

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) THE BUFFALO TRADING CO LTD 2220 BRIGHT ROAD FINDLAY, OH 45840, HANCOCK	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 773030-2016-0420-B1B		
	3. PERMIT/LICENSE NUMBER 434063017F03371	4a. TARGET DATE 9/30/2016	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

6. ATF OFFICER(S) ASSIGNED
(b) (6) Lead Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b) (6) Area Supervisor, 03/01/2016

8. PURPOSE/SPECIAL INSTRUCTIONS
CONDUCT FIREARMS DISPOSITION EMPHASIS INSPECTION FOR THIS TYPE 01 LICENSEE. REFER TO IO MANUAL, CHAPTER C, AND THE ANNUAL CLEVELAND GROUP III DOMAIN ASSESSMENT. THIS INSPECTION MUST BE COMPLETED DURING FY16 AS REQUIRED BY THE DOMAIN ASSESSMENT.

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		NO. OF TECS HITS		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 Operation Investigator
Submitted on: 09/20/2016

Viols WL ONLY and No Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b) (6)	
JUL 2016	1.50		
AUG 2016	59.50		
SEP 2016	26.00		
ATF OFFICER'S SUBTOTAL	87.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	87.00		

13. REVIEW AND ROUTING	
REVIEW COMMENTS AND RECOMMENDATION Viols WL ONLY and No Recall Inspection	

<input checked="" type="checkbox"/> REVIEWED	<input checked="" type="checkbox"/> CONCUR	<input type="checkbox"/> SEE COMMENTS	<input checked="" type="checkbox"/> FINAL DISPOSITION
SIGNATURE AND TITLE (b) (6) - Area Supervisor		REVIEW DATE 09/20/2016	

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) THE BUFFALO TRADING CO LTD 2220 BRIGHT ROAD FINDLAY, OH 45840, HANCOCK	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 773030-2016-0420-B1B		
	3. PERMIT/LICENSE NUMBER 434063017F03371	4a. TARGET DATE 9/30/2016	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

ROUTING SEQUENCE AND DATE

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

CONTROL FILE POSTED DATE _____

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 THE BUFFALO TRADING CO LTD	Street Address 2220 BRIGHT ROAD	City FINDLAY	State OH	Zip Code 45840-	County HANCOCK	Page 1 of 5 Pages
License/Permit/Registry Number (If any) 434063017F03371	Expiration Date 6/1/2017	Date(s) or Period of Inspection 08/04/2015 through 08/04/2016				

Inspection Results

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

Number: 1

Nature of Violation:

(b) (3) - Public Law 112-55 (125 Stat. 552), (b) (6)
On occasion the licensee failed to fully comply with the instructions on the ATF F4473 and transferred a receiver, which is considered an "other firearm" that cannot be transferred to an individual who is less than 21 years old.

(b) (3) - Public Law 112-55 (125 Stat. 552), (b) (6)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee must fully and completely comply with all instructions listed on the ATF F 4473.

"Sales or deliveries to underaged persons. A licensed...dealer... shall not sell or deliver (1) any firearm or ammunition to any individual who the...dealer...and, if the firearm, or ammunition, is other than a shotgun or rifle, or ammunition for a shotgun or rifle, to any individual who the importer, manufacturer, dealer has reasonable cause to believe is less than 21 years of age...ordinance."

Citation: 27 CFR 478.99(b)

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Name of Proprietor THE BUFFALO TRADING CO LTD	Street Address 2220 BRIGHT ROAD	City FINDLAY	State OH	Zip Code 45840-	County HANCOCK	Page 2 of 5 Pages
License/Permit/Registry Number (If any) 434063017F03371	Expiration Date 6/1/2017	Date(s) or Period of Inspection 08/04/2015 through 08/04/2016				

Inspection Results

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

Number: 2

Nature of Violation:

(b) (3) - Public Law 112-55

occasions licensee failed to enter the disposition in Item 21d of the ATF F 4473 after receiving a delayed response from NICS.

(b) (3) - Public Law 112-55 (125 Stat. 552), (b) (6)

Citation: 27 CFR 478.124(c)(3)(iv)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee must fully, completely and properly enter all the information requested on the ATF F 4473.

