

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Combs, Rodney Dean & Angela Kay B. Chestnut Hill Gun Works 1340 Clifton Rd. Crumpler, NC 28617, ASHE	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) <p style="text-align: center;">763050-2016-0352-B1B</p> 3. PERMIT/LICENSE NUMBER 4a. TARGET DATE 4b. TARGET HOURS <p style="text-align: center;">156009018C01455</p> 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, 04/27/2016

8. PURPOSE/SPECIAL INSTRUCTIONS
 Conduct a full-scope compliance inspection.

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	2	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: 07/05/2016

 Viols WL ONLY and No Recall Inspection

12. TIME ACCOUNTING DATA	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)
MAY 2016	1.00
JUN 2016	34.50
JUL 2016	1.00
ATF OFFICER'S SUBTOTAL	36.50
TOTAL HOURS	36.50
	ATF OFFICER'S SIGNATURE

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) - Industry Operations Investigator	REVIEW DATE 07/21/2016
---	---------------------------

(b)(6)
Digitally signed by (b)(6)
 DN: cn=(b)(6), ou=Charlotte FO - Greensboro II,
 email=(b)(6), c=US
 Date: 2016.07.21 15:24:26 -0400

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Combs, Rodney Dean & Angela Kay B. Chestnut Hill Gun Works 1340 Clifton Rd. Crumpler, NC 28617, ASHE	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 763050-2016-0352-B1B		
	3. PERMIT/LICENSE NUMBER 156009018C01455	4a. TARGET DATE	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

ROUTING SEQUENCE AND DATE

- 1. NLC
- 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 Rodney Dean & Angela Kay B. Combs Chestnut Hill Gun Works	Street Address 1340 Clifton Rd.	City Crumpler	State NC	Zip Code 28617-	County ASHE	Page 1 of 8 Pages
License/Permit/Registry Number (If any) 156009018C01455	Expiration Date 3/1/2018	Date(s) or Period of Inspection 06/15/2015 through 06/15/2016				

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:

Failure by the licensee on [redacted] of the 30 ATF Forms 4473 reviewed to ensure the form was complete and accurate as required by the instructions prior to Transferring a firearm to a non-licensee.

(b)(3) 112 Public Law 55 125 STAT 552 (b)(6)

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

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

The ATF Form 4473 must be complete and accurate per the instructions prior to the transfer of a firearm. During the closing conference, IOI (b)(6) reviewed each section of the ATF Form 4473 with Mr. Combs who was instructed to implement a more thorough review system to ensure required information is recorded on the form prior to the transfer of a firearm.

Citation: 27 CFR 478.21(a)

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 Rodney Dean & Angela Kay B. Combs Chestnut Hill Gun Works	Street Address 1340 Clifton Rd.	City Crumpler	State NC	Zip Code 28617-	County ASHE	Page 2 of 8 Pages
License/Permit/Registry Number (if any) 156009018C01455	Expiration Date 3/1/2018	Date(s) or Period of Inspection 06/15/2015 through 06/15/2016				

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:

Failure by the licensee and (b)(3) of the 30 ATF Forms 4473 reviewed to ensure the Transferee recorded their State of birth and/or State of residency in Section A prior to transferring a firearm to a non-licensee.

(b)(3) 112 Public Law 55 125 STAT 552 (b)(6)

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 ATF Form 4473 must be complete and accurate per the instructions prior to the transfer of a firearm. During the closing conference, IOI (b)(6) reviewed each section of the ATF Form 4473 with Mr. Combs who was instructed to implement a more thorough review system to ensure required information is recorded on the form prior to the transfer of a firearm.

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 Rodney Dean & Angela Kay B. Combs Chestnut Hill Gun Works	Street Address 1340 Clifton Rd.	City Crumpler	State NC	Zip Code 28617-	County ASHE	Page 3 of 8 Pages
License/Permit/Registry Number (if any) 156009018C01455	Expiration Date 3/1/2018	Date(s) or Period of Inspection 06/15/2015 through 06/15/2016				

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:

Failure by the licensee on [redacted] of the 30 ATF Forms 4473 reviewed to record the identification information in Section B, #20a, prior to the transfer of a firearm to a non-licensee.

(b)(3) 112 Public Law 55 125 STAT 552 (b)(6)

Date Corrections to be Made:

(if not corrected immediately)

Corrective Action to be Taken:

(if not corrected immediately)

Prior to transferring a firearm to a non-licensee, the licensee must obtain a valid government issued ID from the Transferee (buyer), which is to be recorded in section B, block 20a. The ID cannot be expired. If the address recorded in item 2 does not match the ID provided, then a supplemental government issued document must be provided and recorded in 20b for residency. During the closing conference, KCI (b)(6) reviewed each section of the ATF Form 4473 with Mr. Combs who was instructed to implement a more thorough review system to ensure required information is recorded on the form prior to the transfer of a firearm.

