

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Dragon Fire Armory, LLC None 3220 Dundee Road Suite 3236 Winter Haven, FL 33884, Polk		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 767035-2017-0125-B1B	
		3. PERMIT/LICENSE NUMBER 159105078F16277	4a. TARGET DATE 6/8/2017
		4b. TARGET HOURS	
6. ATF OFFICER(S) ASSIGNED (b)(6) I - Lead Investigator		5. REQUESTED BY (SIGNATURE, TITLE AND DATE) (b)(6), Area Supervisor, 03/08/2017	
7. ASSIGNED BY (SIGNATURE, TITLE AND DATE) (b)(6) Area Supervisor, 03/08/2017			
8. PURPOSE/SPECIAL INSTRUCTIONS DE COMPLIANCE INSPECTION (Type 07). Determine if licensee deals at gun shows, over the Internet or in NFA weapons. Obtain GPS coordinates, photos and emergency contact information. Query NForce for any criminal enforcement (CE) investigations involving the FFL.			
9. INSPECTION RESULTS		10. TRAVEL EXPENSES (OPTIONAL)	
<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC			
NO. OF VIOLATIONS	10	NO. OF REFERRALS	2111 - PER DIEM
NO. OF TECS CHECKS	13	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 7/13/2017 Investigator (b)(6) recommends Violations, Warning Letter Only, No Recall Inspection. Investigator (b)(6) recommends the FFLC update the home address for David Harris, Manager/Responsible Person, to (b)(6) Viols WL ONLY and No Recall Inspection			
12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)			
APR 2017		4.00	
JUN 2017		64.00	
JUL 2017		5.00	
ATF OFFICER'S SUBTOTAL		73.00	ATF OFFICER'S SIGNATURE
TOTAL HOURS		73.00	
13. REVIEW AND ROUTING			
REVIEW COMMENTS AND RECOMMENDATION Viols WL ONLY and No Recall Inspection			
<input checked="" type="checkbox"/> REVIEWED <input checked="" type="checkbox"/> CONCUR <input type="checkbox"/> SEE COMMENTS <input checked="" type="checkbox"/> FINAL DISPOSITION			
SIGNATURE AND TITLE (b)(6) - Area Supervisor		REVIEW DATE 07/14/2017 <small>Digitally signed by (b)(6) Date: 2017.07.14 13:59:09 -04'00'</small>	

Assignment and Report

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	3. PERMIT/LICENSE NUMBER 159105078F16277	4a. TARGET DATE 6/8/2017	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE) (b)(6), Area Supervisor, 03/08/2017		

ROUTING SEQUENCE AND DATE

<input type="checkbox"/> 1.	_____
<input type="checkbox"/> 2.	_____
<input type="checkbox"/> 3.	_____
<input type="checkbox"/> 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 Dragon Fire Armory, LLC None	Street Address 3220 Dundee Road Suite 3236	City Winter Haven	State FL	Zip Code 33884-	County Polk	Page 1 of 6 Pages
License/Permit/Registry Number <i>(If any)</i> 159105078F16277		Expiration Date 6/1/2018		Date(s) or Period of Inspection 06/14/2016 through 06/27/2016		

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:

On (b)(3) occasions, the licensee failed to record the acquisition of a firearm prior to inspection.

Citation: 27 CFR 478.123(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee recorded the acquisition of the (b)(3) firearms into the A&D Record Books. The regulation was reviewed with the licensee.

Number: 2

Nature of Violation:

On (b)(3) 112 Public occasion, the licensee could not account for a firearm, which was reported as a theft/loss to ATF and to local authorities.

Citation: 27 CFR 478.123(d)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee completed and submitted a Federal Firearms Licensee Firearms Inventory Theft/Loss Report (ATF F 3310.11) for the unaccounted firearm. The licensee reported the firearm as a theft/loss to local authorities and ATF. The licensee logged the unaccounted firearm out of the A&D Record Book referencing the ATF issued incident number.

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Name of Proprietor Dragon Fire Armory, LLC None	Street Address 3220 Dundee Road Suite 3236	City Winter Haven	State FL	Zip Code 33884-	County Polk	Page 2 of 6 Pages
License/Permit/Registry Number (if any) 159105078F16277		Expiration Date 6/1/2018	Date(s) or Period of Inspection 06/14/2016 through 06/27/2016			

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:

On (b)(3) 112 Pub ATF F 4473s, the licensee failed to ensure Item #s: 10a, 30a, 31, 32 and/or 33 were properly completed, as follows:

• In (b)(3) 112 Pub instance, Item #10 (Ethnicity) was blank. (2012 Edition)

• In (b)(3) 112 Pub instances, Item #30a (Total Number of Firearms) was blank. (2012 Edition)

• In (b)(3) 112 Pub instances, Item #31 (FFL Trade/Corporate Name and Address) was blank. (2012 Edition)

• In (b)(3) 112 Pub instances, Item #32 (FFL Number) was blank. (2012 Edition)

On one (1) occasion, the licensee failed to timely complete and submit the 2016 Annual Firearms Manufacturing and Exportation Report (AFMER).

