

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Maricopa County Financial LP EZ Money Pawn 2710 West Bethany Home Road Phoenix, AZ 85017, Maricopa		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 785050-2017-0012-B1B		
		3. PERMIT/LICENSE NUMBER 986013029K02661	4a. TARGET DATE 12/5/2016	4b. TARGET HOURS 70
5. REQUESTED BY (SIGNATURE, TITLE AND DATE)				
6. ATF OFFICER(S) ASSIGNED (b)(6) - Lead Investigator				
7. ASSIGNED BY (SIGNATURE, TITLE AND DATE) (b)(6), Area Supervisor, 10/01/2016				
8. PURPOSE/SPECIAL INSTRUCTIONS Conduct a full scope SWB-DE (Pawnbroker) compliance inspection while evaluating for trafficking indicators; Assure compliance with current provisions of GCA. *NOTE: Demand Letter 3 has been issued to licensee. Retain hardcopies of issued ROV (if any) and/or Ack of Regs for file retention.				
9. INSPECTION RESULTS <input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC				
NO. OF VIOLATIONS	8	NO. OF REFERRALS		
NO. OF TECS CHECKS	24	NO. OF TECS HITS	1	
NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES	2111 - PER DIEM	
		\$ VALUE OF TAX DECREASES	2112 - P.O.A.	
NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS	2113 - COMM. AIR	
NO. OF CLAIMS		\$ VALUE OF CLAIMS	2114 - RENTAL CAR	
NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED	2115 - GPV EXPENSES	
			2116 - MISC.	
			TOTAL \$ FOR INSP.	
11. ATF OFFICER'S RECOMMENDATION Submitted by (b)(6) - Industry Operations Investigator Submitted on: 11/17/2016 Viols WL ONLY and No Recall Inspection				
12. TIME ACCOUNTING DATA				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)				
OCT 2016		56.00		
NOV 2016		13.00		
ATF OFFICER'S SUBTOTAL		69.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS		69.00		
13. REVIEW AND ROUTING				
REVIEW COMMENTS AND RECOMMENDATION Field inspection performed 10/19-10/25/16; a ROV was issued for five recordkeeping violations (two of which are low-volume repeat violations), two conduct of business violations and a single (low-volume repeat) administrative violation. A Warning Letter was generated and sent to the licensee (via certified post w/ return receipt) on 11/17/16. A Recall Inspection has been staged for compliance reassessment and follow-up. No further field action required. Viols WL ONLY and Recall Inspection				
<input checked="" type="checkbox"/> REVIEWED <input type="checkbox"/> CONCUR <input checked="" type="checkbox"/> SEE COMMENTS <input checked="" type="checkbox"/> FINAL DISPOSITION				
SIGNATURE AND TITLE (b)(6) - Area Supervisor			REVIEW DATE 11/17/2016	

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Maricopa County Financial LP EZ Money Pawn 2710 West Bethany Home Road Phoenix, AZ 85017, Maricopa	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 785050-2017-0012-B1B		
	3. PERMIT/LICENSE NUMBER 986013029K02661	4a. TARGET DATE 12/5/2016	4b. TARGET HOURS 70
	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

www.atf.gov

Maricopa County Financial LP
EZ Money Pawn
2710 West Bethany Home Road
Phoenix, AZ 85017
RE: 9-86-013-02-9K-02661

November 17, 2016

Mr. Jose Hernandez:

During a recent inspection at your firearms business covering the period of October 19, 2015 to October 19, 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 by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator. 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 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.

Maricopa County Financial LP

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

Sincerely,

(b)(6)

Phoenix III Area Supervisor

Enclosure

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

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 6 Pages
EZ Money Pawn #21	2710 W Bethany Home	Phoenix	AZ	85017	Maricopa	
License/Permit/Registry Number (if any)	Expiration Date	Date(s) or Period of Inspection				
9-86-013-02-9K-02661	10/01/2019	10/19/2016 through 10/25/2016				

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 478.125(e)	Failure in (b)(3) 112 instances, to record required acquisition and disposition information in an Acquisition and Disposition (A&D) Record.	Specifics of the violation - Failure in nine instances, to record the correct serial number of a firearm in an A&D Record (SN (b)(3) 112 Public Law 55 125 STAT 552 (b)(3) 112 Public Law 55 / IOI (b)(6) directed the Licensee to correct the serial number errors.	
2	27 CFR 478.21(a)	Failure on (b)(3) 112 ATF Form 4473, to furnish or obtain all information as required by headings and instructions.	Specifics of the violation - Failure on one ATF Form 4473, to correctly record the required information in Item 31 - Trade/corporate name and address of transferor and Item 32 - Federal Firearms License Number (b)(3) 112 Public Law 55 125 STAT 552 (b)(3) 112). / IOI (b)(6) told the Licensee to make a copy of the page needing correction, initial and date the correction on the copy, and insert the corrected copy in with the original.	

