

## Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) STALEY & SON'S GUN REPAIR INC STALEY & SON'S GUN REPAIR INC 58 STALEY LANE WALDOBORO ,ME 04572, LINCOLN		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 762030-2016-0234-B1B		
		3. PERMIT/LICENSE NUMBER 601015078E01762	4a. TARGET DATE 9/30/2016	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) , Acting Area Supervisor, 03/03/2016	

  

8. PURPOSE/SPECIAL INSTRUCTIONS Please conduct a DE inspection. Obtain EIN.	
--	--

  

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	6	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS	18	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: 08/02/2016  Viols WL ONLY and No Recall Inspection	
--	--

  

12. TIME ACCOUNTING DATA	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)	
JUN 2016	37.00
JUL 2016	24.00
AUG 2016	2.00
ATF OFFICER'S SUBTOTAL	63.00
ATF OFFICER'S SIGNATURE	
TOTAL HOURS	63.00

  

13. REVIEW AND ROUTING	
REVIEW COMMENTS AND RECOMMENDATION Preventative action has been taken and the FFL has been fully educated regarding his responsibilities and it is believed that future compliance can be achieved through a Warning Letter.  Recommend FLS be updated to reflect that a Warning Letter was issued on 08/16/2016 via Certified Mail #7008 1140 0001 1999 8149.  The last inspection date in FLS should now read 06/28/2016.  PII e-mailed to (b)(6) , FFLC, on August 16, 2016.  Viols WL ONLY and No Recall Inspection	
<input checked="" type="checkbox"/> REVIEWED <input checked="" type="checkbox"/> CONCUR <input checked="" type="checkbox"/> SEE COMMENTS <input checked="" type="checkbox"/> FINAL DISPOSITION	
SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 08/16/2016

(b)(6)

(b)(6)

ATF EF 5700.14 (10-98) For Official Use Only

Page 1 of 2

## Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY)  STALEY & SON'S GUN REPAIR INC STALEY & SON'S GUN REPAIR INC 58 STALEY LANE WALDOBORO ,ME 04572, LINCOLN	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 762030-2016-0234-B1B		
	3. PERMIT/LICENSE NUMBER 601015078E01762	4a. TARGET DATE 9/30/2016	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

ROUTING SEQUENCE AND DATE

- ☐ 1. \_\_\_\_\_  
☐ 2. \_\_\_\_\_  
☐ 3. \_\_\_\_\_  
☐ 4. \_\_\_\_\_

CONTROL FILE POSTED DATE \_\_\_\_\_



**U.S. Department of Justice**

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

*10 Causeway St. Ste. 701, Boston, MA 02222*

---

[www.atf.gov](http://www.atf.gov)

August 16, 2016

762030 (b)(6)  
5300

**WARNING LETTER**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Staley & Son's Gun Repair, Inc.  
Ms. Deborah Staley  
58 Staley Ln.  
Waldoboro, ME 04572

REF: FFL # 6-01-015-07-8E-01762

Dear Ms. Staley:

During a recent compliance inspection at your firearms business covering the period June 12, 2015 to June 12, 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 Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Investigator (b)(6). You 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 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.

Staley & Son's Gun Repair, Inc.  
6-01-015-07-8E-01762

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

Sincerely yours,

(b)(6)

Area Supervisor  
Boston Area Office

Enclosure: Report of Violations

cc: Federal Firearms Licensing Center  
Boston Group V  
Director, Industry Operations, Boston Field Division



## 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 Pages
Staley & Son's Gun Repair, Inc.	58 Staley Ln.	Waldoboro	ME	04572	Lincoln	
License/Permit/Registry Number (if any)		Expiration Date	Date(s) or Period of Inspection			
6-01-015-07-8E-01762		5/1/18	6/12/15 to 6/12/16			