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

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 Rodney Dean & Angela Kay B. Combs Chestnut Hill Gun Works	Street Address 1340 Clifton Rd.	City Crumpler	State NC	Zip Code 28617-	County ASHE	Page 4 of 8 Pages
License/Permit/Registry Number (If any) 156009018CD1455	Expiration Date 3/1/2018	Date(s) or Period of Inspection 06/15/2015 through 06/15/2016				

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:

Failure by the licensee on ^{(b)(3)} of the 30 ATF Forms 4473 reviewed to completely document the NICS related information in Section B, 21d.

(b)(3) 112 Public Law 55 125 STAT 552 (b)(6)

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)

All required NICS information, including the date and NICS response, must be recorded on the ATF Form 4473 prior to the transfer of a firearm to a non-licensee. During the closing conference, IOI ^{(b)(6)} reviewed each section of the ATF Form 4473 with Mr. Combs who was instructed to implement a more thorough review system to ensure required information is recorded on the form prior to the transfer of a firearm.

Number: 5

Nature of Violation:

Failure by the licensee on ^{(b)(3)} of the 30 ATF Forms 4473 reviewed to record the firearm type and caliber as required in Section C, #29/30, prior to the transfer of a firearm to a non-licensee.

(b)(3) 112 Public Law 55 125 STAT 552 (b)(6)

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

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

All required firearm information must be recorded on the ATF Form 4473 prior to the transfer of a firearm to a non-licensee. During the closing conference, IOI ^{(b)(6)} reviewed each section of the ATF Form 4473 with Mr. Combs who was instructed to implement a more thorough review system to ensure required information is recorded on the form prior to the transfer of a firearm.

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 Rodney Dean & Angela Kay B. Combs Chestnut Hill Gun Works	Street Address 1340 Clifton Rd.	City Crumpler	State NC	Zip Code 28617-	County ASHE	Page 5 of 8 Pages
License/Permit/Registry Number (If any) 156009018C01455	Expiration Date 3/1/2018	Date(s) or Period of Inspection 06/15/2015 through 06/15/2016				

Inspection Results

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

Citation: 27 CFR 478.124(c)(4)

Number: 6

Nature of Violation:

Failure by the licensee or ^{(b)(3)} of the 30 ATF Forms 4473 reviewed to correctly record the Transferor's signature and/or the correct date the firearm was transferred in Section D of the form.

(b)(3) 112 Public Law 55 125 STAT 552 (b)(6)

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 ATF Form 4473 must be complete and accurate per the instructions prior to the transfer of a firearm. During the closing conference, IOI ^{(b)(6)} reviewed each section of the ATF Form 4473 with Mr. Combs who was instructed to implement a more thorough review system to ensure required information is recorded on the form prior to the transfer of a firearm.

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 Rodney Dean & Angela Kay B. Combs Chestnut Hill Gun Works	Street Address 1340 Clifton Rd.	City Crumpler	State NC	Zip Code 28617-	County ASHE	Page 6 of 8 Pages
License/Permit/Registry Number (if any) 156009018C01455	Expiration Date 3/1/2018	Date(s) or Period of Inspection 06/15/2015 through 06/15/2016				

Inspection Results

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

<p>Number: 7</p> <p>Nature of Violation: Failure by the licensee (Responsible Person Rodney Dean Combs [REDACTED] instance, for the scope of the inspection, conduct a background check when required to execute an ATF Form 4473 for the transfer of a firearm to [REDACTED] (b) (3) - Public Law 112-55 (125 Stat. 552), (b) (6) [REDACTED] (b) (3) - Public Law 112-55 (125 Stat. 552), (b) (6)</p> <p>Citation: 27 CFR 478.102(a)</p>	<p>Date Corrections to be Made: (If not corrected immediately)</p> <p>Corrective Action to be Taken: (If not corrected immediately)</p> <p>Except for the Responsible Person licensed as a sole proprietor, all other Federal firearm licensee Responsible Persons are required to complete an ATF Form 4473 (including NICS or NICS alternate NC permit) prior to transferring a firearm to their personal collection.</p>
--	---

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 Rodney Dean & Angela Kay B. Combs Chestnut Hill Gun Works	Street Address 1340 Clifton Rd.	City Crumpler	State NC	Zip Code 28617-	County ASHE	Page 7 of 8 Pages
License/Permit/Registry Number (if any) 156009018C01455	Expiration Date 3/1/2018	Date(s) or Period of Inspection 06/15/2015 through 06/15/2016				

Inspection Results

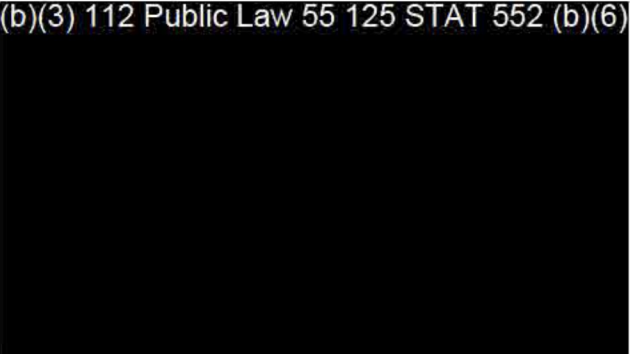
An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Number: 8

Nature of Violation:

Failure by the licensee in **10** instances of the 30 ATF Forms 4473 reviewed to timely submit a Report of Multiple Sale of Pistols and Revolvers (ATF Form 3310.4) as required.