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

(b)(6)

101

Date
10/25/16

Date
10/25/16

Copy 1 - Proprietor's Copy

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 EZ Money Pawn #21	Street Address 2710 W Bethany Home	City Phoenix	State AZ	ZIP Code 85017	County Maricopa	Page 2 of 6 Pages
License/Permit/Registry Number (if any) 9-86-013-02-9K-02661		Expiration Date 10/01/2019	Date(s) or Period of Inspection 10/19/2016 through 10/25/2016			

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)
3	27 CFR 478.124(c)(1)	Failure on (b)(3) 112 P ATF Forms 4473, to obtain and record all required Transferee information.	<p>Specifics of the violation - Failure on three ATF Forms 4473, to ensure that the Transferee recorded the correct date in Item 17 - Certification Date (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)</p> <p>101 (b)(6) told the Licensee to ensure that for all future ATF Forms 4473, they ensure that the Transferee records the correct date in Item 17. If they elect to have the Transferee return to make a correction, they are to make a copy of the page needing correction, have the Transferee make the correction on the copy, initial and date the correction, and insert the corrected copy in with the original ATF Form 4473.</p>	

Report of Violations

Instructions

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

Name of Proprietor EZ Money Pawn #21	Street Address 2710 W Bethany Home	City Phoenix	State AZ	ZIP Code 85017	County Maricopa	Page <u>3</u> of <u>6</u> Pages
License/Permit/Registry Number (if any) 9-86-013-02-9K-02661		Expiration Date 10/01/2019	Date(s) or Period of Inspection 10/19/2016 through 10/25/2016			

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)(i)	Failure on (b)(3) ATF Form 4473, to verify and record proper Transferee's identification documents.	<p>Specifics of the violation - Failure on (b)(3) ATF Form 4473, to record the correct expiration date for the required government issued document examined in Item 20a - Identification (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)</p> <p>IOI (b)(6) told the Licensee that for all future ATF Form 4473 transfers, the required government issued document used by the Transferee must meet the identification requirements outlined in the ATF Form 4473 instructions and recorded correctly by the Licensee. If the Licensee elects to have the Transferee return with valid identification, they are to make a copy of the page needing correction, make the correction on the copy, initial and date the correction, and insert the corrected copy in with the original ATF Form 4473.</p>	

Report of Violations

Instructions

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

Name of Proprietor EZ Money Pawn #21	Street Address 2710 W Bethany Home	City Phoenix	State AZ	ZIP Code 85017	County Maricopa	Page 4 of 6 Pages
License/Permit/Registry Number (if any) 9-86-013-02-9K-02661		Expiration Date 10/01/2019	Date(s) or Period of Inspection 10/19/2016 through 10/25/2016			

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)
5	27 CFR 478.124(c)(3)(iv)	Failure on (b)(3) 112 P ATF Forms 4473, to record all required NICS transaction information.	<p>Specifics of the violation - Failure on one ATF Form 4473, to correctly record the required information for Item 21a - Date the Transferee's identifying information was transmitted to NICS ((b)(3) 112 Public Law 55 125 STAT (b)(3) 112 P</p> <p>(b)(3) 112 P, Failure on one ATF Form 4473, to correctly record the required information for Item 21d - If initial response received from NICS was "Delayed", the following response was received from NICS (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)</p> <p>and Failure on one ATF Form 4473, to correctly record the required information for Item 21e - After the firearm was transferred, the following response was received from NICS on: (b)(3) 112 Public Law 55 125 STAT 552 (b)(6)</p> <p>IOI (b)(6) told the Licensee to ensure that for all future ATF Forms 4473, Item 21a, 21b, 21c, 21d and 21e, are properly completed.</p>	

Report of Violations

Instructions

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

Name of Proprietor EZ Money Pawn #21	Street Address 2710 W Bethany Home	City Phoenix	State AZ	ZIP Code 85017	County Maricopa	Page 5 of 6 Pages
License/Permit/Registry Number (if any) 9-86-013-02-9K-02661		Expiration Date 10/01/2019	Date(s) or Period of Inspection 10/19/2016 through 10/25/2016			

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)
6	27 CFR 478.124(c)(4)	Failure on (b)(3) ATF Form 4473, to record all required firearm identification information.	Specifics of the violation - Failure on one ATF Form 4473, to strike out the information recorded in Item 26 - Manufacture and/or Importer, Item 27 - Model, Item 28 - Serial Number and Item 29 - Type and Item 30 - Caliber or Gauge when a firearm was not transferred (b)(3) 112 Public Law 55 125 STAT 552 (b)(6) IOI (b)(6) told the Licensee to make a copy of the page needing correction, initial and date the correction on the copy, and insert the corrected copy in with the original ATF Form 4473.	
7	27 CFR 478.102(a)	Failure on (b)(3) ATF Form 4473, to record a qualifying state permit in lieu of conducting a NICS background check, instead accepting and recording a non-qualifying state permit.	Specifics of the violation - Failure on one ATF Form 4473, to record a qualifying state permit in lieu of conducting a NICS background check, instead accepting and recording a non-qualifying state permit (b)(3) 112 Public Law 55 125 STAT 552 (b)(6) IOI (b)(6) told the Licensee that for future transfers, only a valid State of Arizona Concealed Carry Permit may be accepted in lieu of conducting a NICS background check.	

