

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Professional Police Supply, Inc. Adamson Police Products 160 Airway Blvd. Livermore, CA 94551, Alameda	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 786060-2016-0213-B1B 3. PERMIT/LICENSE NUMBER 4a. TARGET DATE 4b. TARGET HOURS 994001014B20420 5. REQUESTED BY (SIGNATURE, TITLE AND DATE)
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6. ATF OFFICER(S) ASSIGNED
 (b)(6) - Lead Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
 (b)(6), Area Supervisor, 04/25/2016

8. PURPOSE/SPECIAL INSTRUCTIONS
 talk to AS (b)(6) before inspecting for additional information

9. INSPECTION RESULTS			<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC	10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	5	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS		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: 10/07/2016

 Viols WL ONLY and Recall Inspection

12. TIME ACCOUNTING DATA		
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)	
JUN 2016	49.00	
JUL 2016	18.00	
AUG 2016	81.00	
SEP 2016	26.00	
ATF OFFICER'S SUBTOTAL	174.00	ATF OFFICER'S SIGNATURE
TOTAL HOURS	174.00	

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION
 Full compliance inspection conducted. Warning letter issued 10/11/2016. No further action is required.

 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
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SIGNATURE AND TITLE (b)(6) - NSPECT Program Manager	REVIEW DATE 10/11/2016
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	3. PERMIT/LICENSE NUMBER 994001014B20420	4a. TARGET DATE	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

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 Professional Police Supply, Inc. Adamson Police Products	Street Address 160 Airway Drive	City Livermore	State CA	Zip Code 94544-	County Alameda	Page 1 of 3 Pages
License/Permit/Registry Number (If any) 994001014B20420	Expiration Date 2/1/2017	Date(s) or Period of Inspection 06/14/2015 through 06/14/2016				

Inspection Results

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

Number: 1

Nature of Violation:

Failure to timely record acquisitions of eleven firearms and failure to timely record dispositions of (b)(3) (b)(7)(F) firearms in the A&D records

Repeat Violation (2014, 2011)

Each licensed dealer shall enter into a record each receipt and disposition of firearms.

Citation: 27 CFR 478.125(e)

Date Corrections to be Made: 06/22/2016
(If not corrected immediately)

Corrective Action to be Taken: The licensee recorded the entries in the A&D records on June 15, 2016.
(If not corrected immediately)

Number: 2

Nature of Violation:

Failure to answer item #24 Certification; on (b)(3) (b)(7)(F) Form 4473
Failure to answer item #25 Date; on (b)(3) (b)(7)(F) Form 4473.

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

Citation: 27 CFR 478.21(a)

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

Corrective Action to be Taken: Licensee was counseled on proper execution of the ATF Form 4473
(If not corrected immediately)

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Name of Proprietor Professional Police Supply, Inc. Adamson Police Products	Street Address 160 Airway Drive	City Livermore	State CA	Zip Code 94544-	County Alameda	Page 2 of 3 Pages
License/Permit/Registry Number (If any) 994001014B20420	Expiration Date 2/1/2017	Date(s) or Period of Inspection 06/14/2015 through 06/14/2016				

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:

(b)(3) ATF Form 4473 could not be located after the date of sale

Licensee shall retain each Form 4473 for a period of not less than 20 years after date of sale or disposition.

Citation: 27 CFR 478.129(b)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken: The licensee was counseled on record retention

(If not corrected immediately)

Number: 4

Nature of Violation:

Adamson's Police Products unlawfully possessed (b)(3) - 26 USC 6103 to them

(b)(3) - 26 USC 6103

Citation: 26 U.S.C. 5861(d)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken: ATF seized the short barreled rifles.

(If not corrected immediately)

Report of Violations

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Name of Proprietor Professional Police Supply, Inc. Adamson Police Products	Street Address 160 Airway Drive	City Livermore	State CA	Zip Code 94544-	County Alameda	Page 3 of 3 Pages
License/Permit/Registry Number (If any) 994001014B20420	Expiration Date 2/1/2017	Date(s) or Period of Inspection 06/14/2015 through 06/14/2016				

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:

Failure to prepare a Multiple Sale or Other Disposition of Pistols and Revolvers, ATF Form 3310.4 when ^{(b)(3) 112} multiple handgun sales involving a total of ^{(b)(3) 112} handguns were disposed to unlicensed persons

States in part: Each licensee shall prepare a report of multiple sales or other disposition whenever the licensee sells or otherwise disposes of, at one time or during any five consecutive business days, two or more pistols, or revolvers, or any combination of pistols and revolvers totaling two or more, to an unlicensed person

Citation: 27 CFR 478.126a

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee reported the multiple-sales transactions to the Tracing Center on July 26, 2016.