(b)(3) 112 Public Law 55 125 STAT 552 (b)(6)



Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee shall prepare a report of multiple sales or other disposition whenever the licensee sells or otherwise disposes of, at one time or during any five consecutive business days, two or more pistols, or revolvers, or any combination of pistols and revolvers totaling two or more, to an unlicensed person: Provided, that a report need not be made where pistols or revolvers, or any combination thereof, are returned to the same person from whom they were received. The report shall be prepared on Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers. Not later than the close of business on the day that the multiple sale or other disposition occurs, the licensee shall forward two copies of Form 3310.4 to the ATF office specified thereon and one copy to the State police or to the local law enforcement agency in which the sale or other disposition took place. Where the State or local law enforcement officials have notified the licensee that a particular official has been designated to receive Forms 3310.4, the licensee shall forward such forms to that designated official. The licensee shall retain one copy of Form 3310.4 and attach it to the firearm transaction record, Form 4473, associated with

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 Rodney Dean & Angela Kay B. Combs Chestnut Hill Gun Works	Street Address 1340 Clifton Rd.	City Crumpler	State NC	Zip Code 28617-	County ASHE	Page 8 of 8 Pages
License/Permit/Registry Number (If any) 156009018C01455		Expiration Date 3/1/2018	Date(s) or Period of Inspection 06/15/2015 through 06/15/2016			

Inspection Results

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

the licensee (Responsible Person Rodney Dean Combs) in instance, for the scope of the inspection, to execute an ATF Form 4473, calculated upon delivery of the pistols or revolvers. Mr. Combs submitted the unreported ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers), and ordered a supply of forms during the inspection.

Citation: 27 CFR 478.126a

Number: 9

Nature of Violation:

Failure by the licensee (Responsible Person Rodney Dean Combs) in instance, for the scope of the inspection, to execute an ATF Form 4473 for the transfer of a firearm

(b)(3) 112 Public Law 55 125 STAT 552

Citation: 27 CFR 478.124(a)

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

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

Except for Responsible Persons licensed as a sole proprietor, all Federal firearm licensee Responsible Persons are required to complete an ATF Form 4473 (including NICS or NICS alternate NC permit) prior to transferring a firearm to their personal collection.

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

Rodney Dean & Angela B. Combs own

Date

6-29-16 6-29-16

Date

6-29-16

(b)(6)

TOI



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

1801 Stanley Road, Suite 300
Greensboro, NC 27407

July 25, 2016

www.atf.gov

763050:(b)(6)
5300

WARNING LETTER

CERTIFIED RETURN RECEIPT REQUESTED

Mr. Rodney Dean Combs & Mrs. Angela Kay B. Combs
Chestnut Hill Gun Works
1340 Clifton Road
Crumpler, NC 28617

RE: 1-56-009-01-8C-01455

Dear Mr. & Mrs. Combs:

During a recent inspection of your firearms business covering the period June 15, 2015 through June 15, 2016, you were cited for violations of Title 27, Code of Federal Regulations Part 478. A copy of the Report of Violations, ATF F 5030.5 issued at the time of the inspection is enclosed.

During your closing conference, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator (b)(6) fully explained the violations to you. At that time, you indicated that you understood the requirements of the firearms laws and regulations and discussed the corrective action that 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; including the requirement to report all multiple sales of handguns. This is critical to carrying out our mission to protect the public and to ensure that criminals do not gain access to firearms. ATF appreciates the efforts you and other industry members make in this area. 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.

-2-

Mr. Rodney Dean Combs & Mrs. Angela Kay B. Combs
Chestnut Hill Gun Works

This letter concludes your inspection. Should you have any questions regarding this matter, please contact Industry Operations Investigator (b)(6).

