

## Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY)  CASH MONEY, INC. CASH MONEY PAWN 5015 Portsmouth Blvd Portsmouth, VA 23701, Portsmouth City	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 768035-2017-0089-B1B		
	3. PERMIT/LICENSE NUMBER 154740029F18093	4a. TARGET DATE	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

6. ATF OFFICER(S) ASSIGNED

(b)(6) - Assigned Investigator  
(b)(6) - Assigned Investigator  
(b)(6) - Lead Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)  
(b)(6), Area Supervisor, 12/09/2016

8. PURPOSE/SPECIAL INSTRUCTIONS  
\*\*Please conduct a DE inspection on this 02 FFL. The 02 license was issued on 5/5/2016. Please conduct a DE inspection to determine if FFL is compliant with ATF law and regulations.

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC	10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	9	NO. OF REFERRALS		2111 - PER DIEM
NO. OF TECS CHECKS	14	NO. OF TECS HITS		2112 - P.O.A.
NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES		2113 - COMM. AIR
		\$ VALUE OF TAX DECREASES		2114 - RENTAL CAR
NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS		2115 - GPV EXPENSES
NO. OF CLAIMS		\$ VALUE OF CLAIMS		2116 - MISC.
NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED		TOTAL \$ FOR INSP.

11. ATF OFFICER'S RECOMMENDATION  
Submitted by (b)(6) - Industry Operations Investigator

Submitted on 3/2017  
Investigator (b)(6) recommends that a Warning Letter be issued to the licensee based upon ATF Form 4473, Multiple Sale Report, and conduct of business violations. The licensee failed to record a purchaser's ID in (b)(6) instances, failed to file a Multiple Sale Report in (b)(6) instances, and transferred a firearm to a purchaser who indicated that he was prohibited (but was not prohibited) in (b)(6) instance.

Violts WL ONLY and No Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
DEC 2016	14.00		
ATF OFFICER'S SUBTOTAL	14.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
DEC 2016	11.00		
ATF OFFICER'S SUBTOTAL	11.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
DEC 2016	49.00		
JAN 2017	8.00		
ATF OFFICER'S SUBTOTAL	57.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	82.00		

## Assignment and Report

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	3. PERMIT/LICENSE NUMBER 154740029F18093	4a. TARGET DATE	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

### 13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION  
Viols WL ONLY and No Recall Inspection

☒ REVIEWED      ☒ CONCUR      ☐ SEE COMMENTS      ☒ FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 01/23/2017
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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 CASH MONEY, INC. CASH MONEY PAWN	Street Address 5015 Portsmouth Blvd	City Portsmouth	State VA	Zip Code 23701-	County Portsmouth City	Page 1 of 8 Pages
License/Permit/Registry Number <i>(If any)</i> 154740079F18093		Expiration Date 6/1/2019	Date(s) or Period of Inspection 12/12/2016 through 12/22/2016			

## 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:

The licensee, by and through its agents and employees failed to obtain/execute Form 4473 as indicated by the headings on the form and the instructions on or pertaining to the form, (b)(6) instances cited.

### Date Corrections to be Made:

*(If not corrected immediately)*

### Corrective Action to be Taken:

*(If not corrected immediately)*

Investigator (b)(6) directed the licensee to ensure that an ATF Form 4473 is properly completed before a firearm is transferred to a nonlicensee. Investigator (b)(6) requested that the licensee attempt to correct all ATF Forms 4473 that have errors in Sections A, B, or C. The licensee should contact purchasers and have corrections or additions made to a copy of the purchasers' ATF Forms 4473. The licensee should keep a record of the attempted contact. For any errors that the licensee is able to correct the correction or addition should also be made on a copy. Corrected copies of ATF Forms 4473 should be attached to the originals.

Citation: 27 CFR 478.21(a)

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

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Name of Proprietor CASH MONEY, INC. CASH MONEY PAWN	Street Address 5015 Portsmouth Blvd	City Portsmouth	State VA	Zip Code 23701-	County Portsmouth City	Page 2 of 8 Pages
License/Permit/Registry Number <i>(If any)</i> 154740079F18093		Expiration Date 6/1/2019	Date(s) or Period of Inspection 12/12/2016 through 12/22/2016			

Inspection Results

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

Number: 2

Nature of Violation:  
The licensee, by and through its agents and employees, failed to obtain a properly completed Form 4473 from the transferee prior to making an over-the-counter transfer of a firearm to a non-licensee, ■ instances cited.

