

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) RJM JEWELRY INC PAWN WORLD 346 N VIRGINIA ST RENO,NV 89501, WASHOE	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 786090-2016-0147-B1B <table border="1" style="width:100%"><tr><td style="width:33%">3. PERMIT/LICENSE NUMBER 988031028F02647</td><td style="width:33%">4a. TARGET DATE 6/30/2016</td><td style="width:33%">4b. TARGET HOURS</td></tr></table> 5. REQUESTED BY (SIGNATURE, TITLE AND DATE)	3. PERMIT/LICENSE NUMBER 988031028F02647	4a. TARGET DATE 6/30/2016	4b. TARGET HOURS
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6. ATF OFFICER(S) ASSIGNED
(b)(6) - Assigned Investigator
(b)(6) - Lead Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b)(6), Area Supervisor, 04/05/2016

8. PURPOSE/SPECIAL INSTRUCTIONS
CONDUCT A COMPLIANCE INSPECTION.

9. INSPECTION RESULTS <input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC				10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	7	NO. OF REFERRALS	3	2111 - PER DIEM	
NO. OF TECS CHECKS	182	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

Viols WL ONLY and Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
SEP 2016	40.00	<div style="font-size: 48pt; font-weight: bold;">(b)(6)</div>	
OCT 2016	28.00		
NOV 2016	7.00		
ATF OFFICER'S SUBTOTAL	75.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	75.00		

13. REVIEW AND ROUTING	
REVIEW COMMENTS AND RECOMMENDATION	

<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) LAS VEGAS III AREA SUPERVISOR		<div style="font-weight: bold; font-size: 1.2em;">REVIEWED</div> <div>By (b)(6) at 7:02 am, Nov 22, 2016</div>

Assignment and Report

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	3. PERMIT/LICENSE NUMBER 988031028F02647	4a. TARGET DATE 6/30/2016	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

ROUTING SEQUENCE AND DATE

- ☒ 1. SFFD DIO ROOT
☒ 2. FFLO (b)(6)
☒ 3. LAS VEGAS III AREA FILE
☐ 4.

CONTROL FILE POSTED DATE _____

(b)(6)

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 RJM JEWELRY INC PAWN WORLD	Street Address 346 N VIRGINIA ST	City RENO	State NV	Zip Code 89501-	County WASHOE	Page 1 of 5 Pages
License/Permit/Registry Number <i>(If any)</i> 988031028F02647		Expiration Date 6/1/2018		Date(s) or Period of Inspection 09/12/2016 through 10/06/2016		

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:

In (b)(3) 1 instances, licensee failed to ensure accurate completion of all sections of ATF Form 4473 prior to transfer of a firearm to an individual. Of the 291 ATF Forms 4473 reviewed for the inspection period:

On (b)(3) 1 form (b)(3) 112 5, in block 11a, buyer answered "No";
On (b)(3) 1 form (b)(3) 112 Public Law, block 24 was blank and block 25 was incorrect.

Citation: 27 CFR 478.21(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee was reminded to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

Number: 2

Nature of Violation:

In (b)(3) 11 instances, licensee failed to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the 291 ATF Forms 4473 reviewed for the inspection period:

On (b)(3) 112 forms (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)), block 2 was incorrect;
On (b)(3) 11 form (b)(3) 112 Public, block 7 was incorrect;
On (b)(3) 1 form (b)(3) 112 Public, block 11k was blank;
On (b)(3) 11 forms (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)), block 14 was blank.

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)

Licensee was reminded to ensure completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

Report of Violations

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License/Permit/Registry Number <i>(If any)</i> 988031028F02647		Expiration Date 6/1/2018	Date(s) or Period of Inspection 09/12/2016 through 10/06/2016			

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:

In (b)(3) 112 F forms, licensee failed to ensure completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the 291 ATF Forms 4473 reviewed for the inspection period:

On (b)(3) 112 F forms (b)(3) 112 Public Law 55 125 STAT 552 (b)(6), block 20a was incorrect/incomplete;
On (b)(3) 112 F forms (b)(3) 112 Public Law 55 125 STAT 552 (b)(6), block 20b was incorrect/incomplete.

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

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee was reminded to ensure completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

Number: 4

Nature of Violation:

On (b)(3) 112 F forms, licensee failed to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the 291 ATF Forms 4473 reviewed for the inspection period:

On (b)(3) 112 F forms (b)(3) 112 Public Law 55 125 STAT 552 (b)(6), block 21a was incorrect;
On (b)(3) 112 F forms (b)(3) 112 Public Law 55 125 STAT 552 (b)(6), block 21b was blank;
On (b)(3) 112 F forms (b)(3) 112 Public Law 55 125 STAT 552 (b)(6), block 21c was incorrect;
On (b)(3) 112 F forms (b)(3) 112 Public Law 55 125 STAT 552 (b)(6), block 21c was blank.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee was reminded to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

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License/Permit/Registry Number <i>(If any)</i> 988031028F02647		Expiration Date 6/1/2018		Date(s) or Period of Inspection 09/12/2016 through 10/06/2016		

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)(3)(iv)

Number: 5

Nature of Violation:

In [REDACTED] instances, licensee failed to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the 291 ATF Forms 4473 reviewed for the inspection period:

On [REDACTED] forms ([REDACTED]), block 36 was incorrect.