"Shall comply with the requirements of §478.102 and record on the form the date on which the licensee contacted the NICS, as well as any response provided by the system, including any identification number provided by the system."

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Name of Proprietor THE BUFFALO TRADING CO LTD	Street Address 2220 BRIGHT ROAD	City FINDLAY	State OH	Zip Code 45840-	County HANCOCK	Page 3 of 5 Pages
License/Permit/Registry Number (If any) 434063017F03371	Expiration Date 6/1/2017	Date(s) or Period of Inspection 08/04/2015 through 08/04/2016				

Inspection Results

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

Number: 3

Nature of Violation:

(b) (3) - Public Law 112-55 (12

On occasion the licensee entered an incorrect entry in Item 18 of the ATF 4473 which led to a transfer of a weapon to an underage person.

(b) (3) - Public Law 112-55 (125 Stat. 552), (b) (6)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee must fully, completely and properly enter all the information requested on the ATF F 4473.

"The Director is authorized to prescribe all forms required by this part. All of the information called for in each form shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by this part."

Citation: 27 CFR 478.21(a)

Report of Violations

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Name of Proprietor THE BUFFALO TRADING CO LTD	Street Address 2220 BRIGHT ROAD	City FINDLAY	State OH	Zip Code 45840-	County HANCOCK	Page 4 of 5 Pages
License/Permit/Registry Number (If any) 434063017F03371	Expiration Date 6/1/2017	Date(s) or Period of Inspection 08/04/2015 through 08/04/2016				

Inspection Results

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

Number: 4

Nature of Violation:

(b) (3) - Public Law 112-55 (1)

On occasion the licensee failed to make an entry in Item 36 of the ATF 4473 namely the date of transfer.

(b) (3) - Public Law 112-55 (125 Stat. 552), (b) (6)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee must fully, completely and properly enter all the information requested on the ATF F 4473.

"The licensee shall sign and date the form if the licensee does not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearm and transfer the firearm described on the Form 4473."

Citation: 27 CFR 478.124(c)(5)

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 THE BUFFALO TRADING CO LTD	Street Address 2220 BRIGHT ROAD	City FINDLAY	State OH	Zip Code 45840-	County HANCOCK	Page 5 of 5 Pages
License/Permit/Registry Number (If any) 434063017F03371	Expiration Date 6/1/2017	Date(s) or Period of Inspection 08/04/2015 through 08/04/2016				

Inspection Results

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

Number: **5**

Nature of Violation:

(b) (3) - Public Law 112-55 (125 Stat. 552), (b) (6)
On occasion the licensee failed to submit an ATF F 3310.4 Report of Multiple Sales upon the transfer of two handguns within five business days.

(b) (3) - Public Law 112-55 (125 Stat. 552), (b) (6)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee will submit an ATF F 3310.4 upon the transfer of two or more handguns within a five day period.

"Each licensee shall prepare a report of multiple sales or other disposition whenever the licensee sells or otherwise disposes of, at one time or during any five consecutive business days, two or more pistols, or revolvers, or any combination of pistols and revolvers totaling two or more, to an unlicensed person."

Citation: **27 CFR 478.126a**

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

John A. Laebus **John A. Laebus Owner**

Date

8/18/2016

Signature and

(b) (6)

Date

8/18/2016

For Official Use

61



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
5005 Rockside Road, Suite 700
Independence, OH 44131

September 21, 2016

77303 (b) (6)
5440

Certified Mail – Return Receipt Requested

THE BUFFALO TRADING CO LTD
2220 BRIGHT ROAD
FINDLAY, OH 45840-
RE: 434063017F03371

Dear Mr. John Larbus:

During a recent inspection at your firearms business covering the period 08/05/2015 to 08/05/2016 you were cited for violations of Title 27, Code of Federal Regulations, Part 478. A copy of the Report of Violations, ATF F 5030.5, issued at the time of the inspection is enclosed.

