#### **Assignment and Report**

1. OPERATING NAME AND ADDRESS	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.)
(INCLUDE ZIP CODE AND COUNTY)	782110-2017-0316-B1B
TEXAS EZPAWN LP	3. PERMIT/LICENSE NUMBER 4a. TARGET DATE 4b. TARGET HOURS
EZPAWN	574479028A38978
208 BOB BULLOCK LOOP	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)
LAREDO,TX 78043, WEBB	
6. ATF OFFICER(S) ASSIGNED	
(b)(6) - Lead Investigator	
7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)	
(b)(6) , Area Supervisor, 04/17/2017	

CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC 9. INSPECTION RESULTS 10. TRAVEL EXPENSES (OPTIONAL) NO. OF VIOLATIONS NO. OF REFERRALS 2111 - PER DIEM 4 NO. OF TECS CHECKS 1 NO. OF TECS HITS 2112 - P.O.A. **\$ VALUE OF TAX INCREASES** 2113 - COMM. AIR NO. OF TAX ADJUSTMENTS **\$ VALUE OF TAX DECREASES** 2114 - RENTAL CAR 2115 - GPV EXPENSES NO. OF ASSESSMENTS **\$ VALUE OF ASSESSMENTS** NO. OF CLAIMS \$ VALUE OF CLAIMS 2116 - MISC. \$ VALUE OF TAXES VERIFIED TOTAL \$ FOR INSP. NO. OF TAX PERIODS

11. ATF OFFICER'S RECOMMENDATION

8. PURPOSE/SPECIAL INSTRUCTIONS

Submitted by (b)(6) - Industry Operations Investigator

Submitted on: 05/03/2017 Recommending alternate recommendation of WL ONLY and Recall Inspection. Violation #4 merits Warning Conference but do to the circumstances and the FFL's prior inspection history I believe that a Warning Letter would suffice.

Viols WL ONLY and Recall Inspection

		12. TIME ACCOUNTING DATA		
ATF OFFICER'S NAME (MONTH, YEAR	, HOURS)	p)(6)		
APR 2017	16.00			
MAY 2017	8.00			
ATF OFFICER'S SUBTOTAL	24.00	ATF OFFICER'S SIGNATURE		
TOTAL HOURS	24.00			
		13. REVIEW AND ROUTING		
REVIEW COMMENTS AND RECOMMEN	NDATION			
Concern with IOI recommendatio	n for a WL and	Recall inspection.		
Viols WL ONLY and Recall Inspe	ction			
			FINAL DISPOSITION	
SIGNATURE AND TITLE	×	<b>D</b> )(6) MENTS	REVIEW DATE	
(b)(6) - Area Supervisor			05/03/2017	
ROUTING SEQUENCE AND DATE				
□ 1				
2.				
		CONTR	COL FILE POSTED DATE	
4.				
September 9 2019 Pr	oduction	210		
ATF EF 5700.14 (10-98) For Official Use	Only			Page 1 of 1

#### **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 TEXAS EZPAWN LP EZPAWN	Street Address 208 BOB BULLOCK LOOP		5		State TX	Zip Code 78043-	County WEBB	Page 1 of 2 Pages
License/Permit/Registry Number (If any) 574479028A38978		Expiration Date 1/1/2018				f Inspection h 04/28/2017		

**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:

EZ Pawn failed to obtain and/or furnish all information required in each ATF Form 4473 as indicated by the headings on the form and the instructions on or pertaining to it on forms.

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

#### Citation: 27 CFR 478.21(a)

Number: 2

#### Nature of Violation:

EZ Pawn failed to obtain a properly completed ATF Form 4473, Section A, prior to making an over-the-counter transfer of a firearm to a non-licensee, who is a resident of the State in which the licensee's premises is located on forms

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

#### **Date Corrections to be Made:**

(If not corrected immediately)

(If not corrected immediately)

**Corrective Action to be Taken:** Violation Uncorrectable. IOI (b)(6) reviewed all applicable regulations with Ms. Aguilar. Ms. Aguilar acknowledged by signing and dating Acknowledgment of Federal Firearms Regulations.