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)

Licensee was reminded to ensure completion of all sections of the ATF Form 4473 prior to transfer of the firearm to the individual. On September 12 and 13, 2016, licensee photocopied the incorrect pages, made corrections to the copies and attached the corrected pages to the original ATF Form 4473.

Report of Violations

Instructions

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License/Permit/Registry Number <i>(If any)</i> 988031028F02647		Expiration Date 6/1/2018	Date(s) or Period of Inspection 09/12/2016 through 10/06/2016			

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:

In ^{(b)(3)} instances, the licensee disposed of a firearm to an unlicensed person having reasonable cause to believe that the individual was prohibited from purchasing and possessing firearms.

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

Citation: 27 CFR 478.99(c)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee was reminded that if an individual answers “Yes” in blocks 11b through 11k of ATF Form 4473, licensee should not proceed with the transaction since the buyer has indicated they are prohibited from purchasing/possessing a firearm. Prior to completion of the inspection IOI ^{(b)(6)} conducted a NICS check on purchaser ^{(b)(3) 112 Public} which revealed no prohibiting information.

Report of Violations

Instructions

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License/Permit/Registry Number <i>(If any)</i> 988031028F02647		Expiration Date 6/1/2018	Date(s) or Period of Inspection 09/12/2016 through 10/06/2016			

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:

The licensee failed to accurately and timely maintain the firearms acquisition and disposition record:

In (b)(3) 1 instance, licensee failed to accurately record the acquisition (serial number) of a firearm;
In (b)(3) 1 instance, licensee recorded a disposition for a firearm that was found in inventory;
In (b)(3) 1 instance, licensee failed to timely record the acquisition of a firearm;
In (b)(3) 1 12 7 instances, licensee failed to timely record the disposition of a firearm;
In (b)(3) 1 instance, the firearm was missing from inventory and licensee was unable to reconcile the disposition of the firearm.

Citation: 27 CFR 478.125(e)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee was instructed to ensure acquisition and disposition entries are timely and accurately made in the A&D record. On September 12 and 13, 2016, IOI (b)(6) verified that the corrections were made to the A&D record. Additionally, on September 13, 2016, licensee completed and submitted ATF F 3310.11 to report the missing firearm.

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

Date

Signature and Title of ATF Officer

Date

August 9 2019 Document Production



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
8965 South Eastern, Suite 220
Las Vegas, NV 89123

November 22, 2016

www.atf.gov

Warning Letter

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

RJM Jewelry, Inc. (Pawn World)
Attn: Richard J. Moore
346 N Virginia St.
Reno, NV 89501
RE: 9-88-031-02-8F-02647

Dear Mr. Moore:

During a recent inspection at your firearms business covering the period September 21, 2015 to September 21, 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(s). 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.

Violations 1 through 6 (related to the improper completion of ATF Forms 4473)

Ensuring that ATF Forms 4473 are correctly completed and reviewed is one of the most important things you can do to provide ATF with the ability to trace crime guns. You are reminded that it is your responsibility to ensure that ATF Forms 4473 are properly and completely executed according to the instructions on the form prior to the completion of firearms transactions.

Of particular concern are the transactions disclosed in violation #6 where the response provided on the ATF Form 4473 by the transferee indicated that the transferee was prohibited from receiving a firearm. The instructions on the ATF Form 4473 explain as follows: "the licensee should NOT contact NICS and should stop the transaction if: ... the buyer answers "yes" to any question in 11.b.-1." (See the bottom of page 5 and continued on the top of page 6.) You are advised to regularly review the instructions on the ATF Form 4473 and ensure that the forms are completed and reviewed per the instructions on the form.

Violation 7 (related to the failure to accurately and timely maintain the firearms acquisition and disposition record)

You were cited for several instances where the information required by Federal regulations was not accurately recorded or was not entered in a timely manner. Such violations can impede the ability to trace firearms. Also, of particular concern is the firearm that you were unable to account for and were required to report missing. When firearms are reported missing, the ability to trace these firearms is eliminated. I urge you to continue searching for this firearm or any information as to the disposition of the firearm. Should you locate the firearms or disposition information for the firearms, please report the information to the ATF National Tracing Center (1-800-930-9275).

I also recommend that you conduct full inventory reconciliations on a regular basis and to institute policies to ensure that firearm entries are made in the A&D record in a timely manner. I have enclosed a copy of the ATF Publication: "Federal Firearms Licensee Quick Reference and Best Practices Guide." I suggest that you review the entire publication and that you give particular attention to the section titled "Accountability for Firearms" on pages 9 and 10. Implementing policies based on the best practices recommended in this section of the publication will better enable you to account for your business assets, identify security issues, and provide quick reporting of firearms that have been lost or stolen from your business.

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

Sincerely,

(b)(6)

Area Supervisor
Las Vegas III Field Office

cc: Federal Firearms Licensing Center
Director, Industry Operations, San Francisco Field Division
Las Vegas III Field Office

Address: 346 North Virginia Street
Reno, NV 89501

1 - Introduction

Inspection Profile:

On September 21, 2016, Industry Operations Investigator (IOI) (b) (6) initiated an onsite firearm compliance inspection of the Type 02 (Pawnbroker/Dealer of Firearms Other Than Destructive Devices) license held by RJM Jewelry, Inc., doing business as Pawn World. IOI (b) (6) met with responsible person Richard J. Moore, identified by Nevada Driver's License (b) (6). Also present during the inspection was employee Ted Dietrich.

