

## Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY)  Lohman, David John 29616 150th Ave N Hillsdale, IL 61257, Rock Island	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 772060-2016-0478-B1B		
	3. PERMIT/LICENSE NUMBER 336161017F03148	4a. TARGET DATE	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, 05/18/2016

8. PURPOSE/SPECIAL INSTRUCTIONS  
Please conduct a full scope firearms compliance inspection of this Type 01 FFL. During initial review of this assignment please ensure the shared drive is reviewed for any additional variance approvals, correspondences, etc. that are not located in the file.  
  
Not associated with any other FFL  
No NFA  
  
Zoning - Please utilize the Shared Zoning Folder for all zoning information. If a location needs added, deleted or amended/updated, please do so to ensure we maintain an accurate and up to date database.

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	4	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS	22	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  
  
Su (b) (6) 2016  
IOI (b) (6) conducted a full scope firearms compliance inspection July 12, 2016 at the licensed premise. Licensee David John Lohman was interview during the inspection. The inspection period was January 1, 2014 through July 11, 2016. This was the licensee's first compliance inspection. Although the licensee was cited for 27 CFR 478.102(a) for transferring (b) (6) - Public Law 112-55 (125 Stat. 559) prior to conducting a background check, the licensee thought he could transfer the firearm after 3 days. The licens that he does not use a computer and had called the IL State Police prior to the transfer but that the phone system was temporarily down. The licensee also stated that he had recently obtained an approval number for the same individual and that he did obtain a new approval number prior to filing the ATF F 4473. IOI (b) (6) explained that in accordance to Illinois State law, a firearm cannot be transferred until an approved background check transaction number had been issued. No prohibited transfers or suspicious activities were disclosed, and none of the associated firearms had been traced. Furthermore, the licensee has not been associated with a trace request since issuance of the license in 2011. See narrative and exhibits for further details.  
  
Viols WL ONLY and Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b) (6)	
JUN 2016	2.00		
JUL 2016	27.00		
ATF OFFICER'S SUBTOTAL	29.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	29.00		

## Assignment and Report

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	3. PERMIT/LICENSE NUMBER 336161017F03148	4a. TARGET DATE	4b. TARGET HOURS
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### 13. REVIEW AND ROUTING

#### REVIEW COMMENTS AND RECOMMENDATION

Concur with recommendation of Warning Letter but due to (b) (6) instance of a violation that could have warranted a warning conference A/S is recommending no Recall Inspection. PII forwarded to DIO Arnold on 7/26/16 for review.

With DIO concurrence the Warning Letter was signed and mailed by A/S (b) (6) on 8/17/16.

Viols WL ONLY and No Recall Inspection

☒ REVIEWED ☐ CONCUR ☒ SEE COMMENTS ☐ FINAL DISPOSITION

SIGNATURE AND TITLE (b) (6) T - Area Supervisor	REVIEW DATE 07/26/2016
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#### REVIEW COMMENTS AND RECOMMENDATION

DOI concurs with Warning Letter recommendation.

Viols WL ONLY and No Recall Inspection

☒ REVIEWED ☒ CONCUR ☒ SEE COMMENTS ☒ FINAL DISPOSITION

SIGNATURE AND TITLE TEARNOLD - Director, Industry Operations	REVIEW DATE 08/17/2016
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#### 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 Lohman, David John	Street Address 29616 150th Ave N	City Hillsdale	State IL	Zip Code 61257-	County Rock Island	Page 1 of 2 Pages
License/Permit/Registry Number <i>(If any)</i> 336161017F03148		Expiration Date 6/1/2017		Date(s) or Period of Inspection 07/12/2016 through 07/12/2016		