Citation: 27 CFR 478.124(c)(1)

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

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

Investigator (b)(6) directed the licensee to ensure that an ATF Form 4473 is properly completed before a firearm is transferred to a nonlicensee. Investigator (b)(6) requested that the licensee attempt to correct all ATF Forms 4473 that have errors in Sections A, B, or C. The licensee should contact purchasers and have corrections or additions made to a copy of the purchasers' ATF Forms 4473. The licensee should keep a record of the attempted contact. For any errors that the licensee is able to correct the correction or addition should also be made on a copy. Corrected copies of ATF Forms 4473 should be attached to the originals.

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ATF E-Form 5030 5  
Revised April 2005

## 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 CASH MONEY, INC. CASH MONEY PAWN	Street Address 5015 Portsmouth Blvd	City Portsmouth	State VA	Zip Code 23701-	County Portsmouth City	Page 3 of 8 Pages
License/Permit/Registry Number <i>(If any)</i> 154740079F18093		Expiration Date 6/1/2019	Date(s) or Period of Inspection 12/12/2016 through 12/22/2016			

### Inspection Results

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

**Number:** 3

**Nature of Violation:**

The licensee, by and through its agents and employees, transferred a firearm to a non-licensee without verifying the identification document presented and noting on the Form 4473 the type of identification used, ■ instance cited.

**Date Corrections to be Made:**

*(If not corrected immediately)*

**Corrective Action to be Taken:**

*(If not corrected immediately)*

Investigator (b)(6) directed the licensee to ensure that an ATF Form 4473 is properly completed before a firearm is transferred to a nonlicensee. Investigator (b)(6) requested that the licensee attempt to correct all ATF Forms 4473 that have errors in Sections A, B, or C. The licensee should contact purchasers and have corrections or additions made to a copy of the purchasers' ATF Forms 4473. The licensee should keep a record of the attempted contact. For any errors that the licensee is able to correct the correction or addition should also be made on a copy. Corrected copies of ATF Forms 4473 should be attached to the originals.

**Citation:** 27 CFR 478.124(c)(3)(i)

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

Instructions

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Name of Proprietor CASH MONEY, INC. CASH MONEY PAWN	Street Address 5015 Portsmouth Blvd	City Portsmouth	State VA	Zip Code 23701-	County Portsmouth City	Page 4 of 8 Pages
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License/Permit/Registry Number (If any) 154740079F18093	Expiration Date 6/1/2019	Date(s) or Period of Inspection 12/12/2016 through 12/22/2016
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Inspection Results

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

Number: 4

Nature of Violation:  
The licensee, by and through its agents and employees, transferred a firearm to a non-licensee without recording required NICS information on the Form 4473, (b)(6) instances cited.

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

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

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

Investigator (b)(6) directed the licensee to ensure that an ATF Form 4473 is properly completed before a firearm is transferred to a nonlicensee. Investigator (b)(6) requested that the licensee attempt to correct all ATF Forms 4473 that have errors in Sections A, B, or C. The licensee should contact purchasers and have corrections or additions made to a copy of the purchasers' ATF Forms 4473. The licensee should keep a record of the attempted contact. For any errors that the licensee is able to correct the correction or addition should also be made on a copy. Corrected copies of ATF Forms 4473 should be attached to the originals.

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ATF E-Form 5030 5  
Revised April 2005

## 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 CASH MONEY, INC. CASH MONEY PAWN	Street Address 5015 Portsmouth Blvd	City Portsmouth	State VA	Zip Code 23701-	County Portsmouth City	Page 5 of 8 Pages
License/Permit/Registry Number <i>(If any)</i> 154740079F18093	Expiration Date 6/1/2019	Date(s) or Period of Inspection 12/12/2016 through 12/22/2016				

### Inspection Results

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

**Number:** 5

**Nature of Violation:**

The licensee, by and through its agents and employees, failed to identify the firearm to be transferred on Form 4473, <sup>(b)(6)</sup> instances cited.

**Date Corrections to be Made:**

*(If not corrected immediately)*

**Corrective Action to be Taken:**

*(If not corrected immediately)*

Investigator <sup>(b)(6)</sup> directed the licensee to ensure that an ATF Form 4473 is properly completed before a firearm is transferred to a nonlicensee. Investigator <sup>(b)(6)</sup> requested that the licensee attempt to correct all ATF Forms 4473 that have errors in Sections A, B, or C. The licensee should contact purchasers and have corrections or additions made to a copy of the purchasers' ATF Forms 4473. The licensee should keep a record of the attempted contact. For any errors that the licensee is able to correct the correction or addition should also be made on a copy. Corrected copies of ATF Forms 4473 should be attached to the originals.