Citation: 27 CFR 478.21(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee made a copy of each ATF F 4473, and made corrections for all applicable Items in Section B, C and D. For errors in Section A, the licensee was advised they could attempt to contact the purchaser and ask them to make the applicable correction(s) to the copy of the ATF F 4473.

The licensee completed and submitted an ATF Form 5300.11, Annual Firearms Manufacturing and Exportation Report (AFMER), for calendar year 2016.

The regulations were reviewed with the licensee.

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License/Permit/Registry Number (if any) 159105078F16277		Expiration Date 6/1/2018	Date(s) or Period of Inspection 06/14/2016 through 06/27/2016			

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:

On (b)(3) 112 Pub ATF F 4473, the licensee failed to ensure Item #3 was properly completed, as follows:

• In (b)(3) 112 Pub instance, Item #3 (Place of Birth) had an error. The purchaser recorded the City where they were born, but not the State. (2012 Edition)

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)

The licensee was advised they could attempt to contact the customer and ask them to make the applicable correction on a copy of the ATF F 4473. The regulation was reviewed with the licensee.

Number: 5

Nature of Violation:

On (b)(3) 112 Pub ATF F 4473, the licensee failed to properly complete Item #20a, as follows:

• In (b)(3) 112 Pub instance, Item #20a (Identification) had an error. The licensee recorded the type of identification and expiration date, but not the number on the identification. (2012 Edition)

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

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee was advised they could attempt to contact the customer and ask them to provide the document identification number. The regulation was reviewed with the licensee.

Report of Violations

Instructions

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Name of Proprietor Dragon Fire Armory, LLC None	Street Address 3220 Dundee Road Suite 3236	City Winter Haven	State FL	Zip Code 33884-	County Polk	Page 4 of 6 Pages
License/Permit/Registry Number (If any) 159105078F16277		Expiration Date 6/1/2018	Date(s) or Period of Inspection 06/14/2016 through 06/27/2016			

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:

On (b)(3) 112 Pub ATF F 4473, the licensee failed to complete Item # 21a and Item # 21c as follows:

• In (b)(3) 112 Pub instance Item # 21a (Date the transferee's identifying information in Section A was transmitted to NICS or the appropriate State agency) was blank. (2012 Edition)

• In (b)(3) 112 Pub instance Item #21c (The response initially provided by NICS or the appropriate State agency was:) was blank. (2012 Edition)

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

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken: The licensee made a copy of the ATF F 4473, and made the applicable corrections to the copy. The regulation was reviewed with the licensee.

(If not corrected immediately)

Number: 7

Nature of Violation:

On (b)(3) 112 Pub ATF F 4473, the licensee failed to complete Item #27, as follows:

• In (b)(3) 112 Pub instance, Item #27 (Model) was blank. (2012 Edition)

Citation: 27 CFR 478.124(c)(4)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken: The licensee made a copy of the ATF F 4473, and made the applicable correction to the copy. The regulation was reviewed with the licensee.

(If not corrected immediately)

Report of Violations

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Name of Proprietor Dragon Fire Armory, LLC None	Street Address 3220 Dundee Road Suite 3236	City Winter Haven	State FL	Zip Code 33884-	County Polk	Page 5 of 6 Pages
License/Permit/Registry Number (If any) 159105078F16277		Expiration Date 6/1/2018	Date(s) or Period of Inspection 06/14/2016 through 06/27/2016			

Inspection Results

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

Number: 8

Nature of Violation:

On (b)(3) 112 Public ATF F 4473, the licensee failed to properly complete Item #36, as follows:

• In (b)(3) 112 Public instance, Item #36 (Date Transferred) had an error. The licensee recorded (b)(3) 112 Public dates in this box. The first date was the date the FDLE background check was completed. The second date was the date the actual transfer took place. (2012 Edition)

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)

The licensee made a copy of the ATF F 4473, and made the applicable correction to the copy. The regulation was reviewed with the licensee.

Number: 9

Nature of Violation:

On (b)(3) 112 Public ATF F 4473, the licensee failed to initiate a new FDLE check after 30 days. In this instance, the FDLE check was conducted on 6/24/16, and the firearm was transferred to the individual on 9/30/16. (2012 Edition)

Citation: 27 CFR 478.102(c)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The regulation was reviewed with the licensee. No other corrective action could be taken by the licensee.

Number: 10

Nature of Violation:

The licensee failed to retain (b)(3) 112 Public ATF F 4473. (2012 Edition)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

No correction action could be taken. The licensee could not locate the corresponding ATF F 4473. The regulation was reviewed with the licensee.

Report of Violations

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License/Permit/Registry Number (if any) 159105078F16277	Expiration Date 6/1/2018	Date(s) or Period of Inspection 06/14/2016 through 06/27/2016				

Inspection Results

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

Citation: 27 CFR 478.129(b)

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

David A. Hines, owner-Manager

Date 6/27/17

Signature and Title of ATF Officer

(b)(6)

IOI

Date 6/27/17



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Tampa Field Division

Tampa, Florida 33602

www.atf.gov

767035: (b)(6)
5370

July 14, 2017

WARNING LETTER

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Dragon Fire Armory, LLC
3220 Dundee Road, Suite 3236
Winter Haven, Florida 33884

Re: Federal Firearms License Number: 1-59-105-07-8F-16277

Dear Mr. Harris

During a recent compliance inspection at your firearms business covering the period of inspection of June 14, 2016 through June 13, 2017, you were cited for violations of 27 Code of Federal Regulations, Part 478. The violations were discussed with you during the inspection. A copy of the Report of Violations, ATF 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 efforts 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.