#### Date Corrections to be Made:

(If not corrected immediately)

(If not corrected immediately)

Corrective Action to be Taken: Violation Uncorrectable. IOI (b)(6) reviewed all applicable regulations with Ms. Aguilar. Ms. Aguilar acknowledged by signing and dating Acknowledgment of Federal Firearms Regulations.

#### **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 TEXAS EZPAWN LP EZPAWN	Street Address 208 BOB BULLOCK	LOOP	City LAREDO		State TX	Zip Code 78043-	County WEBB	Page 2 of 2 Pages
License/Permit/Registry Number (If any) 574479028A38978		Expiration Date 1/1/2018				f Inspection h 04/28/2017		
	Inspection Desults							

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)(1)

Number: 3

#### Nature of Violation:

EZ Pawn failed to verify the identity of the transferee and note on the ATF Form 4473 the type of identification used on form.

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

Citation: 27 CFR 478.124(c)(3)(1)

Number: 4

#### Nature of Violation:

EZ Pawn failed to retain the ATF Form 4473 for the prescribed period and failure to record any NICS transaction number on the form, where the licensee initiated a NICS check for a proposed firearms transaction, but the sale, delivery, or transfer of the firearm was not made on instance

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

Cif 27 CFR 478.129(b)

## (If not corrected immediately)

(If not corrected immediately)

Date Corrections to be Made:

Corrective Action to be Taken: Violation Uncorrectable. IOI (b)(6) reviewed all applicable regulations with Ms. Aguilar. Ms. Aguilar acknowledged by signing and dating Acknowledgment of Federal Firearms Regulations.

#### Date Corrections to be Made:

(If not corrected immediately)

(If not corrected immediately)

Corrective Action to be Taken: Violation Uncorrectable. IOI (b)(6) reviewed all applicable regulations with Ms. Aguilar. Ms. Aguilar acknowledged by signing and dating Acknowledgment of Federal Firearms Regulations.

Have Received a Copy of This Report of Violations (Proprietor's signature and title)	Date
Signature and Title of ATF Officer	Date
September 9 2019 Production 212	
For Official Use Only	ATE E-Form 5030 5

#### U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

McAllen II Field Office

## MAY 0 3 2017

McAllen, TX 78504

www.atf.gov

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

782110: (b)(6) 1000

Texas EZPawn LP d/b/a EZPawn 208 Bob Bullock Loop Laredo, TX 78043

REF: 5-74-479-02-8A-38978

Dear Ms. Aguilar:

During a recent compliance inspection at your firearms business covering the period of April 26, 2016 to April 26, 2017 you were cited for violations of 27 Code of Federal Regulations, Part 48. A copy of the Report of Violations, Form 5030.5, issued at the time of the inspection is enclosed.

All violations were fully explained to you by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) IO Investigator(s). You indicated that you understood the requirements of the firearms laws and regulations. You further indicated 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 effort to reduce violent crime and protect the public. It is essential that you comply with all Federal laws and regulations that govern your firearms business. This is critical to carrying out our mission to protect the public and ensure that criminals do not gain access to firearms. ATF appreciates the efforts you and other industry members make in this area, and we look forward to continuing to work with you in that regard.

You are reminded that retention of your Federal firearms license is conditioned upon your compliance with Federal laws and regulations. Any future violations, either repeat or otherwise, could be viewed as willful and may result in the revocation of your license. Please ensure that future compliance is achieved.



