

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Boerger Investigative Services, LLC Strategic Training Group, LLC 1580 King Avenue, Suite 103 Columbus, OH 43212, Franklin		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 773015-2017-0325-B1B		
		3. PERMIT/LICENSE NUMBER 431049019H04482	4a. TARGET DATE 9/30/2017	4b. TARGET HOURS
		5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		
6. ATF OFFICER(S) ASSIGNED (b)(6) - Assigned Investigator (b)(6) - Lead Investigator				
7. ASSIGNED BY (SIGNATURE, TITLE AND DATE) (b)(6), Area Supervisor, 01/10/2017				
8. PURPOSE/SPECIAL INSTRUCTIONS Conduct Firearms Disposition Emphasis Inspection. Refer to IOI Manual, Chapter C – Firearms Inspections and FY 17 Domain Assessment. Conduct 100% inventory and ATF Form 4473 review unless authorized in advanced by Area Supervisor and DIO.				
9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)
NO. OF VIOLATIONS	1	NO. OF REFERRALS		2111 - PER DIEM
NO. OF TECS CHECKS	1	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 Operations Investigator Submitted on: 02/07/2017 Licensee did not have firearms logged into acquisition and disposition (A&D) record book when IOIs arrived at premises. However, he did have all invoices and applicable FFLs on file; correction of A&D record was quick and simple. Licensee has only conducted disposition since license issuance, a dealer transfer. No traces have occurred. A recall inspection would be an unnecessary use of ATF's resources at this time. Violts WL ONLY and No Recall Inspection				
12. TIME ACCOUNTING DATA				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)		
FEB 2017		2.00		
ATF OFFICER'S SUBTOTAL		2.00		ATF OFFICER'S SIGNATURE
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)		
FEB 2017		5.00		
ATF OFFICER'S SUBTOTAL		5.00		ATF OFFICER'S SIGNATURE
TOTAL HOURS		7.00		

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13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Viols WL ONLY and No Recall Inspection

☒ REVIEWED

☒ CONCUR

☐ SEE COMMENTS

☒ FINAL DISPOSITION

SIGNATURE AND TITLE

(b)(6)

- Area Supervisor

(b)(6)

REVIEW DATE

02/07/2017

ROUTING SEQUENCE AND DATE

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

CONTROL FILE POSTED DATE _____

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in quadruplicate. The original copy and the suspense copy (where required) 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 STRATEGIC TRAINING GROUP LARGER INVESTIGATIVE SERVICES LLC	Street Address 1500 KING AVE STE 103	City COLUMBUS	State OHIO	ZIP Code 43212	County FRANKLIN	Page <u>1</u> of <u>1</u> Pages
License/Permit/Registry Number (if any) 4-31-049-01-9H-04482	Expiration Date AUGUST 1, 2019	Date(s) or Period of Inspection FEBRUARY 7, 2017				

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 KEEP AN ACCURATE ACQUISITION AND DISPOSITION ^(A-2) RECORD. LICENSEE FAILED TO LOG IN (b)(3) 112 PUBLIC LAW 55 125 STAT 552 (b)(3) FIREARMS IN AS ACQUISITIONS, AND (b)(3) 112 PUBLIC (b)(3) 112 PUBLIC FIREARM AS A DISPOSITION.	A-2 RECORD CORRECTED IMMEDIATELY LICENSEE SHALL LOG ALL ACQUISITIONS IN BY NEXT BUSINESS DAY AND ALL DISPOSITIONS WITHIN SEVEN (7) CALENDAR DAYS	

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

Date 2/7/2017

Date 2/7/2017

ATF Form 5030.5
Revised April 2005



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
550 Main Street, Room 8-507
Cincinnati, OH 45202

FEB 07 2017

www.atf.gov

773015:(b)(6)
5373

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Boerger Investigative Services, LLC
Strategic Training Group, LLC
Attn: Robert Boerger
1580 King Avenue, Suite 103
Columbus, OH 43212

4-31-049-01-9H-04482

Dear Mr. Boerger:

During a recent compliance inspection at your firearms business covering the period of February 7, 2016, through February 7, 2017, you were cited for violations of 27 Code of Federal Regulations, Part 478. A copy of the Report of Violations, Form 5030.5, issued at the time of the inspection is enclosed.

All violations were fully explained to you by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) investigator. 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.