I Have Received a Copy of This Report of Violations (Proprietor's signature and title)	Date
Signature and Title of ATF Officer	Date



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

San Francisco Field Division

October 11, 2016

*5601 Arnold Road, Suite 400
Dublin, California 94568-7729
www.atf.gov*

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James P. Cunningham
Professional Police Supply Inc. dba Adamson Police Products
160 Airway Blvd
Livermore, California 94551

REF: FFL #9-94-001-01-7B-20420

Dear Mr. Cunningham:

During a recent compliance inspection at your firearms business covering the period June 14, 2015 through June 14, 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 or your designated responsible person by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Investigator (b)(6) [REDACTED]. 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 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

Mr. James P. Cunningham
FFL#: 9-94-001-01-7B-20420

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 (b)(6)
Area Supervisor, a (b)(6)

Sincerely,

(b)(6)

Area Supervisor
San Francisco Area Office

cc: Federal Firearms Licensing Center
Director, Industry Operations, San Francisco Field Division
Dublin III Area Office File

Address: 160 Airway Blvd
Livermore, California 94551

1 - Introduction

Inspection Profile:

On June 14, 2016, Alcohol Tobacco Firearms and Explosives (ATF) Industry Operations Investigator (IOI) (b) (6) commenced a full scope on-site High Crime Firearms Compliance Inspection for the period of June 14, 2015 through June 14, 2016 at Adamson Police Products. IOI (b) (6) interviewed President James Cunningham, CDL (b) (6) and Manager Teresa Riley, CDL (b) (6) and Sales Associate Vijay Maharaj, CDL (b) (6) at the business premises. Other investigative participants were ATF IOI (b) (6) (b)(3)Pub Law 112-55 125 § 552 Kansas Satellite Office and ATF Special Agent (b) (6) (b) (6) The licensee was not notified of the inspection in

Business Profile:

Adamson Police Products is a retail and wholesale firearms dealer engaged in dealing firearms, ammunition, accessories, uniforms and apparel to law enforcement officers. The business is conducted in a store front. The firearms are stored on the premises in a secured storage room. In the last 12-months (b) (4) firearms were acquired and over (b) (4) firearms sold. Out of (b) (4) firearms disposed, (b) (4) percent were handguns; (b) (4) percent were long guns; (b) (4) percent were wholesale; (b) (4) percent was retail (b) (4) percent were new and (b) (4) percent were used. (b) (4) are the suppliers for the business. None of the firearms were sold at gun shows. None were sold over the internet. Adamsonpoliceproducts.com is the business domain name. the items sold are exclusively for law enforcement only. There were no other businesses on the premises. The Federal firearms license #9-94-0420 was posted. It expires February 1, 2017. Other state and local licenses and permits were observed and they were current: California Firearms Dealer (CFD) #14878; California Seller's Permit SRYCH21-725346; Local Firearms License #2002247, expiration December 31, 2016; California Certificate of Eligibility (COE) #2103; January 18, 2016

Ownership and Control:

Professional Police Supply dba Adamson's Police Supply is an active California corporation, business entity #C0973156. There were no changes in ownership or control of the business in the last 12-months. There was no indication of hidden ownership.

Variance:

Adamson Police Products did not conduct business under a variance.

2 - Recommendation

ROV WL Recall

3 - Inspection History

The following are the results of the last three ATF inspections:

Date of Inspection:	July 14, 2014
Type of Inspection:	Compliance Inspection
UI#:	786060-2014-0027 B1B
Inspection Results:	Viols WL Only; Recall Inspection
Cited Violations:	27 CFR 478.21(a) Repeat Violation 27 CFR 478.124(c)(1) Repeat Violations 27 CFR 478.124(c)(3)(1) 27 CFR 478.124(c)(3)(iv) 27 CFR 478.125(e) Repeat Violation 27 CFR 478.126a Repeat Violation
Date of Inspection:	January 15, 2013
Type of Inspection:	Recall Inspection
UI#:	786060-2013-0042 B1B
Inspection Results:	Viols DIO (Delegate) WC ILO Revocation
Cited Violations:	27 CFR 478.124(c)(3)(iv) Repeat Violation 27 CFR 478.99(c)
Date of Inspection:	April 8, 2011
Type of Inspection:	Recall Inspection
UI#:	786060-2011-0213 B1B
Inspection Results:	Viols WC; Recall Inspection
Cited Violations:	27 CFR 478.21(a) Repeat Violation 27 CFR 478.124(c)(1) 27 CFR 478.125(e)