Sincerely yours,

(b)(6)

Acting Area Supervisor

Enclosure

cc: Federal Firearms Licensing Center

FIREARMS INSPECTION REPORT

Name: Rodney Dean & Angela Kay B. Combs **UI#:** 763050-2016-0352-B1B
Trade Name: Chestnut Hill Gun Works **FFL#:** 1-56-009-01-8C-01455
Address: 1340 Clifton Rd
Crumpler, NC 28617 (ASHE)
Phone: 336-982-9750

1 - Introduction

Inspection Profile:

On 4/27/16, Industry Operations Investigator (IOI) (b) (6) was assigned to conduct a full scope compliance inspection for Rodney Dean & Angela Kay B. Combs, dba Chestnut Hill Gun Works, located at 1340 Clifton Road, Crumpler, North Carolina. On 6/7/16, IOI (b) (6) initiated the unannounced firearms compliance inspection on at the licensed premises, but nobody was home. IOI (b) (6) made telephone contact with Rodney Combs who works full time as an electrician and was on a job site in Boone, North Carolina, at that time. An appointment was scheduled for 6/16/16.

On 6/16/16, at 1000 hours, IOI (b) (6) met with Rodney and Angela Combs at the business premise and conducted the inspection. The inspection was conducted in accordance with firearms compliance guidelines outlined in the Industry Operations Manual, and the special instructions noted on the ATF EF 5700.14, Assignment and Report. Responsible Person Rodney Combs was interviewed and identified with his N.C. driver's license, (b) (6) expiration date (b) (6). Angela Combs was present for the interview, but does not have anything to do with the business and is a partner on paper only. The inspection scope covered 6/15/15 through 6/16/16., and was concluded on the same day. The closing conference was held on 6/29/16.

Business Profile:

The Type 01, Dealer of Firearms Other Than Destructive Devices, was issued on 2/11/03 and is appropriate for the activities conducted. Mr. Combs owns and operates Rodney Combs Electric where works full time as a licensed electrician. He operates the firearms business from a dedicated workshop, which is attached to the carport of the residence. The premises is located in rural Crumpler, North Carolina. The business is not open to the general public, nor are firearms sold on the internet. Primary sales are special orders and internet transfers all to persons known to him, in addition to gunsmithing activities. Sales include new and used handguns and long guns are sold. Mr. Combs keeps his personal inventory segregated from the workshop, and stored inside the residence. For the scope of the inspection, Mr. Combs acquired approximate (b) (4) firearms and disposed of approximate (b) (4) firearms. Mr. Combs does not participate in gun shows. Zoning was verified during the qualification inspection in 2003. Mr. Combs is

FIREARMS INSPECTION REPORT

Name: Rodney Dean & Angela Kay B. Combs **UI#:** 763050-2016-0352-B1B
Trade Name: Chestnut Hill Gun Works **FFL#:** 1-56-009-01-8C-01455

familiar with the requirement to obtain a certified copy of an FFL prior to transferring a firearm to another licensee, which are maintained for all related transfers. IOI (b) (6) provided the FFL EZ Check link and recommended verifying the status of the license prior to executing a transfer to another licensee.

Ownership and Control:

Rodney Combs confirmed he and his wife, Angela Combs, own the business together, although he is the sole operator. Mr. Combs advised that other than being named a partner on the license, Angela Combs has nothing to do with the day to day operations related to the licensed activities. They are the only responsible persons associated with the license. Hidden ownership is not suspect, and no additional responsible persons were identified during the inspection. Queries in the Federal Licensing System (FLS), TECS, and Open Fox (NCIC) for both responsible persons resulted in no findings to report.

Variance:

There are no variances associated with this license, nor did the licensee submit a request.

2 - Recommendation

Violations, Warning Letter Only, No Recall Inspection

3 - Inspection History

The following is the inspection history since the license was issued in 2003.

Date and Type of Inspection: 2/4/03, Qualification Inspection (b) (6)

UI#: 763050-2003-0189-NFO

Inspection Results:

AS - Recommend application be approved as submitted.

Cited Violations:

No violations.

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

Mr. Combs maintains a bound A&D record book, which was found to be legible, in the proper format, and contained the required information. Since the license was issued, there have been approximately (b) (6) entries recorded in the record. IOI (b) (6) conducted a full inventory of the licensee's firearms at which time all firearms on hand were compared to the open entries in the A&D Record. The inventory revealed a total of (b) (6) firearms in inventory a (b) (6) open entries in the A&D Record (b) (6) dispositions

FIREARMS INSPECTION REPORT

Name: Rodney Dean & Angela Kay B. Combs

UI#: 763050-2016-0352-B1B

Trade Name: Chestnut Hill Gun Works

FFL#: 1-56-009-01-8C-01455

were traced from the record to the ATF Form 4473 with no discrepancies to report. No inventory related violations were cited during the inspection (Attached Firearms Worksheets). No thefts or losses of firearms were reported as a result of this inspection, nor have there been any since the license was issued.

Mr. Combs is responsible for recording the acquisitions and dispositions in the A&D record, which are done immediately or by the close of the next business day. Since a majority of his business is special orders, internet transfers, or gunsmith related (which do not stay overnight), he rarely maintains an inventory. All firearms in inventory are locked inside a gun case, mounted on the wall inside the workshop.

