

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) CURL, SHAWN DELVIN GRIFFIN, CO. 1209 N CASHUA DRIVE FLORENCE, SC 29501, FLORENCE		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 763075-2017-0059-B1B		
		3. PERMIT/LICENSE NUMBER 157041078F03755	4a. TARGET DATE 5/30/2017	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, 10/14/2016				
8. PURPOSE/SPECIAL INSTRUCTIONS Conduct Firearms Compliance Investigation				
9. INSPECTION RESULTS <input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC				
NO. OF VIOLATIONS	2	NO. OF REFERRALS		10. TRAVEL EXPENSES (OPTIONAL)
NO. OF TECS CHECKS		NO. OF TECS HITS		2111 - PER DIEM
NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES		2112 - P.O.A.
		\$ VALUE OF TAX DECREASES		2113 - COMM. AIR
NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS		2114 - RENTAL CAR
NO. OF CLAIMS		\$ VALUE OF CLAIMS		2115 - GPV EXPENSES
NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED		2116 - MISC.
				TOTAL \$ FOR INSP.
11. ATF OFFICER'S RECOMMENDATION Submitted by (b)(6) - Industry Operations Investigator Submitted on: 03/21/2017 Viols ROV ONLY No Recall Inspection				
12. TIME ACCOUNTING DATA				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)				
NOV 2016		6.00		
DEC 2016		26.00		
JAN 2017		25.00		
FEB 2017		8.00		
MAR 2017		21.00		
ATF OFFICER'S SUBTOTAL		86.00		ATF OFFICER'S SIGNATURE
TOTAL HOURS		86.00		
13. REVIEW AND ROUTING				
REVIEW COMMENTS AND RECOMMENDATION Name of Entity - Curl, Shawn FFL/COMP - 1-57-03755 Lead - (b)(6) Narrative: A firearms compliance investigation was conducted. Recommendation: Viols WL ONLY and No Recall. Last Inspection Date: 1/10/17 E-mailed to FEL Actions-Charlotte/Examiner (b)(6) Viols WL ONLY and No Recall Inspection				
<input checked="" type="checkbox"/> REVIEWED		<input checked="" type="checkbox"/> FINAL DISPOSITION		
SIGNATURE AND TITLE (b)(6) - Area Supervisor		REVIEW DATE 03/21/2017		

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	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

ROUTING SEQUENCE AND DATE

- ☒ 1. FFLC _____
☐ 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	Street Address	City	State	ZIP Code	County	Page 1 of 2
Carl, Shawn Delvin / Griffin Co	1209 N. Cahoon Drive	Florence	SC	29501	Florence	2 Pages
License/Permit/Registry Number (if any)		Expiration Date	Dates of Period of Inspection			
1-37-041-07-3F-03755		6/7/18	December 9th, 2015 - December 9th, 2016			

Inspection Results

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

Number	16 USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Correction to be Made (If not corrected immediately)
1.	27 CFR 478.123(a)	<p>The licensee failed to properly complete and/or timely record the acquisition of a firearm(s) in the A&D record book within the required time frame.</p> <p>On (b)(3) 112 P occasion, the licensee failed to record the acquisition of a firearm no later than the close of the next business day following the date of receipt. (b)(3) - Public Law 112-55 (125 Stat. 552)</p> <p>On (b)(3) - Public Law 112-55 (125 Stat. 552) occasions, the licensee failed to record the license number (FEL#) of the licensee from whom the firearm was received. (b)(3) unrecorded FEL# in the 07 Book, and (b)(3) unrecorded FEL# in the (b)(3) - (26 USC § 6103)</p>	The licensee was instructed to ensure all A&D information such as date of acquisition and from whom received (Name & address or Name & FEL#) are completed and recorded in a timely manner.	
2.	27 CFR 478.123(b)	<p>The licensee failed to properly complete and/or timely record the disposition of (b)(3) firearm(s) in the A&D record book within the required time frame.</p>	The licensee was instructed to ensure all A&D information such as date of disposition and to whom transferred (Name & address or Name & FEL#) are completed and recorded in a timely manner.	