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)
1.	27 CFR 478.21(a)	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. Failure to obtain a complete ATF F 4473 prior to transferring a firearm to a non-licensee. In (b)(6) instances, the transferee failed to sign and date the ATF F 4473 in questions 24 and 25.	Licensee will ensure a complete and accurate ATF F 4473 is obtained for all future transfers to non-licensees.	
2.	27 CFR 478.124(c)(1)	Failure to obtain a complete and accurate ATF F 4473 prior to transferring a firearm to a non-licensee. In (b)(6) instance, the licensee transferred a firearm to a non-licensee after the non-licensee failed to answer question #11d. In (b)(6) instance, the licensee transferred a firearm to a non-licensee after the non-licensee failed to answer question #11k.	Licensee will ensure a complete and accurate ATF F 4473 is obtained for all future transfers to non-licensees.	
3.	27 CFR 478.124(c)(3)(i)	Failure to verify the identity of the transferee by examining the identification document presented and noting on the ATF F 4473 the type of identification used after the transferee executed the form. In (b)(6) instance, the licensee failed to record the expiration date of the identification document. In (b)(6) instances, the licensee failed to record any identification information in question #28a.	The licensee will obtain complete and accurate identification documents prior to transferring a firearm to a non-licensee. The licensee will record this information on the ATF F 4473.	

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

Signature and Title of ATF Officer

(b)(6)

Copy 1 - Proprietor's Copy

Date 7/18/16  
Date 7/14/16

ATF E-Form 5030.5  
Revised April 2005

## Report of Violations

### Instructions

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

Name of Proprietor	Street Address	City	State	ZIP Code	County	Page 2 of 2 Pages
Staley & Son's Gun Repair, Inc.	58 Staley Ln.	Waldoboro	ME	04572	Lincoln	

License/Permit/Registry Number (if any)	Expiration Date	Date(s) or Period of Inspection
6-01-015-07-8E-01762	5/1/18	6/12/15 to 6/12/16

### 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)
4.	27 CFR 478.124(c)(3)(iv)	Failure to comply with the requirements of CFR 478.102 and record on the ATF F 4473 the date on which the licensee contacted NICS (or appropriate State agency) as well as any response provided by the system. In (b)(3) instances, the licensee failed to record the date NICS was contacted on an ATF F 4473. In (b)(3) instance, the licensee failed to enter the initial response received from NICS on an ATF F 4473.	The licensee will record complete and accurate information regarding NICS (or the appropriate State agency) for all future transfers to a non-licensee.	
5.	27 CFR 478.123(d)	Failure to accurately maintain an acquisition and disposition record. The sale or other disposition of a firearm shall be recorded by the licensee not later than seven days following the date of such transaction. Failure to record the disposition of a firearm into a required record. In (b)(3) instances, the licensee failed to timely record the disposition of a firearm in the A&D book.	Licensee will enter the required information into the A&D record. Licensee will maintain a complete and accurate A&D for all firearms transactions.  Licensee reported (b)(3) of the firearms missing from inventory on an ATF F 3310.11.	7/8/16
6.	27 CFR 478.126a	Failure to 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 or revolvers totaling two or more, to an unlicensed person and submit the report to the ATF. (b)(3) instance, the licensee failed to complete a ATF Form 3310.4.	Licensee will submit the ATF F 3310.4 for this instance and for all future multiple handgun sales requiring completion of an ATF F 3310.4.	7/8/16

ATF E-Form 3030.5  
Revised April 2005



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

**CERTIFIED MAIL**<sup>TM</sup>



7008 1140 0001 1999 8149  
7008 1140 0001 1999 8149

U.S. Postal Service<sup>TM</sup>  
**CERTIFIED MAIL<sup>TM</sup> RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com).

**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

6-01-01762

Postmark  
Here

762030-2016-  
0234

Sent To Staley & Son's Gun Repair Inc.  
Street, Apt. No.,  
or PO Box No.  
City, State, ZIP+4<sup>®</sup> Waldoboro ME 04572

PS Form 3806, August 2005

See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Staley & Son's Gun Repair Inc.  
58 Staley Ln  
Waldoboro, ME 04572  
Attn: Ms. Deborah Staley

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature <b>X</b>		<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
B. Received by (Printed Name)	C. Date of Delivery	
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No		
3. Service Type <input checked="" type="checkbox"/> Certified Mail <sup>®</sup> <input type="checkbox"/> Priority Mail Express <sup>™</sup> <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery		
4. Restricted Delivery? (Extra Fee)		<input type="checkbox"/> Yes

2. Article Number

(Transfer from service label)

7008 1140 0001 1999 8149

PS Form 3811, July 2013

Domestic Return Receipt

# FIREARMS INSPECTION REPORT

**Name:** Staley & Sons Gun Repair, Inc.  
**Trade Name:** Staley & Sons Gun Repair, Inc.

**UI#:** 762030-2016-0234-B1B  
**FFL#:** 6-01-015-07-8E-01762

**Address:** 58 Staley Ln.  
Waldoboro, ME 04572

## 1 - Introduction

### Inspection Profile:

A firearms compliance inspection was conducted on Staley & Sons Gun Repair, Inc.'s type 07 firearms license. The assignment was conducted in accordance with the Industry Operations Manual. Loretta Severson, Secretary was interviewed at the business premises on 6/13/16. Present for the inspection were IOI (b) (6) Loretta Severson, Secretary; Andrew Severson, Clerk and Deb (b) (6), President/Owner. The inspection covered the period from 6/12/15 to 6/12/16. Advance notification was given due to the location of the licensee.