## Inspection Results

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

<b>Number:</b> 1	<b>Date Corrections to be Made:</b> <i>(If not corrected immediately)</i>
<b>Nature of Violation:</b> (b)(3)-F0000 instances, the licensee transferred a firearm although ATF F 4473 Question 11a was answered "No". (Actual Buyer)	<b>Corrective Action to be Taken:</b> The violations were reviewed and the licensee was reminded to review each form when completed and prior to the transfer. The licensee was instructed that the actual buyer must complete the ATF F 4473. The licensee was further instructed that firearms cannot be transferred when any question on the ATF F 4473 is not answered correctly. <i>(If not corrected immediately)</i>
<b>Citation:</b> 27 CFR 478.21(a)	
<b>Number:</b> 2	<b>Date Corrections to be Made:</b> <i>(If not corrected immediately)</i>
<b>Nature of Violation:</b> (b)(3)-F0000 instances, the licensee failed to complete an ATF F 3310.4 (Report of Multiple Sale or Other Disposition of Pistols or Revolvers) when (b)(3)-F0000 handguns were transferred to a non-licensee.	<b>Corrective Action to be Taken:</b> The licensee completed an ATF F 3310.4 for each of the transactions during the inspection. <i>(If not corrected immediately)</i>
<b>Citation:</b> 27 CFR 478.126a	
<b>Number:</b> 3	<b>Date Corrections to be Made:</b> <i>(If not corrected immediately)</i>
<b>Nature of Violation:</b> In 1 instance, the licensee transferred a firearm prior to conducting a background check.	<b>Corrective Action to be Taken:</b> The licensee was reminded that an approval number must be issued before transferring a firearm. <i>(If not corrected immediately)</i>
<b>Citation:</b> 27 CFR 478.102(a)	

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

Instructions

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Name of Proprietor Lohman, David John	Street Address 29616 150th Ave N	City Hillsdale	State IL	Zip Code 61257-	County Rock Island	Page 2 of 2 Pages
License/Permit/Registry Number (If any) 336161017F03148		Expiration Date 6/1/2017	Date(s) or Period of Inspection 07/12/2016 through 07/12/2016			

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:  
[REDACTED] instances, firearms found in inventory were not recorded in the A&D and/or did not have an open disposition.

Citation: 27 CFR 478.125(e)

Date Corrections to be Made:  
(If not corrected immediately)

Corrective Action to be Taken:  
(If not corrected immediately)

Licensee recorded the acquisition of each firearm during the inspection.

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

Date

Signature and Title of ATF Officer

Date

February 11 2019 Document Production

734

For Official Use Only

ATF E-Form 5030 5  
Revised April 2005



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

*Springfield II Field Office*

3161 W. White Oaks Dr. Suite 200  
Springfield, IL 62704  
www.atf.gov

AUG 17 2016

772060:(b) (6)  
5300

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

David John Lohman  
29616 150<sup>th</sup> Ave N  
Hillsdale, IL 61257

FFL #3-36-161-01-7F-03148

Dear Mr. Lohman:

During a recent compliance inspection at your firearms business covering the period of January 1, 2016 through July 11, 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.

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

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

You are reminded that retention of your Federal firearms license is conditioned upon your compliance with Federal laws and regulations. Any future violations, either repeat or otherwise, could be viewed as willful and may result in the revocation of your license. Please ensure that future compliance is achieved.

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

Sincerely yours,

(b) (6)

Area Supervisor  
Springfield II  
Downers Grove SO

Enclosure

c: Federal Firearms Licensing Center

# FIREARMS INSPECTION REPORT

**Name:** Lohman, David John  
**Trade Name:**

**UI#:** 772060-2016-0478-B1B  
**FFL#:** 3-36-161-01-7F-03148

**Address:** 29616 150<sup>th</sup> Ave N  
Hillsdale, IL 61257 (Rock Island County)

## 1 - Introduction

### Inspection Profile:

ATF Industry Operations Investigator (IOI) (b)(6) conducted a full scope firearms compliance inspection on July 12, 2016 at the licensed premise. Licensee David John Lohman was interview during the inspection. The inspection period was January 1, 2014 through July 11, 2016. As a result of the inspection, a Report of Violations was issued.

Reference: Section 13-Violations

### Business Profile:

The licensee has held the Type 01, Dealer of Firearms licensee since May 11, 2011, which expires June 1, 2017. FLS correctly shows the licensed premise within Rock Island County. The licensee conducts the firearms business from his individually owned rural residential premise in Hillsdale, IL. Zoning Administrator (b)(6) confirmed a Home Occupation Permit was approved, and there are no other restrictions that prohibit the firearms business. GPS readings were taken, confirmed by Google Earth, and entered into NSpect.

Within the last months, the licensee recorded the acquisition of (b)(4) firearms and the disposition of approximately (b)(4) firearms. The licensee deals in new firearms only, to include both long guns and handguns. The physical inventory of 98 firearms consisted of 49% handguns and 51% long guns. No used firearms were maintained in inventory, and the licensee does not deal in NFA firearms.