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 <u>6</u> of <u>6</u> Pages
EZ Money Pawn #21	2710 W Bethany Home	Phoenix	AZ	85017	Maricopa	

License/Permit/Registry Number (if any)	Expiration Date	Date(s) or Period of Inspection
9-86-013-02-9K-02661	10/01/2019	10/19/2016 through 10/25/2016

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)
8	27 CFR 478.99(c)	Failure on ^{(b)(3) 11} occasion, to stop a firearm transfer to a Transferee when after an initial NICS "Delay" response, a subsequent NICS "Deny" response was provided to the Licensee by NICS.	<p>Specifics of the violation - Licensee failed to stop a transfer to a Transferee after receiving a "Deny" response from NICS ^{(b)(3) 112 Public Law 55 125 STAT 552 (b)(6)}</p> <p>IOI ^{(b)(6)} told the Licensee that future firearm transfers should never be conducted after receiving a "Deny" response from NICS.</p>	

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

Address: 2710 West Bethany Home Road
Phoenix, AZ 85017, Maricopa

1 - Introduction

Inspection Profile:

On October 19, 2016, Industry Operations Investigator (IOI) (b)(6), started a **full scope Top 100 SWB-DE (Pawnbroker) compliance inspection** of Maricopa County Financial L.P. (Licensee), doing business as EZ Money Pawn #21, a Type 02 Pawnbroker FFL #9-86-013-02-9K-02661, expiring October 1, 2019. The period covered by the inspection is October 19, 2015 to October 19, 2016. IOI (b)(6) did not provide advance notice of the inspection.

IOI (b)(6) completed the inspection on October 24, 2016 and conducted the Closing Action on October 25, 2016.

IOI (b)(6) identified Store Manager (b)(6), who assisted with the inspection, by his Arizona Drivers' License (b)(6) with a date of birth of (b)(6) expiring 12/07/2027. Assistant Managers (b)(6) and (b)(6) also assisted IOI (b)(6) with the inspection. Responsible Person Samuel Williams (RP) was present during portions of the inspection and at the Closing Action. RP Williams is known to IOI (b)(6) from previous EZ Money Pawn inspections.

Business Profile:

The Licensee operates a pawn shop out of a leased commercial storefront located in an urban area of Phoenix, Arizona, providing pawn services for all types of items including firearms. The store sells new firearms, ammunition and unredeemed pawned firearms from the store as well as via occasional listings on gunbroker.com.

This location is one of 14 Arizona pawn stores, all FFLs, owned by Courtland Management Corp, an umbrella organization located in Austin, TX that operates a national chain of pawn stores.

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

The Licensee's primary suppliers for new firearms are (b)(4) and they market via word-of-mouth and through their website, <http://ez-moneypawn.com/>. The Licensee does not sell from their website, at gun shows, provide gunsmithing services, use remote storage, have a NFA SOT, sell on consignment or operate any other businesses from the licensed premises.

During the 12 month inspection period, the Licensee:

- Acquired (b)(4) firearms
- Disposed of (b)(4) firearms. Approximately:
 - (b)(4) handgun / (b)(4) long gun
 - (b)(4) new / (b)(4) used

The local zoning and law enforcement authority for the business premises is the City of Phoenix. IOI (b)(6) reviewed the following state/local permits:

- Maricopa County Sheriff's Office Pawnbroker License #P-84
- State of Arizona Tax Privilege Tax License (b)(3) - 26 USC 6103
- City of Phoenix Tax Privilege Tax License (b)(3) - 26 USC 6103

Ownership and Control:

The Licensee operates as a State of Arizona Foreign Limited Partnership. The primary partner is Courtland Management Arizona, LLC, a Foreign LLC in good standing. The parent organization is domiciled in the State of Texas. See Exhibit 1 – ACC Records.

Courtland Management Corporation is the generic name used, that refers to one of the following related companies: National Pawn Inc., Courtland Financial Corp., Countywide Financial L.L.C., National CSO Loan Corp., EZ Gold Exchange L.L.C., Arizona EZ \$ Gold Buyers Inc., Ocho Financial L.L.C., Courtland Management Arizona L.L.C., Courtland Management Oklahoma L.L.C., Courtland Financial Oklahoma L.P., Pima County Financial L.P., Maricopa County Financial L.P. IOI Gilbert did not detect any hidden ownership.

Variance:

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

The Licensee stated that they do not have any current variances. IOI (b)(6) explained to the Licensee what a variance is, and if needed, how to apply for one.