Boerger Investigative Services, LLC

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

Sincerely yours,

(b)(6)

Area Supervisor

Enclosure

cc: National Licensing Center
Cincinnati II (IO) Field Office
Correspondence File

Assignment and Report

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7. ASSIGNED BY (SIGNATURE, TITLE AND DATE) (b)(6) Area Supervisor, 01/10/2017

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13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION
Viols WL ONLY and No Recall Inspection

☒ REVIEWED ☒ CONCUR ☐ SEE COMMENTS ☒ FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Area Supervisor (b)(6)	REVIEW DATE 02/07/2017
--	---------------------------

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 quadruplicate. The original copy and the suspense copy (where required) 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 STRATEGIC TRAINING CENTER FORENSIC INVESTIGATIVE SERVICES LLC	Street Address 1580 KING AVE STE 103	City COLUMBUS	State OHIO	ZIP Code 43212	County FRANKLIN	Page 1 of 1 Pages
License/Permit/Registry Number (if any) 4-31-049-01-9H-04482	Expiration Date AUGUST 1, 2019	Date(s) or Period of Inspection FEBRUARY 7, 2017				

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1	27 CFR 478.125(e)	FAILURE TO PROPERLY KEEP AN ACCURATE ACQUISITION AND DISPOSITION RECORD. LICENSEE FAILED TO LOG IN [REDACTED] FIREARMS IN BY NEXT BUSINESS DAY AND ALL DISPOSITIONS WITHIN SEVEN (7) CALENDAR DAYS.	ADD RECORD CORRECTED IMMEDIATELY. LICENSEE SHALL LOG ALL ACQUISITIONS IN BY NEXT BUSINESS DAY AND ALL DISPOSITIONS WITHIN SEVEN (7) CALENDAR DAYS.	

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

(b)(6)

OPERATIONS INVESTIGATOR

Date 2/7/2017

Date 2/7/2017

ATF Form 5030.5
Revised April 2005

FIREARMS INSPECTION REPORT

Name: Boerger Investigative Services, LLC
Trade Name: Strategic Training Group, LLC

UI#: 773015-2017-0325 B1B
FFL#: 4-31-049-01-9H-04482

Address: 1580 King Avenue, Suite 103
Columbus, OH 43212 (Franklin County)

1 - Introduction

Inspection Profile:

On February 7, 2017 Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator (IOI) (b)(6) and IOI (b)(6) conducted a compliance inspection on federal firearms licensee (FFL) Boerger Investigative Services, LLC doing business as (dba) Strategic Training Group, LLC. The inspection scope covered February 7, 2016 – February 7, 2017. Inspection period was February 7, 2017. IOIs interviewed Robert Boerger, owner, whose identity was verified via State of Ohio driver's license. Advanced notification was not provided. No other agencies collaborated on this inspection.

Business Profile:

Boerger Investigative Services, LLC is a private investigation firm located in urban Columbus, Ohio. The firm uses its trade name Strategic Training Services, LLC to provide firearms training to citizens and law enforcement. Boerger has also conducted one (1) dealer transfer; he said he would only do those for family and friends. Primary supplier is (b)(4). At the time of the inspection four (4) firearms were in inventory (two pistols and two shotguns). In the past 12 months licensee has acquired (b)(4) firearms (b)(4) shotgun and (b)(4) revolver) and disposed of (b)(4) rifle. No actual retail or wholesale sales occur. Licensee has held FFL since 2013. Licensee does not conduct Internet sales nor conduct gun shows. According to (b)(6) Columbus Zoning Manager, no zoning issues exist. There is no off-site storage.

Ownership and Control:

The business entity is a limited liability company (LLC) and is still active in the State of Ohio. Robert Boerger is the owner and sole responsible person. According to the Ohio Secretary of State, the LLC is filed under Boerger Investigative Services, LLC, with a trade name for Strategic Training Group, LLC. The Federal Licensing System (FLS) currently has this backwards. IOI (b)(6) detected no signs of hidden ownership. FLS requires an update to FFL name and to trade name (swap names).

Reference Exhibit #1 for further information.

Variance:

Licensee holds no variances and requested none.

FIREARMS INSPECTION REPORT

Name: Boerger Investigative Services, LLC
Trade Name: Strategic Training Group, LLC

UI#: 773015-2017-0325 B1B
FFL#: 4-31-049-01-9H-04482

2 - Recommendation

Recommend warning letter and no recall inspection. Licensee did not have firearms logged into acquisition and disposition (A&D) record book when IOIs arrived at premises. However, he did have all invoices and applicable FFLs on file; correction of A&D record was quick and simple. Licensee has only conducted one (1) disposition since license issuance, a dealer transfer. No traces have occurred. A recall inspection would be an unnecessary use of ATF's resources at this time.

3 - Inspection History

Date of Inspection: July 9, 2013
Type of Inspection: Qualification Inspection
UI#: 773015-2013-0474 B1B
Inspection Results: License issued.