All violations were fully explained to you or your designated responsible person by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator. You or your responsible person indicated that you understood the requirements of the firearms laws and regulations and 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 efforts 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 to ensure that criminals do not gain access to firearms. ATF appreciates the efforts you and other industry members make in this area. 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.

THE BUFFALO TRADING CO LTD

Should you have any questions regarding this matter, please contact (b) (6)
(b) (6) Industry Operations Investigator at (216)573-8140.

Sincerely yours,

(b) (6)

Area Supervisor, Cleveland III

Enclosure

cc: Federal Firearms Licensing Center
Cleveland III (IO) Field Office

Assignment and Report

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	3. PERMIT/LICENSE NUMBER 434063017F03371	4a. TARGET DATE 9/30/2016	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

6. ATF OFFICER(S) ASSIGNED
(b)(6) - Lead Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b)(6), Area Supervisor, 03/01/2016

8. PURPOSE/SPECIAL INSTRUCTIONS
CONDUCT FIREARMS DISPOSITION EMPHASIS INSPECTION FOR THIS TYPE 01 LICENSEE. REFER TO IO MANUAL, CHAPTER C, AND THE ANNUAL CLEVELAND GROUP III DOMAIN ASSESSMENT. THIS INSPECTION MUST BE COMPLETED DURING FY16 AS REQUIRED BY THE DOMAIN ASSESSMENT.

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		NO. OF TECS HITS		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 Operation Investigator

Submitted on: 09/20/2016

Viols WL ONLY and No Recall Inspection

12. TIME ACCOUNTING DATA

ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)
JUL 2016		1.50
AUG 2016		59.50
SEP 2016		26.00
ATF OFFICER'S SUBTOTAL	87.00	ATF OFFICER'S SIGNATURE
TOTAL HOURS	87.00	

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION
Viols WL ONLY and No Recall Inspection

<input checked="" type="checkbox"/> REVIEWED <input checked="" type="checkbox"/> CONCUR <input type="checkbox"/> SEE COMMENTS <input checked="" type="checkbox"/> FINAL DISPOSITION	
SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 09/20/2016

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) THE BUFFALO TRADING CO LTD 2220 BRIGHT ROAD FINDLAY, OH 45840, HANCOCK	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 773030-2016-0420-B1B		
	3. PERMIT/LICENSE NUMBER 434063017F03371	4a. TARGET DATE 9/30/2016	4b. TARGET HOURS
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ROUTING SEQUENCE AND DATE

- ☐ 1. _____
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☐ 4. _____

CONTROL FILE POSTED DATE _____

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License/Permit/Registry Number (If any) 434063017F03371	Expiration Date 6/1/2017	Date(s) or Period of Inspection 08/04/2015 through 08/04/2016				

Inspection Results

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

Number: 1

Nature of Violation:

On (b)(3) - 112 Public occasion the licensee failed to fully comply with the instructions on the ATF F4473 and transferred a receiver, which is considered an "other firearm" that cannot be transferred to an individual who is less than 21 years old.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee must fully and completely comply with all instructions listed on the ATF F 4473.

"Sales or deliveries to underaged persons. A licensed...dealer... shall not sell or deliver (1) any firearm or ammunition to any individual who the...dealer...and, if the firearm, or ammunition, is other than a shotgun or rifle, or ammunition for a shotgun or rifle, to any individual who the importer, manufacturer, deal.has reasonable cause to believe is less than 21 years of age,...ordinance."

Citation: 27 CFR 478.99(b)

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License/Permit/Registry Number (If any) 434063017F03371	Expiration Date 6/1/2017	Date(s) or Period of Inspection 08/04/2015 through 08/04/2016				

Inspection Results

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

Number: 2

Nature of Violation:

On (b)(3) - 112 Public L occasions licensee failed to enter the disposition in Item 21d of the ATF F 4473 after receiving a delayed response from NICS.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Citation: 27 CFR 478.124(c)(3)(iv)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee must fully, completely and properly enter all the information requested on the ATF F 4473.

"Shall comply with the requirements of §478.102 and record on the form the date on which the licensee contacted the NICS, as well as any response provided by the system, including any identification number provided by the system."