**Citation:** 27 CFR 478.124(c)(4)

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

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License/Permit/Registry Number (If any) 154740079F18093	Expiration Date 6/1/2019	Date(s) or Period of Inspection 12/12/2016 through 12/22/2016
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Inspection Results

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

Number: 6

Nature of Violation:  
The licensee, by and through its agents and employees, failed to sign and date the Form 4473 certifying that the licensee does not know or have reason to believe the transferee is disqualified by law from receiving the firearm described on the Form. instances cited.

Citation: 27 CFR 478.124(c)(5)

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

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

Investigator (b)(6) directed the licensee to ensure that an ATF Form 4473 is properly completed before a firearm is transferred to a nonlicensee. Investigator (b)(6) requested that the licensee attempt to correct all ATF Forms 4473 that have errors in Sections A, B, or C. The licensee should contact purchasers and have corrections or additions made to a copy of the purchasers' ATF Forms 4473. The licensee should keep a record of the attempted contact. For any errors that the licensee is able to correct the correction or addition should also be made on a copy. Corrected copies of ATF Forms 4473 should be attached to the originals.

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ATF E-Form 5030 5  
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## Report of Violations

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License/Permit/Registry Number <i>(If any)</i> 154740079F18093		Expiration Date 6/1/2019	Date(s) or Period of Inspection 12/12/2016 through 12/22/2016			

### Inspection Results

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

**Number:** 7

**Nature of Violation:**

The licensee, by and through its agents and employees, failed to prepare a report of multiple sales or other disposition after the licensee sold or otherwise disposed of, at one time or during five consecutive business days, two or more pistols and/or revolvers to an unlicensed person, [REDACTED] instances.

**Citation:** 27 CFR 478.126(a)

**Date Corrections to be Made:**

*(If not corrected immediately)*

**Corrective Action to be Taken:**

*(If not corrected immediately)*

Investigator (b)(6) directed the licensee to ensure that an ATF Form 3310.4, Report of Multiple Sale or other Disposition of Pistols and Revolvers, is accurately prepared not later than the close of the business day that the multiple sale or other disposition takes place. Investigator (b)(6) also instructed the licensee to prepare the ATF Forms 3310.4 for the [REDACTED] instances cited.

**Number:** 8

**Nature of Violation:**

The licensee, by and through its agents and employees, sold or delivered a firearm to a person the licensee knew or had reasonable cause to believe was subject to Federal firearms disabilities. [REDACTED] instance cited.

**Citation:** 27 CFR 478.99(c)

**Date Corrections to be Made:**

*(If not corrected immediately)*

**Corrective Action to be Taken:**

*(If not corrected immediately)*

Investigator (b)(6) directed the licensee to ensure that forms are thoroughly reviewed before transferring firearms.

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

Instructions

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Name of Proprietor CASH MONEY, INC. CASH MONEY PAWN	Street Address 5015 Portsmouth Blvd	City Portsmouth	State VA	Zip Code 23701-	County Portsmouth City	Page 8 of 8 Pages
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License/Permit/Registry Number <i>(If any)</i> 154740079F18093	Expiration Date 6/1/2019	Date(s) or Period of Inspection 12/12/2016 through 12/22/2016
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Inspection Results

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

Number: 9

Nature of Violation:

The licensee, by and through its agents and employees, failed to timely and/or accurately record the disposition of   firearms and failed to timely and/or accurately record the acquisition of   firearms.

Citation: 27 CFR 478.125(e)

Date Corrections to be Made:

*(If not corrected immediately)*

Corrective Action to be Taken:

*(If not corrected immediately)*

Investigator (b)(6) directed the licensee to ensure that all entries in the A&D book are accurate and timely.

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

Date

Signature and Title of ATF Officer

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Date

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ATF E-Form 5030 5  
Revised April 2005



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives  
1011 Boulder Springs Drive  
Suite 300, Richmond, VA 23225

January 25<sup>th</sup>, 2017

www.atf.gov

Cash Money, Inc.  
T/A Cash Money Pawn  
5015 Portsmouth Blvd.  
Portsmouth, VA 23701

FFL No. 1-54-740-02-9F-18093

Dear Mr. Spencer Hill,

During a recent compliance inspection at your firearms business covering the audit review period 5/5/2016 through 12/12/2016 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) 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 that Cash Money Pawn achieves future compliance.