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

-2-



Enclosure

c: National Firearms Licensing Center McAllen II Area Office

Name: Texas EZPawn LP Trade Name: EZPawn UI#: 782110-2017-0316 FFL#: 5-74-479-02-8A-38978

Address: 208 Bob Bullock Loop Laredo, Texas 78043 – Webb County GPS: N 27.498294; W -99.448415

#### 1 - Introduction

#### **Inspection Profile:**

On April 27, 2017, Industry Operations Investigator (IOI) (b) (6) with Ms. Karla Ann Aguilar, at the business premises of EZPAWN, located at 208 Bob Bullock Loop, Laredo, Texas 78043 - Webb County (GPS: N 27.498294; W -99.4484151). The purpose of the meeting was to conduct a Southwest Border DE firearms inspection on a Type 02 – Dealer (Pawnbroker) in Firearms Other that Destructive Devices, Federal Firearms Licensee. Ms. Aguilar, Store Manager of EZPAWN, was identified by her valid State of Texas driver license, (b)(6) showing a date of birth of (D)(6) , and an expiration date of 12/09/2021 (Exhibit 1). A computerized criminal history was conducted on Ms. Aguilar with negative results for prohibiting factors. The inspection period covered April 26, 2016 through April 26, 2017. Onsite end date was April 27, 2017. No other Federal, State, and/or local agencies participated in the course of the compliance inspection. No advances notice was given.

#### **Business Profile:**

TEXAS EZPAWN LP d.b.a. EZPAWN holds a Type 02 – Dealer (Pawnbroker) in Firearms Other that Destructive Devices, Federal Firearms Licensee which was issued for this location on 12/03/1999. EZPAWN is a pawnshop engaged in selling jewelry, electronics, tools, and other miscellaneous items in addition to the sales of firearms. The business operates from a commercial store front located inside the city limits of the City of Laredo, Texas, owned by TEXAS EZPAWN LP. A query of the Webb County Appraisal District website confirmed TEXAS EZPAWN LP as the owner of the property (Exhibit 2). Business hours are Monday - Friday 9:00am - 8:00pm and Saturday 9:00am -7:00pm. The licensee deals in both handguns and long guns which can be used or new. Within the period of inspection the licensee acquired <sup>(b)(4)</sup> firearms and disposed of (b)(4) firearms during the same time frame. There were 40 firearms in inventory. The licensee buys and sells firearms acquired from the general public and occasionally receives firearms from other Texas EZPAWN stores. The licensee does not participate in gun shows. No other businesses are located on the premises. This EZPAWN location does not hold any other ATF licenses. EZPAWN is registered with the Texas Office of Consumer Credit Commissioner (OCCC) and has an active Pawnbroker license, #771-10721 (Exhibit 3). EZPAWN has no off-site storage of firearms.

Name: Texas EZPawn LP Trade Name: EZPawn UI#: 782110-2017-0316 FFL#: 5-74-479-02-8A-38978

#### **Ownership and Control:**

TEXAS EZPAWN LP d.b.a. EZPAWN is registered in the State of Texas as a Domestic Limited Partnership (LP) under filing number 7127110, with an original date of filing of December 01, 1993 (Exhibit 4). TEXAS EZPAWN LP filed an Assumed Name Certificate with the State of Texas showing the legal name as TEXAS EZPAWN LP and assumed name of EZPAWN on December 23, 2013 with an expiration date of December 23, 2023. A copy of the assumed name certificate was obtained from the Texas Secretary of State website (Exhibit 5). TEXAS EZPAWN LP is managed by TEXAS EZPAWN MANAGEMENT, INC. which is registered in the State of Texas as a Foreign For-Profit Corporation under filing number 9806206, with an original date of filing of December 10, 1993 (Exhibit 6). A query of the Texas Secretary of State website shows the following management structure for TEXAS EZPAWN MANAGEMNET. INC, which last update was on October 2, 2015 (Exhibit 7);

Jodie Maccarrone – President Thomas H Welch Jr – Senior Vice President, Director & Secretary Stephen Brown – Vice President & Controller Nanci Tucker – Vice President, General Counsel & Assistant Secretary

A query of the State of Texas Comptroller shows the sales tax permit to be active at time of inspection (**Exhibit 8**). A query of the State of Texas Comptroller Franchise Tax Certification shows that Texas EZPAWN is registered and in good standing with the state, File #7127110 effective 12/01/1993 (**Exhibit 9**).