### Business Profile:

Deborah Staley operates Staley & Sons Gun Repair, Inc. (Staley and Sons) as a retail firearms, ammunition and firearms accessories sales business. Staley and Sons also deals in NFA weapons and offers gunsmithing service. The business is operated from within Staley's residence in rural Waldoboro, ME. Leslie Staley, Deborah Staley's (b) (6) Deborah Staley owns the corporation and has continued to operate the business. Deborah operates the business along with her daughter Loretta Severson and Loretta's husband Andrew Severson. Loretta Severson was present during most of the inspection. She serves as the primary point of contact for the business. Staley and Sons acquired approximately (b) (4) firearms and disposed approximately (b) (4) firearms during the inspection period. Severson stated that they did not manufacture any firearms during the inspection period. Staley and Sons sells new and used handguns and long guns. Handguns make up approximately (b) (4) of the business while long guns make up the remaining (b) (4). New firearms make up approximately (b) (4) of the business while used firearms make up the remaining (b) (4). Severson stated that they do not sell firearms at gun shows or via the internet. They do not maintain a website for the business. The primary suppliers are (b) (4). There are no other businesses located at the licensed business premises. Staley and Sons does not own or operate any other businesses. Staley and Sons does not hold any other ATF, state or local licenses. License 6-01-01762 was issued to Staley and Sons on 4/27/12. There are no off-site storage locations.

### Ownership and Control:

The business is a corporation with one owner. Deborah Staley is the president of the corporation and she owns 100% of the business. Loretta Severson is the



# FIREARMS INSPECTION REPORT

**Name:** Staley & Sons Gun Repair, Inc.  
**Trade Name:** Staley & Sons Gun Repair, Inc.

**UI#:** 762030-2016-0234-B1B  
**FFL#:** 6-01-015-07-8E-01762

secretary of the corporation. No unreported changes in ownership have occurred and responsible persons are correctly shown in the Federal Licensing System (FLS). The business type is listed correctly in FLS as: Corporation.

According to the State of Maine Department of the Secretary of State website, Staley & Sons Gun Repair, Inc. is in "good standing". Staley & Sons Gun Repair, Inc. has charter number (b) (6)

NCIC checks were conducted on all responsible persons and no hits were received. Hidden ownership is not suspected.

## Variance:

Staley & Sons does not hold any variances and no variances were requested during the inspection.

## 2 - Recommendation

Violations, Warning Letter Only and No Recall Inspection

## 3 - Inspection History

The N-Spect database was searched. The following inspection was found.

**Date and Type of Inspection:** 4/13/12 – Qualification inspection

**UI:** 762030-2012-0503-B1B

**Inspection Results:** License issued

**Cited Violations:** None

Licensee History: 4/27/12 – Original issue date for license 6-01-01762. Results obtained from the Federal Licensing System's Application history.

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

A complete inventory was conducted of all firearms in inventory. Staley & Sons had 112 firearms in inventory. There were 12 open dispositions in the A&D record. The following violation was cited.

Failure to accurately maintain an acquisition and disposition record. The sale or other disposition of a firearm shall be recorded by the licensee not later than seven days following the date of such transaction. Failure to record the disposition of a firearm into a required record. In 112 instances, the licensee failed to timely record the disposition of a firearm in the A&D book. A violation of 27 CFR 478.123(d) was cited. (Reference Violation #5, ROV, Worksheet #1 and Exhibit 1)

# FIREARMS INSPECTION REPORT

**Name:** Staley & Sons Gun Repair, Inc.  
**Trade Name:** Staley & Sons Gun Repair, Inc.

**UI#:** 762030-2016-0234-B1B  
**FFL#:** 6-01-015-07-8E-01762

The record is in the proper format, required information is accurate and most entries appear to be timely made. An ATF F 3310.11 (Federal Firearms Licensee Firearms Inventory Theft/Loss Report) was filed as a result of the inspection inventory firearms were reported missing from inventory on 6/28/16. A copy of the ATF F 3310.11 is attached to this report. **(Reference Exhibit 1)**

firearms were traced through the licensee's records from acquisition through disposition. No discrepancies were noted. No trafficking issues relating to acquisition and disposition of firearms were disclosed. No obliterated serial numbers or illegal firearms were discovered. Staley and Severson are the only people who record information in the A&D record. Severson stated that firearms are usually logged into the A&D record as soon as they arrive at the business premises.