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

FIREARMS INSPECTION REPORT

Name: PROFESSIONAL POLICE SUPPLY INC **UI#:** 786060-2016-0213 B1B

Trade Name: Adamson Police Products

FFL#: 9-94-001-01-7B-20420

IOI (b) (6) completed a full physical inventory of the firearms with assistance from Cody, Sales Inventory. Adamson Police Products was cited for one violation of 27 CFR 478.125(e) in (b)(3) (1.1-percent) instances. The A&D record exhibited (b)(3) Pub L open dispositions; 224 firearms were accounted for in the physical inventory. Reconciliation of the inventory disclosed three dispositions in which firearms sold but were not recorded in the records. In addition, a referral generated by ATF Wichita Satellite Office IOI (b) (6) referred information about Adamson Police Products being in possession of (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6), (b)(7)(C)

(b)(3) Pub L The A&D records exhibited all the required information. Seventeen firearms were traced from acquisition through disposition and there were no discrepancies. The discovery of the SBRs transferred off-book did not indicate trafficking because Post Rock Trading Co. immediately reported the incident to ATF. There was no discovery of firearms with obliterated serial numbers on the premises. The transactions were recorded in the A&D records on July 15, 2016.

Ms. Riley is responsible for recordkeeping. The A&D records are logged daily.

Worksheet 1

5 - ATF Forms 4473 – NICS & Other Dispositions

All of the ATF Form 4473 as well as transactions between licensees in the inspection period were reviewed. Firearms transferred to law enforcement officers and other licensees were properly recorded. Thirty DROS transactions on the Forms 4473 were compared to the NICS Audit Log. There were no discrepancies. There were (b)(3) Pub L Forms 4473 on file and reviewed. Out of (b)(3) Pub L forms (b)(3) - 112 F (1.7%) were found with the following violations:

27 CFR 478.21(a) Item #24, Certification and item #25, signature were blank on (b)(3) Pub L 112-55 125 form.

27 CFR 478.129(b) Failure to maintain (b)(3) - 11 ATF Form 4473 after the date of sale. An AFS query of the firearms disclosed that it sold February 27, 2012.

Ms. Riley is responsible for recordkeeping. The forms are reviewed daily and again when the customer picks up the firearms.

Worksheet 2

Exhibit 1

6 - Multiple Sales

Adamson Police Products was cited for one violation of 27 CFR 478.126a in [REDACTED] instances for failing to timely report the dispositions of [REDACTED] handguns on [REDACTED] ATF Forms 4473. On July 14, 2016, the licensee reported the dispositions to Firearms Tracing Center.

Worksheet 2
Exhibit 2

7 - Suspicious/Prohibited Purchasers

There was no discovery of suspicious or prohibited purchases.

8 - Trace Activity

There were [REDACTED] successfully completed traces linked to the licensee during the inspection period.

9 - NFA/Importer/Collector/Manufacturer

Adamson Police Products was cited for [REDACTED] violation of 26 U.S.C. 5861(d). Possession of [REDACTED] short-barreled rifles that were not registered to the licensee. The licensee did not engage in manufacturing, importing or collecting firearms.

Worksheet 1

10 - Referrals

There were no referrals generated by this inspection.

11 - Other

May 25, 2016, ATF Dublin III received a referral from ATF IOI (b) (6) [REDACTED] Wichita, KS Satellite Office after he commenced an inspection at Post Rock Trading Co., FFL #548-02511 reporting that Adamson Police Products engaged in an off-book transfer of 11 short-barreled rifles to Post Rock Trading Co. without any NFA paperwork. IOI (b) (6) [REDACTED] interviewed Adamson Police Products Manager (b) (6) [REDACTED] (b) (6) who told him that he transferred the firearms off book, and that they did not have an SOT stamp (reference ATF UI# 779025-2016-0204. ATF Special Agent

FIREARMS INSPECTION REPORT

Name: PROFESSIONAL POLICE SUPPLY INC **UI#:** 786060-2016-0213 B1B

Trade Name: Adamson Police Products

FFL#: 9-94-001-01-7B-20420

(b) (6) seized all the firearms except one which was sold reference ATF case #767025-2015-0457.

July 16, 2016, IOI (b) (6) interviewed (b) (6) Raj on the licensed premises. Mr. (b) (6) made the following statements: (b) (6) worked for Adamson Police Products for approximately 35-years. He was the RP/Store Manager until July 2015. Adamson Police Products had an agreement with Oakland Police Department (OPD) to trade old firearms for new equipment. Adamson Police Products served as a broker for OPD to locate dealers to dispose firearms. Adamson Police Products made a few transactions with OPD over the course of the agreement. On July 8, 2015, OPD transferred 11 short barreled rifles to Adamson Police Products. Adamson Police Products transferred the rifles to Post Rock Trading Co. without recording the transaction in the A&D records or acquiring an SOT stamp. (b) (6) stated that he could not explain why he accepted the firearms when they did not have an SOT stamp or why he transferred the firearms off-book. After this incident OPD severed it deal with Adamson Police Products. IOI (b) (6) reviewed the A&D records and it indicated that there were no further transactions between the two parties. (b) (6) stated that this was the sole incident of this kind. Due to his indiscretion, (b) (6) was demoted to a sales position having no further responsibilities related to the firearms and the firearms inventory was transferred to another store.

