

## Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY)  Sarac Distributors, LLC 6391 Corporate Park Circle, Suite 1 Fort Myers, FL 33966, Lee	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 767080-2017-0024-B1B		
	3. PERMIT/LICENSE NUMBER 159071088H17699	4a. TARGET DATE 6/30/2017	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, 10/03/2016

8. PURPOSE/SPECIAL INSTRUCTIONS  
Conduct a full Importer of Firearms (08) inspection as per the IOI manual. Determine if licensee is using this license. Determine if licensee deals at gun shows, over the Internet or in NFA weapons. Obtain GPS coordinates, photos and emergency contact information. Contact ATF CE to verify there is no open CE case associated with the licensee.

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) - Investigator

Submitted on: 11/08/2016

Viols WL ONLY and No Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b) (6)	
OCT 2016	17.00		
NOV 2016	51.00		
ATF OFFICER'S SUBTOTAL	68.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	68.00		

13. REVIEW AND ROUTING	
REVIEW COMMENTS AND RECOMMENDATION	
Inspection disclosed a violation, resulting (b) (3) - Public Law 104-190, firearms reported missing. A Warning Letter was issued on 11/09/16.	
Viols WL ONLY and No Recall Inspection	

<input checked="" type="checkbox"/> REVIEWED		<input checked="" type="checkbox"/> CONCUR	<input checked="" type="checkbox"/> SEE COMMENTS	<input checked="" type="checkbox"/> FINAL DISPOSITION
SIGNATURE AND TITLE (b) (6) Area Supervisor			REVIEW DATE 11/09/2016	

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ROUTING SEQUENCE AND DATE

- ☐ 1. \_\_\_\_\_  
☐ 2. \_\_\_\_\_  
☐ 3. \_\_\_\_\_  
☐ 4. \_\_\_\_\_

CONTROL FILE POSTED DATE \_\_\_\_\_

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

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 Sarac Distributors, LLC	Street Address 6391 Corporate Park Circle, Suite 1	City Fort Myers	State FL	Zip Code 33966-	County Lee	Page 1 of 1 Pages
License/Permit/Registry Number <i>(If any)</i> 159071088H17699		Expiration Date 8/1/2018	Date(s) or Period of Inspection 11/01/2016 through 11/08/2016			

Inspection Results

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

Number: 1

Nature of Violation:

Licensee failed to make a record of all firearms disposed of to another licensee. The licensee was unable to reconcile (b) (3) - Public Law 112-55 open firearm dispositions by producing the firearms or with record(s) of sale or other disposition. The firearms were reported on ATF Form 3310.11, Federal Firearms Licensee Inventory Theft/Loss Report; ATF Incident Number F20160002396.

\*Inventory Acquisition and Disposition Record:  
(b) (3) - Public Law 112-55 (125 Stat. 552)

Citation: 27 CFR 478.122(b)

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

Corrective Action to be Taken: IOI (b) (6) advised the licensee to attempt to reconcile the disposition of the three (3) firearms.  
(If not corrected immediately)

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

Date

Signature and Title of ATF Officer  
March 11 2019 Document Production 719

Date

For Official Use Only

ATF E-Form 5030 5  
Revised April 2005



**U.S. Department of Justice**

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

*Tampa Field Division*

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*Fort Myers II Field Office  
Fort Myers, Florida 33907*

November 9, 2016

767080: (b) (6)  
5300

**WARNING LETTER**

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Sarac Distributors LLC  
Attn: Mr. Matthew Mustafa Sarac  
6391 Corporate Park Circle  
Suite 1  
Fort Myers, FL 33966  
Reference: FFL #1-59-071-08-8H-17699

Dear Mr. Sarac:

During a recent compliance inspection at your firearms business covering the period of October 31, 2015 through October 31, 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 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 Investigator (b) (6) (b) (6) at (b) (6).

Sincerely yours,

(b) (6)

(b) (6)

Area Supervisor

cc: FFLC  
Fort Myers II Field Office

Attachment

# FIREARMS INSPECTION REPORT

**Name:** Sarac Distributors, LLC  
**Trade Name:**

**UI#:** 767080-2017-0024  
**FFL#:** 1-59-071-08-8H-17699

**Address:** 6391 Corporate Park Circle  
Suite 1  
Fort Myers, FL 33966

## 1 - Introduction

### Inspection Profile:

On November 1, 2016 Industry Operations Investigator (IOI) (b) (6) initiated a Firearms Inspection (Importer of Firearms or Ammunition, Manuf. Or Importer DE) on Sarac Distributors, LLC at the licensed premises. The inspection period covered the activity authorized by the Federal Firearms License (FFL) from October 31, 2015 to October 31, 2016. IOI (b) (6) Hancock interviewed Matthew Mustafa Sarac, Responsible Person and MGR of Sarac Distributors, LLC.

