

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) YORKTOWN PAWN, LLC. YORKTOWN PAWN 2713 George Washington Memorial Hwy. Yorktown, VA 23693, York		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 768035-2017-0084-B1B		
		3. PERMIT/LICENSE NUMBER 154199026M13212	4a. TARGET DATE	4b. TARGET HOURS
		5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		
6. ATF OFFICER(S) ASSIGNED (b)(6) Assigned Investigator (b)(6) Lead Investigator				
7. ASSIGNED BY (SIGNATURE, TITLE AND DATE) (b)(6) , Area Supervisor, 12/01/2016				
8. PURPOSE/SPECIAL INSTRUCTIONS **Please conduct a DE inspection on this new 02 FFL. The 02 license was issued on 11/7/2013. Last inspection found FFL had made sales and had was not operating as a pawnbroker. Please conduct a DE inspection to determine if FFL is compliant with ATF law and regulations.				
9. INSPECTION RESULTS <input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC				
NO. OF VIOLATIONS	7	NO. OF REFERRALS	10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF TECS CHECKS	24	NO. OF TECS HITS	2111 - PER DIEM	
NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES	2112 - P.O.A.	
		\$ VALUE OF TAX DECREASES	2113 - COMM. AIR	
NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS	2114 - RENTAL CAR	
NO. OF CLAIMS		\$ VALUE OF CLAIMS	2115 - GPV EXPENSES	
NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED	2116 - MISC.	
			TOTAL \$ FOR INSP.	
11. ATF OFFICER'S RECOMMENDATION Submitted by (b)(6) - Industry Operations Investigator Subj: (b)(6) n: 01/05/2017 IOI (b)(6) recommendation is based on the failure of the licensee to timely record the required disposition entries for 9.3% of the licensee's total dispositions. A failure by the licensee to record any ID on 3.1% of Forms 4473 examined. And, a failure by the licensee to file multiple sales reports when legally required from (b)(6) multiple handgun sales. IOI (b)(6) recommends renewal of Yorktown Pawn LLC's FFL. Viols WL ONLY and No Recall Inspection				
12. TIME ACCOUNTING DATA				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6) r		
DEC 2016		8.00		
ATF OFFICER'S SUBTOTAL		8.00		
ATF OFFICER'S SIGNATURE				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)		
DEC 2016		22.00		
JAN 2017		22.30		
ATF OFFICER'S SUBTOTAL		44.30		
ATF OFFICER'S SIGNATURE				
TOTAL HOURS		52.30		

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13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

WL and Recall recommended by A/S. Recall staged for FY19.

Viols WL ONLY and Recall Inspection

☒ REVIEWED

☐ CONCUR

☒ SEE COMMENTS

☒ FINAL DISPOSITION

SIGNATURE AND TITLE

(b)(6) - Area Supervisor

(b)(6)

REVIEW DATE

01/09/2017

REVIEW COMMENTS AND RECOMMENDATION

DIO concurs with Lead IOI and Area Supervisors recommendation for a Warning Letter and recall inspection, in lieu of a Warning Conference. The inspection merited a warning conference, due to the fact that the licensee failed failure to report multiple handgun reports during the review period. This was the FFL's first compliance inspection and other violations disclosed during the inspection merited a warning letter. The licensee properly accounted for their firearms inventory and did not have any firearms trace activity. The lead IOI thoroughly reviewed the violations disclosed during the inspection, as well as the GCA record keeping requirements, including multiple handgun sales reports.

Viols WL ONLY and Recall Inspection

☒ REVIEWED

☐ CONCUR

☒ SEE COMMENTS

☐ FINAL DISPOSITION

SIGNATURE AND TITLE

MFFRONCZA2 - Director of Industry Operations

REVIEW DATE

01/09/2017

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 YORKTOWN PAWN, LLC. YORKTOWN PAWN	Street Address 2713 George Washington Memorial Hwy.	City Yorktown	State VA	Zip Code 23693-	County York	Page 1 of 6 Pages
License/Permit/Registry Number <i>(If any)</i> 154199026M13212	Expiration Date 12/1/2016	Date(s) or Period of Inspection 12/22/2015 through 12/22/2016				

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:

The licensee, by and through its agents and employees, failed to execute Form 4473 as indicated by the headings on the form and the instructions on or pertaining to the form (b)(3) - 11 forms with (b)(3) - 11 instances cited.

Question 10a (Ethnicity) was answered blank (b)(3) - 11 times
Question 18 (Type of Firearm) was answered blank (b)(3) times
Question 25 (Recertification date) was answered in error (b)(3) times
Question 31 (Trade/corporate name) was answered blank (b)(3) time

Citation: 27 CFR 478.21(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee shall provide the correct and complete information for all errors identified. Make corrections to Forms 4473 on a copy of the affected Form 4473; corrections shall not be made to the original Form 4473.

