

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) KOHN'S LOAN CO KOHN'S 126 WEST HIGH STREET LIMA, OH 45801, ALLEN	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 773030-2016-0244-B1B		
	3. PERMIT/LICENSE NUMBER 434003026M33483	4a. TARGET DATE 9/1/2016	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, 11/20/2015

8. PURPOSE/SPECIAL INSTRUCTIONS
CONDUCT FIREARMS DISPOSITION EMPHASIS INSPECTION FOR THIS TYPE 02 LICENSEE. REFER TO IO MANUAL, CHAPTER C, AND THE ANNUAL CLEVELAND GROUP III DOMAIN ASSESSMENT. THIS INSPECTION MUST BE COMPLETED DURING FY16 AS REQUIRED BY THE DOMAIN ASSESSMENT.

DETERMINE IF ELDERLY RP ACTIVE OR IF NEW RPS NEED ADDED TO THIS LICENSE.

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	7	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 Operation Investigator
Submitted on: 07/12/2016

Viols WL ONLY and No Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
NOV 2015	1.00		
JUN 2016	56.50		
JUL 2016	10.00		
ATF OFFICER'S SUBTOTAL	67.50	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	67.50		

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 07/13/2016	

Assignment and Report

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	3. PERMIT/LICENSE NUMBER 434003026M33483	4a. TARGET DATE 9/1/2016	4b. TARGET HOURS
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ROUTING SEQUENCE AND DATE

- ☐ 1. _____
☐ 2. _____
☐ 3. _____
☐ 4. _____

CONTROL FILE POSTED DATE _____

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor KOHNS LOAN CO KOHNS	Street Address 126 WEST HIGH STREET	City LIMA	State OH	Zip Code 45801-	County ALLEN	Page 1 of 7 Pages
License/Permit/Registry Number <i>(If any)</i> 434003026M33483		Expiration Date 12/1/2016		Date(s) or Period of Inspection 06/10/2015 through 06/10/2016		

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:

1 The licensee failed to comply with 27 CFR 478.21a, as stated below on (b)(3) 112 Public ATF Form 4473:

"The Director is authorized to prescribe all forms required by this part. All of the information called for in each form shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by this part."

1. #26483 (b)(3) 112 Public Law 55 125 STAT 552 (b) Item 25 - left blank
2. #26484 (b)(3) 112 Public Law 55 125 STAT 552 (b) Item 24 - left blank, Item 25 - left blank
3. #26437 (b)(3) 112 Public Law 55 125 STAT 552 (b) Item 31 - left blank, Item 32- left blank
4. #26431 (b)(3) 112 Public Law 55 125 STAT 552 (b) Item 31 - left blank, Item 32- left blank
5. #26405 (b)(3) 112 Public Law 55 125 STAT 552 (b) Item 24 - left blank, Item 25 - left blank
6. #26492 (b)(3) 112 Public Law 55 125 STAT 552 (b) Item 24 - left blank, Item 25 - left blank
7. #26416 (b)(3) 112 Public Law 55 125 STAT 552 (b) Item 24 - left blank, Item 25 - left blank
8. #26410 (b)(3) 112 Public Law 55 125 STAT 552 (b) Item 24 - left blank, Item 25 - left blank

Citation: 27 CFR 478.21(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

All of the information called for in each ATF F 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

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Name of Proprietor KOHNS LOAN CO KOHNS	Street Address 126 WEST HIGH STREET	City LIMA	State OH	Zip Code 45801-	County ALLEN	Page 2 of 7 Pages
License/Permit/Registry Number <i>(If any)</i> 434003026M33483		Expiration Date 12/1/2016		Date(s) or Period of Inspection 06/10/2015 through 06/10/2016		

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:

2 The licensee failed to comply with 27 CFR 478.102(c) as stated below on [REDACTED] ATF Form 4473:

27 CFR 478.102(c):

"Time limitation on NICS checks. A NICS check conducted in accordance with paragraph (a) of this section may be relied upon by the licensee only for use in a single transaction, and for a period not to exceed 30 calendar days from the date that NICS was initially contacted. If the transaction is not completed within the 30-day period, the licensee shall initiate a new NICS check prior to completion of the transfer."

#26442 [REDACTED] Section C of ATF F 4473 was recertified after thirty (30) days had been exceeded.