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

Staley and Sons had approximately ATF F 4473s on file for the inspection period (ATF F 4473s were maintained by Transferor's Transaction Serial Number so an exact count was not obtained. This serial number corresponds to the line number of each firearm in the A&D record). All of the ATF F 4473s were examined. The following violations were cited.

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. Failure to obtain a complete ATF F 4473 prior to transferring a firearm to a non-licensee. In instances, the licensee failed to sign and date the ATF F 4473 in questions 24 and 25. A violation of 27 CFR 478.21(a) was cited. **(Reference Violation #1, ROV, Worksheet #2 and Exhibits 2a and 2b)**

Failure to obtain a complete and accurate ATF F 4473 prior to transferring a firearm to a non-licensee. In instance, the licensee transferred a firearm to a non-licensee after the non-licensee failed to answer question #11d. In instance, the licensee transferred a firearm to a non-licensee after the non-licensee failed to answer question #11k. A violation of 27 CFR 478.124(c)(1) was cited. **(Reference Violation #2, ROV, Worksheet #2 and Exhibits 2c and 2l)**

Failure to verify the identity of the transferee by examining the identification document presented and noting on the ATF F 4473 the type of identification used after the transferee executed the form. In instance, the licensee failed to record the expiration date of the identification document. In instances, the licensee failed to record any identification information in question #20a. A violation of 27 CFR 478.124(c)(3)(i) was cited. **(Reference Violation #3, ROV, Worksheet #2 and Exhibits 2d, 2i, 2j and 2l)**

# FIREARMS INSPECTION REPORT

**Name:** Staley & Sons Gun Repair, Inc.  
**Trade Name:** Staley & Sons Gun Repair, Inc.

**UI#:** 762030-2016-0234-B1B  
**FFL#:** 6-01-015-07-8E-01762

Failure to comply with the requirements of CFR 478.102 and record on the ATF F 4473 the date on which the licensee contacted NICS (or appropriate State agency) as well as any response provided by the system. In [REDACTED] instances, the licensee failed to record the date NICS was contacted on an ATF F 4473. In [REDACTED] instance, the licensee failed to enter the initial response received from NICS on an ATF F 4473. A violation of 27 CFR 478.124(c)(3)(iv) was cited. **(Reference Violation #4, ROV, Worksheet #2 and Exhibits 2f, 2h, 2k, 2l, 2m, 2n, 2o and 2p)**

Transfers to other licensees were documented properly. There were no transfers to law enforcement officers or denied transfers during the inspection period. No discrepancies were found when the FFL audit log was reviewed. The FFL audit log revealed [REDACTED] proceed responses from 4/9/16 to 6/8/16. The FFL audit log revealed [REDACTED] denied response from 11/30/98 to 6/8/16.

## 6 – Multiple Sales

The Firearm Trace History revealed no reported multiple handgun sales during the 12 month period prior to the inspection start date. There were [REDACTED] reported multiple handgun sales from 6/9/13 to 6/9/16 [REDACTED] unreported multiple handgun sale was discovered during the inspection. The following violation was cited.

Failure to 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 or revolvers totaling two or more, to an unlicensed person and submit the report to the ATF. In [REDACTED] instance, the licensee failed to complete an ATF Form 3310.4. A violation of 27CFR 478.126a was cited. **(Reference Violation #6, ROV, Worksheet #2 and Exhibit 2e)**

## 7 – Suspicious/Prohibited Purchasers

No possible traffickers, straw purchasers or any other suspicious purchasers were identified during the inspection. No referrals were made. NCIC checks were conducted on the [REDACTED] purchasers referenced in violation #2 who failed to answer one of the questions in section A of an ATF F 4473. No hits were received. NLETS driver's license queries were conducted on the [REDACTED] purchasers referenced in violation #3 with incomplete or blank identification information on an ATF F 4473. Each purchaser held a valid ME driver's license.