#### Variance:

EZPPAWN has no approved variances and none were requested during the course of the inspection.

#### 2 - Recommendation

Viols WL ONLY and Recall Inspection

#### 3 - Inspection History

Date of Inspection:	07/10/2015
Type of Inspection:	Firearms Inspection – Pawnbroker – Southwest Border DE
UI#:	782110-2015-0392

Name: Texas EZPawn LP Trade Name: EZPawn UI#: 782110-2017-0316 FFL#: 5-74-479-02-8A-38978

Inspection Results:	No Viols No Further Action No Referrals
<b>Cited Violations:</b>	None

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

A full inventory was conducted on EZPAWN. At the time of inspection EZPAWN was utilizing a computerized Acquisitions and Disposition Record Book. The licensee's A&D Record is in compliance with ATF Ruling 2008-2. 100% of inventory was conducted from guns to book. During the period of inspection EZPAWN acquired a total of firearms and disposed a total of firearms during the same time frame. The printed computerized Acquisitions and Disposition Record Book showed open dispositions. A full inventory of 40 firearms was conducted. No errors were found. EZPAWN Acquisitions and Disposition Record Book was in the proper format containing all of the required information under 27 CFR 478.125(e) and all entries were timely made. There were no thefts or losses reported or unreported for the inspection period. There was no discovery of obliterated serial numbers or illegal firearms during the inspection.

As per Ms. Aguilar, standard operating procedures in relation to its A&D Record involve a check's and balance system involving at least two employees and one manager. Only three (3) employees are authorized to enter and dispose of firearms. Upon arrival of the firearm into the business a pawnbroker reviews the firearm to locate all required information. Pawnbroker enters all the required information into the computerized system and the information is double checked by one of the Assistant Managers or the Manager. EZPAWN also has District Managers that conduct unannounced inventories of all EZPAWN locations. Same process applies to firearms that are being sold. The pawnbroker will confirm that all gun information is correct in their computerized system and either one of the Assistant Managers or the Manager will verify the information before the firearm leaves the business.

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

EZPAWN executed ATF Form 4473 during the inspection period. All forms were examined and during the examination it was determined that EZPAWN failed to comply with 27 CFR 47.21(a) on complete or complete the examination it was determined that EZPAWN failed to forms and 27 CFR 478.124(c)(3)(i) on complete form. No sales were made to law enforcement officers. EZPAWN does transfer firearms to other EZPAWN stores which hold their own FFL. A query submitted for the FFL Audit Log reported one (1) denial from the previous inspection which was conducted on 07/10/2015 and 21 proceed responses for the last 60 days, for a total of 22 transactions. During the verification and authentication process of all NTN it was determined that the licensee failed to retain ATF Form 4473 which resulted in complete the instance of 27 CFR 478.129(b) violation being issued. A total of 21 NTN transactions were verified and authenticated.

Name: Texas EZPawn LP Trade Name: EZPawn UI#: 782110-2017-0316 FFL#: 5-74-479-02-8A-38978

As per Ms. Aguilar, only three (3) employees which have been trained on gun purchases can execute ATF Form 4473. Once buyer decides on firearm to be purchased, buyer is given ATF Form 4473 to fill out. Once form has been completed, it is reviewed by pawnbroker to confirm all information was entered correctly. Once reviewed by pawnbroker, form is handed over to member of management for review. At the beginning of each week a member of management reviews all forms that were executed during the prior week. EZPAWN also has District Managers that conduct unannounced checks of ATF Form 4473 of all EZPAWN locations.

Please refer to the Violations section of this report for further details of violations:
27 CFR 478.21(a) – Violation #1, Worksheet 2(2016 Edition) & Exhibit 11.
27 CFR 478.124(c)(1) – Violation #2, Worksheet 2(2012 Edition), Worksheet 2(2016 Edition) & Exhibit 12.
27 CFR 478.124(c)(3)(i) – Violation #3, Worksheet 2(2016 Edition) & Exhibit 13.
27 CFR 478.129(b) – Violation #4, Worksheet 2(2016 Edition) & Exhibit 14.