Report of Violations

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Inspection Results

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

Number: 3

Nature of Violation:

On (b)(3) - 112 Public L occasion the licensee entered an incorrect entry in Item 18 of the ATF 4473 which led to a transfer of a weapon to an underage person.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee must fully, completely and properly enter all the information requested on the ATF F 4473.

"The Director is authorized to prescribe all forms required by this part. All of the information called for in each form shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by this part."

Citation: 27 CFR 478.21(a)

Report of Violations

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Inspection Results

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

Number: 4

Nature of Violation:

On (b)(3) - 112 Public Law occasion the licensee failed to make an entry in Item 36 of the ATF 4473 namely the date of transfer.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee must fully, completely and properly enter all the information requested on the ATF F 4473.

"The licensee shall sign and date the form if the licensee does not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearm and transfer the firearm described on the Form 4473."

Citation: 27 CFR 478.124(c)(5)

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Inspection Results

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

Number: 5

Nature of Violation:

On [REDACTED] occasion the licensee failed to submit an ATF F 3310.4 Report of Multiple Sales upon the transfer of two handguns within five business days.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee will submit an ATF F 3310.4 upon the transfer of two or more handguns within a five day period.

"Each licensee shall prepare a report of multiple sales or other disposition whenever the licensee sells or otherwise disposes of, at one time or during any five consecutive business days, two or more pistols, or revolvers, or any combination of pistols and revolvers totaling two or more, to an unlicensed person."

Citation: 27 CFR 478.126a

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

John A. Laebus John A. Laebus Owner

Date

8/18/2016

Signature and Title

(b)(6)

Date

8/18/2016

For Official Use Only

January 2020 Production

FIREARMS INSPECTION REPORT

Name: The Buffalo Trading Co. LTD
Trade Name:

UI#: 773030-2016-0420-B1B
FFL#: 4-34-063-01-7F-03371

Address: 2220 Bright Rd.
Findlay, OH 45840 (Hancock)

1 - Introduction

Inspection Profile:

On August 5, 2016, Senior Industry Operations Investigator (SIOI) (b)(6) commenced an inspection of the FFL The Buffalo Trading Co. LTD.

Mr. Scott A Kin (ODL: (b)(6) manager and Mr. Larry Corbin ((b)(6) (b)(6)) Responsible Person were interviewed and assisted during the course of the investigation. Mr. John Larbus (ODL: (b)(6) owner was present for the closing. The inspection period was August 5, 2015 - August 5, 2016 and the inspection was completed on August 18, 2016.

Per the ATF F 5700.14 the IOI was instructed to;

Conduct firearms disposition emphasis inspection for this type 01 licensee. Refer to IO Manual, Chapter C, and the Annual Cleveland Group III Domain Assessment. This inspection must be completed by during FY 16 as required by the domain Assessment.

When SIOI (b)(6) arrived at the premise, Mr. Corbin stated that the owner, Mr. Larbus, was out of town but that Mr. Kin was the manager and would assist with the inspection as needed.

Advance notification of this inspection was not given to the licensee.

Business Profile:

The Buffalo Trading Co. is a full service Western themed gun shop located in Findlay, Ohio. The shop includes a Western bar, Western art, figures and memorabilia and stuffed game animals on display such as bears, bison and deer. The Buffalo Trading Co. houses a shooting range with range guns available to rent. They have in-house gunsmithing services and shooting equipment in addition to various types of firearms for sale.

Buffalo Trading Co. acquired approximately (b)(3) - 112 Public Law 55 125 Stat 552) firearms and disposed of approximately (b)(3) - 112 Public Law 55 125 Stat 552) in the past twelve (12) months. The Buffalo Trading Co. deals in approximately 80% new firearms and 20% used firearms with a majority of the used from Internet related transfers. The licensee does not go to gun shows and does not store firearms off-site nor does it hold any other ATF licenses.

FIREARMS INSPECTION REPORT

Name: The Buffalo Trading Co. LTD
Trade Name:

UI#: 773030-2016-0420-B1B
FFL#: 4-34-063-01-7F-03371

Zoning was verified during the qualification inspection conducted by IOI (b)(6) in April 2011.