July 12, 2016, IOI (b) (6) interviewed Adamson Police Products President James Cunningham at the business premises. Mr. Cunningham stated (b) (6) brought the transfer of the NFA firearms to his attention but he did not relay that the firearms were transferred off-book. When he learned of the shipment he demoted Mr. (b) (6) and promoted Teresa Riley and transferred the firearms inventory to the store in Livermore. Adamson Police Products would not deal in NFA firearms in the future.

July 13, 2016, IOI (b) (6) spoke by phone to ATF Special Agent (b) (6) who stated that he seized all but one of the rifles which was sold and could not be located at the time. The firearms were not machineguns. OPD could file a claim with NFA Branch to have the firearms returned to them (reference ATF case #767025-2015-0457).

July 24, 2016, IOI (b) (6) spoke by phone to OPD Officer (b) (6) Officer (b) (6) corroborated (b) (6) statement. Adding that at the time he was unfamiliar with dealing with NFA transfers. OPD filed a claim to have the firearms returned to their custody. A copy of the claim is attached to the report.

Exhibit 4

12 - Closing Actions

September 6, 2016, IOI (b) (6) held the closing conference with Mr. Cunningham, President and Teresa Riley, Manager. Mr. Cunningham was counseled on the violations disclosed which encompassed recordkeeping, timely filing multiple sales transactions and NFA transactions. Mr. Cunningham stated Adamson Police Products would not deal in NFA firearms. And that he thought that Ms. Riley was better suited for the job as she was very detail oriented and a good record keeper. He did not think they would have the problems they had when (b) (6) was managing the firearms. The Acknowledgement of Federal Firearms Regulations form was reviewed and discussed and a copy of it was obtained. IOI (b) (6) recommended that the licensee should attend a seminar in the future and she gave them informational materials pertaining to licensees, as well local ATF phone numbers.

Exhibit 5

13 - Violations

1. 27 CFR 478.21(a) Repeat Violation 2011, 2014

Nature of Violation: Item #24, Certification and Item #25, Signature were blank on ATF Form 4473.

Licensee's Response: Mr. Cunningham stated that the questions were inadvertently missed when the form was reviewed.

Corrective Action: Mr. Cunningham was counseled on the violations

2. 27 CFR 478.125(e) Repeat Violation 2011, 2014

Nature of Violations: Failure to timely record the acquisitions and/or dispositions firearms in the A&D Records.

Licensee's Response: Mr. Cunningham stated that he did not know the firearms transferred off-book and when he learned of the shipment he demoted (b)(6) and promoted Teresa Riley and then he transferred the firearms inventory to the store in Livermore. Adamson Police Products would not deal in NFA firearms in the future.

Corrective Action: ATF Seized the NFA firearms

3. 27 CFR 478.126a Repeat Violation 2011, 2014

FIREARMS INSPECTION REPORT

Name: PROFESSIONAL POLICE SUPPLY INC **UI#:** 786060-2016-0213 B1B

Trade Name: Adamson Police Products **FFL#:** 9-94-001-01-7B-20420

Nature of Violation: Failure to prepare and to timely report the disposition of ^{(b)(3)Pub Law 112-55 125 § 552} handguns on ^{(b)(3)Pub Law} TF Forms 4473.

Licensee's Response: Mr. Cunningham stated they forgot to report the transactions.

Corrective Action: On July 26, 2016, the licensee reported the dispositions to Firearms Tracing Center.

4. **27 CFR 478.129(b)**

Nature of Violation: Failure to maintain one ATF Form 4473 after the date of sale.

Licensee's Response: Mr. Cunningham stated that they looked for the form but all they could find was the DROS form. We don't know what happened to the Form 4473.

Corrective Action: Mr. Cunningham was counseled on the violations

5. **26 U.S.C. 5861(d)**

Nature of Violation: Adamson Police Products was in possession with NFA firearms which were not registered to the licensee.

Licensee's Response: Mr. Cunningham stated that when he learned of the shipment he demoted ^{(b)(6)} and promoted Teresa Riley and transferred the firearms inventory to the store in Livermore. Adamson Police Products would not deal in NFA firearms in the future.

Corrective Action: ATF seized the firearms.

9/7/2016

X

^{(b)(6)}

Industry Operations Investigator

Signed by: ^{(b)(6)}

Index of Worksheets and Exhibits

Report of Violations

Worksheets

- A&D Review
- ATF Form 4473 Review

Exhibits

- ATF Form 4473 (copies)
- Report of MS ATF E-Form 3310.4
- Wichita KS, Referral
- OPD Entries
- Acknowledgement of Federal Firearms Regulations