Assignment and Report

P.P.C.)	DE, ASSIGNMENT NO 2017-0035-B1B	PERATING NAME AND ADDRESS CLUDE ZIP CODE AND COUNTY)	
TARGET HOURS	4a. TARGET DATE 4 9/30/2017	3. PERMIT/LICENSE NUMBER 431061078J05366	Aplos Firearms LLC Comrade Arms
	, TITLE AND DATE)	12055 Mosteller Road Cincinnati,OH 45241, Hamilton	
			Cincinnati,OH 45241, Hamilton 6. ATF OFFICER(S) ASSIGNED

(b)(6) - Lead Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)

(b)(6)

, Area Supervisor, 10/06/2016

8. PURPOSE/SPECIAL INSTRUCTIONS

Conduct full manufacturer of firearms inspection. Refer to IO Manual Chapter C - Firearms Inspections and FY 16 Domain Assessment. Ensure licensee has filed all AFMERs, if any are missing obtain them during inspection. Conduct 100% inventory and ATF Form 4473 review unless authorized in advanced by Area Supervisor and DIO.

9. INSPECTION RESULTS	CHE	ECK IF NO VIOLATIONS, ADJUSTMENTS, ETC	10. TRAVEL EXPENSES (OPTIONAL)
NO. OF VIOLATIONS	4	NO. OF REFERRALS	2111 - PER DIEM
NO. OF TECS CHECKS	12	NO. OF TECS HITS	2112 - P.O.A.
NO. OF TAX		\$ VALUE OF TAX INCREASES	2113 - COMM. AIR
ADJUSTMENTS		\$ 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: 12/14/2016

A compliance inspection was conducted beginning December 1, 2016. Aplos Firearms LLC, a Type 07 FFL, primarily conducts business as a gunsmith. 49 firearms were inventoried and 3 ATF Forms 4473 were reviewed. The licensee was cited for bound book violations of 27 CFR 478.123(a) and 478.123(d). The licensee was also cited for violations of 27 CFR 478.102(a) and 27 CFR 478.124(a) for instances of failing to conduct a NICS check or execute a Form 4473 prior to transferring a firearm from the licensee to one of the responsible persons. The licensee is up-to-date with AFMER submissions. Deconfliction resulted in no hits.

Viols WL ONLY and No Recall Inspection

		12. TIME ACCOUNTING DATA
ATF OFFICER'S NAME (MONTH, YEAF	R, HOURS)	b)(6)
NOV 2016	23.00	
DEC 2016	53.50	
ATF OFFICER'S SUBTOTAL	76.50	ATF OFFICER'S SIGNATURE
TOTAL HOURS	76.50	N.

Assignment and Report

. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY)		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 773015-2017-0035-B1B					
Aplos Firearms LLC		3. PERMIT/LICEN	3. PERMIT/LICENSE NUMBER 4a. TARGET DATE 4b. TARGET HOL				
Comrade Arms		43106107		9/30/2017			
12055 Mosteller Road Cincinnati,OH 45241, Hamilton	5. REQUESTED E	BY (SIGNATURI	E, TITLE AND DATE)				
Cincillati, orr 45241, Hamilton							
	13. R	EVIEW AND ROUTING					
EVIEW COMMENTS AND RECOMMEND	DATION						
Agree with alternate recommendati	on from Warning Confe	rence to Violations, Warning Le	tter Only, No Re	ecall Inspection based	d on following:		
The recommendation is due to way without first obtaining a Form 4473	instances of the license and conducting a NICS	e transferring a firearm from bu check.	siness inventor	/ to ^{(b) (3)} - Public Law 112-55	i (125 Stat. 552), (b) (6)		
In addition, the licensee was cited f representing 54% of acquisition ent either recording an incomplete add other non-ATF records (gunsmith w	trics and 45% of disposi ress, or recording a driv	ition entries from the past year. er's license instead of the addre	Of the insta	nces, bis of them invo	lved the licensee		
Viols WL ONLY and No Recall Insp	ection	SEE COMMENTS	FINAL I	DISPOSITION			
GNATURE AND TITLE (b)(6) - Area Supervisor	Rend	Kandi	REVIEW	DATE 12/15/201	6		
VIEW COMMENTS AND RECOMMEND	ATION						
	tion to issue Warning L	11 12 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	A MAR IN	0			
Concur with alternate recommendation Viols WL ONLY and No Recall Insp		etter. No recall inspection nece	ssary at this um	e.			
Viols WL ONLY and No Recall Insp	vection						
Viols WL ONLY and No Recall Insp REVIEWED		SEE COMMENTS	FINAL	DISPOSITION			
Viols WL ONLY and No Recall Insp REVIEWED	CONCUR	SEE COMMENTS		DISPOSITION	6		
Viols WL ONLY and No Recall Insp REVIEWED IGNATURE AND TITLE JALEDOUX - Director Industry Oper	CONCUR	Digitally signed by Judyth A.	FINAL	DISPOSITION	6		
Viols WL ONLY and No Recall Insp REVIEWED IGNATURE AND TITLE JALEDOUX - Director Industry Oper	CONCUR	Digitally signed by Judyth A.	FINAL	DISPOSITION	6		
Viols WL ONLY and No Recall Insp REVIEWED GRATURE AND TITLE JALEDOUX - Director Industry Oper OUTING SEQUENCE AND DATE	CONCUR	Digitally signed by Judyth A. LeDoux Date: 2016.12.15 10:43:04 -05'00'	FINAL	DISPOSITION DATE 12/15/201	6		



U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

550 Main Street, Room 8-507 Cincinnati, OH 45202



CERTIFIED MAIL RETURN RECEIPT REQUESTED

Aplos Firearms LLC Comrade Arms 12055 Mosteller Road Cincinnati, OH 45241

4-31-061-07-8J-05366

Dear Mr. Mencher,

During a recent compliance inspection at your firearms business covering the period of December 1, 2015, through December 1, 2016, 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.