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

A&D record is in bound book format with one (1) book currently maintained. Open dispositions totaled zero entries. A full inventory was conducted of four (4) firearms with (b)(3)-(1)(2) Public L discrepancies. Licensee did not enter (b)(3)-(1)(2) Public L acquisitions in book; further, licensee did not log (b)(3)-(1)(2) Public Law 56 these firearms out as a disposition (ATF Form 4473 on file).

Going forward, Boerger will ensure all firearms are logged in and out within regulation guidelines. Inventories are not conducted due to low quantity.

There have been zero traces and thefts/losses for this FFL since previous inspection through February 3, 2017.

Reference Section 13 (Violations) of this report (Violation #1) for further information.

Reference Report of Violations #1 for further information.

Reference Worksheet #1 for further information.

5 - ATF Forms 4473 – NICS & Other Dispositions

IOI (b)(6) reviewed all ATF Forms 4473 on hand for past 12 months, totaling (b)(3)-(1)(2) Public L form. Out of the sole form reviewed, IOI (b)(6) disclosed no violations.

A National Instant Criminal Background Check System (NICS) audit log check disclosed zero NICS responses for this FFL within the scope of this inspection with zero

FIREARMS INSPECTION REPORT

Name: Boerger Investigative Services, LLC
Trade Name: Strategic Training Group, LLC

UI#: 773015-2017-0325 B1B
FFL#: 4-31-049-01-9H-04482

discrepancies.

Boerger does not review ATF Forms 4473 prior to filing. Forms are filed chronologically.

6 - Multiple Sales

The Violent Crime Analysis Bureau (VCAB) disclosed zero reported multiple handgun sales for the FFL within the inspection scope. IOI (b)(6) disclosed zero unreported multiple handgun sales. Multiple sales would be disclosed via customer recognition.

7 - Suspicious/Prohibited Purchasers

No suspicious purchasers/prohibited purchasers disclosed.

8 - Trace Activity

There have been zero traces for this FFL since previous inspection through February 3, 2017.

9 - NFA/Importer/Collector/Manufacturer

Boerger Investigative Services, LLC does not deal National Firearms Act (NFA) weapons; it does not import, collect or manufacture firearms.

10 - Referrals

No referrals generated.

11 - Other

IOIs reminded Boerger to post FFL and Youth Handgun Safety Act poster; IOIs also reminded FFL to have gun locks on hand for distribution. FFL had Youth Handgun Safety notices on hand for distribution.

On February 3, 2017 IOI (b)(6) determined no conflicts existed to conduct this inspection:

- N-Force disclosed no active or pending ATF Criminal Enforcement (CE) investigations into FFL;
- Columbus I Field Office and Columbus II Crime Gun Intelligence Center (CGIC) disclosed no potential ATF CE investigations into FFL;
- National Crime Information Center (NCIC) and Ohio Law Enforcement

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Gateway (OHLEG) queries of Robert Boerger disclosed no prohibiting criteria.

12 - Closing Actions

IOIs held closing conference on February 7, 2017 with Robert Boerger. Boerger signed and reviewed Report of Violations and Acknowledgement of Federal Firearms Regulations. IOI (b)(6) and IOI (b)(6) answered all questions and provided contact information.

Reference Exhibit #2 for further information.

13 - Violations

1. 27 CFR 478.125(e)

Nature of violation:

Failure to properly keep an accurate acquisition and disposition (A&D) record. Licensee failed to log in (b)(3) - 112 Public L firearms as acquisitions, and (b)(3) - 112 Public L firearm as a disposition.

Licensee's response:

Boerger acknowledged the violation; he stated "I had the invoices, I just forgot to enter them into the book."

Corrective action:

A&D record corrected. Licensee shall log all acquisitions in by next business day and all dispositions in within seven (7) calendar days.

Reference Report of Violations #1 for further information.
Reference Worksheet #1 for further information.

X

(b)(6)

Industry Operations Investigator

FIREARMS INSPECTION REPORT

Name: Boerger Investigative Services, LLC
Trade Name: Strategic Training Group, LLC

UI#: 773015-2017-0325 B1B
FFL#: 4-31-049-01-9H-04482

Index of Worksheets and Exhibits

Informational Page Worksheet

Worksheet #1 – Inventory, A&D

Other Statistics Worksheet

Exhibit #1 – Corporation details disclosing “Boerger Investigative Services, LLC” is actual corporate name and “Strategic Training Group, LLC” is actual trade name

Exhibit #2 – Acknowledgement of Federal Firearms Regulations



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
550 Main Street, Room 8-507
Cincinnati, OH 45202

FEB 07 2017

www.atf.gov

773015: (b)(6)

5373

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Strategic Training Group, LLC
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Boerger Investigative Services, LLC

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Sincerely yours,

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Area Supervisor

Enclosure

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