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

Signature

(b)(6)

Date

Date

1/10/17
1/10/17

Copy 2 - Inspection Record Copy

ATF Form 5010.3
Revised April 2007

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	Street Address	City	State	ZIP Code	County	Page 2 of 2 Pages
Curl, Shawn Delvin / Griffin Co	1209 N. Cashua Drive	Florence	SC	29501	Florence	
License/Permit/Registry Number (if any)		Expiration Date	Date(s) or Period of Inspection			
1-57-041-07-8F-03755		6/1/18	December 9th, 2015 - December 9th, 2016			

Inspection Results

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

Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
		<p>On (b)(3) 112 Public Law occasions, the licensee failed to record the licensee's name to whom the firearm was transferred.</p> <p>On (b)(3) 112 Pub occasion, the licensee failed to record the license number (FFL#) of the licensee to whom the firearm was transferred.</p>		



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Charlotte Field Division, Columbia II

1835 Assembly Street
Columbia, SC 29201
www.atf.gov

March 21, 2017

763075: (b)(6)
5373

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
WARNING LETTER

Shawn Delvin Curl
Griffin, Co.
1209 N Cashua Drive
Florence, SC 29501

REF: 1-57-041-07-8F-03755

Dear Mr. Curl,

During a recent compliance inspection at your firearms business covering the period December 9, 2015 to December 9, 2016, you were cited for violations of Title 27, Code of Federal Regulations, Part 478. A copy of the Report of Violations, Form 5030.5, issued at the time of the inspection is enclosed.

All violations were fully explained to you by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) investigator(s). You indicated that you understood the requirements of the firearms laws and regulations and that corrective action 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.

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

Sincerely yours,

(b)(6)

Area Supervisor, Industry Operations Investigator
Columbia II, Charlotte Field Division

cc: Federal Firearms Licensing Center
Columbia II Office

FIREARMS INSPECTION REPORT

Name: Curl, Shawn Delvin
Trade Name: Griffin Co

UI#: 763075-2017-0059-B1B
FFL#: 1-57-041-07-8F-03755

Address: 1209 N. Cashua Drive
Florence, SC 29501

Florence County

1 - Introduction

Inspection Profile:

On December 9th, 2016, Industry Operations Investigator (IOI) (b) (6) (b)(6) traveled to the licensed premises of Shawn Delvin Curl doing business as Griffin Co., located at 1209 N. Cashua Drive, Florence, SC 29501 in Florence County to conduct a Firearm Compliance Investigation. Advance notice was not given. Upon arrival, Investigator (b) (6) discovered the establishment was not open for business. Thereafter, Investigator (b) (6) called and left a voice message for Mr. Curl to return the call. Shortly after, Mr. Curl returned the call. Mr. Curl stated he was out of town and would not be able to meet with Investigator (b) (6). Investigator (b) (6) rescheduled the investigation for December 12th, 2016.

On December 12th, 2016, Investigator (b) (6) returned to 1209 N. Cashua Drive, Florence, SC 29501 to continue with the Firearm Compliance Investigation. Present during the investigation was Owner, Shawn Delvin Curl and (b)(6) was present due to Mr. Curl and Mr. (b)(6) conduct business as a partnership under another firearms license (FFL# 1-57-02779). Investigator (b) (6) identified (b) (6) by their (b) (6) Driver's License.

Shawn Delvin Curl (SCDL# (b)(6) (b)(6) SCDL#(b)(6)

This compliance investigation was conducted in conjunction with another compliance investigation under (UI# 763075-2017-00108-B1B), Shawn William Curl, (b)(6) (FFL# 1-57-02779).

The investigation period covered December 9th, 2015 through December 9th, 2016. No other Federal, State, or Local agencies were present during the investigation.