A review of inventory methods, record keeping and regulatory requirements was discussed and explained during this inspection and the qualification inspection in April 2011.

Ownership and Control:

Mr. John Larbus is the owner/CEO of the business and the FFL is in the name of The Buffalo Trading Co. LTD. The Ohio Secretary of State's website lists the company as active (**Exhibit #4**). Mr. Larbus stated there are no other people involved as owners or capital investors with his business.

Mr. Kin has taken over as the manager from Mr. Corbin who is still working on a part-time basis. IOI (b)(6) advised Mr. Larbus to submit a letter, fingerprints card and picture to ATF so Mr. Kin can be added as a responsible person. Mr. Larbus stated he would get it done immediately.

Variance:

No variances on file and none requested.

2 - Recommendation

Violations, WL Only and No Recall.

3 - Inspection History

The following inspection was disclosed after a review of the file. There is no other information or contact on file.

Date and Type of Inspection:	April 2011 Qualification Inspection
UI#:	773030-2011-0341-B1B
Inspection Results:	FFL issued
Cited Violations:	N/A

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

Mr. Kin orders and maintains the business inventory. The Acquisition & Disposition records are kept electronically and maintained by Mr. Kin. The records are kept in the appropriate format, the required information is accurate, and the entries are made in a timely manner.

FIREARMS INSPECTION REPORT

Name: The Buffalo Trading Co. LTD
Trade Name:

UI#: 773030-2016-0420-B1B
FFL#: 4-34-063-01-7F-03371

A review of the A&D printout disclosed that there were (b)(3) - 112 Public Law 55 125 Stat 552
(b)(3) - 112 Public Law 55 125 Stat 552 firearms acquired in the past twelve months. There were (b)(3) - 112 Public Law 55 125 Stat 552
(b)(3) - 112 Public Law 55 125 Stat 552) dispositions made during the past twelve-month period.

A full inventory was performed by IOI (b)(6) with the assistance of Mr. Kin and his staff. Total firearms on hand were 1,882 itemized as follows.

Inventory for sale – 1,753 (**Exhibit #5**)
Firearms needing repairs – 53 (**Exhibit #8**)
Separate Gunsmith A&D - 28 (**Exhibit #7**)
Shooting Range guns - 48 (**Exhibit #6**)

(IOI (b)(6) recommends that next inspection should have a minimum of three IOIs due to the large inventory and number of forms.)

The size of inventory which was dispersed throughout the 4,800 square foot building made it difficult to complete without additional IOI assistance. Mr. Kin stated that he now plans to have a rolling inventory that will be performed on a monthly basis. Mr. Kin plans to take one area of the store and do an inventory, settle the errors or problems disclosed (if any) and then move to another area.

There were no errors or violations disclosed or cited in the inventory or A&D Records.

5 - ATF Forms 4473 – NICS & Other Dispositions

There were approximately one thousand one hundred (1,100) ATF Forms 4473 on file for the inspection period. A review of the forms was completed and several errors or omissions were disclosed and cited during this phase of the inspection.

Discrepancies disclosed and cited on the **ATF F 5030.5 Report of Violations** under the following violations.

Number 1 (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
Number 2

Number 3
Number 4

A review of the NICS Audit Log (**Exhibit 2**) disclosed four hundred and fifty-six (456) transfers for the period. No errors or omissions disclosed.

FIREARMS INSPECTION REPORT

Name: The Buffalo Trading Co. LTD
Trade Name:

UI#: 773030-2016-0420-B1B
FFL#: 4-34-063-01-7F-03371

6 – Multiple Sales

There were (b)(3) - 112 Public Law 55 125 Stat 552 multiple handgun sales reported during the inspection period.

A review of the A & D records and ATF Forms 4473 disclosed (b)(3) - 112 Public L unreported multiple sale. The one multiple sale encompassed (b)(3) - 112 Public L handguns that were transferred.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

SIOI (b)(6) verified that the multiple sales report had been submitted and entered by a query of E-Trace (**Exhibit # 15**).