The licensee does not maintain a website and no other internet transfers are conducted. No gunsmith or manufacturing activities were disclosed during the inspection. The licensee operates as a dealer at the Princeton, IL gun show, and transfers are also conducted at the licensed premise. The licensee's primary suppliers are (b)(4).

The licensee is registered with the Illinois Department of Revenue, and is enrolled with Illinois State Police to conduct background checks.

### Ownership and Control:

The firearms business is individually owned by Licensee David John Lohman. No hidden ownership or change in control were disclosed. Mr. Lohman is the only responsible person listed in the Federal Licensing System (FLS).

# FIREARMS INSPECTION REPORT

**Name:** Lohman, David John  
**Trade Name:**

**UI#:** 772060-2016-0478-B1B  
**FFL#:** 3-36-161-01-7F-03148

## Variance:

No variances are maintained. The licensee maintains manual records.

## 2 - Recommendation

An alternate recommendation of a Warning Letter and Recall Inspection is recommended in lieu of a Warning Conference.

This was the licensee's first compliance inspection. Although the licensee was cited for 27 CFR 478.102(a) for transferring (b)(3) - 112 Public Law 55 125 Stat 552 prior to conducting a background check, the licensee thought he could transfer the firearm after 3 days. The licensee further explained that he does not use a computer and had called the IL State Police prior to the transfer but that the phone system was temporarily down. The licensee also stated that he had recently obtained an approval number for the same individual and that he did obtain a new approval number prior to filing the ATF F 4473. IOI (b)(6) explained that in accordance to Illinois State law, a firearm cannot be transferred until an approved background check transaction number had been issued for each transaction. The licensee was also advised to start using the IL State Police website if possible. IOI (b)(6) confirmed with ISP (b)(6) that licensees are still able to conduct background checks telephonically.

The licensee was also cited for the following violations, although they did not warrant a Warning Conference:

- 27 CFR 478.21(a) (b)(3) instances ATF F 4473 Question 11a was answered "No" (Actual Buyer)
- 27 CFR 478.126a - (b)(3) instances ATF F 3310.4 was not completed (b)(3) - 112 F handguns to a non-licensee.
- 27 CFR 478.125(e) - (b)(3) instances a firearm in inventory was not recorded in the A&D records.

No prohibited transfers or suspicious activities were disclosed, and none of the associated firearms had been traced. Furthermore, the licensee has not been associated with a trace request since issuance of the license in 2011. During the closing conference, each violation was reviewed and the licensee ensured future compliance with Federal regulations by stating each form would be thoroughly reviewed and all firearms would be entered into the A&D records.

## 3 - Inspection History

**Date and Type of Inspection:** April 19, 2011 – Onsite Qualification Inspection  
**UI#:** 772060-2011-0180-B1B  
**Inspection Results:** Approved  
**Cited Violations:** None



# FIREARMS INSPECTION REPORT

**Name:** Lohman, David John  
**Trade Name:**

**UI#:** 772060-2016-0478-B1B  
**FFL#:** 3-36-161-01-7F-03148

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

The physical inventory was taken on July 12, 2016 and consisted of 98 firearms. The physical inventory was compared to the manual A&D records which contained (b)(3)-(12) open dispositions. The licensee was cited for 27 CFR 478.125(e). (b)(3)-(12) instances, firearms found in inventory were not recorded in the A&D and/or did not have an open disposition. None of the firearms were associated with a trace. The inspection disclosed no missing firearms.

### Reference:

Section 13 – Violation #4

Inspection Worksheets

Exhibit 5 – A&D Record of Unrecorded Firearms

In regards to the licensee's standard operating procedures, Licensee David Lohman is the only person responsible for maintaining the inventory and A&D records.

## **5 - ATF Forms 4473 – NICS & Other Dispositions**

For the inspection period of January 1, 2014 through July 11, 2016, the licensee maintained (b)(3)-(12) ATF Forms 4473, of which 90 were within the last 12 months. The review of the forms disclosed violations involving (b)(3) forms. An Inspection Worksheet was completed and a Report of Violations was issued. The licensee was cited for 27 CFR 478.21(a) where (b)(3)-(12) instances a firearm was transferred although Question 11a (Actual Buyer) was answered "No", and 27 CFR 478.102(a) where (b)(3)-(12) instance the licensee transferred a firearm prior to conducting a background check. No prohibited transfers were disclosed and no other suspicious activities were disclosed.