2 - Recommendation

Viols WL ONLY and No Recall Inspection

3 - Inspection History

Date of Inspection: September 9, 2014 through September 18, 2014
Type of Inspection: Type 02 Compliance Inspection
UI#: 785050-2014-0329-B1B
Inspection Results: Viols ROV ONLY No Recall Inspection
Cited Violations: 27 CFR 478.21(a) - The licensee failed on (b)(6) occasions to ensure the ATF F4473 Blocks 11a and 30b were accurately completed
27 CFR 478.124(c)(1) - The licensee failed on (b)(6) occasions to ensure the ATF F4473 Block 11L was accurately completed
A signed Acknowledgment of Federal Firearms Regulations, dated September 18, 2014 is in the Area Office File for this inspection.

Date of Inspection: March 5, 2012
Type of Inspection: Type 02 Compliance Inspection
UI#: 785050-2012-0155-B1B
Inspection Results: Viols ROV ONLY No Recall Inspection
Cited Violations: 27 CFR 478.124(c)(1) - The licensee failed to ensure the ATF Form 4473 Section A, Item 11d or 11h were completed on (b)(6) occasions
27 CFR 478.124(c)(3)(i) - The licensee failed to obtain supplemental address documentation to ensure a valid address was provided by a purchaser on (b)(6) occasion
A signed Acknowledgment of Federal Firearms Regulations, dated March 19, 2012 is in the Area Office File for this inspection.

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

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

The Licensee maintains their A&D records on computer using Pawn Master software (<http://www.pawnmaster.com/>), all entries, with the exception of nine incorrect serial numbers, met the regulation requirements and were timely made. A printed version is maintained and updates sheets are printed daily and inserted into the printed version, reflecting the previous day's activity, replacing the applicable existing sheets.

IOI (b)(6) conducted a 100% physical inventory that resulted in the following:

- (b)(3) - 11 open entries in the A&D records that matched 593 firearms in inventory

After conducting the inventory and review of the A&D records, IOI (b)(6) cited the Licensee for failure in (b)(3) - 11 instances, to record the correct acquisition serial number for a firearm in an Acquisition and Disposition (A&D) Record, a violation of 27 CFR 478.125(e). See Worksheet 1 – Inventory, A&D, Exhibit 2 – A&D Record 27 CFR 478.125(e) violations and ATF Form 5030.5 – Report of Violations.

IOI (b)(6) checked 44 firearms from acquisition through dispositions with no discrepancies found.

A&D SOP

The store manager and assistant managers maintain the required records. As firearms are received, they initiate the acquisition entries in the A&D records and record the disposition on the day of the disposition. Due to the nine serial number errors, IOI (b)(6) recommended to the Licensee that they improve their serial number review process.

Pawned firearms are reported to the City of Phoenix Police Department by email on a nightly basis.

The Licensee states that prior to this inspection, they conducted a physical gun-to-book inventory on a quarterly basis. As a result of this inspection, they have implemented a monthly inventory. The premises are locked down by barrier hardware after hours and protection is provided by a monitored alarm system along with CCTV. Display long guns are secured by a cable lock and display handguns are locked in display cases. Pawned firearms are stored in a secured room.

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

5 - ATF Forms 4473 – NICS & Other Dispositions

The Licensee files their ATF Forms 4473 chronologically, completes ATF Forms 4473 manually and contacts NICS by telephone. From the NICS FFL Audit Report for the period requested, IOI (b)(6) matched 100% of the responses.

- 170 Total Number of Transactions
 - 102 Proceed Responses – no discrepancies
 - 13 Open Transactions – no discrepancies
 - 55 Denied Transactions – (b)(3) - 11 discrepancy (b)(3) - 112 Public Law 55 125 Stat 552)
 - (b)(3) - 112 NTN, from an ATF Form 4473 showing a transferred firearm to (b)(3) - 112 Public Law 55 125 Stat 552, was listed on the NICS FFL Audit Report as a “Deny” NTN. IOI (b)(6) determined that a firearm was transferred to after the Licensee received a “Deny” response from NICS and cited the Licensee for a violation of 27 CFR 478.99(c). See below.

The Licensee had (b)(3) - 11 ATF Forms 4473 on file for the 12 month inspection period and IOI (b)(6) reviewed 100%. After review of all the ATF Forms 4473, IOI (b)(6) noted that:

- Approximately 5% of the ATF Forms 4473 are the Spanish language version,
- Several Spanish ATF Forms 4473 appeared to have been completed by someone well versed in English. At the Closing Conference, the store manager stated that they completed them for a few Hispanic buyers who struggled with forms. IOI (b)(6) directed the store manager, in the presence of RP Williams, to cease this practice immediately and reviewed the correct process for a third party to complete an ATF Form 4473 along with sign-off by two non-involved witnesses per the ATF Form 4473 instructions, and
- Several ATF Forms 4473 were recertified several days after receiving a NICS “Proceed”. At the Closing Conference, the store manager stated that they conduct a NICS background check on initiating a lay-a-way purchase, with the recertification occurring when the firearm was actually transferred. IOI (b)(6) directed the store manager, in the presence of RP Williams, to cease this practice immediately and reviewed the correct process for conducting NICS background checks, including how it has to be done with lay-a-way purchases.