Aplos Firearms

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



Enclosure

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

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 Aplos Frearms LLC Commade Arms Street Address City (2055 Mosteller Road City (2055 Mosteller Road Street Address City (2001 multiple Arms State OH Zip Code (43241- County Hamilton Page 1 o 3 Pages License/PermiVRegistry Number (If any) 431061078/05366 Expiration Date 9/1/2018 Expiration Date 9/1/2018 Date(s) or Period of Inspection 12/01/2016 through 12/13/2016 Page 1 o 3 Pages Number 1 An examination of your premises, records and operations has disclosed the following violations which have been explained to you: Date Corrections to be Made: (If not corrected immediately) Orrective Action to be Taken: (If not corrected immediately) Corrective Action to be Taken: (If not corrected immediately) To all future transferring a Transferring a firearm to an unlicensed individual, 10.5401/125 Stat.5502 (0) for project Passart.5502 (0) for (0) (s) - Future information of the response) Date Corrections to be Made: (If not corrected immediately) To all future transferr, the FFL, should not sell or otherwice 3 days have elapsed after receiving a "Delayed" response. See also exceptions in 27 CFR 478.102(d). Corrective Action to be Taken: (0) (s) - Future informations, the firearm was transferred to (0) (s) - Future informations, the firearm was transferred to (10) (s) - Future informations, the firearm was transferred to (10) (s) - Future informations of a prometal state (10) or therwice (If not corrected immediately) Date Corrections to be Made: (If not corrected immediately) Corrective Action to be Taken: (If not corrected immediately) Corrective Act									
Aplos Firearms LLC Comrade Arms 12055 Mosteller Road Cincinnati OH 45241- Hamilton 3 Pages License/Permit/Registry Number (If any) Expiration Date 9/1/2018 Date(s) or Period of Inspection 12/01/2016 Inspection An examination of your premises, records and operations has disclosed the following violations which have been explained to you: Inspection Results Inspection Results Number: 1 Nature of Violation: Failure in Correction to transferring a firearm to an unlicensed individual, to each instance, the firearm was transferred to UP intention in the Sof (De State Soft (De S	AT A CONTRACT AND A MARKED AND A	Street Address		City	Sta	nte	Zip Code	County	Page 1 of
431061078J05366 9/1/2018 12/01/2016 through 12/13/2016 Inspection Results An examination of your premises, records and operations has disclosed the following violations which have been explained to you: Number: 1 Number: 1 Pailure in Ubinstances to conduct a NICS check prior to transferring a firearm to an unlicensed individual. In each instances to conduct a NICS check prior to transferring a firearm to an unlicensed individue of the transferred the transferrence of the transferrence of the transferrence of the transferrence of transferrence of transferrence of transferrence of the transferrence of transference of trans		12055 Mosteller Road	d	Cincinnati	OF	I	45241-	Hamilton	5 mg
Inspection Results An examination of your premises, records and operations has disclosed the following violations which have been explained to you: Number: 1 Date Corrections to be Made: (If not corrected immediately) Failure in form instances to conduct a NICS check prior to transferring a firearm to an unlicensed individual. In each instance, the firearm was transferred to (0)(3) - Public Law 112-55 (125 Stat 552),(0)(6) Date Corrections to be Made: (If not corrected immediately) to an unlicensed person unless first the licensee has contacted NICS and received either a "Proceed" response 3 days have elapsed after received either a "Proceed" response. See also exceptions in 27 CFR 478.102(a). Number: 2 Date Corrections to be Made: (If not corrected immediately) For all future transfers, the FFL should not sell or otherwing displays have elapsed after received either a "Proceed" response. See also exceptions in 27 CFR 478.102(d). Valuer of Violation: Failure in form instance, the firearm was transferred to (0)(3) - Public Law 112-55 (125 Stat 552).(0)(6) Date Corrections to be Made: (If not corrected immediately) Corrective Action to be Taken: (0)(3) - Public Law 112-55 (125 Stat 552).(0)(6) For all future transfers, the FFL should not sell or otherwing dispose of any firearm to an unlicensed individual unless transfer or and unlicense individual unless transfer or the responsible transfers from the licensed LLC to either of the responsible	License/Permit/Registry Number (If any)		Expiration Date		Date(s) or Pe	eriod o	of Inspection		
An examination of your premises, records and operations has disclosed the following violations which have been explained to you: Number: 1 Date Corrections to be Made: (If not corrected immediately) Nature of Violation: Failure informations, a firearm must not be transferring a firearm to an unlicensed individual, n each instance, the firearm was transferred to (ID(3) - Public Law 112-55 (125 Stat. 552), (b) (6) Date Corrections to be Made: (If not corrected immediately) For all future transactions, a firearm must not be transferm to an unlicensed person unless first the licensee has contacted NICS and received either a "Proceed" response 3 days have elapsed after receiving a "Delayed" response. See also exceptions in 27 CFR 478.102(d). Number: 2 Date Corrections to be Made: (If not corrected immediately) Nature of Violation: Pailure in This instances to execute an ATF Form 4473 prior to transferring a firearm to an unlicensed individual. In each instance, the firearm was transferred to (ID(3) - Public Law 112-55 (125 Stat. 552), (b) (6) Date Corrections to be Made: (If not corrected immediately) Corrective Action to be Taken: (b) (3) - Public Law 112-55 (125 Stat. 552), (b) (6) For all future transfers, the FFL should not sell or otherwit dispose of any firearm to an unlicensed individual unless is transaction to be Taken: (b) (2) - Public Law 112-55 (125 Stat. 552), (b) (6)	431061078J05366		9/1/2018		12/01/2016	throug	gh 12/13/2016		
An examination of your premises, records and operations has disclosed the following violations which have been explained to you: Number: 1 Date Corrections to be Made: (If not corrected immediately) Nature of Violation: individual. In each instances to execute an ATF Form 4473 prior to transferring a firearm to an unlicensed individual. In each instance, the firearm was transferred to (b)(3) = Public Law 112-55 (125 Stat. 552), (b)(6) Date Corrections to be Made: (If not corrected immediately) For all future transactions, a firearm must not be transferring to an unlicensed person unless first the licensee has contacted NICS and received either a "Proceed" response. 3 days have elapsed after receiving a "Delayed" response. See also exceptions in 27 CFR 478.102(d). Number: 2 Date Corrections to be Made: (If not corrected immediately) Nature of Violation: Failure in the instance, the firearm was transferred to (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: (b)(3) = Public Law 112-55 (125 Stat. 552), (b)(6) For all future transfers, the FFL should not sell or otherwing dispose of any firearm to an unlicensed individual unless (b)(3) = Public Law 112-55 (125 Stat. 552), (b)(6)			Inspectio	on Results					