Discrepancies were disclosed and cited on the **ATF F 5030.5 Report of Violations** under **Violation # 5** and **Exhibit # 1**.

7 – Suspicious/Prohibited Purchasers

There were no suspicious persons identified during the inspection.

There was a possible prohibited purchaser disclosed (under age) while reviewing the ATF Forms 4473. See **Violation #1** and **#3** and **Exhibit #9**. See Paragraph **10** of this report for further information.

IOI (b)(6) conducted deconfliction queries through N-Force with negative results. A May 27, 2016 email from Toledo RAC (b)(6) elicited a negative result on The Buffalo Trading Co.

8 – Trace Activity

The Trace History (**Exhibit # 3**) indicated there were (b)(3) - 112 Public Law 55 125 Stat traces attributed to this licensee in the past twelve (12) months. All traces were completed successfully by the licensee.

9 – NFA/Importer/Collector/Manufacturer

This licensee is not an importer, collector of firearms, nor a manufacturer and does not deal in NFA weapons.

There were no errors or violations disclosed or cited.

10 – Referrals

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6), (b)(7)(C)

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(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6), (b)(7)(C)
in the review of the A&D Records or the ATF Forms 4473.

(From Paragraph 7 of this report)

An official referral was not submitted on the purchase of a receiver by an underage individual, (b)(6), (b)(7)(C). The information was discussed with SA (b)(6) and a copy of the ATF F 4473 was forwarded to him.

11 - Other

At the beginning of the inspection Mr. Corbin, Responsible Person advised IOI (b)(6) that he was now working part-time and that Mr. Kin was the manager of the store. Mr. Kin is not listed on the FLS printout. Mr. Larbus the owner was on a short vacation and was to return within the week. Mr. Corbin was listed as a Responsible Person and SIOI (b)(6) continued the inspection with Mr. Kin's assistance. At the closing conference, Mr. Larbus was advised to add Mr. Kin as a responsible person.

There is a Youth Handgun Safety Act poster in view in the main area where the firearms are transferred.

12 - Closing Actions

On August 18, 2016, IOI (b)(6) held a closing conference with Mr. Larbus and Mr. Kin which included a final review of the inventory and records.

IOI (b)(6) presented the **Report of Violations (ROV)** to the gentlemen and each violation was reviewed and discussed with them. The ramifications of the ROV was including possible outcomes were explained. The most serious violation concerned the transfer of a receiver to the underage individual listed in **Violation #1** and **#3**.

IOI (b)(6) discussed and answered all the questions concerning the Acknowledgment of Federal Firearms Regulations and Mr. Larbus signed the form (**Exhibit # 1**).

13 - Violations

1. 27 CFR 478.99(b)

Nature of Violation: The licensee failed on (b)(3) - 112 Public occasion to fully comply with the instructions on the ATF F 4473 and transferred a receiver, which is considered an "other firearm" that cannot be transferred to an individual who is less than twenty-one (21) years old.

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1. ATF F 4473 dated 3/16/2016 Martin, Christian Riley **Exhibit # 9**

Licensee Response: Mr. Kin stated that the receiver was for a long gun so they thought it was a legal transfer. He stated that he will ensure the forms are completed properly from now on.

Corrective Action:

The licensee will fully and completely comply with all instructions listed on the ATF F 4473.

ROV

Firearms Inspection WS - ATF F 4473 (2012) Edition Review Worksheet
Exhibit # 9

2. **27 CFR 478.124(c)(3)(iv)**

Nature of Violation: On (b)(3) - 112 Public Law 5 occasions the licensee failed to enter the final response/disposition in Item 21d of the ATF F 4473 after receiving a delayed response from NICS.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's Response: Mr. Kin stated he is not sure how they were missed but that it would not happen again.

Correction Action: The licensee will ensure all the information is entered correctly upon the transfer of the firearm or prior to the filing of the ATF F 4473 which must be completed within seven (7) days.