5 - ATF Forms 4473 – NICS & Other Dispositions

There were approximately [redacted] TF Forms 4473 on file for the scope of the inspection. IOI (b) (6) conducted a full examination of a [redacted] forms, which were reviewed for evidence of straw purchases and potential trafficking, as well as completeness and accuracy. Violations 1-7, and [redacted] document the violations (**Attached ROV and Worksheet 2, Exhibit 1 – 4473 Supporting documents**):

1) 27 CFR 478.21(a)

Failure by the licensee of [redacted] of the [redacted] TF Forms 4473 reviewed to ensure the form was complete and accurate as required by the instructions prior to Transferring a firearm to a non-licensee.

2) 27 CFR 478.124(c)(1)

Failure by the licensee of [redacted] of the [redacted] TF Forms 4473 reviewed to ensure the Transferee recorded their State of birth and/or State of residency in Section A prior to transferring a firearm to a non-licensee.

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

Failure by the licensee of [redacted] of the [redacted] TF Forms 4473 reviewed to record the identification information in Section #20a, prior to the transfer of a firearm to a non-licensee. (Note: copy of IDs attached to the ATF Form 4473)

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

Failure by the licensee of [redacted] of the [redacted] TF Forms 4473 reviewed to completely document the NICS related information in Section B, 21d. (Date/response blank)

5) 27 CFR 478.124(c)(4)

Failure by the licensee of [redacted] of the [redacted] TF Forms 4473 reviewed to record the firearm

FIREARMS INSPECTION REPORT

Name: Rodney Dean & Angela Kay B.
Combs

UI#: 763050-2016-0352-B1B

Trade Name: Chestnut Hill Gun Works

FFL#: 1-56-009-01-8C-01455

type and caliber as required in Section C, #29/30, prior to the transfer of a firearm to a non-licensee.

6) 27 CFR 478.124(c)(5)

Failure by the licensee of the ATF Forms 4473 reviewed to correctly record the Transferor's signature and/or the correct date the firearm was transferred in Section D of the form.

7) 27 CFR 478.102(a)

Failure by the licensee (Responsible Person Rodney Dean Combs) instance, for the scope of the inspection, conduct a background check when required to execute an ATF Form 4473 for b3 Public Law 112-55 (125 Stat. 552)

9) 27 CFR 478.124(a)

Failure by the licensee (Responsible Person Rodney Dean Combs) instance, for the scope of the inspection, to execute an ATF Form 4473 for b3 Public Law 112-55 (125 Stat. 552)

According to the Statistical Page the following error ratios were calculated (Attached Worksheet):

-Failure to obtain complete or accurate information in the certification: 0 %

-Failure to record any ID: 0%

-Failure to obtain valid or complete ID information: 6.7%*

*Note: Since the licensee had photocopies of NC driver's licenses attached to the related Form 4473, those instances were documented on the worksheets as errors (E) instead of blanks (B) which requires a warning conference if higher than

On 5/27/16, a NICS Audit Log query revealed transactions for this licensee (zero denied, zero proceed, zero open). The NICS response within the ATF F 4473 review scope was verified on the NICS Au g. There were no denied form. Mr. Combs was reminded that the denied forms must be filed separately.

The ATF Forms 4473 are filed by a serialized number which is based on the date of acquisition. This creates a problem if more than one firearm is sold, and they are not in sequential order in the A&D book. IOI (b) (6) explained that if he continues to use this filing method and more than one firearm is sold on a form, he must place a copy of the form to fill the spot for each related number on that form (except one will be utilized for the original form). Mr. Combs advised the original form will be placed in the lowest number slot, and a copy will be placed in all related numbers which will reference the location of the original document. Most of the firearms are sold upon receipt, so even when multiple firearms are sold the serialized numbers are sequential which does not create a problem. When there is a gap between the serialized numbers,

FIREARMS INSPECTION REPORT

Name: Rodney Dean & Angela Kay B.
Combs

UI#: 763050-2016-0352-B1B

Trade Name: Chestnut Hill Gun Works

FFL#: 1-56-009-01-8C-01455

only one of the dispositions will correctly reflect the location of the related ATF Form 4473. IOI (b) (6) explained that he can also file them by date of sale (instead of by serialized number) and still record the A&D acquisition reference numbers on the form but he would be required to record the customer's address.

Mr. Combs is the only person that conducts firearm transfers, and signs the ATF Form 4473. He described the proper procedure for conducting a firearm sale, which only occurs at the licensed premises. Customers are identified with valid Government issued identification cards. Copies of the ID and concealed carry permit are attached to each ATF Form 4473. ATF Form 4473 is completed at the time of the sale, and not before. He conducts a secondary review prior to the customer leaving the shop. NICS checks are conducted via telephone.

6 – Multiple Sales

On 5/27/16, the Violent Crime Analysis Branch conducted a licensee query for Rodney Dean and Angela Kay B. Combs, d/b/a Chestnut Hill Gun Works, which revealed no multiple sales for the three year scope. There were unreported multiple sales, involving handguns, found for the review scope of the ATF Forms 4473 which were submitted during the inspection (Attached ROV - Violation #8 and Worksheet 2 – 4473, Exhibit 1 – Supporting Documents).