Nature of Violation: [/] for corrected immediately) Failure in 1000 mistances to conduct a NICS check prior to transferring a firearm to an unlicensed individual. In each instance, the firearm was transferred to (0) (3) = Public Law 112-55 (125 Stat 552), (b) (6) For all future transactions, a firearm must not be transferred to to an unlicensed person unless first the licensee has contacted NICS and received either a "Proceed" response. See also exceptions in 27 CFR 478.102(a). Number: 2 Date Corrections to be Made: (// not corrected immediately) Carrective Action to be Taken: For all future transactions, a firearm must not be transferred to an unlicensed person unless first the licensee has contacted NICS and received either a "Proceed" response. See also exceptions in 27 CFR 478.102(d). Number: 2 Date Corrections to be Made: (// not corrected immediately) Corrective Action to be Taken: For all future transfers, the FFL should not sell or otherwing a firearm to an unlicensed individual. In each instance, the firearm was transferred to (0) (1) = Public Law 112-55 (125 Stat 552), (b) (6) (b) (3) = Public Law 112-55 (125 Stat 552). (b) (6)	An examination of your premises, records and	operations has disclosed th		a the state of the search regarded for	explained to y	ou:		-	
Nature of Violation: [/] for corrected immediately) Failure in 1000 mistances to conduct a NICS check prior to transferring a firearm to an unlicensed individual. In each instance, the firearm was transferred to (0) (3) = Public Law 112-55 (125 Stat 552), (b) (6) For all future transactions, a firearm must not be transferred to to an unlicensed person unless first the licensee has contacted NICS and received either a "Proceed" response. See also exceptions in 27 CFR 478.102(a). Number: 2 Date Corrections to be Made: (// not corrected immediately) Carrective Action to be Taken: For all future transactions, a firearm must not be transferred to an unlicensed person unless first the licensee has contacted NICS and received either a "Proceed" response. See also exceptions in 27 CFR 478.102(d). Number: 2 Date Corrections to be Made: (// not corrected immediately) Corrective Action to be Taken: For all future transfers, the FFL should not sell or otherwing a firearm to an unlicensed individual. In each instance, the firearm was transferred to (0) (1) = Public Law 112-55 (125 Stat 552), (b) (6) (b) (3) = Public Law 112-55 (125 Stat 552). (b) (6)	AV			20	9 93				
Number: 2 Numbr: <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>									
 Individual, In each instance, the firearm was transferred to 10/03 - Public Law 112-55 (125 Stat. 552), (b) (6) Citation: 27 CFR 478.102(a) Number: 2 Nature of Violation: Failure in ⁰⁰⁰¹¹¹/₁ instances to execute an ATF Form 4473 prior to transferring a firearm to an unlicensed individual. In each instance, the firearm was transferred to 10/03 - Public Law 112-55 (125 Stat. 552), (b) (6) Date Corrections to be Made: (If not corrected immediately) Corrective Action to be Taken: (D) (3) - Public Law 112-55 (125 Stat. 552), (b) (6) 			a: 2 -	Corrective			For all future tr	ansactions, a firearm mu	ist not be transferred
(D) (3) - Public Law 112-95 (125 Stat. 552), (b) (6) 3 days have elapsed after receiving a "Delayed" response. See also exceptions in 27 CFR 478.102(d). Citation: 27 CFR 478.102(a) Number: 2 Nature of Violation: Date Corrections to be Made: (If not corrected immediately) Corrective Action to be Taken: For all future transfers, the FFL should not sell or otherwiding invited in the second individual unless in transaction is recorded on a Form 4473, This includes transfers from the licensed LLC to either of the responsibility in the second on a Form 4473, This includes transfers from the licensed LLC to either of the responsibility in the second on a Form 4473, This includes transfers from the licensed LLC to either of the responsibility in the second on a Form 4473, This includes transfers from the licensed LLC to either of the responsibility in the second on a Form 4473, This includes transfers from the licensed LLC to either of the responsibility in the second on a Form 4473, This includes transfers from the licensed LLC to either of the responsibility in the second on a Form 4473, This includes transfers from the licensed LLC to either of the responsibility in the second on a Form 4473, This includes transfers from the licensed LLC to either of the responsibility in the second on a Form 4473, This includes transfers from the licensed LLC to either of the responsibility in the second on a Form 4473, This includes transfers from the licensed LLC to either of the responsibility in the second on a Form 4473, This includes transfers from the licensed LLC to either of the responsibility in the second on a Form 4473, This includes transfers from the licensed LLC to either of the responsibility in the second on a Form 4473, This includes transfers from the licensed LLC to either o	individual. In each instance, the firearm was	transferred to transferring a	11rearm to an unlicensed w 112-55 (125 Stat. 552), (b) (6				to an unlicense	d person unless first the	licensee has
See also exceptions in 27 CFR 478.102(d). Citation: 27 CFR 478.102(a) Number: 2 Nature of Violation: Failure in [005000] Failure in [005000] Instances to execute an ATF Form 4473 prior to transferring a firearm to an unlicensed individual. In each instance, the firearm was transferred to [0100000000000000000000000000000000000							3 days have ela	s and received either a " psed after receiving a "I	Proceed" response or Delayed" response
Nature of Violation: Failure in Timestances to execute an ATF Form 4473 prior to transferring a firearm to an unlicensed individual. In each instance, the firearm was transferred to (b) (3) - Public Law 112-55 (125 Stat. 552) (b) (3) - Public Law 112-55 (125 Stat. 552), (b) (3) - Public Law 112-55 (125 Stat. 552), (b) (a) - Public Law 112-55 (125 Stat. 552), (b) (b) (c) - Public Law 112-55 (125 Stat. 552), (c) (c) (c) (c) - c) (c) (c) (c) - c) (c) (c) (c) (c) (c) (c) (c) (c) (c)	Citation: 27 CFR 478.102(a)						See also except	10ns in 27 CFK 478,102	(d).
Failure in (0)(0)(1) Failure in (0)(0)(1) Failure in (0)(0)(1) Failure in (0)(0)(1) Failure in (0)(0)(1) Failure in (0)(1)(1) Failure in (0)(1)(1)(1) Failure in (0)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)	Number: 2				Contraction of the second second second second	10200000000			
(b) (3) - Public Law 112-55 (125 Stat. 552), (b) (6) (If not corrected immediately) (If not c						1.00	For all future tr	anefers the FEL should	not call or otherwise
			ring a firearm to an 3)-Public Law (1/235 (1/25 Stat. 552), (5)	(If not corn			dispose of any transaction is re transfers from t	firearm to an unlicensed ecorded on a Form 4473.	individual unless the This includes