## 8 – Trace Activity

The Firearm Trace History report revealed no trace requests during the 12 month period prior to the inspection start date. There were no trace requests from 6/9/13 to



## FIREARMS INSPECTION REPORT

**Name:** Staley & Sons Gun Repair, Inc.  
**Trade Name:** Staley & Sons Gun Repair, Inc.

**UI#:** 762030-2016-0234-B1B  
**FFL#:** 6-01-015-07-8E-01762

6/9/16. Staley and Sons acquired and disposed of approximately [REDACTED] sed firearms during the inspection period. [REDACTED] firearms were searched in NCIC with no resulting hits.

### 9 - NFA/Importer/Collector/Manufacturer

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

### 10 - Referrals

No referrals were generated as a result of this inspection.

### 11 - Other

On 6/3/16, IOI (b) (6) contacted RAC (b) (6) of the Portland, ME Field Office via email. (b) (6) indicated that there were no ongoing criminal investigations, safety concerns, or other concerns that would prevent the inspections from being conducted. (b) (6) also stated that he helped Staley and Sons obtain an NFRTR from the NFA Branch sometime in January 2016.

The licensee was in compliance with the requirement to have secure gun storage/safety devices available for sale and provided with all handguns. The licensee was in compliance with the Youth Handgun Safety Act (YHSA) poster and notices requirements.

# FIREARMS INSPECTION REPORT

**Name:** Staley & Sons Gun Repair, Inc.  
**Trade Name:** Staley & Sons Gun Repair, Inc.

**UI#:** 762030-2016-0234-B1B  
**FFL#:** 6-01-015-07-8E-01762

## 12 - Closing Actions

A closing conference was held on 6/28/16 between IOI (b) (6) and Loretta Severson, Owner. An Acknowledgement of Federal Firearms Regulations was reviewed with Severson. Severson signed the Acknowledgement. She retained a copy for the business records. A copy of the Acknowledgement is attached to this report. (Reference Exhibit 3)

A Report of Violations (ROV) was issued to Staley and Sons. Staley signed the ROV on 7/18/16.

## 13 - Violations

### 1. 27 CFR 478.21(a)

**Nature of violation:** 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. Failure to obtain a complete ATF F 4473 prior to transferring a firearm to a non-licensee. In 83 Public Law 112-55 (125 Stat. 552) instances, the licensee failed to sign and date the ATF F 4473 in questions 24 and 25.

**Licensee's response:** Licensee stated that they must have just misse 83 Public Law 112-55 (125 Stat. 552) instances. Licensee stated that they (and Mr. Staley) had relied on employees to complete the ATF F 4473s and they failed to double check their work. Licensee stated that new policies will be enacted to ensure forms are complete and accurate in the future.

**Corrective action:** Licensee will ensure a complete and accurate ATF F 4473 is obtained for all future transfers to non-licensees.

**Reference:** ROV, Worksheet #2 and Exhibits 2a and 2b

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

**Nature of violation:** Failure to obtain a complete and accurate ATF F 4473 prior to transferring a firearm to a non-licensee. In 83 Public Law 112-55 (125 Stat. 552) instance, the licensee transferred a firearm to a non-licensee after the non-licensee failed to answer question #11d. In 83 Public Law 112-55 (125 Stat. 552) instance, the licensee transferred a firearm to a non-licensee after the non-licensee failed to answer question #11k.

**Licensee's response:** Licensee stated that they must have just missed 83 Public Law 112-55 (125 Stat. 552) instances. Licensee stated that they (and Mr. Staley) had relied on employees to complete the

## FIREARMS INSPECTION REPORT

**Name:** Staley & Sons Gun Repair, Inc.  
**Trade Name:** Staley & Sons Gun Repair, Inc.

**UI#:** 762030-2016-0234-B1B  
**FFL#:** 6-01-015-07-8E-01762

ATF F 4473s and they failed to double check their work. Licensee stated that new policies will be enacted to ensure forms are complete and accurate in the future.

**Corrective action:** Licensee will ensure a complete and accurate ATF F 4473 is obtained for all future transfers to non-licensees.

**Reference:** ROV, Worksheet #2 and Exhibits 2c and 2l

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

**Nature of violation:** Failure to verify the identity of the transferee by examining the identification document presented and noting on the ATF F 4473 the type of identification used after the transferee executed the form.