#### 6 - Multiple Sales

A query of eTrace online database indicated that EZPAWN reported no multiples sales during the inspection period. No unreported multiple sales were identified during the course of the inspection.

#### 7 - Suspicious/Prohibited Purchasers

No Suspicious/Prohibited purchasers were identified as a result of this inspection.

#### 8 - Trace Activity

A query of eTrace online database indicated that EZPAWN was not associated with any traces during the inspection period.

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

EZPAWN does not deal in NFA nor manufacture, import or collect firearms.

#### 10 - Referrals

No referrals were generated as a result of this inspection.

#### 11 - Other

Name:	<b>Texas EZPawn LP</b>
Trade Name:	EZPawn

UI#: 782110-2017-0316 FFL#: 5-74-479-02-8A-38978

At time of inspection EZPAWN was compliant with 27 CFR 478.91 by having his license posted on the premises covered by the license. EZPAWN is compliant with 27 CFR 478.103 by having a Youth Handgun Safety Act sign posted. All handguns transferred with a child safety lock. EZPAWN was not found to be in violation of 923(g)(5)(A) and has been abiding by all stipulations set forth under Demand Letter III.

#### 12 - Closing Actions

On April 28, 2017, a closing conference was held at the business premises by IOI (b)(6); present was Ms. Aguilar. During the closing conference a total of four (4) violation of the Gun Control Act (GCA) were cited. A copy of ATF Form 5030.5-Report of Violations, with original signatures, was provided to Ms. Aguilar for her review. Ms. Aguilar acknowledged receiving explanations of violations, by signing and dating the form. Ms. Aguilar was instructed on her responsibilities as a Store Manager of a business with a Federal Firearms Licensee to adhere and comply with all laws and regulations pertaining to the commerce of firearms and the conduct of business as regulated by the Gun Control Act (GCA). Ms. Aguilar was advised that continued noncompliance with the prescribed regulations can be considered willful violations, which could result in adverse actions, to include revocation or renewal denial of license. All applicable sections of the Acknowledgement of Federal Firearms Regulations Worksheet were discussed in detail. Ms. Aguilar was given the opportunity to ask questions. Ms. Aguilar acknowledged receiving the briefing and explanation, by signing and dating the certification (Exhibit 8). An executed copy of the Acknowledgement of Federal Firearms Regulations Worksheet was provided to Ms. Aguilar for her records.

#### 13 - Violations

#### 1. **27 CFR 478.21(a)**

#### **Nature Of Violation:**

EZ Pawn failed to obtain and/or furnish all information required in each ATF Form 4473 as indicated by the headings on the form and the instructions on or pertaining to it on forms.

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

#### Licensee/Permitee Response:

Ms. Aguilar stated, "That error was due to it being a manual form. Our automated system does not allow us to continue if the form is not being filled out properly and being that it was an automated form we did not take the time to double check it. I'll

#### Name: Texas EZPawn LP Trade Name: EZPawn

UI#: 782110-2017-0316 FFL#: 5-74-479-02-8A-38978

make sure that from now on that we double check all forms before the customer leaves."

#### **Corrective Action:**

Violation Uncorrectable. IOI (b)(6) reviewed all applicable regulations with Ms. Aguilar. Ms. Aguilar acknowledged by signing and dating Acknowledgment of Federal Firearms Regulations.

#### REF: ROV Violation #1, Worksheet 2(2016 Edition) & Exhibit 11.

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

#### Nature Of Violation:

EZ Pawn failed to obtain a properly completed ATF Form 4473, Section A, prior to making an over-the-counter transfer of a firearm to a non-licensee, who is a resident of the State in which the licensee's premises is located on forms.



#### Licensee/Permitee Response:

Ms. Aguilar stated, "We didn't pay attention to that part. We took for granted that he was filling it out correctly. We will be more careful when reviewing forms."