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 Aplos Firearms LLC Comrade Arms	Street Address 12055 Mosteller Road		City Cincinnati	State OH	Zip Code 45241-	County Hamilton	Page 2 of 3 Pages
License/Permit/Registry Number (If any) 431061078J05366		spiration Date		Date(s) or Perio 12/01/2016 three	f of Inspection ugh 12/13/2016		
		21414.87	ection Results				
An examination of your premises, records a	and operations has disclosed the fo	ollowing violation	s which have been	explained to you:			
Number: 3 Nature of Violation: Failure in Failure in	information in the acquisition por the see Attachment A.	rtion of the	(If not corr Corrective	ctions to be Made ected immediately Action to be Take ected immediately	 where possibl future transfer caliber or gaug manufactured manufacture o shall be record 	e, log book errors should s, the licensee should rec ge, and serial number of e or otherwise acquired, as r other acquisition was m ed not later than the seve manufacture or acquisiti	ord the type, model, ach firearm well as the date the ade. The information nth day following
Number: 4 Nature of Violation: Failure in instances to properly record acquisition and disposition records. Pleas	information in the disposition por e see Attachment A.	rtion of the	(If not corr Corrective	ctions to be Made ected immediately Action to be Take ected immediately	 Where possible Disposition re- in 27 CFR 478 disposition, the transferred, or serial number. 	e, log book errors should cords should adhere to the .125(e), and should conta e name and address of the the name and license nur Dispositions should be re the date of the transaction	e conditions set forth ain the date of person to whom nber, or the 4473 ecorded within 7

Instructions

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Name of Proprietor Aplos Firearms LLC Comrade Arms	Street Address 12055 Mosteller Ros	ad	City Cincinnati		State OH	Zip Code 45241-	County Hamilton	Page 3 of 3 Pages
License/Permit/Registry Number (If any) 431061078J05366	h	Expiration Date 9/1/2018				of Inspection ugh 12/13/2016		
An examination of your premises, records and	operations has disclosed t		tion Results	n avalained	to your			

Citation: 27 CFR 478.123(d)

I Have Received a Copy of This Report of Violations (Proprietor's signature and title)		Date
Signature and Title of ATF Officer		Date
	322	
For Official Use Only		ATF E-Form 5030.5

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY)	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 773015-2017-0035-B1B
Aplos Firearms LLC Comrade Arms	3. PERMIT/LICENSE NUMBER 4a. TARGET DATE 4b. TARGET HOURS 431061078J05366 9/30/2017
12055 Mosteller Road Cincinnati,OH 45241, Hamilton	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, 10/06/2016

8. PURPOSE/SPECIAL INSTRUCTIONS

Conduct full manufacturer of firearms inspection. Refer to IO Manual Chapter C - Firearms Inspections and FY 16 Domain Assessment. Ensure licensee has filed all AFMERs, if any are missing obtain them during inspection. Conduct 100% inventory and ATF Form 4473 review unless authorized in advanced by Area Supervisor and DIO.