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

Sincerely yours,

(b)(6)

(b)(6), Area Supervisor

Enclosure

cc: Federal Firearms Licensing Center  
Richmond Area Office  
March 11 2019 Document Production

# FIREARMS INSPECTION REPORT

**Name:** Cash Money Inc.  
**Trade Name:** Cash Money Pawn

**UI#:** 768035-2017-0089  
**FFL#:** 1-54-740-02-9F-18093

**Address:** 5015 Portsmouth Blvd.  
Portsmouth, VA 23701

## 1 – Introduction

### Inspection Profile:

On December 12, 2016, ATF Industry Operations Investigator (IOI) (b)(6) conducted a full DE firearms inspection at Cash Money Inc. d/b/a Cash Money Pawn. This inspection was a follow up to a theft/loss that occurred on approximately 12/02/2016 and was reported to ATF on 12/09/2016.

Investigator (b)(6) interviewed Spencer Hill, owner and responsible person, and Sara Douros, Pawn Broker and Responsible Person at the licensed premises. On December 9, 2016, Mr. Hill contacted Investigator (b)(6) to notify her of a theft in the store. At that time, Investigator (b)(6) notified the licensee that she may come to verify the inventory as a result of the theft. Area Supervisor (b)(6) later recommended conducting a full inspection because the license was fairly new and had not yet been inspected. The inspection period covered 05/05/2016 (the date the license was originally issued) to 12/12/2016. IOIs (b)(6) and (b)(6) assisted with the inspection.

### Business Profile:

Cash Money Inc. is licensed as a Pawnbroker in Firearms other than Destructive Devices (02). The licensee operates from a commercially zoned store front in an urban area of Portsmouth, Virginia.

In the last 12 months, the licensee acquired approximately (b)(4) firearms (approximately (b)(4) handguns and (b)(4) long guns) and disposed of approximately (b)(4) firearms. The licensee conducts only retail sales and no wholesales. In the last 12 months the licensee sold or transferred approximately (b)(4) % new firearms and approximately (b)(4) % used firearms.

The licensee's primary suppliers include (b)(4). The licensee does not conduct firearm sales at gun shows or on the internet. The licensee has a website with store information - [www.cashmoneypawn.com](http://www.cashmoneypawn.com). The licensee also has a store page on Facebook - [www.facebook.com/CashMoneyPawn/](https://www.facebook.com/CashMoneyPawn/). Neither site directly offers firearms for sale.

There are no other businesses on the premises; however, the licensee does deal in electronics, jewelry and other items associated with the pawn industry. The

# FIREARMS INSPECTION REPORT

**Name:** Cash Money Inc.  
**Trade Name:** Cash Money Pawn

**UI#:** 768035-2017-0089  
**FFL#:** 1-54-740-02-9F-18093

licensee does not hold any other ATF licenses. The licensee is in compliance with state and local licenses and zoning requirements. The licensee's Federal Firearms License was issued on 05/05/2016 and it expires on 06/01/2019. The licensee does not maintain any off-site storage.

(b)(3) Pub law 112-55 125 Stat. 552

. Most firearms are kept in locked cabinets during business hours and in safes after closing. The licensee immediately contacted the local police and provided them with surveillance video. The licensee attempted to contact ATF, but stated that he did not leave a message on the hotline number. The licensee then contacted Investigator (b)(6) as he was completing an ATF Form 3310.11. Investigator (b)(6) reminded the licensee that notice must be made to ATF within 48 hours of the discovery of a theft or loss. SEE ATTACHMENT #1- Theft Loss Report # (b)(3) Pub law 112-55 125 Stat. 552

## Ownership and Control:

Cash Money, Inc is a corporation, certified by the Virginia State Corporation Commission. Investigator (b)(6) verified through the Virginia State Corporation Commission website that Cash Money, Inc. is properly registered in the Commonwealth of Virginia. Mr. Hill stated that there have been no changes in ownership or control.

Investigator (b)(6) did not disclose any indications of hidden ownership. All responsible persons are correctly shown in the Federal Licensing System database.

## Variance:

The licensee does not have any ATF approved variances. Investigator (b)(6) reviewed ATF Ruling 2016-1 for computerized A&D records.