Original date of NICS was December 31, 2015 - recertified on February 3, 2016

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

All of the information called for in each ATF F 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

Citation: 27 CFR 478.102(c)

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 KOHN'S LOAN CO KOHN'S	Street Address 126 WEST HIGH STREET	City LIMA	State OH	Zip Code 45801-	County ALLEN	Page 3 of 7 Pages
License/Permit/Registry Number <i>(If any)</i> 434003026M33483		Expiration Date 12/1/2016		Date(s) or Period of Inspection 06/10/2015 through 06/10/2016		

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:

3 The licensee failed to comply with 27 CFR 478.124(c)(1) as stated below on [REDACTED] ATF Form 4473

Prior to making an over-the-counter transfer of a firearm to a nonlicensee who is a resident of the State in which the licensee's business premises is located, the licensed importer, licensed manufacturer, or licensed dealer so transferring the firearm shall obtain a Form 4473 from the transferee showing the transferee's name...and certification by the transferee that the transferee is not prohibited by the Act from transporting or shipping a firearm in interstate or foreign commerce or receiving a firearm which has been shipped or transported in interstate or foreign commerce or possessing a firearm in or affecting commerce.

#26442 [REDACTED] Certification in Section A of ATF F 4473 Item 17 date not entered correctly.

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)

All of the information called for in each ATF F 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

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 KOHN'S LOAN CO KOHN'S	Street Address 126 WEST HIGH STREET	City LIMA	State OH	Zip Code 45801-	County ALLEN	Page 4 of 7 Pages
License/Permit/Registry Number <i>(If any)</i> 434003026M33483		Expiration Date 12/1/2016		Date(s) or Period of Inspection 06/10/2015 through 06/10/2016		

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:

4 The licensee failed to comply with the requirements of 27 CFR §478.124(c)(3)(iv) and record fully and completely on (b)(3) 112 Public ATF Forms 4473 the information required in Item 21 a, b, or d of NICS section.

- 1.#26430 (b)(3) 112 Public Law 55 125 STAT 552 21a and 21d
- 2.#26418 (b)(3) 112 Public Law 55 125 STAT 552 21a
- 3.#26387 (b)(3) 112 Public Law 55 125 STAT 552 - 21a
- 4.#26369 (b)(3) 112 Public Law 55 125 STAT 552 (b)(6) S - 21a
- 5.#26365 (b)(3) 112 Public Law 55 125 STAT 552 (b)(6) 21d
- 6.#26388 (b)(3) 112 Public Law 55 125 STAT 552 - 21a
- 7.#26410 (b)(3) 112 Public Law 55 125 STAT 552 - 21d
- 8.#26458 (b)(3) 112 Public Law 55 125 STAT 552 21a (21f has different date same as 36)
- 9.#26492 (b)(3) 112 Public Law 55 125 STAT 552 - 21b
- 10.#26442 (b)(3) 112 Public Law 55 125 STAT 552 (b)(6) 21d

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

All of the information called for in each ATF F 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

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

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 KOHN'S LOAN CO KOHN'S	Street Address 126 WEST HIGH STREET	City LIMA	State OH	Zip Code 45801-	County ALLEN	Page 5 of 7 Pages
License/Permit/Registry Number <i>(If any)</i> 434003026M33483		Expiration Date 12/1/2016	Date(s) or Period of Inspection 06/10/2015 through 06/10/2016			

Inspection Results

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

Number: 5

Nature of Violation:

5 The licensee failed to comply with the requirements of 27 CFR §478.124(c)(4) and record fully and completely on (b)(3) 112 Pub ATF Form 4473 the information as follows.

"The licensee shall identify the firearm to be transferred by listing on the Form 4473 the name of the manufacturer, the name of the importer (if any), the type, model, caliber or gauge, and the serial number of the firearm."

#26485 (b)(3) 112 Public Law 59 125 S(A) Item 26, 27, 28, 29 and 30.

Citation: 27 CFR 478.124(c)(4)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

All of the information called for in each ATF F 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

Instructions

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Name of Proprietor KOHN'S LOAN CO KOHN'S	Street Address 126 WEST HIGH STREET	City LIMA	State OH	Zip Code 45801-	County ALLEN	Page 6 of 7 Pages
License/Permit/Registry Number (If any) 434003026M33483		Expiration Date 12/1/2016	Date(s) or Period of Inspection 06/10/2015 through 06/10/2016			

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:
6 The licensee failed in (b)(3) 112 Public Law instances to enter the date in Item #36 of the ATF F 4473. "The licensee shall sign and date the form if the licensee does not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearm and transfer the firearm described on the Form 4473."