9. INSPECTION RESULTS	CHE	CK IF NO VIOLATIONS, ADJUSTME	ENTS, ETC	10. TRAVEL EXPENSES	(OPTIONAL)
NO. OF VIOLATIONS	4	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS	12	NO. OF TECS HITS		2112 - P.O.A.	
NO. OF TAX		\$ VALUE OF TAX INCREASES		2113 - COMM. AIR	
ADJUSTMENTS		\$ 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: 12/14/2016

A compliance inspection was conducted beginning December 1, 2016. Aplos Firearms LLC, a Type 07 FFL, primarily conducts business as a gunsmith. 49 firearms were inventoried and 3 ATF Forms 4473 were reviewed. The licensee was cited for bound book violations of 27 CFR 478.123(a) and 478.123(d). The licensee was also cited for violations of 27 CFR 478.102(a) and 27 CFR 478.124(a) for the licensee of failing to conduct a NICS check or execute a Form 4473 prior to transferring a firearm from the licensee to one of the responsible persons. The licensee is up-to-date with AFMER submissions. Deconfliction resulted in no hits.

Viols WL ONLY and No Recall Inspection

		12. TIME ACCOUNTING DATA
ATF OFFICER'S NAME (MONTH, YEAF	R, HOURS)	b)(6)
NOV 2016	23.00	
DEC 2016	53.50	
ATF OFFICER'S SUBTOTAL	76.50	ATF OFFICER'S SIGNATURE
TOTAL HOURS	76.50	

Assignment and Report

1. OPERATING NAME AND ADDRESS		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.)	
(INCLUDE ZIP CODE AND COUNTY)			773015-2017-0035-B1B	
Aplos Firearms LLC			SE NUMBER 4a. TARGET DATE 4b. TARGET H	OURS
Comrade Arms		43106107	i	
12055 Mosteller Road Cincinnati,OH 45241, Hamilton		5. REQUESTED E	BY (SIGNATURE, TITLE AND DATE)	
Oneimati, On 40241, Hamilton				
	13. R	EVIEW AND ROUTING		
REVIEW COMMENTS AND RECOMMEND	ATION			
Agree with alternate recommendation	on from Warning Confer	rence to Violations, Warning Le	tter Only, No Recall Inspection based on following:	
The recommendation is due without first obtaining a Form 4473	instances of the license and conducting a NICS	e transferring a firearm from bu check.	siness inventory <mark>(b)(6)</mark>	
representing 54% of acquisition ent	ries and 45% of disposition ress, or recording a drive	tion entries from the past year. er's license instead of the addre	and disposition information in the bound book, Of weath instances we of them involved the licensee ess. The missing information was readily available in censee.	:
Viols WL ONLY and No Recall Insp	ection	X SEE COMMENTS		
SIGNATURE AND TITLE		<u>x.x</u>		
(b)(6) - Area Supervisor			12/15/2016	
REVIEW COMMENTS AND RECOMMEND	ATION			
Concur with alternate recommendation	tion to issue Warning Le	etter. No recall inspection nece	ssary at this time.	
Viols WL ONLY and No Recall Insp	ection			
X REVIEWED		SEE COMMENTS	K FINAL DISPOSITION	
SIGNATURE AND TITLE			REVIEW DATE	
JALEDOUX - Director Industry Oper	ations		12/15/2016	
ROUTING SEQUENCE AND DATE				
1				
2.			DL FILE POSTED DATE	
3 .		0011110		
4				

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	Proprietor Street Address City State Zap Code County						Page 1 of	
Aplos Firearms LLC Comrade Arms	12055 Monteiler Road	1	Cincinnati		он	45241-	Hamilton	3 Pages
License Permit Registry Number (IJ 099)	l	Expression Date		Date(s) c	r Period o	Inspection		
431061078305366		9/1/2018		1202/20	16 throug	h 12/13/2016		
	***************************************	Inspecti	ion Results	***********				
An examination of your premises, records and ope	rations has disclosed the	e foliewing vielations w	thich have been e	xplained i	io you			
Number: 1 Nature of Violation: Failure in five instances to conduct a NICS check (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) (b)(3) - 27 (FR 478 102(a))	k prins to transferring a aferred to <mark>(b)(3) - 112 Put</mark>	olic Law 55 125 Stat 552, (cicil imme iction to t	danety) * Takea: danety)	to an unlicensed j contacted NICS a 3 days have claps	person unless (inst the	Proceed" response or Delayed" response
Number: 2 Nature of Violation: Failure of Pisterier underensed individual in each instance, the firear (b)(3) - 112 Public Law 55 125 Stat 552; (b)(6) (b)(3) - 112 Public Law 55 125 Stat 552; (b)(6)	n 4473 proor to transferr m was transferred in ^{D73}	1102 & Örrartin to an - 112 Public Law 55 125 Stat 552, (b	144	: Ind Imme ction to b	deurchy) w Taken: deurchy	dispose of any fin transaction is reco	sfers, the FFL should carm to an unlicensed inded on a Form 4473 i licensed LLC to eith	individual unless the This includes

Please write firmily with a ball point pen when e representative. The remaining copies will be su	completing this form. ATF binitted with the complete	officers will prepare d	ructions his form in triplic: pervisors will def	ate. The or lach one co	riginal co 199 from	py will be given t the completed rep	to the proprietor or a re- port for their files.	ponsible
Name of Proprietor Apios Firearms LLC Comrade Arms	Street Addross 12055 Mosteller Ross	đ	City Cincinnati		State OH	Zip Code 45241-	County Hamilton	Page 2 of 3 Pages
License Permit/Registry Number (I/ 099) Expiration Date 431061078J05366 9/1/2018			Date(s) or Period of Inspection 12/02/2016 through 12/13/2016					
An examination of your premises, records and o	perations has disclosed th		lion Results which have been :	crplained i	ho you:			
Citation: 27 CFR 478 124(a)								
Number: 3			Date Correc	tions to b	e Made:			

Nature of Violation:

Failud interestances to properly record information in the acquisition portion of the acquisition and disposition records. Please see Attachment A.