Business Profile:

Shawn Delvin Curl doing business as Griffin Co. is a low volume firearms manufacturer. The licensee's manufacturing process consists of converting GCA rifles and shotguns into short barrel rifles and shotguns. In addition, the licensee sells handguns, long-guns and silencers. Mr. Curl provides a transfer

FIREARMS INSPECTION REPORT

Name: Curl, Shawn Delvin
Trade Name: Griffin Co

UI#: 763075-2017-0059-B1B
FFL#: 1-57-041-07-8F-03755

service. Mr. Curl stated he does not attend gun shows, take firearms in on consignment or conduct internet sales.

During the investigation period, the business acquired (b) (4) firearms and disposed of (b) (4) (b)(4) are the licensee's primary suppliers.

(b) (6) maintains a SC Retail License (# 021326637) under Griffin Co. The hours of operation are from 12pm – 1pm on Fridays. Mr. Curl stated he currently works full time at (b)(6) located in front of the license premises. Mr. Curl stated in most cases he can be available during the day Monday – Friday for ATF purposes outside the licensee's normal business hours.

The licensee does not have any off-site storage.

Ownership and Control:

Shawn Delvin Curl is a sole proprietorship. Mr. Curl is the only responsible person listed on the license.

No hidden ownership is suspected, and no responsible persons were added to or removed from the license.

Variance:

No variances were on file for the licensee and none were requested during the investigation.

Mr. Curl discussed the possibility of Troy Industries manufacturing, marking receivers and/or parts for the licensee. Investigator (b) (6) discussed and provided Mr. Curl with an ATF Form 3311.4 "Application for Alternate Means of Identification of a Firearm(s)" (Marking Variance) and the March 8th, 2008 letter (Marking Variance Guidelines) from the Firearms Technology Branch.

2 - Recommendation

Violations WL ONLY and No Recall Inspection

FIREARMS INSPECTION REPORT

Name: Curl, Shawn Delvin
Trade Name: Griffin Co

UI#: 763075-2017-0059-B1B
FFL#: 1-57-041-07-8F-03755

3 - Inspection History

Date of Inspection: 4/12/2012
Type of Inspection: Qualification
UI#: 763075-2012-0265-B1B
Inspection Results: Application Approved
Cited Violations: None

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

On December 12th, 2016, Investigator (b) (6) initiated a physical inventory. The licensee had twenty-three (23) firearms in inventory and the acquisition and disposition (A&D) record book disclosed (b)(3)Pub Law 112-55 125 § 552 open entries. It was found that (b)(3) - 112 Public Law discrepancy was the result of the licensee failing to record the acquisition of a firearm not later than the close of the next business day following the date of acquisition. It was further discovered, there were (b)(4), (b)(3)Pub Law 112-55 125 § 552 discrepancies where the licensee failed to log the acquisition in correctly (Whom received and/or FFL#). The licensee was cited for violating **27 CFR 478.123(a)** for failing to properly complete and/or timely record the acquisition of a firearms(s) in the A&D record book within the required time frame. In addition, the licensee failed to properly complete and/or timely record the disposition of a firearm(s) in the A&D record book within the required period. On (b)(3)Pub Law 112-55 125 § 552 occasions, the licensee failed to complete whom transferred and/or FFL#. The licensee was cited for violating **27 CFR 478.123(b)** for this violation. There were a total of (b) (4) discrepancies found in the licensee's A&D record book. The licensee was able to reconcile the discrepancies within the allotted time. **(See Violation 1 and 2, Worksheet 1, Exhibit 1).**

The licensee maintains a manual acquisition and disposition record book.

5 - ATF Forms 4473 – NICS & Other Dispositions

There were approximately (b)(3)Pub Law 112-55 125 § 552 ATF Form 4473s for the investigation period of December 9th, 2015 through December 9th, 2016. Investigator (b) (6) conducted a full review of all ATF Form 4473s. The ATF Form 4473s were reviewed for multiple sales of firearms, accuracy and possible trafficking. All ATF Form 4473s were kept in order by the transferor's transaction serial number.