Dragon Fire Armory, LLC
Federal Firearms License Number: 1-59-105-07-8F-16277

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

Sincerely,

(b)(6)

Area Supervisor

cc: Federal Firearms Licensing Center
Tampa II Area Office

Attachment

FIREARMS INSPECTION REPORT

Name: Dragon Fire Armory, LLC
Trade Name: None

UI#: 767035-2017-0125-B1B
FFL#: 1-59-105-07-8F-16277

Address: 3220 Dundee Road, Suite 3236
Winter Haven, Florida 33884 (Polk County)

1 - Introduction

Inspection Profile

On June 14, 2017, ATF Industry Operations Investigator (b) (6) hereafter referred to as 'Investigator' unless mentioned by name) initiated a firearms compliance inspection for Dragon Fire Armory, LLC. Investigator (b) (6) interviewed Mr. David Harris, Manager, Dragon Fire Armory, LLC (who may hereafter be referred to by name or as 'licensee'). The period of inspection covered 6/14/16 to 6/13/17. The inventory and records review were conducted on 6/14/17, 6/15/17, 6/20/17, and 6/27/17. The last records review, as well as the closing conference (to include the issuance of the Report of Violations) and regulation review, was completed on 6/27/17. The scope of this inspection was a DE compliance inspection of a Type 07, Manufacturer of Firearms, Federal Firearms License. Investigator (b) (6) did not provide the licensee with advance notification.

Business Profile

Dragon Fire Armory, LLC, is licensed by the Bureau of Alcohol, Tobacco, Firearms and Explosives as a Type 07, Manufacturer of Firearms, Federal Firearms Licensee. The license was originally issued on 5/2/2012. The licensee does not hold any other ATF licenses or permits.

The licensee's business profile includes the following:

- (b) (4) GCA firearms (b) (4) NFA weapons
- (b) (4) new firearm (b) (4) used firearms
- (b) (4) long guns (b) (4) handguns
- (b) (4) retail sales at business premise (b) (4) internet transfers (b) (4) gun show transfers

b3 Public Law 112-55 (125 Stat. 552), (b) (4)

Dragon Firearm Armory, LLC. Dragon Firearm Armory, LLC sells some of the receivers to non-licensees (in the same configure as originally manufactured) and manufactures some of them into other firearms such as rifles and NFA weapons.

The licensee does not gunsmith, reload ammunition or deal in black powder.

FIREARMS INSPECTION REPORT

Name: Dragon Fire Armory, LLC
Trade Name: None

UI#: 767035-2017-0125-B1B
FFL#: 1-59-105-07-8F-16277

The licensee's primary suppliers are (b) (4)

(b) (4)

During the last 12 months, the licensee acquired approximately (b) (4) firearms and disposed of approximately (b) (4) firearms. These numbers are inclusive of the NFA Inventor (b) (4) FA weapon acquired and (b) (4) NFA weapon disposed of during the inspection period).

The licensee had their FFL posted at the business premise. The licensee also has the following:

- 2017 Florida Resales Certificate (b) (6)
- 2017 Polk County Local Business Tax Receipt (b) (6)
- 2017 Special Tax Stamp, Control Number (b)(3)-(26 USC 6103)

The licensee is not currently registered with the Directorate of Defense Trades Control (DDTRC). Mr. Harris stated that he did not think he needed to register with them because of their variance for another FFL to manufacture and mark their receivers. Investigator (b) (6) instructed the licensee to contact the State Department to verify if they were required to be registered as a Type 07, Manufacturer of Firearms. On 6/27/17, (b) (6) sent an e-mail to the DDTRC Response Team notifying them that they hold a Type 07 FFL and to verify if they were required to be registered with them. Mr. Harris stated he would comply with the State Department regulations and would register with the DDTRC if they instructed him to do so. As of 6/30/17, the licensee had not received a response back from the DDTRC.

The business premise is a commercial storefront located in a small strip shopping center in a rural area of Winter Haven, Florida (Polk County). The licensee rents the business premise. The business premise has an alarm system, secure locks on the doors and a gun safe. During the day, the firearms are displayed on wall racks and in glass display cases. At night, the licensee stores the firearms in a safe located in the back room of the business premise. Mr. Harris occasionally stores firearms off-site at his residence (b) (6) (b) (6) and/or his (b) (6) (b) (6) who also works at the store.