The review of the ATF Forms 4473 revealed the following violations that IOI (b)(6) cited the Licensee for:

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

Failure on (b)(3)-(1) ATF Form 4473, to furnish or obtain all information as required by headings and instructions, a violation of 27 CFR 478.21(a). See Worksheet 2 - 4473 (2012 Edition), Exhibit 3 – ATF Form 4473 27 CFR 478.21(a) violation and ATF Form 5030.5 – Report of Violations.

Failure on (b)(3)-(12) ATF Forms 4473, to obtain and record all required Transferee information, a violation of 27 CFR 478.124(c)(1). See Worksheet 2 - 4473 (2012 Edition), Exhibit 4 – ATF Forms 4473 27 CFR 478.124(c)(1) violations and ATF Form 5030.5 – Report of Violations.

Failure on (b)(3)-(1) ATF Form 4473, to verify and record proper Transferee's identification documents, a violation of 27 CFR 478.124(c)(3)(i). See Worksheet 2 - 4473 (2012 Edition), Exhibit 5 – ATF Form 4473 27 CFR 478.124(c)(3)(i) violation and ATF Form 5030.5 – Report of Violations.

IOI (b)(6) checked the Transferee in NLETS and verified the validity of the driver's license information listed on the ATF Form 4473.

Failure on (b)(3)-(12) ATF Forms 4473, to record all required NICS transaction information, a violation of 27 CFR 478.124(c)(3)(iv). See Worksheet 2 - 4473 (2012 Edition), Exhibit 6 – ATF Form 4473 27 CFR 478.124(c)(3)(iv) violations and ATF Form 5030.5 – Report of Violations.

IOI (b)(6) checked all the Transferees in OpenFox, N-Force and Arizona Judicial Branch Public Access to Court Case Information to ensure that they are not prohibited and no prohibiting information was returned.

Failure on (b)(3)-(1) ATF Form 4473, to record all required firearm identification information, a violation of 27 CFR 478.124(c)(4). See Worksheet 2 - 4473 (2012 Edition), Exhibit 7 – ATF Form 4473 27 CFR 478.124(c)(4) violation and ATF Form 5030.5 – Report of Violations.

Failure on (b)(3)-(1) ATF Form 4473, to record a qualifying state permit in lieu of conducting a NICS background check, instead accepting and recording a non-qualifying state (Nevada) permit, a violation of 27 CFR 478.102(a). See Worksheet 2 - 4473 (2012 Edition), Exhibit 8 – ATF Form 4473 27 CFR 478.102(a) violation and ATF Form 5030.5 – Report of Violations.

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

IOI (b)(6) checked the Transferee in OpenFox, N-Force and Arizona Judicial Branch Public Access to Court Case Information to ensure that they are not prohibited and no prohibiting information was returned.

Failure on (b)(6) occasion, to stop a firearm transfer to a Transferee when after an initial NICS "Delay" response, a subsequent NICS "Deny" response was provided to the Licensee by NICS, a violation of 27 CFR 478.99(c). See Worksheet 2 - 4473 (2012 Edition), Exhibit 9 – ATF Form 4473 27 CFR 478.99(c) violation and ATF Form 5030.5 – Report of Violations.

IOI (b)(6) reviewed the NICS record which indicates that a follow-up "Deny" response was provided to Store Manager (b)(6) by NICS on the day of the initial NICS background request that first resulted in a "Delay". (b)(6) thinks that he attached a note noting the "Deny" to the ATF Form 4473, however Item 21d with "No resolution was provided within 3 business days" was checked and the firearm transferred six days after the generation of the "Deny" by another store employee. IOI (b)(6) examined the ATF Form 4473 and did not find a note attached, however it appears to have had something attached to it at one time, based on puncture holes.

IOI (b)(6) instructed the store manager to contact NICS and explain that the firearm was transferred after receiving a "Deny". NICS instructed the store manager to fax in the ATF Form 4473. IOI (b)(6) checked the Transferee in OpenFox verifying the NICS report that the Transferee was prohibited and then worked with (b)(6), FBI NICS Section, to verify that the NICS record was updated and a firearm retrieval request generated. See Exhibit 10 – Initial NICS Record and Follow-up NICS FBI Email.

On November 16, 2016, ATF IRS (b)(6) contacted NICS, after not finding a retrieval case in N-Force. IRS Ramos received a NICS reply that due to the open warrant being in the same state as the purchase, ATF does not consider the situation as grounds for field referral due to insufficient evidence of prohibition. See Exhibit 11 – Follow up NICS Email re (b)(6) Status.

The Licensee conducted transfers to other FFLs properly and did not have any transfers to law enforcement personnel.

ATF Form 4473 SOP

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

As required, all employees contact NICS by phone, and are responsible for completion of the ATF Forms 4473. Forms are set aside for filing and reviewed again prior to filing. IOI (b)(6) recommended to the Licensee that they revisit their review policy as evidence didn't support a multi-step review process.