Investigator (b) (6) received and verified one (1) NICS proceed transaction number from the FFL Audit Report. No discrepancies were found.

FIREARMS INSPECTION REPORT

Name: Curl, Shawn Delvin
Trade Name: Griffin Co

UI#: 763075-2017-0059-B1B
FFL#: 1-57-041-07-8F-03755

6 - Multiple Sales

Shawn Delvin Curl reported (b)(3)Pub Law 112-55 multiple sales of handguns involving (b)(3)Pub Law 112-55 § 552 handguns in the past year. On November 4th, 2016, Investigator (b) (6) requested a FFL History Query for Santee Gun Sales. No discrepancies were found.

7 - Suspicious/Prohibited Purchasers

No suspicious purchasers were identified, and no referrals were generated.

8 - Trace Activity

Investigator (b) (6) acquired the Trace History Report for Shawn Delvin Curl from the Violent Crime Analysis Branch. According to the report, no firearms have been traced to this licensee.

9 - NFA/Importer/Collector/Manufacturer

Shawn Delvin Curl doing business as Griffin Co currently holds a Special Tax Stamp (SOT) (b)(3) - 26 USC 6103. The licensee is a small NFA manufacturing business. A comparison with the physical inventory, A&D record book and the Annual Firearms Manufacturing and Exportation Report (AFMER), no discrepancies disclosed.

During the investigation, Investigator (b) (6) acquired a copy of the National Firearm Registration and Transfer Record (NFRTR) for Shawn Delvin Curl doing business as Griffin Co. A comparison with the physical inventory, A&D record book and required NFRTR for all NFA firearms in inventory, no discrepancies disclosed.

10 - Referrals

No referrals were made for this investigation.

11 - Other

On November 4th, 2016, Investigator (b) (6) queried the Federal Firearms Licensing System (FLS) to obtain any additional FFL information associated with Mr. Curl. Investigator (b) (6) discovered Mr. Curl was associated with (b)(6) (b)(6) and listed as a responsible person on an additional license.

- 1-57-02779 (Type 01) (Partnership) Shawn Devlin Curl, (b)(6)

FIREARMS INSPECTION REPORT

Name: Curl, Shawn Delvin
Trade Name: Griffin Co

UI#: 763075-2017-0059-B1B
FFL#: 1-57-041-07-8F-03755

No prohibiting or other significant findings were made during this investigation.

12 - Closing Actions

On January 10th, 2017, Investigator (b) (6) conducted a closing conference with Mr. Shawn Devlin Curl. During the conference, Investigator (b) (6) reviewed the ATF Form 5030.5, Report of Violations. Investigator (b) (6) explained each violation, and the corrective action required. Mr. Curl stated that all corrective actions that he was able to correct, were completed. Mr. Curl stated that he understands the violations cited, and that he will continue to work to maintain compliance with all firearms laws and regulations. Mr. Shawn Curl acknowledged receipt of the ATF Form 5030.5, Report of Violations, by signing and dating it on 1/10/17.

During the closing conference, Investigator (b) (6) also provided Mr. Shawn Curl with a comprehensive explanation of the Federal Firearms Rules and Regulations; including required records & reports, conduct of business, licenses, miscellaneous provisions, state laws & local ordinances, and general questions & answers. Mr. Curl was advised to maintain gun safety locks for prospective customers, and to provide gun safety locks with all handgun sales. Mr. Shawn Curl indicated that he understood all of the information provided by initialing, signing, and dating the Acknowledgement of Federal Firearms Regulations on January 10th, 2017 (**Exhibit 2**). Investigator (b) (6) provided Mr. Shawn Curl with a copy of the signed acknowledgement for his records.