Ownership and Control

Dragon Fire Armory, LLC is a Limited Liability Company and is properly registered with the Florida Department of State, Division of Corporation. David Harris, and his (b) (6) are both listed as Managers on the corporate documents. David Harris is the only Responsible Person on the

FIREARMS INSPECTION REPORT

Name: Dragon Fire Armory, LLC
Trade Name: None

UI#: 767035-2017-0125-B1B
FFL#: 1-59-105-07-8F-16277

FFL. Mr. Harris explained that (b) (6) assists with the paperwork, but does not have any authority or control as it pertains to the firearms. Mr. Harris provided Investigator (b) (6) with a document titled "Limited Power to Act on Behalf of Dragon Fire Armory, LLC, Delegation of Authority Pertaining to Firearms" which was previously provided to ATF during a prior application inspection. This document outlines that, as a result of a Board Members Meeting, all authority to direct or cause the direction of the management, policies, and practices of the corporation, insofar as they pertain to firearms, are delegated to David Harris. Furthermore, it outlines that (b) (6) does not have any authority over the firearms (**Exhibit 1**). Mr. Harris stated that he does not have any other Responsible Persons on the license and does not want to add any to the FFL.

Mr. Harris stated that there have not been any unreported changes to the ownership or control of the business and Investigator (b) (6) did not discover any evidence of hidden ownership.

Mr. Harris reviewed the information on the FLS printout. Mr. Harris said that he now resides at (b) (6) a different address than what is listed on the FLS printout. Mr. Harris provided Investigator (b) (6) a letter requesting the FFLC update all applicable records to reflect his new home address (**Exhibit 1A**). Therefore, as part of the recommendation for this assignment, Investigator (b) (6) commended the FFLC update the home address they have on file for Mr. Harris.

Investigator (b) (6) conducted Openfox/NCIC checks on David Alan Harris. No prohibiting factors were disclosed.

Variance

b3 Public Law 112-55 (125 Stat. 552)

2 – Recommendation

Investigator (b) (6) commends **Violations, Warning Letter Only, No Recall Inspection.** Investigator (b) (6) commends the FFLC update the home address for David Harris, Manager/Responsible Person, to (b) (6)
(b) (6)

FIREARMS INSPECTION REPORT

Name: Dragon Fire Armory, LLC
Trade Name: None

UI#: 767035-2017-0125-B1B
FFL#: 1-59-105-07-8F-16277

3 - Inspection History

Date of Inspection: 11/18/2016
Type of Inspection: Amended Application Inspection.
UI#: 767035-2017-0029-B1B
Inspection Results: Amended Application Approved. New license issued.
Cited Violations: None-N/A

Date of Inspection: 2/1/2016
Type of Inspection: Amended Application Inspection.
UI#: 767035-2016-0181-B1B
Inspection Results: Amended Application Approved. New license issued.
Cited Violations: None-N/A

Date of Inspection: 6/4/2014
Type of Inspection: Theft/Loss
UI#: 767035-2014-0401-B1B
Inspection Results: See related CE (b) (7)(A)
Cited Violations: None-N/A

Date of Inspection: 11/4/2013
Type of Inspection: Amended Application.
UI#: 767035-2014-0012-B1B
Inspection Results: Amended Application Approved. New license issued.
Cited Violations: None-N/A

Date of Inspection: 8/29/2013
Type of Inspection: Amended Application Inspection.
UI#: 767035-2013-0447-B1B
Inspection Results: Application withdrawn.
Cited Violations: None-N/A

Date of Inspection: 4/19/2012
Type of Inspection: Application Inspection.
UI#: 767035-2012-0200-B1B
Inspection Results: Application Approved. License issued.
Cited Violations: None-N/A

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

Investigator (b) (6) conducted a 100% firearms inventory and physically identified each firearm in inventory by the serial number and other markings and matched them to the corresponding Acquisition and Disposition (A&D) Record entry. There were (b) (6)

FIREARMS INSPECTION REPORT

Name: Dragon Fire Armory, LLC
Trade Name: None

UI#: 767035-2017-0125-B1B
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firearms in inventory (b) (6) which were NFA weapons) and (b) (6) pen entries in the A&D Books. Upon reviewing the A&D Record books and conducting the inventory, the following violations were disclosed:

27 CFR 478.123(a): On (b) (6) occasions, the licensee failed to record the acquisition of a firearm prior to inspection.

Reference Violation # 1 and Worksheet 1 - Inventory and A&D Worksheet

27 CFR 478.123(d): On (b) (6) occasion, the licensee could not account for a firearm, which was reported as a theft/loss to ATF and the Polk County Sheriff's Office.

Reference Violation # 2, Exhibit 2 and Worksheet 1 - Inventory and A&D Worksheet.

The licensee conducted a thorough search of the business premise as well as the off-site storage (b) (6) and could not locate the missing firearm. Additionally, Investigator (b) (6) and the licensee thoroughly reviewed all ATF records to try to account for the firearm through a disposition. Investigator (b) (6) also conducted NCIC/Openfox and E-Trace queries on the firearm to try to account for it. However, all efforts to locate the firearm were unsuccessful.

The licensee completed and submitted a Federal Firearms Licensee Firearms Inventory Theft/Loss Report (ATF F 3310.11) for the unaccounted firearm noted above. The licensee reported the firearm as a theft/loss to the Polk County Sheriff's Office, and to ATF, (ATF Issued Incident Number (b) (6)). Investigator (b) (6) verified that the licensee logged the unaccounted firearms out of the A&D Record as a theft/loss referencing the ATF Issued Incident Number.

Theft/Loss Report is Exhibit 3.