## 2 - Recommendation

Viols WL ONLY and No Recall Inspection

Investigator (b)(6) recommends that a Warning Letter be issued to the licensee based upon ATF Form 4473, Multiple Sale Report, and conduct of business violations. The licensee failed to record a purchaser's ID in (b)(3) Pub law 112-55 instances, failed to file a Multiple Sale Report in (b)(3) Pub law 112-55 instances, and transferred a firearm to a purchaser who indicated that he was prohibited (but was not prohibited) in (b)(3) Pub law 112-55 instance.

# FIREARMS INSPECTION REPORT

**Name:** Cash Money Inc.  
**Trade Name:** Cash Money Pawn

**UI#:** 768035-2017-0089  
**FFL#:** 1-54-740-02-9F-18093

## 3 - Inspection History

**Date of Inspection:** March 14, 2016, IOI (b)(6)  
**Type of Inspection:** New Application, Type 02  
**UI#:** 768035-2016-0173  
**Inspection Results:** Application Approved  
**Cited Violations:** N/A

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

On Monday, December 12, 2016, Investigators (b)(6) and (b)(6) conducted a full inventory verification. There were (b)(3) Pub law 112-55 125 Stat. 552) open disposition entries in the A&D book and one hundred ninety-six (196) firearms in the inventory. Investigator (b)(6) examined the A&D Book and determined that the records were in the proper format. All firearms in the inventory were compared to the open entries in the A&D record. Investigator (b)(6) found that the licensee had recorded the wrong serial number (1 digit wrong or missing) in the A&D record for (b)(3) Pub law 112-55) firearms. The licensee also failed to timely record the disposition of (b)(3) Pub law 112-55) firearms and failed to timely record the acquisition of (b)(3) Pub law 112-55) firearm following an error in labelling the firearm.

Firearms in A&D record- (b)(3) Pub law 112-55)  
Late Acquisitions- (b)(3) Pub law 112-55)  
Late Dispositions- (b)(3) Pub law 112-55)  
Stolen firearm- (b)(3) Pub law 112-55)  
Firearms in inventory- 196

Investigators (b)(6) and (b)(6) traced (b)(3) A&D disposition entries to ATF Forms 4473 and (b)(3) ATF Forms 4473 to their disposition entries. They determined that the licensee had recorded the incorrect disposition information for (b)(3) Pub law 112-55) firearms. In all instances, the address was incorrect and in (b)(3) Pub law 112-55) of those instances, the name was also incorrect. The licensee stated that his A&D record automatically completes the address field if the customer's information has been previously entered. Investigator (b)(6) directed the licensee to ensure that all information is current and correct. Investigator (b)(6) cited the licensee for the following violations:

**27 CFR 478.125(e)-** The licensee, by and through its agents and employees, failed to timely and/or accurately record the disposition of (b)(3) firearms and failed to timely and/or accurately record the acquisition of (b)(3) firearms.

**SEE WORKSHEET #1**

# FIREARMS INSPECTION REPORT

**Name:** Cash Money Inc.  
**Trade Name:** Cash Money Pawn

**UI#:** 768035-2017-0089  
**FFL#:** 1-54-740-02-9F-18093

Investigators found no additional missing or stolen firearms as a result of the inventory verification or inspection. Mr. Hill prepared a Theft/Loss Form and forwarded it to ATF on 12/9/16. **SEE ATTACHMENT #1- Theft Loss Report #** [REDACTED] (b)(3) Pub law 112-55 125 Stat. 552

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

The licensee completed (b)(3) Pub law 112-55 125 Stat. 552) ATF Forms 4473 for this inspection period (5/5/2016 – 12/12/2016). IOIs (b)(6) reviewed all of the forms for errors.

Investigator (b)(6) determined that the licensee failed to properly complete ATF Forms 4473 with a total of (b)(3) Pub law 112-55 125 Stat. 552 instances. Investigator (b)(6) cited the licensee for the following violations:

**#1 - 27 CFR 478.21(a)** - The licensee, by and through its agents and employees failed to obtain/execute Form 4473 as indicated by the headings on the form and the instructions on or pertaining to the form, (b)(3) Pub instances cited.

**#2 - 27 CFR 478.124(c)(1)** - The licensee, by and through its agents and employees, failed to obtain a properly completed Form 4473 from the transferee prior to making an over-the-counter transfer of a firearm to a non-licensee, [REDACTED] instances cited.

**#3 – 27 CFR 478.124(c)(3)(i)** - The licensee, by and through its agents and employees, transferred a firearm to a non-licensee without verifying the identification document presented and noting on the Form 4473 the type of identification used, <sup>(b)(7)(D)</sup> instances cited.