The period of inspection was September 21, 2015 to September 21, 2016. No other Federal, State or local agencies were involved. Advance notice was not provided to licensee.

Business Profile:

Licensee holds a Pawnbroker/Dealer of Firearms Other Than Destructive Devices (Type 02) Federal firearms license (FFL). The licensed premise is a storefront located in downtown Reno, Nevada. Licensee transacts primarily in used firearms. Licensee does not conduct gun repair services; gun show transactions or sales of black powder. Licensee sells ammunition, fine jewelry and general merchandise from the premise.

During the last 12 months, licensee acquired approximately (b) (4) firearms and disposed of approximately (b) (4) firearms. The Licensee's Acquisition and Disposition (A&D) book reflects (b) (4) used firearms, (b) (4) new; (b) (4) long guns; (b) (4) handguns. Licensee's primary supplier for firearms is the general public.

Other than noted above, no additional business is operated from the premise. Licensee holds State of Nevada business license NV20031242002 and City of Reno business license 122327. Licensee is in compliance with zoning requirements; licensee has no off-site storage.

Ownership and Control:

The FFL was originally issued on May 9, 2012 to RJM Jewelry Inc., dba Pawn World. RJM Jewelry, Inc. is a domestic corporation registered with the State of Nevada and currently in active status (**Exhibit 1**). Responsible person Richard J. Moore is the sole member of the corporation. Moore's mother, Tu Smith is

FIREARMS INSPECTION REPORT

Name: RJM Jewelry, Inc.
Trade Name: Pawn World

UI#: 786090-2016-0147-B1B
FFL#: 9-88-031-02-8F-02647

listed as a responsible person on the FFL. There have been no changes in ownership since the license was issued; no hidden ownership was suspected.

Variance:

Licensee holds no variances and none were requested as a result of this inspection.

2 - Recommendation

Violations, Report of Violations, Warning Letter with Recall.

3 - Inspection History

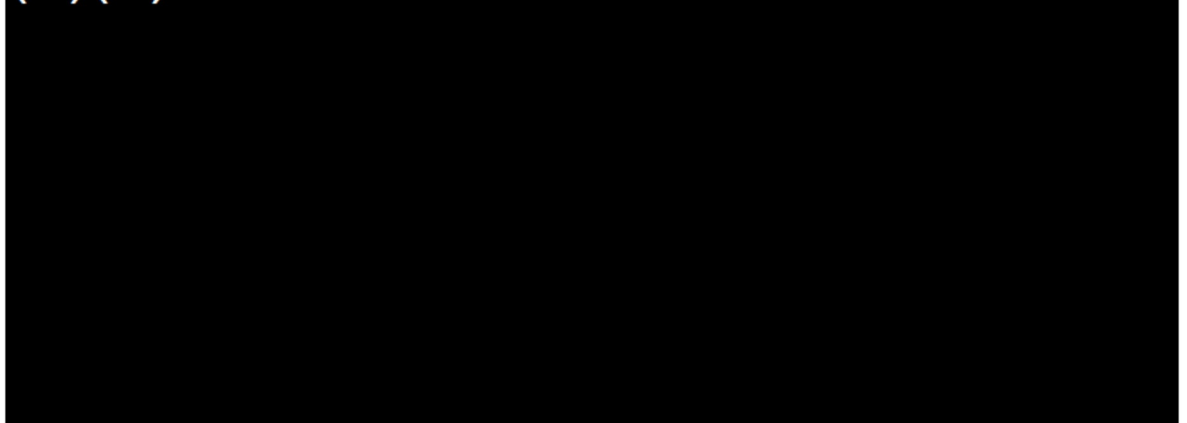
Date of Inspection: April 9, 2012
Type of Inspection: Qualification Inspection
UI#: 786090-2012-0078-B1B
Inspection Results: Approve issuance of license.
Cited Violations: None

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

A complete inventory was conducted. There were 195 firearms in inventory and open entries in the A&D record; discrepancies were noted. Licensee maintains the A&D record in bound format; Moore is the only individual who makes entries into the record. The record contained all required information; entries were not made timely. Licensee is aware of the time requirements for entering and disposing of firearms from the A&D log.

The following discrepancies were noted in the record:

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



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

In (b)(3) Pub Law 1 instances, licensee failed to timely record the disposition of a firearm:

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

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

Several suspicious purchasers were identified as a result of this inspection (See Section 7 of this report for elaboration). No firearms with obliterated serial numbers or illegal

FIREARMS INSPECTION REPORT

Name: RJM Jewelry, Inc.
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firearms were discovered as a result of this inspection. One loss report was submitted as a result of this inspection.

5 - ATF Forms 4473 – NICS & Other Dispositions

Licensee had [REDACTED] ATF Forms 4473s on file for the inspection period with discrepancies noted.