8) 27 CFR 478.126a

Failure by the licensee in instances of the ATF Forms 4473 reviewed to timely submit a Report of Multiple Sale of Pistols and Revolvers (ATF Form 3310.4) as required.

7 – Suspicious/Prohibited Purchasers

No suspicious or prohibited purchasers were identified during the inspection.

8 – Trace Activity

On 5/27/16, the Violent Crime Analysis Branch conducted a Firearms Trace History query for Rodney Dean and Angela Kay B. Combs, d/b/a Chestnut Hill Gun Works. The three year scope of the query revealed the licensee was not associated with any trace requests.

9 - NFA/Importer/Collector/Manufacturer

No NFA weapons were found during the inspection. Mr. Combs does not have a Special Occupation Tax Stamp, nor does he conduct importer or manufacturer

FIREARMS INSPECTION REPORT

Name: Rodney Dean & Angela Kay B. Combs **UI#:** 763050-2016-0352-B1B
Trade Name: Chestnut Hill Gun Works **FFL#:** 1-56-009-01-8C-01455

activities. On 5/31/16, the NFA Branch reported there were no results found during a query of their records. IOI (b) (6) thoroughly explained the difference between manufacturing and gunsmithing per the Gun Control Act. Mr. Combs acknowledged that he understood the difference.

10 - Referrals

No referrals were generated from this inspection.

11 - Other

At the time of the inspection, the Mr. Combs was compliant with the Federal Youth Handgun Safety Act (notice and poster), as well as the 2005 Child Safety Lock Act. He also maintains a supply of firearm locks available for customers. Mr. Combs was partially compliant with North Carolina General Statute 14-315 in that he was providing the notice, but did not have it posted. He advised he was not familiar with the poster requirement. IOI (b) (6) provided him with a copy of the law and sample poster during the inspection. The required poster was created and on display at the time of the closing conference.

Mr. Combs signed an ATF Voluntary Consent to Inspect Outside Business Hours since the inspection was conducted outside the documented FLS business hours of Tuesday through Saturday, 1200 to 2000 hours (Exhibit 2).

12 - Closing Actions

On 6/29/16, IOI (b) (6) held a closing conference with Responsible Person Rodney Combs and Angela Combs who were issued a Report of Violations (ROV) on ATF Form 5030.5 (Attached). Rodney and Angela Combs signed the ROV in acknowledgment that they received a copy. IOI (b) (6) discussed the violations and related preventative action with them, which is outlined in Section 13. IOI (b) (6) also conducted a full review of ATF laws and regulations per the Acknowledgement Federal Firearms Regulations Form they both certified receipt by signing the form (Exhibit 3). Particular emphasis was placed on the topics related to the violations cited during the inspection.

During the closing conference, IOI (b) (6) provided the ATF P 5300.15, FFL Quick Reference and Best Practices Guide, and the required forms and posters noted in the acknowledgment. Detailed instructions regarding the Acquisition and Disposition Record Book, the ATF Form 4473, ATF Form 3310.11 (FFL Theft/Loss Report), and ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) were explained during the interview. Mr. Combs was encouraged to sign

FIREARMS INSPECTION REPORT

Name: Rodney Dean & Angela Kay B. Combs
UI#: 763050-2016-0352-B1B
Trade Name: Chestnut Hill Gun Works
FFL#: 1-56-009-01-8C-01455

up for ATF email notifications via ATF.GOV, and to contact her for any questions or concerns in the future. IOI (b) (6) also provided her business card with all her contact information.

13 - Violations

1. 27 CFR 478.21(a)

Nature of violation:

Failure by the licensee of the TF Forms 4473 reviewed to ensure the form was complete and accurate as required by the instructions prior to Transferring a firearm to a non-licensee.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

Mr. Combs advised these errors were an oversight on his part. As a result of the inspection, he will review the forms more carefully to ensure they are complete and accurate prior to concluding the transaction.

Corrective action:

The ATF Form 4473 must be complete and accurate per the instructions prior to the transfer of a firearm. During the closing conference, IOI (b) (6) reviewed each section of the ATF Form 4473 with Mr. Combs who was instructed to implement a more thorough review system to ensure required information is recorded on the form prior to the transfer of a firearm.

Reference: Attached ROV and Worksheet 2 – ATF Form 4473, Exhibit 1 – Supporting documents.

