade Name: Pepper Tackle Dist.

UI#: 775045-2014-0146-B1B
FFL#: 4-61-111-01-8C-34256

disclosed 431 firearms in physical inventory with [REDACTED] openings in the bound record. The licensee was unable to account [REDACTED] firearms.

5. 27 CFR 478.99(c)- The licensee employed [REDACTED]

4 - Acquisition & Disposition (A&D) Record - Inventory

The licensee maintains bound books for the A & D record which are in the correct format. The licensee stated they have been conducting an inventory for comparison to the A & D record on an annual basis. There was a tag system set up which would reference a particular firearm in the physical inventory with the A & D records. The licensee stated the acquisitions and dispositions are typically entered into the bound book at the time of the transaction. The licensee's current procedures with regards to the inventory and A & D record need to show improvement as there were [REDACTED] total errors disclosed during the inspection.

At the time of the inspection, there were 175 firearms in physical inventory and there were [REDACTED] firearms on hand according to the licensee's A & D records. A 100% inventory was conducted on the firearms. [REDACTED] discrepancies were disclosed at that time.

No commercial invoices were compared to the A & D record. The licensee did not acquire any firearms during the previous year.

[REDACTED] ATF F 4473s during the inspection period were compared to the A & D record. No discrepancies disclosed.

After the final reconciliation, the following violations of 27 CFR 478.125(e) regarding the inventory and A & D record were reported on the Report of Violations: Licensee failed to record a firearm acquisition in the A & D record [REDACTED] instances. (**See Violations, Report of Violations, Worksheet 2 - Inventory and A & D Review Worksheet**)

5 - ATF Forms 4473 – NICS & Other Dispositions

Each salesclerk is responsible for the proper completion of ATF Forms 4473 at the time of the transaction. The licensee verifies the ID of the purchaser, enters the licensee

FIREARMS INSPECTION REPORT

Name: Norman Gene Pepper
Trade Name: Pepper Tackle Dist.

UI#: 775045-2014-0146-B1B
FFL#: 4-61-111-01-8C-34256

information and signs the form. There were no errors disclosed during the current inspection which were related to the identification section. There were no errors related to the certification section. The licensee currently maintains their ATF F 4473s in chronological order. The licensee maintains the denials separately. There are instances where a firearm is shipped to a licensee outside the business on behalf of a customer. In these instances, the licensee obtains a certified copy of the recipient dealer's FFL and a file copy is maintained. Overall, the error rate for proper completion of the ATF F 4473 was 28.5% during the inspection period. The licensee's procedures with regards to the ATF F 4473 need to show improvement.

The inspection period was June 7, 2015 to present. [REDACTED] ATF F 4473s were reviewed. There were deficiencies noted on four forms. These violations included the following:

Failure to obtain a properly completed ATF F4473 in [REDACTED] out of [REDACTED] forms examined. A total of [REDACTED] instance was found to be either missing, incomplete or incorrect. The following was found: In [REDACTED] instance, Item 2 (2012 edition) was incorrect. **(See Exhibit 1- Photos of ATF F 4473 Errors for Violation of 27CFR478.124(c)(1), Violations, Report of Violations, Worksheet 3 - ATF Form 4473 (2012 Edition) Review Worksheet)**

Failure to properly complete ATF F4473s. [REDACTED] forms were examined. Errors were found in [REDACTED] instances on [REDACTED] forms. The following was found: In [REDACTED] instances, Item 21a (2012 edition) was blank. **(See Exhibit 2- Photos of ATF F 4473 Errors for Violation of 27CFR478.124(c)(3)(iv), Violations, Report of Violations, Worksheet 3 - ATF Form 4473 (2012 Edition) Review Worksheet)**

Failure to properly complete ATF F4473s [REDACTED] forms were examined. Errors were found in [REDACTED] instance on [REDACTED] form. The following was found: In [REDACTED] instance, Item 30 (2012 edition) was blank. **(See Exhibit 3- Photos of ATF F 4473 Errors for Violation of 27CFR478.124(c)(4), Violations, Report of Violations, Worksheet 3 - ATF Form 4473 (2012 Edition) Review Worksheet)**

Failure to complete/report a Multiple Handgun Sales Report when two or more handguns are transferred/sold to the same individual within five working days. The licensee failed to complete and/or report [REDACTED] Multiple Handgun Sales Report during the inspection period which involved [REDACTED] handguns. [REDACTED] **(See Exhibit 4- Photos of ATF F 4473 Errors for Violation of 27CFR478.126a, Violations, Report of Violations, Worksheet 3 - ATF Form 4473 (2012 Edition) Review Worksheet)**

Transaction approval numbers were acquired from NICS for the period of March 26, 2016 to May 25, 2016. There were four approval numbers/open transactions for this period. There were no denied transactions during the inspection period. All four NTN

FIREARMS INSPECTION REPORT

Name: Norman Gene Pepper
Trade Name: Pepper Tackle Dist.