On three ATF Form 4473s, block 2 was incorrect/incomplete:

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

On [REDACTED] ATF Form 4473, block 7 was incorrect. (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

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

In [REDACTED] instances, the licensee disposed of a firearm to an unlicensed person having reasonable cause to believe that the individual was prohibited from purchasing and possessing firearms:

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

FIREARMS INSPECTION REPORT

Name: RJM Jewelry, Inc.
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(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)



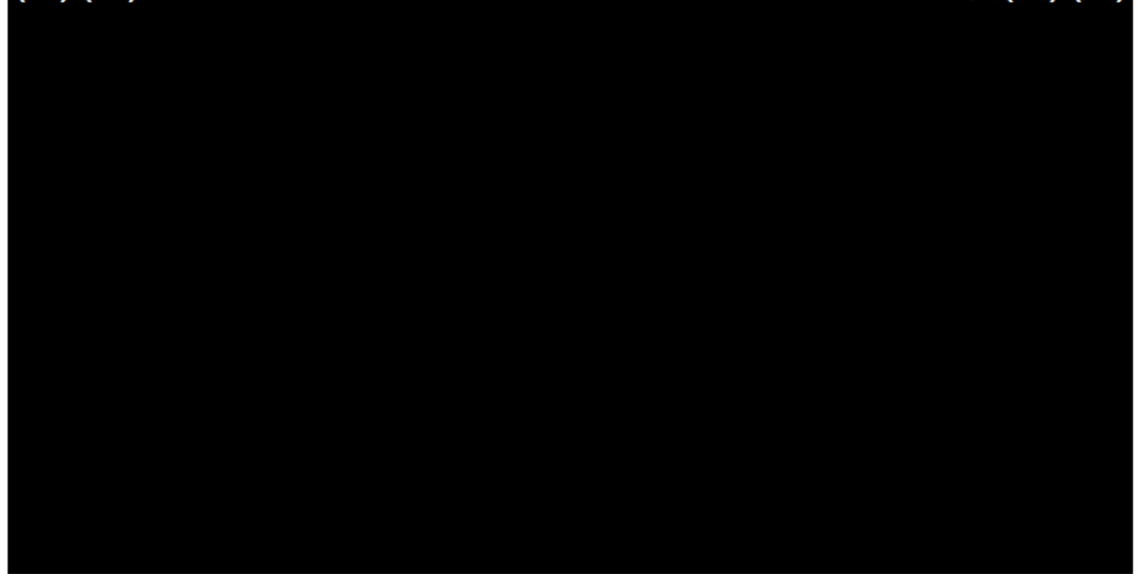
(b)(3) - 112 Public Law 55 125 Stat 552



On (b)(3) - 112 F ATF Form 4473s, the purchaser failed to answer block 14 "What is your country of citizenship?" (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

On (b)(3) - 112 F ATF Form 4473s, block 20a was incorrect/incomplete:

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



¹ IO (b) (6) conducted a criminal history check of purchaser (b) (6) which did not reveal any prohibiting information.

FIREARMS INSPECTION REPORT

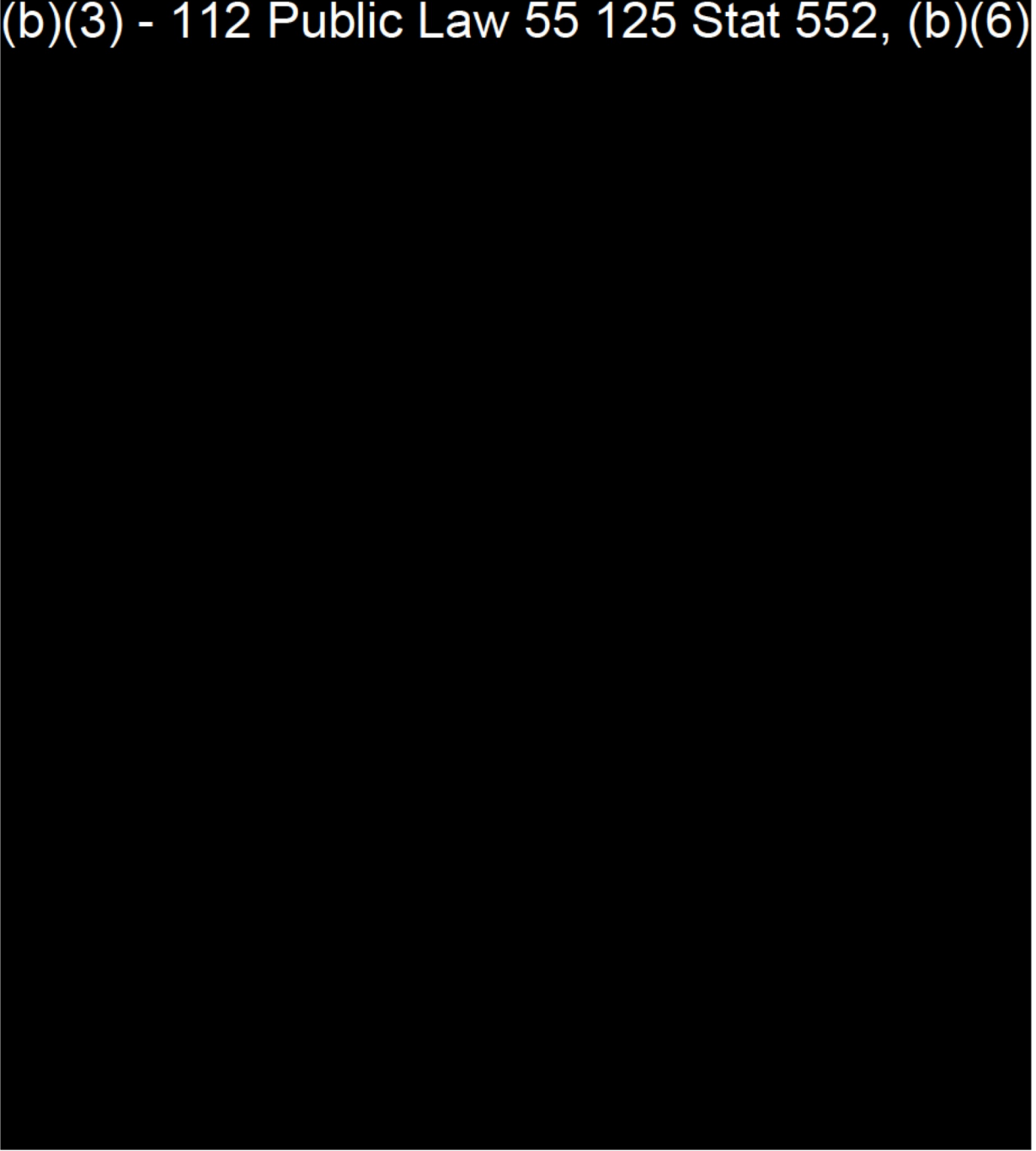
Name: RJM Jewelry, Inc.
Trade Name: Pawn World