2. 27 CFR 478.124(c)(1)

Nature of violation:

Failure by the licensee of the ATF Forms 4473 reviewed to ensure the Transferee recorded their State of birth and/or State of residency in Section A prior to transferring a firearm to a non-licensee.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

FIREARMS INSPECTION REPORT

Name: Rodney Dean & Angela Kay B. UI#: 763050-2016-0352-B1B
Combs
Trade Name: Chestnut Hill Gun Works FFL#: 1-56-009-01-8C-01455

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

Mr. Combs advised these errors were an oversight on his part. As a result of the inspection, he will review the forms more carefully to ensure they are complete and accurate prior to concluding the transaction.

Corrective action:

The ATF Form 4473 must be complete and accurate per the instructions prior to the transfer of a firearm. During the closing conference, IOI **(b)(6)** reviewed each section of the ATF Form 4473 with Mr. Combs who was instructed to implement a more thorough review system to ensure required information is recorded on the form prior to the transfer of a firearm.

Reference: Attached ROV and Worksheet 2 – ATF Form 4473, Exhibit 1 – Supporting documents.

3. **27 CFR 478. 124(c)(3)(i)**

Nature of violation:

Failure by the licensee 03 Public Law 112-55 (125 Stat 552) of the 03 Public Law 112-55 (125 Stat 552) TF Forms 4473 reviewed to record the identification information in Section B, #20a, prior to the transfer of a firearm to a non-licensee.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

Mr. Combs advised these errors were an oversight on his part. As a result of the inspection, he will review the forms more carefully to ensure they are complete and accurate prior to concluding the transaction.

Corrective action:

Prior to transferring a firearm to a non-licensee, the licensee must obtain a valid government issued ID from the Transferee (buyer), which is to be recorded in section B, block 20a. The ID cannot be expired. If the address recorded in item 2 does not match the ID provided, then a supplemental government issued document must be provided and recorded in 20b for residency. During the closing conference, IOI **(b)(6)** reviewed each section of the ATF Form 4473 with Mr. Combs who was instructed to implement a more thorough review system to ensure required information is recorded on the form prior to the transfer of a firearm.

FIREARMS INSPECTION REPORT

Name: Rodney Dean & Angela Kay B. Combs **UI#:** 763050-2016-0352-B1B
Trade Name: Chestnut Hill Gun Works **FFL#:** 1-56-009-01-8C-01455

Reference: Attached ROV and Worksheet 2 – ATF Form 4473, Exhibit 1 – Supporting documents.

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

Nature of violation:

Failure by the licensee 03 Public Law 112-55 (125 Stat. 552) of the 03 Public Law 112-55 (125 Stat. 552) TF Forms 4473 reviewed to completely document the NICS related information in Section B, 21d.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

Mr. Combs advised these errors were an oversight on his part. As a result of the inspection, he will review the forms more carefully to ensure they are complete and accurate prior to concluding the transaction.

Corrective action:

All required NICS information, including the date and NICS response, must be recorded on the ATF Form 4473 prior to the transfer of a firearm to a non-licensee. During the closing conference, IOI **(b)(6)** reviewed each section of the ATF Form 4473 with Mr. Combs who was instructed to implement a more thorough review system to ensure required information is recorded on the form prior to the transfer of a firearm.

Reference: Attached ROV and Worksheet 2 – ATF Form 4473, Exhibit 1 – Supporting documents.

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

Nature of violation:

Failure by the licensee 03 Public Law 112-55 (125 Stat. 552) of the 03 Public Law 112-55 (125 Stat. 552) TF Forms 4473 reviewed to record the firearm type and caliber as required in Section C, #29/30, prior to the transfer of a firearm to a non-licensee.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

Mr. Combs advised these errors were an oversight on his part. As a result of the inspection, he will review the forms more carefully to ensure they are complete and accurate prior to concluding the transaction.

FIREARMS INSPECTION REPORT

Name: Rodney Dean & Angela Kay B. Combs
UI#: 763050-2016-0352-B1B
Trade Name: Chestnut Hill Gun Works
FFL#: 1-56-009-01-8C-01455

Corrective action:

All required firearm information must be recorded on the ATF Form 4473 prior to the transfer of a firearm to a non-licensee. During the closing conference, IOI (b) (6) reviewed each section of the ATF Form 4473 with Mr. Combs who was instructed to implement a more thorough review system to ensure required information is recorded on the form prior to the transfer of a firearm.

Reference: Attached ROV and Worksheet 2 – ATF Form 4473, Exhibit 1 – Supporting documents.

6. 27 CFR 478.124(c)(5)

Nature of violation:

Failure by the licensee of the TF Forms 4473 reviewed to correctly record the Transferor's signature and/or the correct date the firearm was transferred in Section D of the form.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

Mr. Combs advised these errors were an oversight on his part. As a result of the inspection, he will review the forms more carefully to ensure they are complete and accurate prior to concluding the transaction.

Corrective action:

The ATF Form 4473 must be complete and accurate per the instructions prior to the transfer of a firearm. During the closing conference, IOI (b) (6) reviewed each section of the ATF Form 4473 with Mr. Combs who was instructed to implement a more thorough review system to ensure required information is recorded on the form prior to the transfer of a firearm.