### Business Profile:

Sarac Distributors, LLC was engaged in a business activity requiring a license as an Importer of Firearms. The premises was an urban commercial location. Sarac Distributors, LLC acquired approximately (b) (4) (b) (4) firearms and disposed of approximately (b) (4) (b) (4) firearms during the last twelve (12) months. Sarac Distributors, LLC identified Pasa Makina Tekstil Ve Gida San.Tic. Ltd. Sti. (Pasa Makina) and MT Silah Sanayi Ve Ticaret Ltd. Sti. (MT Silah) as primary suppliers of firearms. Sarac Distributors, LLC stated that licensed business was not conducted at gun shows. Sarac Distributors, LLC stated that firearms were sold via the internet at www.fflwholesale.com. IOI (b) (6) identified SRC USA, LLC, ABIANCA, LLC, MAREX, LLC, and AMS Land, LLC as other businesses on the premises also conducted by Matthew Mustafa Sarac. IOI (b) (6) identified (b) (4) and (b) (4) as other business also operated by Matthew Mustafa Sarac. IOI (b) (6) identified Sarac Distributors, LLC (1590730110) and (b) (4) (1590730115, 1590830116) as other FFL's issued by the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) also operated by Matthew Mustafa Sarac. IOI (b) (6) identified no compliance issues with State/Local licensing or zoning. This license was first issued in 2012 according to the Federal Licensing System (FLS).

# FIREARMS INSPECTION REPORT

**Name:** Sarac Distributors, LLC  
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## **Ownership and Control:**

The licensee was Sarac Distributors, LLC a Limited Liability Corporation (LLC). A review of the FLS and the Florida Department of State Division of Corporations (Sunbiz) confirmed the business structure and identified Matthew Mustafa Sarac as the sole Responsible Person on the license and MGR of Sarac Distributors, LLC.

IOI (b) (6) conducted a query of the National Crime Information Center (NCIC) Interstate Identification Index (III), the National Criminal Instant Background Check System (NICS), and N-Force for any relevant information about Matthew Mustafa Sarac disclosing no information relevant to the status of Matthew Mustafa Sarac as a Responsible Person.

## **Variance:**

The licensee held no approved variances.

## **2 - Recommendation**

Viols WL ONLY and No Recall Inspection

## **3 - Inspection History**

<b>Date of Inspection:</b>	July 11, 2012
<b>Type of Inspection:</b>	Firearms Inspection (Importer of Firearms or Ammunition, Qualification New Onsite)
<b>UI#:</b>	767035-2012-0313
<b>Inspection Results:</b>	Application Approved
<b>Cited Violations:</b>	No Violations Cited

# FIREARMS INSPECTION REPORT

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

The A&D Record was computerized. The A&D Record was in the proper format, required information was accurate, and entries timely made. IOI (b) (6) conducted a complete inventory. The licensee had (b)(3)Pub Law 112-55 125 § 552 (b)(3)Pub Law 112-55 125 § 552 firearms in inventory and (b)(3)Pub Law 112-55 125 § 552 open entries in the A&D Record.

Licensee failed to make a record of all firearms disposed of to another licensee. The licensee was unable to reconcile (b)(3)Pub Law 112-55 125 § 552 open firearm entries by producing the firearms or with record(s) of sale or other disposition. The firearms were reported on ATF Form 3310.11, Federal Firearms Licensee Inventory Theft/Loss Report; ATF Incident Number F20160002396.

### **[ROV #1, Inventory and A&D Review Worksheet]**

The licensee submitted (b)(3)Pub Law 112-55 125 § 552 theft or loss reports during the inspection period (b)(3) - 112 Public Law 55 125 Stat 552 and (b)(3)Pub Law 112-55 125 § 552 theft or loss report as a result of this inspection (b)(3) - 112 Public Law 55 125 Stat 552). IOI (b) (6) traced (b)(3)Pub Law 112-55 125 § 552 firearms through the required records from acquisition to disposition disclosing no additional discrepancies.