The licensee recorded (in the A&D Record Books) the acquisition of the (b) (6) firearms that were not logged in prior to this inspection.

While reviewing the licensee's A&D Record Books, Investigator (b) (6) noted (b) (6) instances where the licensee did not record the FFL number for a firearm acquisition. Investigator (b) (6) discussed ATF Ruling 2016-3 with the licensee, which outlines the record keeping requirements for licensed manufacturers who consolidate their records. The ruling states that the licensed manufacturer must record (in the A&D Record Book) the complete 15 digit license number of the licensed manufacturer, or other licensee from whom the firearm was acquired, along with other identifying information (i.e.: Date of manufacture, name of person from whom the firearm was acquired, etc.). Investigator (b) (6) educated the licensee on how to properly and timely record firearm

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Name: Dragon Fire Armory, LLC
Trade Name: None

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acquisition and disposition information in the A&D Record Books. Since the requirements for recording the FFL # are outlined in an ATF Ruling, and not specifically referenced in a regulation, no violation was cited. The licensee stated he now fully understood the A&D Record keeping requirements and would comply with them.

Aside from the missing firearm reported (as referenced above), the licensee did not have any other thefts or losses of firearms during the inspection period.

The licensee did not have a tagging system to match the firearms to the A&D Record Book entries. Additionally, Mr. Harris was initially unable to locate some of the firearms, which were eventually reconciled through inventory found on-site, and also at his off-site storage locations (his residence and (b) (6) residence). As a result, the inventory was very time-consuming. Investigator (b) (6) encouraged the FFL to use a tagging system to match the firearms to the A&D Record Books. Mr. Harris and (b) (6) stated they thought that was a great idea and would incorporate a tagging system to match the firearms to the A&D Record Books.

5 - ATF Forms 4473 – NICS & Other Dispositions

The licensee has (b) (6) ATF F 4473s on hand for the last 12 months. Investigator (b) (6) reviewed all forms, placing special emphasis in comparing similar last names, firearms purchased, and addresses. The following violations were disclosed as a result of this review:

27 CFR 478.21(a): On (b) (6) ATF F 4473s, the licensee failed to ensure Item #s: (b) (6) were properly completed, as follows:

- In (b) (6) instance, Item #10 (Ethnicity) was blank. (2012 Edition)
- In (b) (6) instances, Item #30a (Total Number of Firearms) was blank. (2012 Edition)
- In (b) (6) instances, Item #31 (FFL Trade/Corporate Name and Address) was blank. (2012 Edition)
- In (b) (6) instances, Item #32 (FFL Number) was blank. (2012 Edition)

Reference Violation # 3, Exhibits: 4, 5, 6, 7, 8 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition and 2016 Edition)

27 CFR 478.124(c)(1): On (b) (6) ATF F 4473, the licensee failed to ensure Item #3 was properly completed, as follows:

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Name: Dragon Fire Armory, LLC
Trade Name: None

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FFL#: 1-59-105-07-8F-16277

- In [§ 83 Public Law 112-55 (125 Stat. 552)] instance, Item #3 (Place of Birth) had an error. The purchaser recorded the city where they were born, but not the state. (2012 Edition).

Reference Violation # 4 , Exhibit 6 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

27 CFR 478.124(c)(3)(i): On [§ 83 Public Law 112-55 (125 Stat. 552)] ATF F 4473, the licensee failed to properly complete Item #20a, as follows:

- In [§ 83 Public Law 112-55 (125 Stat. 552)] instance, Item #20a (Identification) had an error. The licensee recorded the type of identification and expiration date, but not the number on the identification. (2012 Edition)

Reference Violation # 5, Exhibit 6 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

27 CFR 478.124(c)(3)(iv): On [§ 83 Public Law 112-55 (125 Stat. 552)] ATF F 4473, the licensee failed to complete Item # 21a and Item # 21c as follows:

- In [§ 83 Public Law 112-55 (125 Stat. 552)] instance, Item # 21a (Date the transferee's identifying information in Section A was transmitted to NICS or the appropriate State agency) was blank. (2012 Edition)
- I [§ 83 Public Law 112-55 (125 Stat. 552)] instance, Item #21c (The response initially provided by NICS or the appropriate State agency was:) was blank. (2012 Edition). **Note:** Investigator (b) (6) conducted a NCIC/Openfox check on the customer and confirmed they were not prohibited from purchasing a firearm.

Note: The same ATF F 4473 contains the errors for 21a and 21c.

Reference Violation # 6, Exhibit 5 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

27 CFR 478.124(c)(4): On [§ 83 Public Law 112-55 (125 Stat. 552)] ATF F 4473, the licensee failed to complete Item #27, as follows:

- I [§ 83 Public Law 112-55 (125 Stat. 552)] instance, Item #27 (Model) was blank. (2012 Edition)

Reference Violation # 7, Exhibit 7 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

27 CFR 478.124(c)(5): O [§ 83 Public Law 112-55 (125 Stat. 552)] ATF F 4473, the licensee failed to properly complete Item #36, as follows:

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Name: Dragon Fire Armory, LLC
Trade Name: None

UI#: 767035-2017-0125-B1B
FFL#: 1-59-105-07-8F-16277

- I [§ 87(2)(b)] instance, Item #36 (Date Transferred) had an error. The licensee recorded two (2) dates in this box. The first date was the date the FDLE background check was completed. The second date was the date the actual transfer took place. (2012 Edition) **Note:** Investigator [§ 87(2)(b)] conducted a NCIC/Openfox check on the customer and confirmed they were not prohibited from purchasing a firearm.