**#4 – 27 CFR 478.124(c)(3)(iv)** - The licensee, by and through its agents and employees, transferred a firearm to a nonlicensee without recording required NICS information on the Form 4473, [REDACTED] instances cited.

**#5 – 27 CFR 478.124(c)(4)** - The licensee, by and through its agents and employees, failed to identify the firearm to be transferred on Form 4473, <sup>(b)</sup> instance cited.

**#6 – 27 CFR 478.124(c)(5)** - The licensee, by and through its agents and employees, failed to sign and date the Form 4473 certifying that the licensee does not know or have reason to believe the transferee is disqualified by law from receiving the firearm described on the Form. (b)(3) instances cited.

**#7 – 27 CFR 478.126a** – The licensee, by and through its agents and employees, failed to prepare a report of multiple sales or other disposition after the licensee sold or

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otherwise disposed of, at one time or during five consecutive business days, two or more pistols and/or revolvers to an unlicensed person, (b)(3) instances.

**#8 – 27 CFR 478.99(c)** - The licensee, by and through its agents and employees, sold or delivered a firearm to a person the licensee knew or had reasonable cause to believe was subject to Federal firearms disabilities, (b)(3) instance cited.

## **SEE WORKSHEET #2 & REPORT OF VIOLATIONS**

### **6 - Multiple Sales**

Investigator (b)(6) queried eTrace for Cash Money, Inc. and determined that there were no multiple handgun sales reported by the licensee during the inspection period. Investigator (b)(6) determined that the licensee failed to report multiple sales in (b)(3) Pub law instances, involving (b)(3) Pub law 112-55 125 Stat. 552 handguns. Investigator (b)(6) directed the licensee to submit the Multiple Sale form and cited them for the following violation:

**27 CFR 478.126a** -The licensee, by and through its agents and employees, failed to timely and accurately report the sale or other disposition of two or more pistols and/or revolvers to an unlicensed person, (b)(3) instances cited.

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

Investigator (b)(6) examined the licensee's records to determine if any trafficking or straw purchase indicators were present and did not find any suspicious activity.

On 12/13/16, Investigator (b)(6) completed criminal history checks for three individual purchasers and four responsible persons (one had been deactivated). The results indicated no conditions prohibiting persons from possessing a firearm. Investigator (b)(6) administered a total of (b)(3) Pub law 112-55 125 Stat. 552 criminal history checks for all individuals during this investigation including responsible persons.

### **8 - Trace Activity**

Investigator (b)(6) queried eTrace and determined that there was (b)(3) Pub trace associated with the licensee for the life of the license. Investigator (b)(6) determined that the licensee acquired approximately (b)(3) Pub law 112-55 125 Stat. 552 and disposed of approximately (b)(3) Pub law 112-55 125 Stat. 552 used firearms during the inspection period. Investigator (b)(6) queried (b)(3) Pub law 112-55 125 Stat. 552 used firearms in Openfox and eTrace, and found that none had been traced or reported as stolen.

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## 9 - NFA/Importer/Collector/Manufacturer

Cash Money, Inc. is not engaged in the business of dealing in NFA weapons, manufacturing, or importing firearms.

## 10 - Referrals

Investigator (b)(6) did not generate or forward any referrals of information.

## 11 - Other

Investigator (b)(6) provided Mr. Hill with a current list of ATF phone numbers and addresses. Investigator (b)(6) answered all questions Mr. Hill had during the investigation. She advised him to call ATF if he had any questions in the future. The licensee is properly displaying a Youth Handgun Safety Act poster and providing secure gun storage with every handgun transferred.

## 12 - Closing Actions

Investigator (b)(6) held a closing conference with Mr. Spencer Hill on December 22, 2016. Investigator (b)(6) reviewed the Acknowledgement of Federal Firearms Regulations and Mr. Hill signed it verifying that Investigator (b)(6) had explained all the information. SEE EXHIBIT #1. Investigator (b)(6) also issued a Report of Violations to the licensee. Investigator (b)(6) explained the violations and how to prevent the violations in the future. Mr. Hill stated that he understood and signed the Report of Violations. SEE REPORT OF VIOLATIONS.

## 13 - Violations

### 1.) 27 CFR 478.21(a)

#### Nature of Violation:

The licensee, by and through its agents and employees failed to obtain/execute Form 4473 as indicated by the headings on the form and the instructions on or pertaining to the form, (b)(6) instances cited.