(If not corrected immediately)

Corrective Action to be Taken: Where possible, log book errors should be corrected. For future transfers, the licensee should record the type, model, (If not corrected immediately) caliber or gauge, and serial number of each firearm manufactured or otherwise acquired, as well as the date the manufacture or other acquisition was made. The information shall be recorded not later than the seventh day following

the date of the manufacture or acquisition.

Citation: 27 CFR 478,123(a)

Number: 4

Nature of Violation:

nstances to properly record information in the disposition portion of the Failur acquisition and disposition records. Please we Attachment A.

Date Corrections to be Made:

(If not corrected immediately)

(If not corrected immediately)

Corrective Action to be Taken: Where possible, log book errors should be corrected. Disposition records should adhere to the conditions set forth in 27 CFR 478 125(c), and should contain the date of disposition, the name and address of the person to whom transferred, or the name and license number, or the 4473 serial number. Dispositions should be recorded within 7 days following the date of the transaction.

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 Aplos Firearms LLC Cornrade Arms	Street Address 12055 Mosteller R	nad	City Cincinnati	State OH	Zip Code 45241-	County Hamilton	Page 3 of 3 Pages
License Permit Registry Number (1/ am) 431061078J05366		Expiration Date 9/1/2018			of Inspection agh 12/13/2016		
		last	ection Results				

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

Citation: 27 CFR 478 123(d)

1 Have Received a Copy of This Report of Violations Name More 04	(Proprietor's signature and title)	Date 12/13/14
Signature and Title of ATROfficer	ten Oneutics Incostigato	Date 12, 13 2016
January 2020 Production	717	ATF E-Form \$030.5 Revised April 2005

Date Acquired	Matula tare importe	Montel	Serui Numbur	ĩspe			Nature of Violation			
b)(3) - 1	12 F	Public	; L	aw	55	125	Stat	552	

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



Name:	Aplos Firearms LLC
Trade Name:	Comrade Arms

UI#: 773015-2017-0035-B1B FFL#: 4-31-061-07-8J-05366

Address: 12055 Mosteller Road Cincinnati, OH 45241

1 - Introduction

Inspection Profile:

A compliance inspection was conducted beginning December 1, 2016 by Industry Operations Investigator (b)(6) Also present was responsible person David Menchen. Responsible person Brian Cooper did not participate in the inspection. Advanced notice was given after IOI (b)(6) attempted to conduct an unannounced inspection but found no one at the premises. Mr. Menchen stated that he keeps irregular hours and that he recommends calling ahead of time. There were no participants from other agencies. The scope was manufacturer compliance and covered the period of December 1, 2015 to December 1, 2016.

Business Profile:

Aplos Firearms LLC has been licensed as a Type 07 manufacturer since 2015 and conducts business as a gunsmith. The current inspection is the licensee's first compliance inspection. The business premises are located inside Manufactory, a "makerspace" located in a commercial/industrial area of Sharonville, Ohio. The premises are locked and are not accessible by the general public or other Manufactory employees unless access is given by Mr. Menchen or Mr. Cooper.

In the past 12 months, the licensee has acquired firearms and disposed of most of which were gunsmith transactions. Although licensed as a manufacturer, the licensee is currently not conducting any manufacturing activities. The licensee also pays Special Occupational Tax, but to date has conducted no National Firearms Act-related business. Suppliers include (b)(4) and non-FFL's for repair purposes. No sales are made at gun shows. The store does have a website – comradearms.com – which is used for advertising purposes only. No firearms are sold on third party websites such as gunbroker.com. The licensee has no other ATF licenses. The business does have a vendor's license issued by the State of Ohio. Occasionally, firearms are stored off-site at Mr. Menchen's residence.

Ownership and Control:

Aplos Firearms is licensed as an LLC and conducts business under the trade name Comrade Arms. A query of the Ohio Secretary of State website shows the LLC was registered with the State in 2015. Brian Cooper is listed as the agent. Mr. Cooper and Dave Menchen are listed as the responsible persons on the license, and they are the only people involved in the business. Hidden ownership is not suspected, and information is shown correctly in the Federal Licensing

Name: Aplos Firearms LLC Trade Name: Comrade Arms UI#: 773015-2017-0035-B1B FFL#: 4-31-061-07-8J-05366

System. Mr. Menchen stated that business has not gone as well as he and Mr. Cooper had hoped, and that he anticipated that Mr. Cooper may return to fulltime work as an engineer. Mr. Menchen, who is retired, stated he is therefore considering reapplying for his own FFL as a sole proprietor.

Variance:

N/A - the licensee has no variances on file and requested no new variances.