Reference Violation # 8, Exhibit 8 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

The licensee made copies of all [§ 87(2)(b)] ATF F 4473s that contained errors (as referenced in the violations above). The licensee made corrections to the items in Sections B, C and D. For the errors in Section A, the licensee was advised they could attempt to contact the purchaser and ask them to make the applicable corrections(s) to the copy of the ATF F 4473.

27 CFR 478.102(c): On [§ 87(2)(b)] ATF F 4473, the licensee failed to initiate a new FDLE check after 30 days. I [§ 87(2)(b)] instance, the FDLE check was conducted on 6/24/16, and the firearm was transferred to the individual on 9/30/16. (2012 Edition) **Note:** Investigator [§ 87(2)(b)] conducted a NCIC/Openfox check on the purchaser and did not discover any prohibiting factors.

Reference Violation # 9, Exhibit 8 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

A Florida Department of Law Enforcement (FDLE) records examination found that the licensee was properly registered in the FDLE System [§ 87(2)(b)] and the corresponding background checks were being conducted (FDLE printout attached). The licensee did not have any FDLE non-approvals during the inspection period.

There were [§ 87(2)(b)] FDLE State transaction numbers on the printout. Investigator [§ 87(2)(b)] compared [§ 87(2)(b)] state transaction numbers to the ATF F 4473s. Investigator [§ 87(2)(b)] discovered [§ 87(2)(b)] missing ATF F 4473, based on the discrepancy between [§ 87(2)(b)] number of FDLE transaction numbers and the number of ATF F 4473s the licensee had on file. Mr. Harris and [§ 87(2)(b)] stated that they do not know what happened to the ATF F 4473 and could not locate it.

27 CFR 478.129(b): The licensee failed to retain an ATF F 4473. (2012 Edition)

Reference Violation # 10 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

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Name: Dragon Fire Armory, LLC
Trade Name: None

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The licensee properly conducts firearm transfers to other Federal Firearm Licensees (obtaining a copy of the FFL). The licensee is also aware of the requirements regarding firearm transfers to law enforcement officers.

6 - Multiple Sales

The Violent Crime Analysis Branch (VCAB) printout revealed that the licensee was not associated with any multiple sales. Investigator (b) (6) did not discover any unreported multiple sales.

7 - Suspicious/Prohibited Purchasers

Investigator (b) (6) did not discover any suspicious or prohibited purchasers during this inspection.

8 - Trace Activity

The Violent Crime Analysis Branch (VCAB) printout revealed that the licensee was associated with (b) (6) successful traces within the last twelve months of those traces are associated with the same individual (b) (6). The

b3 Public Law 112-55 (125 Stat. 552)

9 - NFA/Importer/Collector/Manufacturer

(b)(3)-(26 USC 6103)

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Name: Dragon Fire Armory, LLC
Trade Name: None

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(b)(3)-(26 USC 6103)



10 - Referrals

There were no referrals generated as a result of this inspection.

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Name: Dragon Fire Armory, LLC
Trade Name: None

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11 - Other

Investigator (b) (6) discussed the contents of the Important Notice regarding the selling of firearms after revocation, expiration, or surrender of a Federal Firearms License. Investigator (b) (6) provided the licensee with a copy of the notice. The licensee stated he understood the Notice and would comply.

The licensee had the Youth Handgun Poster posted and pamphlets available for customers. In addition, the licensee had secure gun storage and safety devices available for sale.

For de-confliction purposes, Investigator (b) (6) conducted NFORCE queries on Dragon Fire Armory, LLC and David Alan Harris, prior to conducting this inspection and again before submitting the assignment. No prohibiting information was disclosed as a result of these queries.

A grand total of (b) (6) Openfox/NCIC person checks and (b) (6) NCIC firearm check was conducted. No derogatory information was discovered as a result of these checks.

12 - Closing Actions

On 6/27/2017, Investigator (b) (6) conducted a closing conference with Mr. David Alan Harris, Manager, Dragon Fire Armory, LLC. (b) (6) employee, was also present during the closing conference. A Report of Violations was issued during the conference and the violations disclosed were discussed with the licensee. Mr. Harris acknowledged, signed and dated the Report of Violations (**see attached ROV**).

The Acknowledgement of Federal Firearms Regulations Checklist was also reviewed with the licensee on 6/27/17. Investigator (b) (6) placed special emphasis on recordkeeping requirements, inventory control, manufacturing and marking firearms, NFA weapons and background checks. Mr. Harris signed the Acknowledgment of Federal Firearms Regulations (**Exhibit 10**) and a copy of it was provided to him, along with a List of Important ATF Addresses and Telephone Numbers. Mr. Harris stated that he understood the regulations and requirements for FFL's. Investigator (b) (6) provided the licensee with her business card containing office and cell phone numbers as a means of contact. Mr. Harris stated that, if he ever had any questions or concerns, he would contact her/ATF.