UI#: 775045-2014-0146-B1B
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for approved/open transactions were compared to the ATF F 4473s. No discrepancies disclosed. (See **Exhibit 5- NICS Audit Log**)

Overall, there were deficiencies noted [REDACTED] of the [REDACTED] forms reviewed which is an error rate of 28.5%. There were no errors related to the certification section. There were no errors related to the identification section. The licensee failed to report a multiple handgun sale in [REDACTED] instance. Violations of 27 CFR §§ 478.124(c)(1), 478.124(c)(3)(iv), 478.124(c)(4), 478.126a were cited on the Report of Violations. (See **Violations, Report of Violations, Worksheet 3 - ATF Form 4473 (2012 Edition) Review Worksheet**)

6 - Multiple Sales

The licensee reported no multiple handgun sale transactions during the past year according to the report acquired from the Violent Crime Analysis Branch. A review of the ATF F 4473s during the previous year disclosed [REDACTED] unreported multiple handgun sale. (See **Exhibit 4- Photos of ATF F 4473 Errors for Violation of 27CFR478.126a, Exhibit 6- VCAB Query, Violations, Report of Violations, Worksheet 3 - ATF Form 4473 (2012 Edition) Review Worksheet**)

7 - Suspicious/Prohibited Purchasers

The ATF F 4473s during the inspection period were reviewed to determine if any trafficking patterns were present. One individual was identified as having unusual purchases or purchase patterns, and additional checks were conducted (LEAD and NCIC). The additional checks did not disclose any information that would indicate firearms trafficking activity. No prohibited purchasers were identified.

8 - Trace Activity

Prior to conducting the inspection, the Firearms Trace History of the licensee was obtained from the Violent Crime Analysis Branch for the previous year. The VCAB Query indicated the licensee was associated with four firearm trace requests. These trace attempts were successful. (See **Exhibit 6- VCAB Query**)

A secondary market analysis was not conducted. The licensee did not acquire any firearms during the previous year. The licensee does not acquire firearms from non-licensees.

9 - NFA/Importer/Collector/Manufacturer

No NFA/Importer/Collector/Manufacturer operations conducted.

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10 - Referrals

No referrals.

11 - Other

No other information.

12 - Closing Actions

On June 13, 2016, IOI (b)(6) attended a closing conference at the licensed premises. Norman Pepper and Vicki Curtis were present. A review of the regulatory requirements was conducted. An Acknowledgement of Federal Firearms Regulations was signed by Norman Pepper. (See **Exhibit 7-Acknowledgement of Federal Firearms Regulations**)

A Report of Violations (ATF F 5030.5) was issued on June 13, 2016 by IOI (b)(6) (b)(6) and reviewed. Norman Pepper and Vicki Curtis were present. Norman Pepper signed the Report of Violations. (See **Report of Violations**)

13 - Violations

1. **27 CFR 478.125(e) – Firearms Receipt and Disposition by Dealers- REPEAT OF VIOLATION CITED ON 7-20-11**

Failure to properly maintain the acquisition and disposition record in two instances.

Licensee failed to record a firearm acquisition in the A & D record in two instances.

Norman Pepper stated these two firearms were personal firearms located at the premise and that he had failed to tag them as personal firearms as required by regulation. It should be noted that the licensee did have approximately 10 firearms at the premise which were tagged as personal and not for sale. IOI (b)(6) ran these two firearms in NCIC with negative results. IOI (b)(6) instructed the licensee to tag these two firearms as personal or record them in the A & D record as business inventory.

The licensee was instructed to begin maintaining the A & D record accurately and in a timely manner. Licensee was instructed to make the appropriate corrections to the A & D record, which they did.

(See **Violations, Report of Violations, Worksheet 2 - Inventory and A & D Review Worksheet**)

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2. 27 CFR 478.124(c)(1) – Firearms Transaction Record

Failure to obtain a properly completed ATF F4473 in ^{(b)(6)} out of ^{(b)(6)} forms examined. A total of ^{(b)(6)} instance was found to be either missing, incomplete or incorrect. The following was found:

In ^{(b)(6)} instance, Item 2 (2012 edition) was incorrect.

Norman Pepper stated the ATF F 4473 errors were unintentional mistakes. Mr. Pepper stated that ^{(b)(6)} was previously the office manager who dealt with the majority of the firearm transfers. Mr. Pepper stated ^{(b)(6)} is no longer employed at the business. Mr. Pepper stated he has been training new employees on how to properly complete the forms. Norman Pepper stated they will review the ATF F 4473 more carefully in the future to reduce the number of errors.

Licensee was instructed to examine all ATF F4473s completed by purchasers to ensure that all required information is fully complete and correct.