1.#26489 (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)
2.#26456
3.#26455
4.#26453
5.#26452
6.#26372
7.#26434
8.#26416
9.#26388
10.#2645
11.#2644

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

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

All of the information called for in each ATF F 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

Citation: 27 CFR 478.124(c)(5)

June 10 2019 Document Production

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For Official Use Only

ATF E-Form 5030 5
Revised April 2005

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

Instructions

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License/Permit/Registry Number (If any) 434003026M33483		Expiration Date 12/1/2016	Date(s) or Period of Inspection 06/10/2015 through 06/10/2016			

Inspection Results

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

Number: 7

Nature of Violation:
7 The licensee failed in (b)(3) 112 F-906 instance to enter the identification information as required.
"Shall verify the identity of the transferee by examining the identification document (as defined in §478.11) presented, and shall note on the Form 4473 the type of identification used;
#26373 (b)(3) 112 Public Law 55 123 S(A) 552 (b)(3) Item 20 left blank.

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

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

All of the information called for in each ATF F 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

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

Date

Signature and Title of ATF Officer

Date

June 10 2019 Document Production

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ATF E-Form 5030 5
Revised April 2005



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
5005 Rockside Road, Suite 700
Independence, OH 44131

July 13, 2016
www.atf.gov

773030
5440

(b) (6)

Certified Mail – Return Receipt Requested

KOHN'S LOAN CO
KOHN'S
126 WEST HIGH STREET
LIMA, OH 45801-
RE: 434003026M33483

Dear Mr. Mark Scher:

During a recent inspection at your firearms business covering the period 06/10/2015 to 06/10/2016 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.

All violations were fully explained to you or your designated responsible person by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator. You or your responsible person indicated that you understood the requirements of the firearms laws and regulations and 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 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.

KOHN'S LOAN CO

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

Sincerely yours,

(b)(6)

Area Supervisor, Cleveland III

Enclosure

c: Federal Firearms Licensing Center
Cleveland III (IO) Field Office

FIREARMS INSPECTION REPORT

Name: Kohn's Loan Co.
Trade Name: Kohn's

UI#: 773030-2016-0244-B1B
FFL#: 4-34-003-02-6M-33483

Address: 126 West High St.
Lima, Ohio 45801 (Allen)

1 - Introduction

Inspection Profile:

On June 10, 2016, Senior Industry Operations Investigator (SIOI) (b)(6) commenced an inspection of the licensee, Kohn's Loan Company.

Mr. Mark Scher, Manager under receivership (*See Item 11 Other of this report for further explanation*) and Thomas Clarke, manager were interviewed and assisted during the course of the investigation. The inspection period covered June 10, 2015 – June 16, 2016.

Per the ATF F 5700.14 the IOI was instructed to;

Conduct firearms disposition emphasis inspection for this type 01 licensee. Refer to IO Manual, Chapter C, and the Annual Cleveland Group III Domain Assessment. This inspection must be completed by during FY 16 as required by the domain Assessment.

Advance notification of this inspection was not given to the licensee.

Business Profile:

Kohn's Loan Co. is a full service pawn shop licensed in Lima, Ohio. Kohn's Loan Co. deals in all types of Title I firearms for pawn with an occasional transfer of a firearm that has been forfeited. Kohn's Loan Co. is a full service pawn shop and offers loans on various items to be pawned.

Kohn's Loan Co. is currently in the process of being transferred to another owner (*See Item 11 Other of this report for a further explanation*).

The licensee does not have any off-site storage of firearms nor do they conduct business at gun shows but do occasional internet transfers.

Ownership and Control:

The firearm business is a corporation with Mr. Scher currently in charge. There are several employees. There have been changes in ownership and control. The information was updated in FLS per a request from Mr. Scher with assistance from Investigator (b)(6) and the FFLC.

Hidden ownership is not suspected.

FIREARMS INSPECTION REPORT

Name: Kohn's Loan Co.
Trade Name: Kohn's

UI#: 773030-2016-0244-B1B
FFL#: 4-34-003-02-6M-33483

Variance:

The licensee does not hold any variances.

2 - Recommendation

Violation, WL only and No Recall Inspection

3 - Inspection History

The following inspections were disclosed after a review of the file.