13 - Violations

1. 27 CFR 478.123(a) – Records and Reports

Nature of Violation:

(b) (6) occasions, the licensee failed to record the acquisition of a firearm prior to inspection.

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Name: Dragon Fire Armory, LLC
Trade Name: None

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Licensee's Response: The licensee stated this was an oversight on their part. The licensee stated they would implement better internal controls to ensure firearms are logged in and out of the A&D Record Books in a timely manner and ensured future compliance.

Corrective Action: The licensee recorded the acquisition of t [REDACTED] firearms into the A&D Record Books. The regulation was reviewed with the lic [REDACTED]

Reference Worksheet 1 - Inventory and A&D Worksheet

2. 27 CFR 478.123(d) – Records and Reports

Nature of Violation: O [REDACTED] occasion, the licensee could not account for a firearm, which was report [REDACTED] theft/loss to ATF and to local authorities.

Licensee's Response: The licensee stated they do not know what happened to the firearm and exhausted all efforts in reconciling it through inventory and/or a disposition (i.e. ATF F 4473, FFL transfer, etc.). The licensee also stated they would work on conducting firearm inventories more frequently. The licensee ensured future compliance.

Corrective Action: The licensee completed and submitted a Federal Firearms Licensee Firearms Inventory Theft/Loss Report (ATF F 3310.11) for the [REDACTED] firearm. The licensee reported the firearm as a theft/loss to local authorities and ATF. The licensee logged the [REDACTED] firearm out of the A&D Record Book referencing the ATF issued incident number.

Reference Exhibit 2 and Worksheet 1 - Inventory and A&D Worksheet

3. 27 CFR 478.21(a) – Administrative and Miscellaneous Provisions

Nature of Violation: On [REDACTED] ATF F 4473s, the licensee failed to ensure Item #s: 10a, 30a, 31, 32 and/or 33 were properly completed, as follows:

- In [REDACTED] instance, Item #10 (Ethnicity) was blank. (2012 Edition)
- In [REDACTED] instances, Item #30a (Total Number of Firearms) was blank. (2012 Edition)
- In [REDACTED] instances, Item #31 (FFL Trade/Corporate Name and Address) was blank. (2012 Edition)

FIREARMS INSPECTION REPORT

Name: Dragon Fire Armory, LLC
Trade Name: None

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- I [REDACTED] instances, Item #32 (FFL Number) was blank. (2012 Edition)

On [REDACTED] occasion, the licensee failed to timely complete and submit an ATF F 5300.11, 2016 Annual Firearms Manufacturing and Exportation Report (AFMER).

Licensee's Response: The licensee said the errors were an oversight. The licensee stated they would attempt to contact the customer to make the correction to a copy of the ATF F 4473 (for the Section A error) and ensured future compliance. The licensee stated it was an oversight in not submitting the AFMER report for calendar year 2016. The licensee stated they would be more diligent in submitting the required reports in a timely manner and ensured future compliance.

Corrective Action: The licensee made a copy of each ATF F 4473, and made corrections for all applicable Items in Section B, C and D. For errors in Section A, the licensee was advised they could attempt to contact the purchaser and ask them to make the applicable correction(s) to the copy of the ATF F 4473. The licensee completed and submitted an ATF Form 5300.11, Annual Firearms Manufacturing and Exportation Report (AFMER), for calendar year 2016. The regulations were reviewed with the licensee.

Reference Exhibits: 4, 5, 6, 7, 8 and 9 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition and 2016 Edition)

4. 27 CFR 478.124(c)(1) – Records and Reports

Nature of Violation: O [REDACTED] ATF F 4473, the licensee failed to ensure Item #3 was properly completed, as follows:

- I [REDACTED] instance, Item #3 (Place of Birth) had an error. The purchaser recorded the city where they were born, but not the state. (2012 Edition)

Licensee's Response: The licensee advised they would attempt to contact the customer and ask them to make the applicable correction for Section A on a copy of the ATF F 4473. The licensee ensured future compliance.

Corrective Action: The licensee was advised they could attempt to contact the purchaser and ask them to make the applicable correction to a copy of the ATF F 4473. The regulation was reviewed with the licensee.

Reference Exhibit 6 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

FIREARMS INSPECTION REPORT

Name: Dragon Fire Armory, LLC
Trade Name: None

UI#: 767035-2017-0125-B1B
FFL#: 1-59-105-07-8F-16277

5. 27 CFR 478.124(c)(3)(i) – Records and Reports

Nature of Violation: On <sup>03 Public Law 112-55
(125 Stat. 552)</sup> ATF F 4473, the licensee failed to properly complete Item #20a, as follows:

- In <sup>03 Public Law 112-55
(125 Stat. 552)</sup> instance, Item #20a (Identification) had an error. The licensee recorded the type of identification and expiration date, but not the number on the identification. (2012 Edition)

Licensee's Response: The licensee said this was an oversight. The licensee stated they would be more diligent in reviewing the ATF F 4473s. The licensee said they would attempt to contact the customer to get the identification number and ensured future compliance.