Reference: Attached ROV and Worksheet 2 – ATF Form 4473, Exhibit 1 – Supporting documents.

7. 27 CFR 478.102(a)

Nature of violation:

Failure by the licensee (Responsible Person Rodney Dean Combs) in accordance with the scope of the inspection, conduct a background check when required to execute an ATF Form 4473 for (b) (3) Public Law 112-55 (125 Stat. 552)

FIREARMS INSPECTION REPORT

Name: Rodney Dean & Angela Kay B. Combs **UI#:** 763050-2016-0352-B1B
Trade Name: Chestnut Hill Gun Works **FFL#:** 1-56-009-01-8C-01455

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Licensee's response:

Mr. Combs advised that he was told during the qualification he was not required to complete the ATF Form 4473 for firearms transferred to his personal collection. Now that he knows he is required to do one, he will ensure they are completed (including NICS or NICS alternate) for all future transfers to his personal collection.

Corrective action:

Except for the Responsible Person licensed as a sole proprietor, all other Federal firearm licensee Responsible Persons are required to complete an ATF Form 4473 (including NICS or NICS alternate NC permit) prior to transferring a firearm to their personal collection.

Reference: Attached ROV and Worksheet 2 – ATF Form 4473, Exhibit 1 – Supporting documents.

8. **27 CFR 478.126a**

Nature of violation:

Failure by the licensee in ^{(b)(3) - 112 Public Law 55 125 Stat 552} instances of the ^{(b)(3) - 112 Public Law 55 125 Stat 552} ATF Forms 4473 reviewed to timely submit a Report of Multiple Sale of Pistols and Revolvers (ATF Form 3310.4) as required.

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)



Licensee's response:

Mr. Combs advised that he understood the ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers, was only required when three or more handguns are sold to the same person within three days. He will now complete them as required. A review of the ATF Forms for previous three years, outside the inspection

FIREARMS INSPECTION REPORT

Name: Rodney Dean & Angela Kay B. Combs **UI#:** 763050-2016-0352-B1B
Trade Name: Chestnut Hill Gun Works **FFL#:** 1-56-009-01-8C-01455

scope, was conducted and three more reports were submitted.

Corrective action:

The licensee shall prepare a report of multiple sales or other disposition whenever the licensee sells or otherwise disposes of, at one time or during any five consecutive business days, two or more pistols, or revolvers, or any combination of pistols and revolvers totaling two or more, to an unlicensed person: Provided, that a report need not be made where pistols or revolvers, or any combination thereof, are returned to the same person from whom they were received. The report shall be prepared on ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers. Not later than the close of business on the day that the multiple sale or other disposition occurs, the licensee shall forward two copies of Form 3310.4 to the ATF office specified thereon and one copy to the State police or to the local law enforcement agency in which the sale or other disposition took place. Where the State or local law enforcement officials have notified the licensee that a particular official has been designated to receive Forms 3310.4, the licensee shall forward such forms to that designated official. The licensee shall retain one copy of Form 3310.4 and attach it to the firearms transaction record, Form 4473, executed upon delivery of the pistols or revolvers. Mr. Combs submitted the unreported ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers), and ordered a supply of forms during the inspection.

Reference: Attached ROV and Worksheet 2 – ATF Form 4473, Exhibit 1 – Supporting documents.

9. 27 CFR 478.124(a)

Nature of violation:

Failure by the licensee (Responsible Person Rodney Dean Combs) in ^{b3 Public Law 112-55 (125 Stat. 552)} stance, for the scope of the inspection, to execute an ATF Form 4473 for ^{b3 Public Law 112-55 (125 Stat. 552)} **b3 Public Law 112-55 (125 Stat. 552)**

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

Licensee's response:

Mr. Combs advised that he was told during the qualification he was not required to complete the ATF Form 4473 for firearms transferred to his personal collection. He was directed to record the disposition in the A&D Record, and maintain a record of personal firearms. He further advised that he has a N.C. concealed carry permit, so completing the form would be easy. Now that he knows he is required to do one, he will ensure they are completed for all future transfers to his personal collection.

FIREARMS INSPECTION REPORT

Name: Rodney Dean & Angela Kay B. **UI#:** 763050-2016-0352-B1B
Combs
Trade Name: Chestnut Hill Gun Works **FFL#:** 1-56-009-01-8C-01455

Corrective action:

Except for Responsible Persons licensed as a sole proprietor, all Federal firearm licensee Responsible Persons are required to complete an ATF Form 4473 (including NICS or NICS alternate NC permit) prior to transferring a firearm to their personal collection.

Reference: Attached ROV and Worksheet 2 – ATF Form 4473, Exhibit 1 – Supporting documents.

 Expired certificate

X (b) (6)

(b) (6)

Industry Operations Investigator
Signed by: ATF

Index of Worksheets and Exhibits