Date and Type of Inspection:	April 2010, DEI
UI#:	773030-2010-0308-B1B
Inspection Results:	No violations, no further action, no referrals
Cited Violations:	No violations
Date and Type of Inspection:	October 2007, Recall DEI
UI#:	773030-2007-0489-B1B
Inspection Results:	No further action
Cited Violations:	27CFR 478.21(a), 27CFR 124(c)(1),124(c)(3)(iv)
Date and Type of Inspection:	May 2006, DEI
UI#:	773030-2006-0238-B1B
Inspection Results:	Violations WL Only and Recall
Cited Violations:	27 CFR 478.125(e) 27 CFR 478.124(c) 27 CFR 478.21(a)

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

Mr. Clarke maintains the inventory and the Acquisition & Disposition records. The records are kept in the appropriate format, the required information is accurate, and the entries appear to be made in a timely manner. The A&D records are being maintained electronically and are in accordance with ATF Ruling 2016-1.

A review of the A&D records disclosed that there were (b)(4) firearms acquired and disposed in the past twelve months.

A full inventory was taken of the ninety-six (96) firearms listed in the inventory printout (**Exhibit #6**).

There were no errors or violations disclosed or cited in the inventory or A&D Records being maintained.

FIREARMS INSPECTION REPORT

Name: Kohn's Loan Co.
Trade Name: Kohn's

UI#: 773030-2016-0244-B1B
FFL#: 4-34-003-02-6M-33483

5 - ATF Forms 4473 – NICS & Other Dispositions

There were one hundred and thirty-eight (138) ATF Forms 4473 on file for the inspection period. A review of the forms was completed and violations were disclosed and cited on (b)(3) - 112 Public Law 55 125 Stat 552 the ATF Forms 4473.

A review of the NICS Audit Log (**Exhibit 2**) disclosed nineteen (19) transfers for the period. No errors or omissions.

Discrepancies were disclosed and there were seven (7) violations cited on ATF F 5030.5, Report of Violations.

6 – Multiple Sales

There were zero (0) multiple handgun sales reported during the inspection period (**Exhibit 3**).

A review of the A & D records and ATF Forms 4473s disclosed zero (0) unreported multiple sales.

There were no discrepancies disclosed or cited.

7 – Suspicious/Prohibited Purchasers

There were no suspicious or prohibited purchasers identified during the inspection.

On May 24, 2016, IOI (b)(6) conducted deconfliction queries through N-Force with negative results. A May 27, 2016, an email from RAC (b)(6) of the Toledo Field Office elicited a negative result on Kohn's Loan Co.

8 – Trace Activity

The Trace History (**Exhibit 3**) indicated there have been no traces attributed to this licensee in the past twelve months.

9 - NFA/Importer/Collector/Manufacturer

This licensee is not an importer, collector of firearms, nor a manufacturer and does not deal in NFA weapons.

10 - Referrals

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

11 - Other

As of December 2015 there were major changes in the ownership of Kohn's Loan Co. including a retirement of the last owner and a resignation of the counsel that represented the business. Ms. Andrea S. Rabiner, successor/trustee filed a motion to place Kohn's Loan Co. under receivership through the court. Mr. Scher supplied the

FIREARMS INSPECTION REPORT

Name: Kohn's Loan Co.
Trade Name: Kohn's

UI#: 773030-2016-0244-B1B
FFL#: 4-34-003-02-6M-33483

“Order Appointing Receiver (**Exhibit # 5**).”

Christopher F. Cowan, Attorney at Law was appointed receiver by the court and he placed Mr. Scher in charge of the business operations. Mr. Scher is a licensed pawnbroker in the State of Ohio and is in the process of purchasing this Kohn's location and a second business location in Cincinnati, Ohio.

Mr. Scher explained that the pawn business is a fiduciary business as items are held for money and certain levels of fungible funds must be available at all times. With the retirement and changes in the business, the Kohn's was in danger of falling below the levels required by the State of Ohio. Mr. Scher explained further that this is the reason that Ms. Rabiner, who is not a pawnbroker, applied to the court for receivership.

There is a Youth Handgun Safety Act poster in view in the area where the firearms are transferred.

12 - Closing Actions

On June 29, 2016, IOI (b)(6) held a closing conference with Mr. Scher to include a final review of the inventory and records.

IOI (b)(6) Mr. Scher that the failure to complete an ATF Form 4473 completely and fully could be a serious infraction of the laws and regulations and lead to revocation of this license.

Mr. Scher was given instructions on completing an application for a new license. The current license expires on December 1, 2016 and Mr. Scher is listed as a RP. He is applying for two separate licenses for the Lima, Ohio location and a location in Cincinnati, Ohio.