IOI (b) (6) discussed standard operating procedures relevant to the A&D record and inventory with the licensee. Matthew Mustafa Sarac stated that a full inventory was conducted regularly. Matthew Mustafa Sarac acknowledged and accepted responsibility for accounting for inventory, safeguarding inventory from theft and/or loss, and accurately and timely making entries in the required records. Matthew Mustafa Sarac stated intent to follow procedures for conducting inventories and making entries in the required records as prescribed by the law, regulation, rulings, and other information provided by the ATF.



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

The licensee conducted only FFL to FFL transfers, which appeared to be handled properly.

IOI (b) (6) discussed standard operating procedures relevant to ATF Form 4473 completion and other dispositions with the licensee. Matthew Mustafa Sarac acknowledged and accepted responsibility for accurately and timely making entries in the required records and ensuring the transfer of firearms only to persons not prohibited by law from receiving or possessing firearms. Matthew Mustafa Sarac stated intent to follow procedures for making entries in the required records and transferring firearms as prescribed by the law, regulation, headings on required forms and the instructions on or pertaining to required forms, rulings, and other information provided by the ATF.

## **6 - Multiple Sales**

Firearm Trace History for the last twelve (12) months acquired from the Violent Crime Analysis Branch (VCAB) disclosed that the licensee was associated with zero (0) multiple sales or other dispositions where the licensee sold or otherwise disposed of, at one time or during any five (5) consecutive business days, two (2) or more pistols, or revolvers, or any combination of pistols and revolvers.

## **7 - Suspicious/Prohibited Purchasers**

IOI (b) (6) identified no suspicious or prohibited persons associated with the licensee during the last twelve (12) months.

## **8 - Trace Activity**

Firearm Trace History for the last twelve (12) months acquired from the VCAB disclosed that the licensee was associated with (b) (6) successful trace requests. Firearm Trace History for the last twelve (12) months acquired from the VCAB disclosed that the licensee was associated with zero (0) unsuccessful trace requests.

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## 9 - NFA/Importer/Collector/Manufacturer

The licensee did not possess a Special Tax Stamp for engaging in any activity with firearms under the purview of the National Firearms Act (NFA) and did not engage in the business as a Collector, or Manufacturer.

IOI (b) (6) verified that the licensee properly marked imported firearms, that information obtained from ATF Form 6 and ATF Form 6A were properly entered into the required A&D Records, and that the importer was properly forwarding completed ATF Forms 6A to the Firearms and Explosives Imports Branch.

## 10 - Referrals

IOI (b) (6) generated no referrals as a result of this inspection.

## 11 - Other

IOI (b) (6) queried N-Force to verify that the FFL and any Responsible Person was not under investigation for the purpose of safety, collaboration and coordination.

IOI (b) (6) conducted (b)(3)(F)ub Law 112-59 query of the NICS and the NCIC III for any relevant information about:

- Matthew Mustafa Sarac; Responsible Person and MGR of Sarac Distributors, LLC

## 12 - Closing Actions

IOI (b) (6) reviewed and discussed each applicable point of the Acknowledgement of Federal Firearms Regulations, including secure gun storage and safety devices, and the ATF Important Notice – Selling Firearms AFTER Revocation, Expiration, or Surrender of an FFL with Matthew Mustafa Sarac, Responsible Person and Managing Member of Sarac Distributors, LLC on November 2, 2016.

IOI (b) (6) and Matthew Mustafa Sarac signed the Acknowledgement of Federal Firearms Regulations.

**[Exhibit 1]**

The final record review was completed on November 8, 2016.

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## 13 - Violations

### 1. **27 CFR 478.122(b)**

#### Nature of Violation:

Licensee failed to make a record of all firearms disposed of to another licensee. The licensee was unable to reconcile [REDACTED] open firearm dispositions by producing the firearms or with record(s) of sale or other disposition. The firearms were reported on ATF Form 3310.11, Federal Firearms Licensee Inventory Theft/Loss Report; ATF Incident Number [REDACTED]

#### \*Inventory Acquisition and Disposition Record:

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

#### Licensee Response:

IOI (b) (6) [REDACTED] advised the licensee to attempt to reconcile the disposition of the [REDACTED] firearms.

#### Corrective Action:

IOI (b) (6) [REDACTED] advised the licensee to attempt to reconcile the disposition of the [REDACTED] firearms.

**[Inventory and A&D Review Worksheet]**

**X**

Industry Operations Investigator

## Index of Worksheets and Exhibits

Informational Page

Inventory and A&D Review Worksheet

ATF Form 4473 (September 2008 Edition) Review Worksheet

ATF Form 4473 (September 2012 Edition) Review Worksheet

Other Statistics

Exhibit 1 – Signed Acknowledgement of Federal Firearms Regulations

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