6 - Multiple Sales

The VCAB Firearm Trace History Report for the 12 month inspection period lists a total of (b)(6) multiple sale reports filed that involve a total of (b)(6) firearms consisting of:

- Multiple Sale of Handgun Reports totaling (b)(6) involving (b)(6) handguns
- Multiple Sale of Certain Rifles Reports totaling (b)(6) involving (b)(6) certain rifles

IOI (b)(6) compared the Licensee's ATF Forms 3310.4 (Report of Multiple Sales-Pistols and Revolvers) and ATF Forms 3310.12 (Report of Multiple Sale-Certain Rifles) to the VCAB report. The review resulted in one serial number correction that IOI (b)(6) emailed to ATF Contractor Annie Slonaker at the NTC. (b)(6) confirmed by return email that the correction had been made.

The Licensee had (b)(6) multiple sale reports on file that were not found on the VCAB Firearm Trace History Report. IOI (b)(6) directed the Licensee to resubmit the reports and IOI (b)(6) verified their inclusion in eTrace on November 2, 2016. IOI (b)(6) encouraged the Licensee to consider emailing future reports into the NTC and provided the licensee with the proper email address.

7 - Suspicious/Prohibited Purchasers

IOI (b)(6) identified 19 suspicious purchasers based on volume and/or firearm type acquired and checked the suspicious purchasers in the following systems:

- Open Fox
- N-Force
- Arizona Judicial Branch Public Access to Court Case Information
- Accurant

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

The searches did not return any derogatory or prohibiting information, however IOI (b)(6) provided the ATF Phoenix Crime Gun Intelligence Center with the names of the 19 suspicious buyers.

8 - Trace Activity

The Violent Crime Analysis Branch's (VCAB) Firearm Trace History report indicates, that for the 12 month inspection period, there were (b)(6) successful trace requests made of the Licensee.

IOI (b)(6) did not conduct any routine secondary market analysis as the Licensee reports all used firearms acquired to the Phoenix PD on a daily basis.

IOI (b)(6) provided the ATF Phoenix Crime Gun Intelligence Center with a list of the purchasers that obtained 50 caliber rifles, Colt 38 Super pistols and various AK rifle/pistol variants.

9 - NFA/Importer/Collector/Manufacturer

The Licensee is not involved in NFA/Importer/Collector/Manufacturer activity.

NFA

While the Licensee does not have an active SOT, in the event one is obtained, IOI (b)(6) advised the Licensee of the requirement to obtain an ATF Form 4473 and conduct a NICs background check for any individual who takes possession of a NFA item on behalf of a trust.

10 - Referrals

IOI (b)(6) did not generate any referrals as a result of this inspection.

11 - Other

IOI (b)(6) checked RP Williams and the three store managers in the following systems:

- Open Fox


FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

- N-Force (query done by the Crime Gun Intelligence Center)
- Arizona Judicial Branch Public Access to Court Case Information
- Accurint

(b)(6), (b)(7)(C)



The Licensee is not in violation of the Youth Handgun Safety Act. The Youth Handgun Safety Act poster was readily visible to Transferees and the RPs state that they give a Youth Handgun Safety act brochure to every Transferee receiving a handgun. The Licensee also has secure gun storage/safety devices available for all handgun transfers.

12 - Closing Actions

IOI (b)(6) conducted a Closing Conference with Store Manager (b)(6) and Responsible Person Sam Williams on October 25, 2016. IOI (b)(6) reviewed the ATF Form 5030.5 Report of Violations (ROV) with both individuals, who stated that they understood the nature of the violations cited and the corrective action required.

The correct procedure for completion of the ATF Form 4473 by a person on behalf of the buyer was reviewed in detail along with the correct process of conducting a NICS background check for lay-a-way purchases.

After review of the issues and violations, the RP signed the ROV, acknowledging that he had received a copy, after which IOI (b)(6) signed and retained the original.

IOI (b)(6) provided and/or reviewed the following ATF forms, publications and regulations with both individuals to include:

- Federal Firearms Reference Guide (2014)
- Acquisition and Disposition records (manual & computerized)
- ATF Form 4473 to include eForm 4473
- ATF Open Letter re Correcting ATF Form 4473 Errors
- State Regulations found at www.atf.gov

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

- Deny? / Delay? Flip Card
- Theft and Loss Report
- NICS Brochure
- NTC Brochure
- Youth Handgun Safety Brochures & Poster
- ATF Form 3310.4 – Multiple Sale Report / Handguns
- ATF Form 3310.12 – Multiple Sale Report / Certain Rifles
- Important ATF Phone Numbers
- Availability of FFL Newsletters Online and Electronic News Delivery
- Safety and Security Information for FFLs
- FFL Quick Reference and Best Practices Guide

IOI (b)(6) provided an opportunity for both individuals to ask any questions or discuss any concerns from the compliance inspection. IOI (b)(6) reviewed the Acknowledgement of Federal Firearms Regulations with both individuals, which the RP then signed, retaining a copy. See **Exhibit 12** – Executed Copy of the Acknowledgement of Federal Firearms Regulations.