#### **Corrective Action:**

Violation Uncorrectable. IOI (b)(6) reviewed all applicable regulations with Ms. Aguilar. Ms. Aguilar acknowledged by signing and dating Acknowledgment of Federal Firearms Regulations.

## **REF: ROV Violation #2, Worksheet 2(2012 Edition), Worksheet 2(2016 Edition) & Exhibit 12.**

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

#### **Nature Of Violation:**

EZ Pawn failed to verify the identity of the transferee and note on the ATF Form 4473 the type of identification used on form.

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

Name: Texas EZPawn LP Trade Name: EZPawn UI#: 782110-2017-0316 FFL#: 5-74-479-02-8A-38978

#### Licensee/Permitee Response:

Ms. Aguilar stated, "That error was due to it being a manual form. Our automated system does not allow us to continue if the form is not being filled out properly and being that it was an automated form we did not take the time to double check it. I'll make sure that from now on that we double check all forms before the customer leaves."

#### **Corrective Action:**

Violation Uncorrectable. IOI (b)(6) reviewed all applicable regulations with Ms. Aguilar. Ms. Aguilar acknowledged by signing and dating Acknowledgment of Federal Firearms Regulations.

#### REF: ROV Violation #3, Worksheet 2(2016 Edition) & Exhibit 13.

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

#### Nature Of Violation:

EZ Pawn failed to retain the ATF Form 4473 for the prescribed period and failure to record any NICS transaction number on the form, where the licensee initiated a NICS check for a proposed firearms transaction, but the sale, delivery, or transfer of the firearm was not made in **transaction** instance.

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

#### Licensee/Permitee Response:

Ms. Aguilar stated, "That was a human error. That day we had someone helping us out from a different store. Customer came in to buy the guy, the employee had him fill out the form but customer decided not to take gun after the NICS check had been done and since he did not take the gun the employee canceled the form instead of printing it. I did advise my manager about this and we have no longer had this error."

#### **Corrective Action:**

Violation Uncorrectable. IOI (b)(6) reviewed all applicable regulations with Ms. Aguilar. Ms. Aguilar acknowledged by signing and dating Acknowledgment of Federal Firearms Regulations.

#### REF: ROV Violation #4, Worksheet 2(2016 Edition) & Exhibit 14.

Name: Texas EZPawn LP Trade Name: EZPawn UI#: 782110-2017-0316 FFL#: 5-74-479-02-8A-38978

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Industry Operations Investigator

#### Index of Worksheets and Exhibits

Information Page Worksheet 1 – Inventory, A&D Worksheet 2 – 4473(2012 edition) Worksheet 2 – 4473(2016 edition) Other Statistics

Exhibit 1 – TXDPS Driver License Image – Aguilar, Karla Ann Exhibit 2 – Webb CAD – Property Details Exhibit 3 – Texas Office of Consumer Credit Commissioner – Lending License Exhibit 4 – Texas Secretary of State – TEXAS EZPAWN LP Business Organization Inquiry Exhibit 5 – Texas Secretary of State – EZPAWN Assumed Name Certificate Exhibit 6 – Texas Secretary of State – TEXAS EZPAWN MANAGEMENT, INC. Business Organization Inquiry Exhibit 7 – Texas Secretary of State – TEXAS EZPAWN MANAGEMENT, INC. Business Organization Inquiry Exhibit 8 – State of Texas Comptroller of Public Accounts – Tax Payer Details Exhibit 9 – State of Texas Comptroller of Public Accounts – Tax Details Exhibit 10 – Acknowledgment of Federal Firearms Regulations Exhibit 11 – Copies of ATF Form 4473 with errors Violation #1 Exhibit 12 – Copies of ATF Form 4473 with errors Violation #2 Exhibit 13 – Copy of ATF Form 4473 with errors Violation #3

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Exhibit 14 - Copy of FFL Audit Report with Violation #4

Narrative Reports for Sept 2019 Production