(See Exhibit 1- Photos of ATF F 4473 Errors for Violation of 27CFR478.124(c)(1), Violations, Report of Violations, Worksheet 3 - ATF Form 4473 (2012 Edition) Review Worksheet)

3. 27CFR478.124(c)(3)(iv) – Firearms Transaction Record- REPEAT OF VIOLATION CITED ON 7-20-11

Failure to properly complete ATF F4473s ^{(b)(6)} forms were examined. Errors were found in ^{(b)(6)} instances on ^{(b)(6)} forms. The following was found:

In ^{(b)(6)} instances, Item 21a (2012 edition) was blank.

Norman Pepper stated the ATF F 4473 errors were unintentional mistakes. Mr. Pepper stated that ^{(b)(6)} was previously the office manager who dealt with the majority of the firearm transfers. Mr. Pepper stated ^{(b)(6)} is no longer employed at the business. Mr. Pepper stated he has been training new employees on how to properly complete the forms. Norman Pepper stated they will review the ATF F 4473 more carefully in the future to reduce the number of errors.

Licensee was instructed to properly complete ATF F4473s.

(See Exhibit 2- Photos of ATF F 4473 Errors for Violation of 27CFR478.124(c)(3)(iv), Violations, Report of Violations, Worksheet 3 - ATF Form 4473 (2012 Edition) Review Worksheet)

FIREARMS INSPECTION REPORT

Name: Norman Gene Pepper
Trade Name: Pepper Tackle Dist.

UI#: 775045-2014-0146-B1B
FFL#: 4-61-111-01-8C-34256

4. 27CFR478.124(c)(4) – Firearms Transaction Record

Failure to properly complete ATF F4473s. 14 forms were examined. Errors were found in [REDACTED] instance on [REDACTED] form. The following was found:

[REDACTED] instance, Item 30 (2012 edition) was blank.

Norman Pepper stated the ATF F 4473 errors were unintentional mistakes. Mr. Pepper stated that (b)(6) was previously the office manager who dealt with the majority of the firearm transfers. Mr. Pepper stated (b)(6) is no longer employed at the business. Mr. Pepper stated he has been training new employees on how to properly complete the forms. Norman Pepper stated they will review the ATF F 4473 more carefully in the future to reduce the number of errors.

Licensee was instructed to begin completing ATF F4473 completely and accurately.

(See Exhibit 3- Photos of ATF F 4473 Errors for Violation of 27CFR478.124(c)(4), Violations, Report of Violations, Worksheet 3 - ATF Form 4473 (2012 Edition) Review Worksheet)

5. 27CFR478.126a – Reporting Multiple Sales or Other Disposition of Pistols and Revolvers

Failure to complete/report a Multiple Handgun Sales Report when two or more handguns are transferred/sold to the same individual within five working days.

The licensee failed to complete and/or report [REDACTED] Multiple Handgun Sales Report during the inspection period which involved [REDACTED] handguns. [REDACTED]

Norman Pepper stated the ATF F 4473 errors were unintentional mistakes. Mr. Pepper stated that (b)(6) was previously the office manager who dealt with the majority of the firearm transfers. Mr. Pepper stated (b)(6) is no longer employed at the business. Mr. Pepper stated he has been training new employees on how to properly complete the forms. Norman Pepper stated they will review the ATF F 4473 more carefully in the future to reduce the number of errors. Norman Pepper stated he was aware a multiple handgun sales report was required in this instance. Vicki Curtis was listed as the saleclerk for this transaction. Vicki Curtis stated she did not know a multiple handgun sales report was required in this instance.

The licensee was instructed to complete/report a Multiple Handgun Sales Report when two or more handguns are transferred/sold to the same individual within five working days. Licensee was instructed to report the unreported multiple sale.

FIREARMS INSPECTION REPORT

Name: Norman Gene Pepper
Trade Name: Pepper Tackle Dist.

UI#: 775045-2014-0146-B1B
FFL#: 4-61-111-01-8C-34256

(See Exhibit 4- Photos of ATF F 4473 Errors for Violation of 27CFR478.126a,
Exhibit 6- VCAB Query, Violations, Report of Violations, Worksheet 3 - ATF
Form 4473 (2012 Edition) Review Worksheet))

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Industry Operations Investigator

Index of Worksheets and Exhibits

Report of Violations

Worksheets

- 1-Information Page
- 2-Inventory and A&D Review Worksheet
- 3-ATF F 4473 (2012 Edition) Review Worksheet
- 4-Statistical Page

Exhibits

- 1- Photos of ATF F 4473 Errors for Violation of 27CFR478.124(c)(1)
- 2- Photos of ATF F 4473 Errors for Violation of 27CFR478.124(c)(3)(iv)
- 3- Photos of ATF F 4473 Errors for Violation of 27CFR478.124(c)(4)
- 4- Photos of ATF F 4473 Errors for Violation of 27CFR478.126a
- 5- NICS Audit Log
- 6- VCAB Query
- 7- Acknowledgement of Federal Firearms Regulations