13 - Violations

1 27 CFR 478.125(e)

Nature of Violation:

Failure in (b)(3) - 112 instances, to record required acquisition and disposition information in an Acquisition and Disposition (A&D) Record.

Specifics of the violation:

Failure in (b)(3) - 112 instances, to record the correct serial number of a firearm in an A&D Record (b)(3) - 112 Public Law 55 125 Stat 552).

Licensee Response:

The Licensee did not have a response.

Corrective Action:

IOI (b)(6) directed the Licensee to correct the serial number errors.

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

Worksheets and Exhibits: Worksheet 1 / Exhibit 2 – A&D Record 27 CFR 478.125(e) violations

2 27 CFR 478.21(a)

REPEAT OF VIOLATION CITED ON SEPTEMBER 18, 2014

Nature of Violation:

Failure on (b)(3) - 11 ATF Form 4473, to furnish or obtain all information as required by headings and instructions.

Specifics of the violation:

Failure on (b)(3) - 11 ATF Form 4473, to correctly record the required information in Item 31 – Trade/corporate name and address of transferor and Item 32 – Federal Firearms License Number (b)(3) - 112 Public Law 55 125 Stat 552).

Licensee Response:

The Licensee had no response.

Corrective Action:

IOI (b)(6) told the Licensee to make a copy of the page needing correction, initial and date the correction on the copy, and insert the corrected copy in with the original ATF Form 4473.

Worksheets and Exhibits: Worksheet 2 / Exhibit 3 – ATF Form 4473 27 CFR 478.21(a) violation

3 27 CFR 478.124(c)(1)

REPEAT OF VIOLATION CITED ON MARCH 19, 2012 AND SEPTEMBER 18, 2014

Nature of Violation:

Failure on (b)(3) - 112 ATF Forms 4473, to obtain and record all required Transferee information.

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

Specifics of the violation:

Failure on (b)(3) - 112 ATF Forms 4473, to ensure that the Transferee recorded the correct date in Item 17 – Certification Date ((b)(3) - 112 Public Law 55 125 Stat 552, (b)(6))

Licensee Response:

The Licensee had no response.

Corrective Action:

IOI (b)(6) told the Licensee that for all future ATF Forms 4473, they ensure that the Transferee records the correct date in Item 17. If they elect to have the Transferee return to make a correction, they are to make a copy of the page needing correction, have the Transferee make the correction on the copy, initial and date the correction, and insert the corrected copy in with the original ATF Form 4473.

Worksheets and Exhibits: Worksheet 2 / Exhibit 4 – ATF Forms 4473 27 CFR 478.124(c)(1) violations

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

REPEAT OF VIOLATION CITED ON MARCH 19, 2012

Nature of Violation:

Failure on (b)(3) - 112 ATF Form 4473, to verify and record proper Transferee's identification documents.

Specifics of the violation:

Failure on (b)(3) - 112 ATF Form 4473, to record the correct expiration date for the required government issued document examined in Item 20a –Identification (b)(3) - 112 Public Law 55 125 Stat 552. The date recorded for the expiration date was the Transferee's date of birth.

Licensee Response:

The Licensee had no response.

Corrective Action:

IOI (b)(6) told the Licensee that for all future ATF Form 4473 transfers, the required government issued document used by the Transferee must meet the identification

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

requirements outlined in the ATF Form 4473 instructions and recorded correctly by the Licensee. If the Licensee elects to have the Transferee return with valid identification, they are to make a copy of the page needing correction, make the correction on the copy, initial and date the correction, and insert the corrected copy in with the original ATF Form 4473.

Worksheets and Exhibits: Worksheet 2 / Exhibit 5 – ATF Form 4473 27 CFR 478.124(c)(3)(i) violation

5 27 CFR 478.124(c)(3)(iv)

Nature of Violation:

Failure on (b)(3) - 112 ATF Forms 4473, to record all required NICS transaction information.

Specifics of the violation:

Failure on (b)(3) - 112 ATF Form 4473, to correctly record the required information for Item 21a - Date the Transferee's identifying information was transmitted to NICS (b)(3) - 112 Public Law 55-125 Stat 552). The NICS Audit Log indicates a "Proceed" response was issued one day later than the date the Licensee recorded,

Failure on (b)(3) - 112 ATF Form 4473, to correctly record any date for Item 21d – If initial response received from NICS was "Delayed", the following response was received from NICS (b)(3) - 112 Public Law 55-125 Stat 552, (b)(6)

Failure on (b)(3) - 112 ATF Form 4473, to correctly record a response for Item 21e – After the firearm was transferred, the following response was received from NICS on: (b)(3) - 112 Public Law 55-125 Stat 552. The NICS Audit Log indicates the Licensee was contacted with a "Proceed" after the initial "Delay" response but Licensee failed to update status.