In <sup>23 Public Law 112-55 (125 Stat. 552)</sup> instance, the licensee failed to record the expiration date of the identification document. In <sup>23 Public Law 112-55 (125 Stat. 552)</sup> instances, the licensee failed to record any identification information in question #20a.

**Licensee's response:** Licensee stated that they must have just missed <sup>23 Public Law 112-55 (125 Stat. 552)</sup> instances. Licensee stated that they (and Mr. Staley) had relied on employees to complete the ATF F 4473s and they failed to double check their work. Licensee stated that new policies will be enacted to ensure forms are complete and accurate in the future.

**Corrective action:** The licensee will obtain complete and accurate identification documents prior to transferring a firearm to a non-licensee. The licensee will record this information on the ATF F 4473.

**Reference:** ROV, Worksheet #2 and Exhibits 2d, 2i, 2j and 2l

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

**Nature of violation:** Failure to comply with the requirements of CFR 478.102 and record on the ATF F 4473 the date on which the licensee contacted NICS (or appropriate State agency) as well as any response provided by the system. In <sup>23 Public Law 112-55 (125 Stat. 552)</sup> instances, the licensee failed to record the date NICS was contacted on an ATF F 4473. In <sup>23 Public Law 112-55 (125 Stat. 552)</sup> instance, the licensee failed to enter the initial response received from NICS on an ATF F 4473.

**Licensee's response:** Licensee stated that they must have just missed <sup>23 Public Law 112-55 (125 Stat. 552)</sup> instances. Licensee stated that they (and Mr. Staley) had relied on employees to complete the ATF F 4473s and they failed to double check their work. Licensee stated that new policies will be enacted to ensure forms are complete and accurate in the future.



## FIREARMS INSPECTION REPORT

**Name:** Staley & Sons Gun Repair, Inc.  
**Trade Name:** Staley & Sons Gun Repair, Inc.

**UI#:** 762030-2016-0234-B1B  
**FFL#:** 6-01-015-07-8E-01762

**Corrective action:** The licensee will record complete and accurate information regarding NICS (or the appropriate State agency) for all future transfers to a non-licensee.

**Reference:** ROV, Worksheet #2 and Exhibits 2f, 2h, 2k, 2l, 2m, 2n, 2o and 2p

### 5. 27 CFR 478.123(d)

**Nature of violation:** Failure to accurately maintain an acquisition and disposition record. The sale or other disposition of a firearm shall be recorded by the licensee not later than seven days following the date of such transaction. Failure to record the disposition of a firearm into a required record. In [REDACTED] instances, the licensee failed to timely record the disposition of a firearm in the A&D book.

**Licensee's response:** Licensee stated that they believe the firearms were sold on ATF F 4473s or returned to gunsmithing customers and they failed to record the disposition entries in the A&D record. Licensee stated that they will conduct regular firearm inventories to ensure the A&D record is accurate in the future.

**Corrective action:** Licensee will enter the required information into the A&D record. Licensee will maintain a complete and accurate A&D for all firearms transactions.

Licensee reported [REDACTED] of the firearms missing from inventory on an ATF F 3310.11.

**Reference:** ROV, Worksheet #1 and Exhibit 1

### 6. 27 CFR 478.126a

**Nature of violation:** Failure to 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 or revolvers totaling two or more, to an unlicensed person and submit the report to the ATF. In [REDACTED] instance, the licensee failed to complete an ATF Form 3310.4.

**Licensee's response:** Licensee stated that they just missed [REDACTED] instance. Licensee stated that they will ensure multiple handgun sales are reported in the future.

**Corrective action:** Licensee will submit the ATF F 3310.4 for [REDACTED] instance and for all future multiple handgun sales requiring completion of an ATF F 3310.4.

## **FIREARMS INSPECTION REPORT**

**Name:** Staley & Sons Gun Repair, Inc.      **UI#:** 762030-2016-0234-B1B  
**Trade Name:** Staley & Sons Gun Repair, Inc.      **FFL#:** 6-01-015-07-8E-01762

**Reference:** ROV, Worksheet #2 and Exhibit 2e

**X**

---

Industry Operations Investigator

### **Index of Worksheets and Exhibits**

Exhibit 1 – ATF F 3310.11

Exhibit 2 – Copies of ATF F 4473s

Exhibit 3 – Acknowledgement of Federal Firearms Regulations