#### Licensee's Response:

In addition to other errors, the licensee failed to stamp the name, address, and license number on almost every ATF Form 4473 completed. The licensee immediately ordered a stamp and corrected the error. He stated that he misunderstood the form and thought that the information was

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optional. The licensee stated that he has had some challenges learning all of the required paperwork and conduct of business regulations during the first few months of business. He stated that he will review all violations, discuss them with his employees, and ensure that records are properly completed in the future.

### **Corrective Action:**

Investigator (b)(6) directed the licensee to ensure that an ATF Form 4473 is properly completed before a firearm is transferred to a nonlicensee. Investigator (b)(6) requested that the licensee attempt to correct all ATF Forms 4473 that have errors in Sections A, B, or C. The licensee should contact purchasers and have corrections or additions made to a copy of the purchasers' ATF Forms 4473. The licensee should keep a record of the attempted contact. For any errors that the licensee is able to correct the correction or addition should also be made on a copy. Corrected copies of ATF Forms 4473 should be attached to the originals.

### **SEE WORKSHEET #2 and REPORT OF VIOLATIONS**

#### **2.) 27 CFR 478.124(c)(1)**

### **Nature of Violation:**

The licensee, by and through its agents and employees, failed to obtain a properly completed Form 4473 from the transferee prior to making an over-the-counter transfer of a firearm to a non-licensee, (b)(6) instances cited.

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

The licensee stated that he has had some challenges learning all of the required paperwork and conduct of business regulations during the first few months of business. He stated that he will review all violations, discuss them with his employees, and ensure that records are properly completed in the future.

### **Corrective Action:**

Investigator (b)(6) directed the licensee to ensure that an ATF Form 4473 is properly completed before a firearm is transferred to a nonlicensee. Investigator (b)(6) requested that the licensee attempt to correct all ATF Forms 4473 that have errors in Sections A, B, or C. The licensee should

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contact purchasers and have corrections or additions made to a copy of the purchasers' ATF Forms 4473. The licensee should keep a record of the attempted contact. For any errors that the licensee is able to correct the correction or addition should also be made on a copy. Corrected copies of ATF Forms 4473 should be attached to the originals.

### **SEE WORKSHEET #2 and REPORT OF VIOLATIONS**

#### **3.) 27 CFR 478.124(c)(3)(i)**

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

The licensee, by and through its agents and employees, transferred a firearm to a non-licensee without verifying the identification document presented and noting on the Form 4473 the type of identification used, [REDACTED] instance cited.

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

The licensee stated that he has had some challenges learning all of the required paperwork and conduct of business regulations during the first few months of business. He stated that he will review all violations, discuss them with his employees, and ensure that records are properly completed in the future.

##### **Corrective Action:**

Investigator (b)(6) directed the licensee to ensure that an ATF Form 4473 is properly completed before a firearm is transferred to a nonlicensee. Investigator (b)(6) requested that the licensee attempt to correct all ATF Forms 4473 that have errors in Sections A, B, or C. The licensee should contact purchasers and have corrections or additions made to a copy of the purchasers' ATF Forms 4473. The licensee should keep a record of the attempted contact. For any errors that the licensee is able to correct the correction or addition should also be made on a copy. Corrected copies of ATF Forms 4473 should be attached to the originals.

### **SEE WORKSHEET #2 and REPORT OF VIOLATIONS**

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**4.) 27 CFR 478.124(c)(3)(iv)**

**Nature of Violation:**

The licensee, by and through its agents and employees, transferred a firearm to a non-licensee without recording required NICS information on the Form 4473, [REDACTED] instances cited.

**Licensee's Response:**

The licensee stated that he has had some challenges learning all of the required paperwork and conduct of business regulations during the first few months of business. He stated that he will review all violations, discuss them with his employees, and ensure that records are properly completed in the future.

**Corrective Action:**

Investigator (b)(6) directed the licensee to ensure that an ATF Form 4473 is properly completed before a firearm is transferred to a nonlicensee. Investigator (b)(6) requested that the licensee attempt to correct all ATF Forms 4473 that have errors in Sections A, B, or C. The licensee should contact purchasers and have corrections or additions made to a copy of the purchasers' ATF Forms 4473. The licensee should keep a record of the attempted contact. For any errors that the licensee is able to correct the correction or addition should also be made on a copy. Corrected copies of ATF Forms 4473 should be attached to the originals.

**SEE WORKSHEET #2 and REPORT OF VIOLATIONS**

**5.) 27 CFR 478.124(c)(4)**

**Nature of Violation:**

The licensee, by and through its agents and employees, failed to identify the firearm to be transferred on Form 4473, [REDACTED] instances cited.