Corrective Action: The licensee was advised they could attempt to contact the customer and ask them to provide the document identification number. The regulation was reviewed with the licensee.

Reference Exhibit 6 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

6. 27 CFR 478.124(c)(3)(iv) – Records and Reports

Nature of Violation: On <sup>03 Public Law 112-55
(125 Stat. 552)</sup> ATF F 4473, the licensee failed to complete Item # 21a and Item # 21c as follows:

- In <sup>03 Public Law 112-55
(125 Stat. 552)</sup> instance, Item # 21a (Date the transferee's identifying information in Section A was transmitted to NICS or the appropriate State agency) was blank. (2012 Edition)

In <sup>03 Public Law 112-55
(125 Stat. 552)</sup> instance, Item #21c (The response initially provided by NICS or the appropriate State agency was:) was blank. (2012 Edition)

Licensee's Response: The licensee said this was an oversight. The licensee stated they would be more diligent in reviewing the ATF F 4473s for accuracy and completeness and ensured future compliance.

Corrective Action: The licensee made a copy of the ATF F 4473, and made the applicable corrections to the copy. The regulation was reviewed with the licensee.

Reference Exhibit 5 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

FIREARMS INSPECTION REPORT

Name: Dragon Fire Armory, LLC
Trade Name: None

UI#: 767035-2017-0125-B1B
FFL#: 1-59-105-07-8F-16277

7. 27 CFR 478.124(c)(4) – Records and Reports

Nature of Violation: On ^{b3 Public Law 112-55 (125 Stat. 552)} ATF F 4473, the licensee failed to complete Item #27, as follows:

- In ^{b3 Public Law 112-55 (125 Stat. 552)} instance, Item #27 (Model) was blank. (2012 Edition)

Licensee's Response: The licensee said this was an oversight. The licensee stated they would be more diligent in reviewing the ATF F 4473s and ensured future compliance.

Corrective Action: The licensee made a copy of the ATF F 4473, and made the applicable correction to the copy. The regulation was reviewed with the licensee.

Reference Exhibit 7 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

8. 27 CFR 478.124(c)(5) – Records and Reports

Nature of Violation: O ^{b3 Public Law 112-55 (125 Stat. 552)} ATF F 4473, the licensee failed to properly complete Item #36, as follows:

In ^{b3 Public Law 112-55 (125 Stat. 552)} instance, Item #36 (Date Transferred) had an error. The licensee recorded two (2) dates in this box. The first date was the date the FDLE background check was completed. The second date was the date the actual transfer took place. (2012 Edition)

Licensee's Response: The licensee said this was an oversight. The licensee said they would be more diligent in ensuring the ATF F 4473s were properly completed. The licensee ensured future compliance.

Corrective Action: The licensee made a copy of the ATF F 4473, and made the applicable correction to the copy. The regulation was reviewed with the licensee.

Reference Exhibit 8 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

9. 27 CFR 478.102(c) – Conduct of Business

Nature of Violation: O ^{b3 Public Law 112-55 (125 Stat. 552)} ATF F 4473, the licensee failed to initiate a new FDLE check after 30 days. I ^{b3 Public Law 112-55 (125 Stat. 552)} instance, the FDLE check was conducted on 6/24/16, and the firearm was transferred to the individual on 9/30/16. (2012 Edition)

FIREARMS INSPECTION REPORT

Name: Dragon Fire Armory, LLC
Trade Name: None

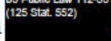
UI#: 767035-2017-0125-B1B
FFL#: 1-59-105-07-8F-16277

Licensee's Response: The licensee stated they did not realize they needed to conduct a new background check after 30 days. The licensee stated they now understood the regulation and ensured future compliance.

Corrective Action: The regulation was reviewed with the licensee. No other corrective action could be taken by the licensee.

Reference Exhibit 8 and Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

10. **27 CFR 478.129(b) – Records and Reports**

Nature of Violation: The licensee failed to retain  ATF F 4473. (2012 Edition)

Licensee's Response: The licensee stated they do not know what happened to the ATF F 4473. The licensee stated they would be more diligent in their records retention and ensured future compliance.

Corrective Action: No correction action could be taken. The licensee could not locate the corresponding ATF F 4473. The regulation was reviewed with the licensee.

Reference Worksheet 2 - ATF F 4473 Review Worksheet (2012 Edition)

X

Industry Operations Investigator

Index of Worksheets and Exhibits

Worksheet 1 - A&D Inventory Worksheet

Worksheet 2 - ATF Form 4473 (2012 Edition) Review Worksheet

Exhibit 1: Delegation Letter

Exhibit 1A: FLS Letter to update Mr. Harris's home address

Exhibit 2: A&D Record Book for 478.123(d) violations

Exhibit 3: Theft/Loss Report

FIREARMS INSPECTION REPORT

Name: Dragon Fire Armory, LLC
Trade Name: None

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Exhibit 4:

Exhibit 5:

Exhibit 6:

Exhibit 7:

Exhibit 8:

Exhibit 9: 2016 AFMER Report

Exhibit 10: Acknowledgement of Federal Firearm Regulations

b3 Public Law 112-55 (125 Stat. 552)