UI#: 786090-2016-0147-B1B
FFL#: 9-88-031-02-8F-02647

Exhibit 35).

On (b)(3) Pub Law ATF Form 4473s, block 20b was incorrect/incomplete:

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



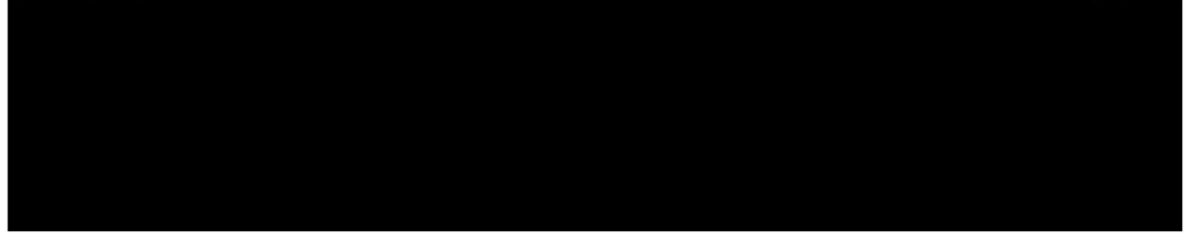
On (b)(3) - 112 P ATF Form 4473s, block 21b was blank:


FIREARMS INSPECTION REPORT

Name: RJM Jewelry, Inc.
Trade Name: Pawn World

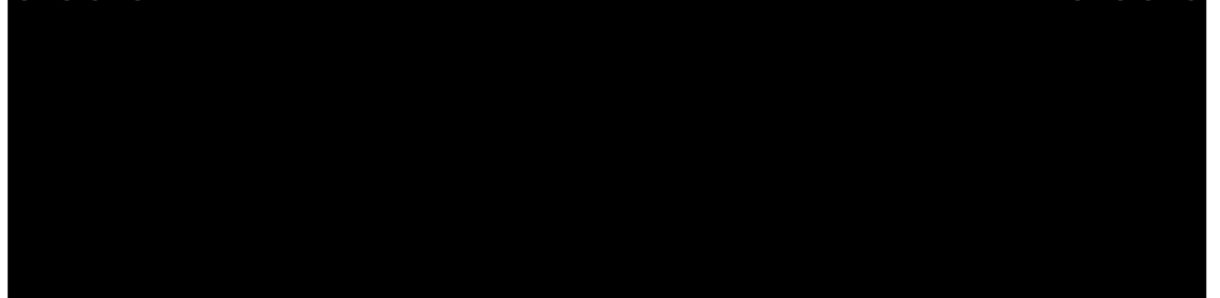
UI#: 786090-2016-0147-B1B
FFL#: 9-88-031-02-8F-02647

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

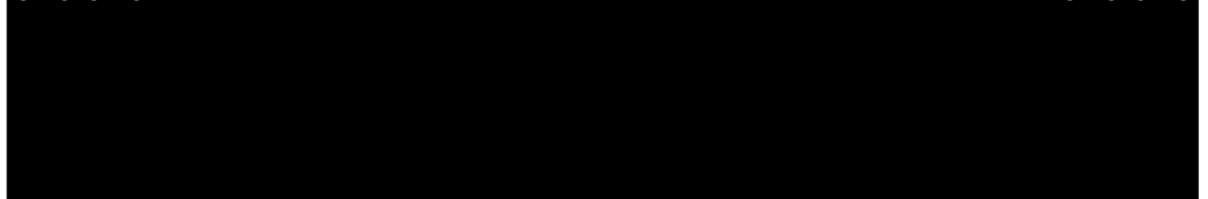



On  ATF Form 4473s, block 21c was incorrect/blank:

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

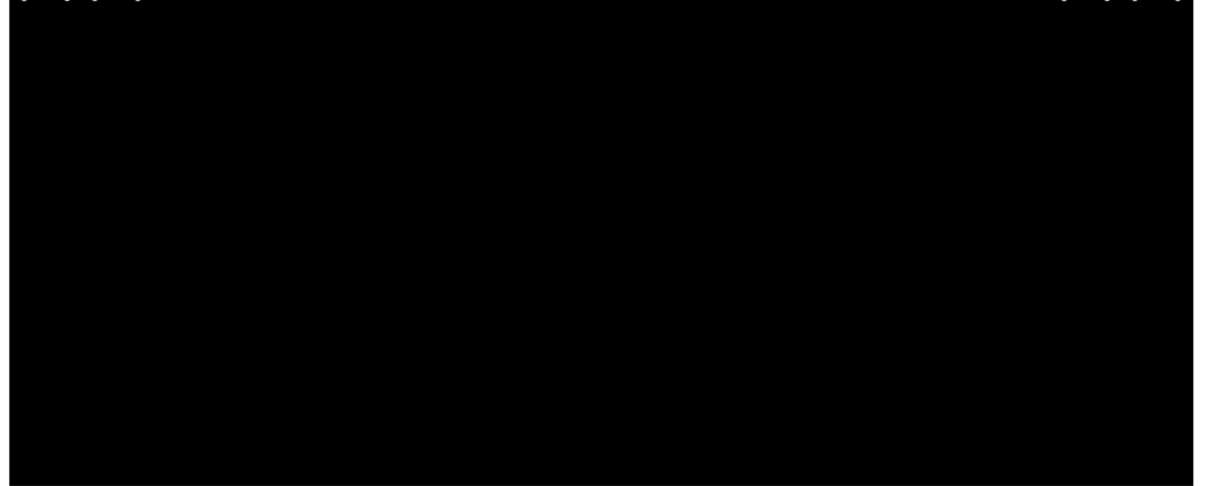


(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)



On  ATF Form 4473s, block 36 was incorrect:

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



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Name: RJM Jewelry, Inc.
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(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

There were no discrepancies noted when comparing the audit log; licensee had received 12 NICS denials during the inspection period. Licensee had not conducted any law enforcement transfers during the inspection period.

Licensee had conducted several FFL transfers and was maintaining copies of the licenses on file. Several suspicious purchasers were identified as a result of this inspection.

6 - Multiple Sales

The Violent Crime Analysis Branch (VCAB) Report indicated that the licensee had conducted (b)(3) multiple sales during the inspection period; discrepancies were noted with the VCAB Report:

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

No unreported multiple sales were discovered during the inspection. Licensee is familiar with the reporting requirements and ensures the report is submitted by the close of business the day of the sale.

7 - Suspicious/Prohibited Purchasers

Several suspicious purchasers were identified during the course of inspection:

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

(b)(3) - 112 Public Law 55 125 Stat 552 . Reference Referral

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2017-0002.

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

Reference Referral 2017-0003.

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

(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
Reference Referral 2017-0004.

8 - Trace Activity

During the last 12 months, licensee has had (b)(3)/(b)(6) trace requests. All traces were successfully completed by licensee. Licensee had 180 used firearms in inventory; a secondary market analysis was conducted on all used firearms which resulted in no hits. During the last 12 months, licensee acquired approximately (b)(4) used firearms and disposed of approximately (b)(4) used firearms.

9 - NFA/Importer/Collector/Manufacturer

Licensee holds a Special Occupational Tax to deal in NFA firearms. A query of the National Firearm Transfer and Registration Record revealed licensee had five registered NFA items. All NFA items were accounted for during the inspection.

Licensee is not a collector or manufacturer of firearms.

10 - Referrals

Three referrals were generated as a result of this inspection. See Referrals 2017-0002, 2017-0003 and 2017-0004.

11 - Other

Since receiving the license in May 2012, licensee is associated with approximately (b)(3)/(b)(6) firearms traces. (b)(3) - 112 Public Law 55 125 Stat 552 numbers are attributed to: licensee's clientele; if licensee is not delegating tasks related to the firearms sales and recordkeeping; or if licensee is simply "turning a blind eye" to suspicious purchasers. During the course of inspection, IOI (b)(6) discussed with licensee measures/business practices to reduce the number of firearms traced, e.g., asking a potential buyer questions about their familiarity with

firearms; visiting www.dontlie.org for tools on ferreting out potential straw purchasers or individuals who may be trafficking in firearms. Moore stated he would be more alert for suspicious buyers and additionally, will delegate more tasks to employee (b)(6). (b)(6) To minimize ATF Forms 4473 errors, IOI (b)(6) recommended that licensee have another employee/RP conduct a second review of the ATF Form 4473 prior to filing the forms. IOI (b)(6) is recommending a recall inspection of licensee to determine if they have put any measures in place to reduce the numbers of firearms traced through the license.