2 - <u>Recommendation</u>

Violations, Warning Letter Only, No Recall Inspection

The recommendation is due to five instances of the licensee transferring a firearm from business inventory to (b)(6) without first obtaining a Form 4473 and conducting a NICS check.

In addition, the licensee was cited for instances of failing to record complete acquisition and disposition information in the bound book, representing 54% of acquisition entries and 45% of disposition entries from the past year. Although that error rate could warrant a recommendation of a warning conference, a warning letter is being recommended instead. Of the instances, of them involved the licensee either recording an incomplete address, or recording a driver's license instead of the address. The missing information was readily available in other non-ATF records (gunsmith work order forms) and could be easily corrected by the licensee.

3 - Inspection History

Date and Type of Inspection:	August 26, 2015 - Qualification
UI#:	773015-2015-0535-B1B
Inspection Results:	Approval recommended
Cited Violations:	None

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

On December 1, a full inventory was conducted and open bound book entries were successfully matched to 48 firearms in inventory. Mr. Menchen stated that he occasionally stores firearms at his residence and that the remaining firearm was there. IOI (b)(6) returned to the business premises on December 5 and inventoried the last firearm.

The licensee's bound book was reviewed. Errors or discrepancies were noted in

Revised 5/15/14

Page 2 of 8

January 2020 Production

Name: Aplos Firearms LLC Trade Name: Comrade Arms UI#: 773015-2017-0035-B1B FFL#: 4-31-061-07-8J-05366

instances acquisition entries and disposition entries). Most of the errors involved incomplete or missing addresses. For example, the licensee would often record just the street address or would record a driver's license number. The licensee was cited for violations of 27 CFR 478.123(a) and 478.123(d).

In addition, $IO_1(b)(6)$ noted several acquisitions of firearms from (b)(6) Mr. (b)(6) Mr. Menchen explained that (b)(6) is a firearms enthusiast and owns many guns, and that he brings firearms to the business premises for repairs, cleanings, etc. In those instances, the dispositions directly (b)(6) appear appropriate. However, instances, new firearms were acquired from an FFL wholesaler such as Davidson's and then transferred directly (b)(6) without a Form 4473 or NICS check. The licensee was therefore cited for violations of 27 CFR 478.102(a) and 27 CFR 478.124(a).

The licensee has never reported any firearms as lost or stolen. Three firearms were traced through the licensee's acquisition and disposition records with no discrepancies. No trafficking issues, illegal firearms or obliterated serial numbers were discovered.

Internal controls pertaining to acquisition and disposition records were evaluated and found to be lacking in some areas. Entries are often incomplete, and the licensee does not conduct regular inventories. IOI(b)(6) suggested regularly conducting inventories and double-checking bound book entries for accuracy.

See Worksheets 1 & 2, Violations 1-4 and Exhibit 1.

5 - ATF Forms 4473 - NICS & Other Dispositions

In the past 12 months, the licensee has disposed of firearms. Because most dispositions were the return of a repaired firearm to the original owner, very few ATF Forms 4473 are completed. For the past 12 months, the licensee had (b)(4) ATF Forms 4473 on file. Each was reviewed; no errors were noted. There have been no transfers to other licensees or to law enforcement officers. The FFL Audit log was obtained and two recent transactions were compared to the report with no discrepancies. No trafficking issues were noted.

Internal controls – Internal controls pertaining to the completion of ATF Forms 4473 were evaluated and found to be sufficient. Mr. Menchen stated that both he and Mr. Cooper complete required records. The license was familiar with theft/ loss reporting requirements, trace request requirements and the definition of a straw purchaser.

6 – <u>Multiple Sales</u>

Revised 5/15/14

Page 3 of 8

Name: Aplos Firearms LLC Trade Name: Comrade Arms UI#: 773015-2017-0035-B1B FFL#: 4-31-061-07-8J-05366

The licensee has never made a multiple handgun sale. Reporting requirements were reviewed.

7 - Suspicious/Prohibited Purchasers

No possible traffickers, straw purchasers or any other suspicious purchasers were identified. NCIC/ NLETS queries were conducted of both responsible persons via Open Fox. No hits resulted.

8 - Trace Activity

The licensee has never sold a firearm that has been the subject of a trace. Trace request reporting requirements were reviewed. Secondary market analysis was conducted of ten firearms in inventory for repair purposes. No hits resulted.

9 - NFA/Importer/Collector/Manufacturer

NFA – The licensee pays Special Occupational Tax, but to date has conducted no NFA-related business. Mr. Menchen stated that he does not anticipate paying Special Occupational Tax for the upcoming year. The National Firearms Registration and Transfer Record (NFRTR) was queried and showed no results.

Manufacturer – Aplos Firearms is licensed as a Type 07 manufacturer. The licensee does not manufacturer any new firearms "from scratch" and does not modify or assemble firearms. Mr. Menchen stated that, although he and Mr. Cooper had planned on assembling and modifying firearms, they have not been able to build up that portion of their business. Instead, the FFL has been doing more traditional gunsmith work (repairs, cleaning, etc). Per Program Analyst (b)(6) for the licensee is up to date with Annual Firearms Manufacturing and Exportation Reports (AFMER). Mr. Menchen stated that he is aware of excise tax requirements. He also stated he is aware of State Department ITAR fees, but does not pay them.

See Exhibit 2.

10 - Referrals

N/A – no referrals were made as a result of this inspection.

11 - Other

Child Safety Lock Act – The licensee is in compliance with the provisions of the CSLA.