Licensee Response:

The Licensee had no response.

Corrective Action:

IOI (b)(6) told the Licensee to ensure that for all future ATF Forms 4473, Item 21a, 21b, 21c, 21d and 21e, are properly completed.

Worksheets and Exhibits: Worksheet 2 / Exhibit 6 – ATF Forms 4473 27 CFR 478.124(c)(3)(iv) violations

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

6 27 CFR 478.124(c)(4)

Nature of Violation:

Failure on (b)(3) - 112 ATF Form 4473, to record all required firearm identification information.

Specifics of the violation:

Failure on (b)(3) - 112 ATF Form 4473, to strike out the information recorded in Item 26 – Manufacture and/or Importer, Item 27 – Model, Item 28 – Serial Number and Item 29 – Type and Item 30 – Caliber or Gauge when a firearm was not transferred (b)(3) - 112 Public Law 55 125 Stat 552

Licensee Response:

The Licensee had no response.

Corrective Action:

IOI (b)(6) told the Licensee to make a copy of the page needing correction, initial and date the correction on the copy, and insert the corrected copy in with the original ATF Form 4473.

Worksheets and Exhibits: Worksheet 2 / Exhibit 7 – ATF Form 4473 27 CFR 478.124(c)(4) violation

7 27 CFR 478.102(a)

Nature of Violation:

Failure on (b)(3) - 112 ATF Form 4473, to record a qualifying state permit in lieu of conducting a NICS background check, instead accepting and recording a non-qualifying state permit.

Specifics of the violation:

Failure on (b)(3) - 112 ATF Form 4473, to record a qualifying state permit in lieu of conducting a NICS background check, instead accepting and recording a non-qualifying state permit (Nevada CCW). (b)(3) - 112 Public Law 55 125 Stat 552

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

Licensee Response:

The Licensee had no response.

Corrective Action:

IOI (b)(6) told the Licensee that for future transfers, only a valid State of Arizona Concealed Carry Permit may be accepted in lieu of conducting a NICS background check.

Worksheets and Exhibits: Worksheet 2 / Exhibit 8 – ATF Form 4473 27 CFR 478.102(a) violation

8 27 CFR 478.99(c)

Nature of Violation:

Failure on (b)(3) - 11 occasion, to stop a firearm transfer to a Transferee when after an initial NICS “Delay” response, a subsequent NICS “Deny” response was provided to the Licensee by NICS.

Specifics of the violation:

Licensee failed to stop a transfer to a Transferee after receiving a “Deny” response from NICS (b)(3) - 112 Public Law 55 125 Stat 552).

Licensee Response:

The “Deny” response was provided to Store Manager (b)(6) by NICS on the day of the NICS background request that resulted in an initial “(b)(6)” thinks that he attached a note noting the “Deny” to the ATF Form 4473, however Item 21d with “No resolution was provided within 3 business days” was checked and the firearm transferred six days after the generation of the “Deny” by another store employee. IOI (b)(6) examined the ATF Form 4473 and did not find a note attached, however it appears to have had something attached to it at one time.

Corrective Action:

IOI (b)(6) told the Licensee that future firearm transfers should never be conducted after receiving a “Deny” response from NICS.

Worksheets and Exhibits: Worksheet 2 / Exhibit 9 – ATF Form 4473 27 CFR 478.99(c) violation, Exhibit 10 – Initial NICS Record and Follow-up NICS FBI Email & Exhibit 11 – Follow up NICS Email re Conner Prohibited Status

FIREARMS INSPECTION REPORT

Name: Maricopa County Financial L.P.
Trade Name: EZ Money Pawn #21

UI#: 785050-2017-0012-B1B
FFL#: 9-86-013-02-9K-02661

X

Industry Operations Investigator

Index of Worksheets and Exhibits

Worksheet 1 – Inventory, A&D

Worksheet 2 – 4473 (2012 Edition) Review

Exhibit 1 – ACC Records.

Exhibit 2 – A&D Record 27 CFR 478.125(e) violations

Exhibit 3 – ATF Form 4473 27 CFR 478.21(a) violation

Exhibit 4 – ATF Form 4473 27 CFR 478.124(c)(1) violation

Exhibit 5 – ATF Form 4473 27 CFR 478.124(c)(3)(i) violation

Exhibit 6 – ATF Forms 4473 27 CFR 478.124(c)(3)(iv) violations

Exhibit 7 – ATF Form 4473 27 CFR 478.124(c)(4) violation

Exhibit 8 – ATF Form 4473 27 CFR 478.102(a) violation

Exhibit 9 – ATF Form 4473 27 CFR 478.99(c) violation

Exhibit 10 – Initial NICS Record and Follow-up NICS FBI Email

Exhibit 11 – Follow up NICS Email re (b)(6)

Exhibit 12 – Executed Copy of the Acknowledgement of Federal Firearms Regulations