12 - Closing Actions

On October 6, 2016, IOI (b)(6) conducted a closing conference with responsible person Richard J. Moore. The result of the inspection was discussed and a Report of Violations was issued. IOI (b)(6) reviewed the Acknowledgement of Federal Firearms Regulations checklist (**Exhibit 41**) with responsible person Moore who signed and dated the Acknowledgement. On November 1, 2016, IOI (b)(6) served a revised Report of Violations which Moore signed.

13 - Violations

1. 27 CFR 478.21(a)

Nature of Violation: In (b)(3) Pub L 112-55 instances, licensee failed to ensure accurate completion of all sections of ATF Form 4473 prior to transfer of a firearm to an individual. Of the (b)(3) - 112 ATF Forms 4473 reviewed for the inspection period:

On (b)(3) Pub Law 112-55 125 § 552, (b)(6) in block 11a, buyer answered “No”;
On (b)(3) Pub Law 112-55 125 § 552, (b)(6), block 24 was blank and block 25 was incorrect.

Licensee’s Response: Licensee admitted that they didn’t review the form carefully prior to transfer of the firearm. Licensee stated they would conduct an initial review, along with a secondary review of the form prior to the purchaser leaving the premise.

Corrective Action: Licensee was reminded to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

Reference: Exhibits (b)(3) - 112 Public Worksheet 2.

2. 27 CFR 478.124(c)(1)

Nature of Violation: In (b)(3) Pub L 112-55 instances, licensee failed to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the (b)(3) - 112 ATF Forms 4473 reviewed for the inspection period:

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On (b)(3) Pub Law 112-55 125 § 552 (b) (6) block 2 was incorrect;
On (b)(3) Pub Law 112-55 125 (b) (6) block 7 was incorrect;
On (b)(3) Pub Law 112-55 125 § block 11k was blank;
On (b)(3) Pub Law 112-55 125 § 552 (b) (6) block 14 was blank.

Licensee's Response: Licensee admitted that they didn't review the form carefully prior to transfer of the firearm. Licensee stated they would conduct an initial review, along with a secondary review of the form prior to the purchaser leaving the premise.

Corrective Action: Licensee was reminded to ensure completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

Reference: Exhibits (b)(3) - 112 Public Law 55 125 Stat 552 Worksheet 2.

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

Nature of Violation: In (b)(3) Pub Law instances, licensee failed to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the (b)(3) Pub Law ATF Forms 4473 reviewed for the inspection period:

On (b)(3) Pub Law forms (b) (6) block 20a was incorrect/incomplete;
On (b)(3) Pub Law forms (b) (6) block 20b was incorrect/incomplete.

Licensee's Response: Licensee admitted that they didn't review the form carefully prior to transfer of the firearm. Licensee stated they would conduct an initial review, along with a secondary review of the form prior to the purchaser leaving the premise.

Corrective Action: Licensee was reminded to ensure completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

Reference: Exhibits (b)(3) - 112 Public Law 55 125 Stat 552; Worksheet 2.

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

Nature of Violation: On (b)(3) Pub Law forms, licensee failed to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the (b)(3) - 112 Public ATF Forms 4473 reviewed for the inspection period:

On (b)(3) Pub Law form (b) (6) block 21a was incorrect;
On (b)(3) Pub Law forms (b) (6) block 21b was blank;

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On (b)(3) Pub L 112 forms (b) (6) block 21c was incorrect;
On (b)(3) Pub L 112 forms (b) (6) block 21c was blank.

Licensee's Response: Licensee admitted that they didn't review the form carefully prior to transfer of the firearm. Licensee stated they would conduct an initial review, along with a secondary review of the form prior to the purchaser leaving the premise.

Corrective Action: Licensee was reminded to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of the firearm to an individual.

Reference: Exhibits (b)(3) - 112 Public Law 55; Worksheet 2.

5. 27 CFR 478.124(c)(5)

Nature of Violation: In (b)(3) Pub L 112 instances, licensee failed to ensure accurate completion of all sections of the ATF Form 4473 prior to transfer of a firearm to an individual. Of the (b)(3) Pub L 112 ATF Forms 4473 reviewed for the inspection period:

On (b)(3) - 112 Pub L 112 forms (b) (6) block 36 was incorrect.

Licensee's Response: Licensee admitted that they didn't review the form carefully prior to transfer of the firearm. Licensee stated they would conduct an initial review, along with a secondary review of the form prior to the purchaser leaving the premise.

Corrective Action: Licensee was reminded to ensure completion of all sections of the ATF Form 4473 prior to transfer of the firearm to the individual. On September 12 and 13, 2016, licensee photocopied the incorrect pages, made corrections to the copies and attached the corrected pages to the original ATF Form 4473.

Reference: Exhibits (b)(3) - 112 Public Law 55; Worksheet 2.

6. 27 CFR 478.99(c)

Nature of Violation: In (b)(3) Pub L 112 instances, the licensee disposed of a firearm to an unlicensed person having reasonable cause to believe that the individual was prohibited from purchasing and possessing firearms.

On (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) in response to question 11c.: "Have you ever been convicted in any court for a felony, or any other crime, for which the judge could have imprisoned you for more than one year?" In block 21a. of ATF Form 4473 for this transaction, licensee indicated that on November 3, 2015, a NICS/State background check was conducted; in block 21c. licensee indicated that the

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initial response provided by NICS/State was "Proceed."