**Licensee's Response:**

The licensee stated that he has had some challenges learning all of the required paperwork and conduct of business regulations during the first few months of business. He stated that he will review all violations,

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discuss them with his employees, and ensure that records are properly completed in the future.

### **Corrective Action:**

Investigator (b)(6) directed the licensee to ensure that an ATF Form 4473 is properly completed before a firearm is transferred to a nonlicensee. Investigator (b)(6) requested that the licensee attempt to correct all ATF Forms 4473 that have errors in Sections A, B, or C. The licensee should contact purchasers and have corrections or additions made to a copy of the purchasers' ATF Forms 4473. The licensee should keep a record of the attempted contact. For any errors that the licensee is able to correct the correction or addition should also be made on a copy. Corrected copies of ATF Forms 4473 should be attached to the originals.

### **SEE WORKSHEET #2 and REPORT OF VIOLATIONS**

#### **6.) 27 CFR 478.124(c)(5)**

### **Nature of Violation:**

The licensee, by and through its agents and employees, failed to sign and date the Form 4473 certifying that the licensee does not know or have reason to believe the transferee is disqualified by law from receiving the firearm described on the Form, (b)(6) instances cited.

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

The licensee stated that he has had some challenges learning all of the required paperwork and conduct of business regulations during the first few months of business. He stated that he will review all violations, discuss them with his employees, and ensure that records are properly completed in the future.

### **Corrective Action:**

Investigator (b)(6) directed the licensee to ensure that an ATF Form 4473 is properly completed before a firearm is transferred to a nonlicensee. Investigator (b)(6) requested that the licensee attempt to correct all ATF Forms 4473 that have errors in Sections A, B, or C. The licensee should contact purchasers and have corrections or additions made to a copy of the purchasers' ATF Forms 4473. The licensee should keep a record of the

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attempted contact. For any errors that the licensee is able to correct the correction or addition should also be made on a copy. Corrected copies of ATF Forms 4473 should be attached to the originals.

### **SEE WORKSHEET #2 and REPORT OF VIOLATIONS**

**7.) 27 CFR 478.126(a)**

**Nature of Violation:**

The licensee, by and through its agents and employees, failed to prepare a report of multiple sales or other disposition after the licensee sold or otherwise disposed of, at one time or during five consecutive business days, two or more pistols and/or revolvers to an unlicensed person, [REDACTED] instances.

**Licensee's Response:**

The licensee stated that he was unaware of the requirement to complete a multiple sale form if the sales occurred on different days. He stated that he will submit the Multiple Sales Forms immediately.

**Corrective Action:**

Investigator (b)(6) directed the licensee to ensure that an ATF Form 3310.4, Report of Multiple Sale or other Disposition of Pistols and Revolvers, is accurately prepared not later than the close of the business day that the multiple sale or other disposition takes place. Investigator (b)(6) also instructed the licensee to prepare the ATF Forms 3310.4 for the [REDACTED] instances cited.

### **SEE WORKSHEET #2 and REPORT OF VIOLATIONS**

**8.) 27 CFR 478.99(c)**

**Nature of Violation:**

The licensee, by and through its agents and employees, sold or delivered a firearm to a person the licensee knew or had reasonable cause to believe was subject to Federal firearms disabilities. [REDACTED] instance cited.

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

The licensee stated that he missed the "Yes" answer on this form. Mr. Hill stated that he knows that he must stop any sale in which a purchaser appears to be prohibited. He stated that he will discuss all violations with his employees and ensure that records are properly completed in the future.

### **Corrective Action:**

Investigator (b)(6) directed the licensee to ensure that forms are thoroughly reviewed before transferring firearms.

### **SEE WORKSHEET #2 and REPORT OF VIOLATIONS**

#### 9.) 27 CFR 478.125(e)

### **Nature of Violation:**

The licensee, by and through its agents and employees, failed to timely and/or accurately record the disposition of (b)(6) firearms and failed to timely and/or accurately record the acquisition of (b)(6) firearms.

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

The licensee stated that his computerized A&D record automatically completes fields (specifically the address) for any customer who is already in the system. He stated that he will ensure that records are properly completed in the future.

### **Corrective Action:**

Investigator (b)(6) directed the licensee to ensure that all entries in the A&D book are accurate and timely.

### **SEE WORKSHEET #1 and REPORT OF VIOLATIONS**

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X

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Industry Operations Investigator

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### **II. Worksheets:**

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