ROV

Firearms Inspection WS - ATF F 4473 (2012) Edition Review Worksheet
Exhibits # 10, #11, #12

3. **27 CFR 478.21(a)**

Nature of Violation: On (b)(3) - 112 Public Law 5 occasion the licensee entered an incorrect entry in Item 18 of the ATF F 4473 which led to a transfer of a weapon to an underage person.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

FIREARMS INSPECTION REPORT

Name: The Buffalo Trading Co. LTD
Trade Name:

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Licensee's Response: Mr. Kin stated that the receiver transferred was for a long gun so it was entered as such. He further stated that it would not happen again.

Correction Action: The licensee will ensure all the information is entered correctly upon the transfer of the firearm or prior to the filing of the ATF F 4473 which must be completed within seven (7) days.

ROV

Firearms Inspection WS - ATF F 4473 (2012) Edition Review Worksheet
Exhibit # 9

4. 27 CFR 478.124(c)(5)

Nature of Violation: On (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) occasion the licensee failed to make an entry in Item 36 of the ATF F 4473 namely the date of transfer.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's Response: Mr. Kin stated he is not sure how it was missed but that it would not happen again.

Correction Action: The licensee will ensure all the information is entered correctly upon the transfer of the firearm or prior to the filing of the ATF F 4473 which must be completed within seven (7) days.

ROV

Firearms Inspection WS - ATF F 4473 (2012) Edition Review Worksheet
Exhibit # 13

5. 27 CFR 478.126a

Nature of Violation: On (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) occasion the licensee failed to submit an ATF F 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers by close of business day when the disposition occurred or within five (5) business days.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee Response: Mr. Kim stated he is not sure how they missed submitting the report. He stated that the computer had been updated so that multiple sales will be flagged so the report will be submitted.

FIREARMS INSPECTION REPORT

Name: The Buffalo Trading Co. LTD
Trade Name:

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Corrective Action: Ensure that all multiple sales are prepared and submitted by close of business.

SIOI (b)(6) confirmed via e-Trace that the report had been submitted properly (Exhibit #15).

ROV

Firearms Inspection WS - ATF F 4473 (2012) Edition Review Worksheet
Exhibits # 14, #15

	Senior Industry Operations Investigator	September 20, 2016
Signature	Title	Date of Report

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Firearms Inspection Work Sheet

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3. Firearms Trace History
4. Corporate Status, Ohio Secretary of State
5. Inventory Report - 1,753
6. Range Guns - 48
7. Gunsmith Report - 28
8. Firearms needing repair report - 53
9. ATF F 4473 dated 3/16/2016 Martin, Christian Riley
10. ATF F 4473 dated 7/25/2016 – Currier, Karen Knight
11. ATF F 4473 dated 8/08/2015 – Dobe', David Carlyle
12. ATF F 4473 dated 4/26/2016 – Gay, Eric Joseph
13. ATF F 4473 dated 7/23/2016 – Seeling, Cory James
14. ATF F 4473 dated 7/23/2016 Houk, Christina Leigh
15. National Tracing Center Multiple Sales Summary
16. Email from SA Allick on underage sale



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
5005 Rockside Road, Suite 700
Independence, OH 44131

September 21, 2016

773030 (b)(6)
5440

Certified Mail – Return Receipt Requested

THE BUFFALO TRADING CO LTD
2220 BRIGHT ROAD
FINDLAY, OH 45840-
RE: 434063017F03371

Dear Mr. John Larbus:

During a recent inspection at your firearms business covering the period 08/05/2015 to 08/05/2016 you were cited for violations of Title 27, Code of Federal Regulations, Part 478. A copy of the Report of Violations, ATF F 5030.5, issued at the time of the inspection is enclosed.

All violations were fully explained to you or your designated responsible person by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator. You or your responsible person indicated that you understood the requirements of the firearms laws and regulations and 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 efforts 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 to ensure that criminals do not gain access to firearms. ATF appreciates the efforts you and other industry members make in this area. 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.

THE BUFFALO TRADING CO LTD

Should you have any questions regarding this matter, please contact (b)(6)
(b)(6) Industry Operations Investigator at (b)(6)

Sincerely yours,

(b)(6)

Area Supervisor, Cleveland III

Enclosure

cc: Federal Firearms Licensing Center
Cleveland III (IO) Field Office