On (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6) in response to question 11f.: "Have you ever been adjudicated mentally defective...OR have you ever been committed to a mental institution?" In block 21a. of ATF Form 4473 for this transaction, licensee indicated that on December 5, 2015, a NICS/State background check was conducted; in block 21c. licensee indicated that the initial response provided by NICS/State was "Proceed."

Licensee's Response: Licensee admitted that they didn't review the form carefully prior to transfer of the firearm. Licensee stated they would conduct an initial review, along with a secondary review of the form prior to the purchaser leaving the premise.

Corrective Action: Licensee was reminded that if an individual answers "Yes" in blocks 11b through 11k of ATF Form 4473, licensee should not proceed with the transaction since the buyer has indicated they are prohibited from purchasing/possessing a firearm. Prior to completion of the inspection, IOI (b)(6) conducted a NICS check on purchaser (b)(6) which revealed no prohibiting information.

Reference: Exhibits (b)(3) - 112 Public Law 55 125 Stat 552 Worksheet 2.

7. 27 CFR 478.125e

Nature of Violation: The licensee failed to accurately and timely maintain the firearms acquisition and disposition record:

- In (b)(3) - 112 Public Law 55 125 Stat 552 instance, licensee failed to accurately record the acquisition (serial number) of a firearm;
- In (b)(3) - 112 Public Law 55 125 Stat 552 instance, licensee recorded a disposition for a firearm that was found in inventory;
- In (b)(3) - 112 Public Law 55 125 Stat 552 instance, licensee failed to timely record the acquisition of a firearm;
- In (b)(3) - 112 Public Law 55 125 Stat 552 instances, licensee failed to timely record the disposition of a firearm;
- In (b)(3) - 112 Public Law 55 125 Stat 552 instance, the firearm was missing from inventory and licensee was unable to reconcile the disposition of the firearm.

Licensee's Response: Licensee did not dispute the errors and stated they would ensure that all firearms were entered into the record timely and accurately.

Corrective Action: Licensee was instructed to ensure acquisition and disposition entries are timely and accurately made in the A&D record. On September 12 and 13, 2016, IOI (b)(6) verified that the corrections were made to the A&D record. Additionally, on September 13, 2016, licensee completed and submitted ATF Form

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3310.11 to report the missing firearm.

Reference: Exhibits ^{(b)(3) - 112 P}; Worksheet 1.

X

Industry Operations Investigator

Index of Worksheets and Exhibits

Worksheets

- 1 – Inventory, A&D
- 2 – ATF Form 4473 Review

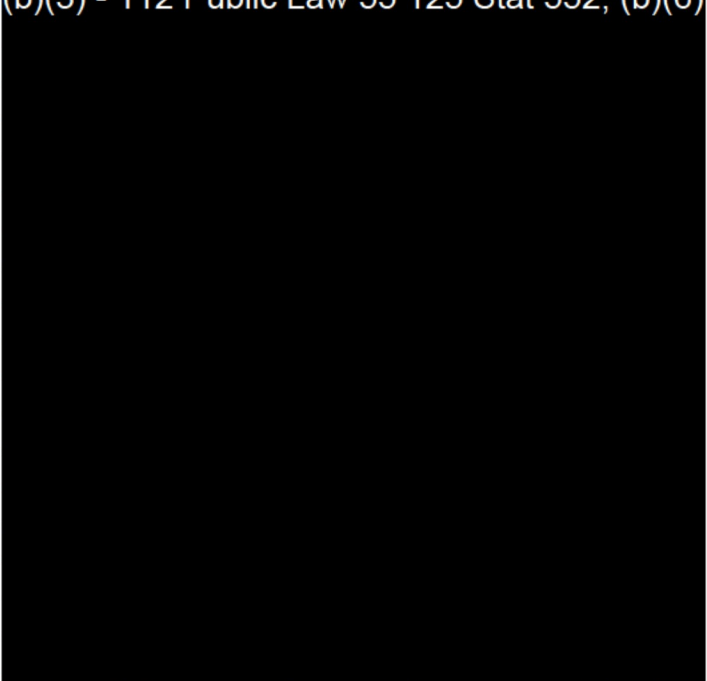
Exhibits

- 1. Entity Details, Secretary of State Nevada for RJM Jewelry, Inc.
- 2. Firearm # 235 Documentation
- 3. Firearm # 320 Documentation
- 4. Firearm # 531 Documentation
- 5. Firearm # 199 Documentation
- 6. Firearm # 284 Documentation
- 7. Firearm # 436 Documentation
- 8. Firearm # 492 Documentation
- 9. Firearm # 859 Documentation
- 10. Firearm # 872 Documentation
- 11. ATF Form 3310.11 dated 9/13/16
- 12. (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
- 13. [REDACTED]
- 14. [REDACTED]
- 15. [REDACTED]
- 16. [REDACTED]
- 17. [REDACTED]
- 18. [REDACTED]
- 19. [REDACTED]
- 20. [REDACTED]
- 21. [REDACTED]

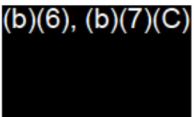
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22. (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
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33.
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40.
41. Acknowledgement of Federal Firearms Checklist signed 10/6/16

Referrals:

2017-0002 (b)(6), (b)(7)(C)
2017-0003 
2017-0004 