### Reference:

Section 7 – Suspicious/Prohibited Persons

Section 13 – Violations #1 and #3

Inspection Worksheets

Exhibit 1 – ATF Forms 4473 for Violations of 27 CFR 478.21(a)

Exhibit 4 – ATF Form 4473 for Violation of 27 CFR 478.102(a)

The licensee maintains the ATF Forms 4473 filed by chronological order for each year. The licensee properly maintains a separate file for denied and/or incomplete transactions. The licensee also maintains a manual file of FFL copies when firearms are transferred to other licensees. No law enforcement sales have been made.

The Illinois State Police (ISP) provided a Firearm Transaction Inquiry Program (FTIP) history for the period of July 1, 2015 through July 5, 2016. During the review of the ATF F 4473's, 14 approval numbers were compared to the history which disclosed the licensee is aware of the required background check and waiting period.

# FIREARMS INSPECTION REPORT

**Name:** Lohman, David John  
**Trade Name:**

**UI#:** 772060-2016-0478-B1B  
**FFL#:** 3-36-161-01-7F-03148

## **6 – Multiple Sales**

According to eTrace, no multiple sales had been reported. However, a Report of Violations was issued and the licensee was cited for 27 CFR 478.126a. In (b)(3) instances, the licensee failed to complete an ATF F 3310.4 when (b)(3) handguns were transferred to a non-licensee. IOI (b)(6) assisted the licensee with completion of the ATF Forms 3310.4 and forwarded the forms accordingly.

### Reference:

Section 7 – Suspicious/Prohibited Persons

Section 13 – Violation #2

Inspection Worksheets

Exhibit 2 – ATF Forms 4473 for Violations of 27 CFR 478.126a

Exhibit 3 – ATF F 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers

## **7 – Suspicious/Prohibited Purchasers**

As a result of the inspection, 6 individuals were queried in TECS/NICS, eTrace, and IL Leads which resulted in no disabling information. Specifically;

- 1 Responsible Person (David John Lohman)
- (b)(6) individuals associated with the Unreported Multiple Sales
- (b)(6) individuals associated with other ATF F 4473 violations

None of the above individuals were prohibited, and none were prohibited at the time of the transfer. Furthermore, after an extensive review of the licensee's A&D records and eTrace, no additional traces or suspicious activity was disclosed. Therefore, no referral was generated.

## **8 – Trace Activity**

According to eTrace, the licensee has not been associated with a trace request since issuance of the license in 2011.

Although no used firearms were in inventory, and no used firearms had been transferred within the last 12 months, the following 16 firearms were queried in eTrace and IL Leads for Secondary Market Analysis:

- (b)(6) firearms associated with ATF F 4473 violations
- (b)(6) firearms associated with Unreported Multiple Sales
- (b)(6) firearms in inventory but not recorded in the A&D records.

## **9 – NFA/Importer/Collector/Manufacturer**

The licensee does not deal in NFA firearms, does not import or manufacture firearms, and does not possess a collector's license.

# FIREARMS INSPECTION REPORT

**Name:** Lohman, David John  
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## 10 - Referrals

No referrals were generated.

## 11 - Other

The licensee displays the Federal Firearms License and Youth Handgun Safety Act poster, and pamphlets were available at the licensed premise. The licensee was reminded that such pamphlet must be provided with all handgun transfers to non-licensees. In addition, trigger locks were maintained at the licensed premise, and the licensee was reminded that a trigger lock must be provided with all handgun transfers to non-licensees in accordance with the Child Safety Lock Act of 2005.

## 12 - Closing Actions

IOI (b)(6) conducted a closing conference on July 12, 2016 with Licensee David John Lohman. The Report of Violations was issued. Each violation and exhibit was thoroughly reviewed and IOI (b)(6) noted the licensee's response. The Acknowledgement of Federal Firearms Regulations was also thoroughly reviewed and all questions were answered. Both the Report of Violations and the Acknowledgement of Federal Firearms Regulations were signed by Licensee David John Lohman.

### Reference:

Report of Violations

Exhibit 6 – Acknowledgement of Federal Firearms Regulations

IOI (b)(6) explained that although the inspection included an in-depth review of the Federal regulations, the acknowledgement is a general overview of the regulations and that it is the responsibility of each licensee to familiarize themselves with all the laws and regulations that govern the firearms business. The licensee was instructed to contact (b)(6) or the ATF Springfield Area Office should any questions or concerns arise in the future.