Revised 5/15/14

Page 4 of 8

January 2020 Production

Name: Aplos Firearms LLC Trade Name: Comrade Arms UI#: 773015-2017-0035-B1B FFL#: 4-31-061-07-8J-05366

Youth Handgun Safety Act – The Youth Handgun Safety Act poster is displayed and the accompanying brochures are provided as required.

Deconfliction - Deconfliction was conducted by IOI(b)(6) on November 9, 2016 through NFORCE, NCIC and through ATF CE and Intel with negative results. E-Trace queries of both responsible persons as individual purchasers were also conducted; again, there were no results.

12 - Closing Actions

A closing conference was held on December 13, 2016 by IOI (b)(6) Responsible person Dave Menchen was present. The Acknowledgement of Federal Firearms Regulations was reviewed with the licensee, and the Report of Violations was issued. The licensee was also provided with a copy of ATF P 5300.15, Federal Firearms Licensee Quick Reference and Best Practices Guide.

Please see Exhibit 3.

13 - Violations

1. **27 CFR 478.102(a)**

Nature of violation:

Failure in five instances to conduct a NICS check prior to transferring a firearm to an unlicensed individual. In each instance, the firearm was transferred (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

The licensee stated that he and Mr. Cooper were under the impression that firearms could be transferred to responsible persons without a NICS check or a Form 4473.

Corrective action:

The licensee was instructed that, for all future transactions, a firearm must not be transferred to an unlicensed person, including a responsible person, unless first the licensee has contacted NICS and received either a "Proceed" response or 3 days have

Revised 5/15/14

Name: Aplos Firearms LLC Trade Name: Comrade Arms UI#: 773015-2017-0035-B1B FFL#: 4-31-061-07-8J-05366

elapsed after receiving a "Delayed" response. NCIC/ NLETS queries was conducted (b)(6). No hits resulted.

See Worksheet 2 and Exhibit 1.

2. 27 CFR 478.124(a)

Nature of violation:

Failure instances to execute an ATF Form 4473 prior to transferring a firearm to an unlicensed individual. In each instance, the firearm was transferred to (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

The licensee stated that he and Mr. Cooper were under the impression that firearms could be transferred to responsible persons without a NICS check or a Form 4473.

Corrective action:

The licensee was reminded that, for all future transfers, the FFL should not sell or otherwise dispose of any firearm to an unlicensed individual unless the transaction is recorded on a Form 4473. This includes transfers from the licensed LLC to either of the responsible persons. NCIC/ NLETS queries was conducted on (b)(6). No hits resulted.

See Worksheet 2 and Exhibit 1.

3. **27 CFR 478.123(a)**

Nature of violation:

Failure instances to properly record information in the acquisition portion of the acquisition and disposition records. The licensee was provided with "Attachment A" which details the errors and discrepancies.

Licensee's response:

Revised 5/15/14

Page 6 of 8

January 2020 Production

Name: Aplos Firearms LLC Trade Name: Comrade Arms UI#: 773015-2017-0035-B1B FFL#: 4-31-061-07-8J-05366

Mr. Menchen stated that he was not aware that a complete address needed to be recorded. He also stated that because the headings of the bound book state "Name and address or name and license number", he thought a driver's license number would be sufficient.

Corrective action:

The licensee was instructed to correct log book errors where possible. The licensee was also instructed that, for future transfers, the licensee should record the type, model, caliber or gauge, and serial number of each firearm manufactured or otherwise acquired, as well as the date the manufacture or other acquisition was made. The information shall be recorded not later than the seventh day following the date of the manufacture or acquisition.

Please see Attachment A to the Report of Violations, Worksheet 1 and Exhibit 1.

4. 27 CFR 478.123(d)

Nature of violation:

Failure instances to properly record information in the disposition portion of the acquisition and disposition records. The licensee was provided with "Attachment A" which details the errors and discrepancies.

Licensee's response:

Mr. Menchen stated that he was not aware that a complete address needed to be recorded. He also stated that because the headings of the bound book state "Name and address or name and license number", he thought a driver's license number would be sufficient.

Corrective action:

The licensee was instructed to correct bound book entries where possible. The licensee was reminded that, disposition records should adhere to the conditions set forth in 27 CFR 478.125(e), and should contain the date of disposition, the name and address of the person to whom transferred, or the name and license number, or the 4473 serial number. Dispositions should be recorded within 7 days following the date of the transaction.

Please see Attachment A to the Report of Violations, Worksheet 1 and Exhibit 1.

Revised 5/15/14

Page 7 of 8

January 2020 Production

Name:Aplos Firearms LLCTrade Name:Comrade Arms

UI#: 773015-2017-0035-B1B FFL#: 4-31-061-07-8J-05366

	Industry Operations Investigator	December 14,
		2016
Signature	Title	Date of Report

Index of Worksheets and Exhibits

- 1. Report of Violations
- 2. Worksheet 1
- 3. Worksheet 2
- 4. Exhibit 1 Copy of bound book; corresponds to Violations 1-4
- 5. Exhibit 2 AFMER reports
- 6. Exhibit 3 Acknowledgement of Federal Firearms Regulations
- 7. Worknotes



U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

550 Main Street, Room 8-507 Cincinnati, OH 45202

DEC 1 5 2016 www.atf.gov

773015:<mark>(b)(6)</mark> 5373

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Aplos Firearms LLC Comrade Arms 12055 Mosteller Road Cincinnati, OH 45241

4-31-061-07-8J-05366

Dear Mr. Mencher,

During a recent compliance inspection at your firearms business covering the period of December 1, 2015, through December 1, 2016, 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.

Aplos Firearms





Enclosure

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