The licensee was provided and explained the following documents/publications:

- Safety and Security Information for Federal Firearms Licensees (ATF P 3317.2)
- Federal Firearms Licensee/Quick Reference and Best Practices Guide (ATF P 5300.15)
- Youth Handgun Safety Act (ATF I 5300.1 and ATF I 5300.2)
- Firearms Transaction Record/4473 (ATF F 5300.9)
- Report of Multiple Sales or Other Disposition of Pistols and Revolvers (ATF F 3310.4)
- Federal Firearms Licensee Firearms Inventory Theft/Loss Report (ATF F 3310.11 and ATF F 3310.11A)
- Interstate Firearms Shipment Theft/Loss Report (ATF F 3310.6)
- NICS Voluntary Appeal File

FIREARMS INSPECTION REPORT

Name: Curl, Shawn Delvin
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UI#: 763075-2017-0059-B1B
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- FFL eZ Check 3.1.2 – Federal Firearms License Search
- Important Notice to Dealers and Other participants at This Gun Show (ATF I 5300.23A)
- ATF List of Important Contact Numbers – ATF Website / News Letter
- Open Letter to FFL's (Nov. 6, 2003) Making Changes to ATF F 4473 after transaction has occurred
- Rulings: 76-22, 77-1, 2009-5, 2010-6, 2010-8, 2010-10, 2011-1, 2012-1, 2013-3, 2013-5, and 2016-3
- Marking Variance Guidelines - (New Form ATF Form 3311.4) available online
- ATF F 3311.4 – Alternate Means of Identification of Firearm(s)
- Repair of NFA Letter
- ITAR Letter
- General Information to obtain (ATF F 5630.7) NFA Regulations Book

13 - Violations

1. 27 CFR 478.123(a)

Nature of violation:

The licensee failed to properly complete and/or timely record the acquisition of a firearm(s) in the A&D record book within the required timeframe.

On (b)(3) Pub Law 112-5 occasion, the licensee failed to record the acquisition of a firearm no later than the close of the next business day following the date of receipt. (b)(3) Pub Law 112-5

On (b)(3) Pub Law 112-55 125 § 552 occasions, the licensee failed to record the license number (FFL#) of the licensee from whom the firearm was received. (b)(3) Pub L unrecorded FFL# in the 07 Book, and (b)(3) Pub L unrecorded FFL# in the Suppressor Book.

Licensee's response:

Mr. Curl stated he was unaware that he failed to record the VLTOR.

Mr. Curl stated he was not aware both the licensee name from whom received and the FFL# were required.

FIREARMS INSPECTION REPORT

Name: Curl, Shawn Delvin
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Corrective action:

The licensee was instructed to ensure all A&D information such as date of acquisition and from whom received (Name & address or Name & FFL#) are completed and recorded in a timely manner.

The licensee immediately entered the VLTOR into the NFA record book and all FFL#s from the whom received were entered as instructed.

2. **27 CFR 478.123(b)**

Nature of violation:

The licensee failed to properly complete and/or timely record the disposition of a firearm(s) in the A&D record book within the required timeframe.

On (b)(3)(F) Pub Law 112-55 125 § 55 occasions, the licensee failed to record the licensee's name to whom the firearm was transferred.

On (b)(3)(F) Pub Law 112-55 occasion, the licensee failed to record the license number (FFL#) of the licensee to whom the firearm was transferred.

Licensee's response:

Mr. Curl stated he was not aware he was required to enter the name of whom disposed. He thought he was only required to enter the number of the ATF F 4473. In addition, he was not aware both the licensee name from whom transferred and the FFL# were required.

Corrective action:

The licensee was instructed to ensure all A&D information such as date of disposition and from whom transferred (Name & address or ATF 4473#) or (Name & FFL#) are completed and recorded in a timely manner.

The licensee recorded into the 07 record book the names from whom transferred as instructed.

FIREARMS INSPECTION REPORT

Name: Curl, Shawn Delvin
Trade Name: Griffin Co

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X

Industry Operations Investigator

Index of Worksheets and Exhibits

Exhibit 1 – Copies of A&D violations

Exhibit 2 – Acknowledgement of Federal Firearms Regulations