## 13 - Violations

1. 27 CFR 478.21(a)

### Nature of Violation:

(b)(6) instances, the licensee transferred a firearm although ATF F 4473 Question 11a was answered "No". (Actual Buyer)

### Licensee's Response:

The licensee stated, "I didn't notice the wrong answer was checked because both of them had bought guns from me before and was approved. The licensee stated he will pay closer attention when the forms are completed.

# FIREARMS INSPECTION REPORT

**Name:** Lohman, David John  
**Trade Name:**

**UI#:** 772060-2016-0478-B1B  
**FFL#:** 3-36-161-01-7F-03148

## **Corrective Action:**

The violations were reviewed and the licensee was reminded to review each form when completed and prior to the transfer. The licensee was instructed that the actual buyer must complete the ATF F 4473. The licensee was further instructed that firearms cannot be transferred when any question on the ATF F 4473 is not answered correctly.

*NOTE:* The non-licensee was not prohibited at the time of the transfer. Furthermore, the individuals nor the firearms were not associated with a trace.


## **Reference:**

Worksheet 2-4473

Exhibit 1 – ATF Forms 4473 for Violations of 27 CFR 478.21(a)

### **2. 27 CFR 478.126a**

#### **Nature of Violation:**

 instances, the licensee failed to complete an ATF F 3310.4 (Report of Multiple Sale or Other Disposition of Pistols or Revolvers) when 2 handguns were transferred to a non-licensee.

#### **Licensee's Response:**

The licensee stated, "I thought the form was filled out if they bought more than 2 handguns." The licensee now understands that an ATF F 3310.4 must be completed when 2 or more handguns are transferred to the same non-licensee with 5 business days.

#### **Corrective Action:**

The licensee completed an ATF F 3310.4 for each of the transactions during the inspection.

#### **Reference:**


Worksheet 2-4473

Exhibit 2 – ATF Forms 4473 for Violations of 27 CFR 478.126a

Exhibit 3 – ATF F 3310.4, Report of Multiple Sale or Other Disposition of Pistols or Revolvers

### **3. 27 CFR 478.102(a)**

#### **Nature of Violation:**

 instance, the licensee transferred a firearm prior to conducting a background check.

## FIREARMS INSPECTION REPORT

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**Licensee's Response:**

The licensee stated, "I don't use the computer and the ISP phone system was down. I went ahead and transferred it after 3 days because I had also recently transferred a gun to him and he was approved. I did call it in before I filed the form and got an approved number."

**Corrective Action:**

The licensee was reminded that an approval number must be issued before transferring a firearm.

*NOTE:* The non-licensee was not prohibited at the time of the transfer. Furthermore, the individual nor the firearm was not associated with a trace.


**Reference:**

Worksheet 2-4473

Exhibit 4 – ATF F 4473 for Violation of 27 CFR 478.102(a)

**4. 27 CFR 478.125(e)**

**Nature of Violation:**

 instances, firearms found in inventory were not recorded in the A&D and/or did not have an open disposition.

**Licensee's Response:**

The licensee was unable to explain why the firearms had not been recorded. However, the licensee was able to determine who shipped him each firearm.

**Corrective Action:**

Licensee recorded the acquisition of each firearm during the inspection.

*NOTE:* The licensee was unable to determine the actual acquisition date. Therefore, the acquisition date for the corrective action reflects the inspection date. None of the unrecorded firearms were associated with a trace.

**Reference:**

Worksheet 2-4473

Exhibit 5 – A&D Record of Unrecorded Firearms

# FIREARMS INSPECTION REPORT

**Name:** Lohman, David John  
**Trade Name:**

**UI#:** 772060-2016-0478-B1B  
**FFL#:** 3-36-161-01-7F-03148

X

(b)(6)

ATF Senior Industry Operations Investigator

## **Index of Attachments:**

Report of Violations (Signed)  
Report of Violations (Created in NSpect)  
Inspection Worksheets  
Exhibit 1 – ATF Forms 4473 for Violations of 27 CFR 478.21(a)  
Exhibit 2 – ATF Forms 4473 for Violations of 27 CFR 478.126a  
Exhibit 3 – ATF F 3310.4, Report of Multiple Sale or Other Disposition of Pistols or Revolvers  
Exhibit 4 – ATF F 4473 for Violation of 27 CFR 478.102(a)  
Exhibit 5 – A&D Record of Unrecorded Firearms  
Exhibit 6 – Acknowledgement of Federal Firearms Regulations