On July 7, 2016, Mr. Scher advised IOI (b)(6) by email that as of July 11, 2016 the applications were going to be sent to the FFLC as discussed (**Exhibit 4**).

IOI (b)(6) discussed with Mr. Scher and answered all of the questions concerning the Acknowledgment of Federal Firearms Regulations (**Exhibit 1**).

13 - Violations

1. 27 CFR 478.21(a) **Repeat from 2006 and 2007**

Nature of Violation: The licensee failed to comply with 27 CFR 478.21a, as stated below on (b)(6) ATF Forms 4473:

FIREARMS INSPECTION REPORT

Name: Kohn's Loan Co.
Trade Name: Kohn's

UI#: 773030-2016-0244-B1B
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"The Director is authorized to prescribe all forms required by this part. All of the information called for in each form shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by this part."

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




Licensee's Response: Mr. Scher stated that he was not sure of what was correct and was following the previous owner's example. That is why the ATF Forms 4473 were incorrect. He stated that now that he and his manager know what to do, he will ensure they are correct from now on.

Correction Action: All of the information called for in each ATF Form 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

ROV

Firearms Inspection WS - ATF F 4473 (2012) Edition Review Worksheet
Exhibit # 7

2. 27 CFR 478.102(c)

Nature of Violation: The licensee failed to comply with 27 CFR 478.102(c) as stated below on  ATF Form 4473:

27 CFR 478.102(c):

"Time limitation on NICS checks. A NICS check conducted in accordance with paragraph (a) of this section may be relied upon by the licensee only for use in a single transaction, and for a period not to exceed 30 calendar days from the date that NICS was initially contacted. If the transaction is not completed within the 30-day period, the licensee shall initiate a new NICS check prior to completion of the transfer."

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



FIREARMS INSPECTION REPORT

Name: Kohn's Loan Co.
Trade Name: Kohn's

UI#: 773030-2016-0244-B1B
FFL#: 4-34-003-02-6M-33483

Original date of NICS was December 31, 2015 - recertified on February 3, 2016.

Follow Up: On July 12, 2016, a query through OpenFox generated arrests for this customer that appear to be the reason for the initial delay. The outcome of the arrests do not appear to be prohibiting and a NICS recheck was completed and yielded a "proceed" response.


Licensee's Response: Mr. Scher stated that he was not sure of what was correct and was following the previous owner's example. That is why the ATF Forms 4473 were incorrect. He stated that now that he and his manager know what to do, he will ensure they are correct from now on.

Correction Action: All of the information called for in each ATF Form 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

ROV

Firearms Inspection WS - ATF F 4473 (2012) Edition Review Worksheet Exhibit # 8

3. 27 CFR 478.124(c)(1) **Repeat from 2006 and 2007**

Nature of Violation: The licensee failed to comply with 27 CFR 478.124(c)(1) as stated below on  ATF Form 4473

Prior to making an over-the-counter transfer of a firearm to a nonlicensee who is a resident of the State in which the licensee's business premises is located, the licensed importer, licensed manufacturer, or licensed dealer so transferring the firearm shall obtain a Form 4473 from the transferee showing the transferee's name...and certification by the transferee that the transferee is not prohibited by the Act from transporting or shipping a firearm in interstate or foreign commerce or receiving a firearm which has been shipped or transported in interstate or foreign commerce or possessing a firearm in or affecting commerce.

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

Licensee's Response: Mr. Scher stated that he was not sure of what was correct and was following the previous owner's example. That is why the ATF Forms 4473 were incorrect. He stated that now that he and his manager know what to do, he will ensure they are correct from now on.

FIREARMS INSPECTION REPORT

Name: Kohn's Loan Co.
Trade Name: Kohn's

UI#: 773030-2016-0244-B1B
FFL#: 4-34-003-02-6M-33483

Correction Action: All of the information called for in each ATF Form 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

ROV

Firearms Inspection WS - ATF F 4473 (2012) Edition Review Worksheet
Exhibit # 9

4. **27 CFR 478.124(c)(3)(iv) **Repeat from 2006 and 2007****

The licensee failed to comply with the requirements of 27 CFR §478.124(c)(3)(iv) and record fully and completely on (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) ATF Forms 4473 the information required in Item 21 a, b, or d of NICS section.

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

Licensee's Response: Mr. Scher stated that he was not sure of what was correct and was following the previous owner's example. That is why the ATF Forms 4473 were incorrect. He stated that now that he and his manager know what to do, he will ensure they are correct from now on.

Correction Action: All of the information called for in each ATF Form 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

ROV

Firearms Inspection WS - ATF F 4473 (2012) Edition Review Worksheet
Exhibit # 10

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

FIREARMS INSPECTION REPORT

Name: Kohn's Loan Co.
Trade Name: Kohn's

UI#: 773030-2016-0244-B1B
FFL#: 4-34-003-02-6M-33483

The licensee failed to comply with the requirements of 27 CFR §478.124(c)(4) and record fully and completely on (b)(3) - 112 Public Law 55 125 Stat 552 Form 4473 the information as follows.

"The licensee shall identify the firearm to be transferred by listing on the Form 4473 the name of the manufacturer, the name of the importer (if any), the type, model, caliber or gauge, and the serial number of the firearm."

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

Licensee's Response: Mr. Scher stated that he was not sure of what was correct and was following the previous owner's example. That is why the ATF Forms 4473 were incorrect. He stated that now that he and his manager know what to do, he will ensure they are correct from now on.

Correction Action: All of the information called for in each ATF Form 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

ROV

Firearms Inspection WS - ATF F 4473 (2012) Edition Review Worksheet
Exhibit # 11

6. 27 CFR 478.124(c)(5) **Repeat from 2006**

Nature of Violation: The licensee failed in (b)(3) - 112 Public Law 55 125 instances to enter the date in Item #36 of the ATF Form 4473.

"The licensee shall sign and date the form if the licensee does not know or have reasonable cause to believe that the transferee is disqualified by law from receiving the firearm and transfer the firearm described on the Form 4473."

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



FIREARMS INSPECTION REPORT

Name: Kohn's Loan Co.
Trade Name: Kohn's

UI#: 773030-2016-0244-B1B
FFL#: 4-34-003-02-6M-33483

Licensee's Response: Mr. Scher stated that he was not sure of what was correct and was following the previous owner's example. That is why the ATF Forms 4473 were incorrect. He stated that now that he and his manager know what to do, he will ensure they are correct from now on.

Correction Action: All of the information called for in each ATF Form 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

ROV

Firearms Inspection WS - ATF F 4473 (2012) Edition Review Worksheet Exhibit #12

7. **27 CFR 478.124(c)(3)(i) **Repeat from 2006****

Nature of Violation: The licensee failed in (b)(3) - 112 Public Law 55 instance to enter the identification information as required.

"Shall verify the identity of the transferee by examining the identification document (as defined in §478.11) presented, and shall note on the Form 4473 the type of identification used;

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

Licensee's Response: Mr. Scher stated that he was not sure of what was correct and was following the previous owner's example. That is why the ATF Forms 4473 were incorrect. He stated that now that he and his manager know what to do, he will ensure they are correct from now on.

Correction Action: All of the information called for in each ATF Form 4473 shall be furnished as indicated by the headings on the form and the instructions on or pertaining to the form. In addition, information called for in each form shall be furnished as required by the particular regulation cited.

Follow Up: On July 12, 2016, it was confirmed via OHLEG that (b)(3) - 112 Public Law 55 has a valid driver's license which would have been valid at the time of the transaction.

ROV

Firearms Inspection WS - ATF F 4473 (2012) Edition Review Worksheet Exhibit #13

FIREARMS INSPECTION REPORT

Name: Kohn's Loan Co.
Trade Name: Kohn's

UI#: 773030-2016-0244-B1B
FFL#: 4-34-003-02-6M-33483

	Senior Industry Operations Investigator	July 12, 2016
Signature	Title	Date of Report

Index of Worksheets and Exhibits

ATF F 5030.5 Report of Violations (ROV)

Firearms Inspection Work Sheet

Exhibits:

1. Acknowledgement of Federal Firearms Regulations
2. FFL Audit Report
3. FFL History Report
4. July 7, 2016 Email
5. Order Appointing Receiver
6. Inventory printout
7. ATF F 4473 for violation #1 - 27CFR 478.21a
8. ATF F 4473 for violation #2 - 27 CFR 478.102(c)
9. ATF F 4473 for violation #3 - 27 CFR 478.124(c)(1)
10. ATF F 4473 for violation #4 - 27 CFR 478.124(c)(3)(iv)
11. ATF F 4473 for violation #5 - 27 CFR 478.124(c)(4)
12. ATF F 4473 for violation #6 - 27 CFR 478.124(c)(5)
13. ATF F 4473 for violation #7 - 27 CFR 478.124 (c)(3)(i)