Report of Violations

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Name of Proprietor YORKTOWN PAWN, LLC. YORKTOWN PAWN	Street Address 2713 George Washington Memorial Hwy.	City Yorktown	State VA	Zip Code 23693-	County York	Page 2 of 6 Pages
License/Permit/Registry Number <i>(If any)</i> 154199026M13212	Expiration Date 12/1/2016	Date(s) or Period of Inspection 12/22/2015 through 12/22/2016				

Inspection Results

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

Number: 2

Nature of Violation:

The licensee, by and through its agents and employees failed to execute Form 4473 as indicated by the headings on the form and the instructions on or pertaining to the Form (b)(3)-1 forms, with (b)(3)-112 P instances cited.

Question 2 (Buyers address) was answered in error (b)(3) times

Question 17 (Certification date) was answered in error (b)(3) time

Question 20a (Identification) was answered blank (b)(3) times and in error (b)(3) times

Citation: 27 CFR 478.124(c)(1)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee shall provide the correct and complete information for all errors identified. Make corrections to Forms 4473 on a copy of the affected Form 4473; corrections shall not be made to the original Form 4473.

Number: 3

Nature of Violation:

The licensee, by and through its agents and employees, transferred a firearm to a non-licensee without recording required NICS information on the Form 4473 (b)(3) forms with (b)(3) instances cited.

Question 21a (Date NICS initiated) was answered blank (b)(3) time

Question 21d (Response after a delayed response) was answered in error (b)(3) times

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

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee shall obtain and enter the missing NICS information; obtain missing Form 4473 NICS information by referring to the NICS information on the corresponding SP-65. Make Forms 4473 corrections on a copy of the affected Form 4473; make no corrections to the original Form 4473.

Report of Violations

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Name of Proprietor YORKTOWN PAWN, LLC. YORKTOWN PAWN	Street Address 2713 George Washington Memorial Hwy.	City Yorktown	State VA	Zip Code 23693-	County York	Page 3 of 6 Pages
License/Permit/Registry Number <i>(If any)</i> 154199026M13212	Expiration Date 12/1/2016	Date(s) or Period of Inspection 12/22/2015 through 12/22/2016				

Inspection Results

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

Number: 4

Nature of Violation:

The licensee, by and through its agents and employees, failed to correctly identify the firearm to be transferred on Form 4473, 3 forms with (b)(3) - 112 instances cited.

Question 27 (Model) was in error (b)(3) times

Question 28 (Serial number) was blank (b)(3) time and in error (b)(3) time

Question 30 (Caliber or gauge) was blank (b)(3) time and in error (b)(3) time

Citation: 27 CFR 478.124(c)(4)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee shall enter the missing information into the proper spaces on the Form 4473. Make corrections to Forms 4473 on a copy of the affected Form 4473; corrections shall not be made to the original Form 4473.

Number: 5

Nature of Violation:

The licensee, by and through its agents and employees, failed to sign and date the Form 4473 certifying that the licensee does not know or have reason to believe the transferee is disqualified by law from receiving the firearm described on the Form 4473; (b)(3) forms with (b)(3) instances cited.

Question 36 (Transfer date) was answered in error (b)(3) times

Citation: 27 CFR 478.124(c)(5)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee shall enter the missing information into the proper spaces on the Form 4473. Make corrections to Forms 4473 on a copy of the affected Form 4473; corrections shall not be made to the original Form 4473.

Report of Violations

Instructions

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Name of Proprietor YORKTOWN PAWN, LLC. YORKTOWN PAWN	Street Address 2713 George Washington Memorial Hwy.	City Yorktown	State VA	Zip Code 23693-	County York	Page 4 of 6 Pages
License/Permit/Registry Number <i>(If any)</i> 154199026M13212	Expiration Date 12/1/2016	Date(s) or Period of Inspection 12/22/2015 through 12/22/2016				

Inspection Results

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

Report of Violations

Instructions

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Name of Proprietor YORKTOWN PAWN, LLC. YORKTOWN PAWN	Street Address 2713 George Washington Memorial Hwy.	City Yorktown	State VA	Zip Code 23693-	County York	Page 5 of 6 Pages
License/Permit/Registry Number <i>(If any)</i> 154199026M13212		Expiration Date 12/1/2016	Date(s) or Period of Inspection 12/22/2015 through 12/22/2016			

Inspection Results

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

Number: 6

Nature of Violation:

- a) The licensee, by and through its agents and employees, failed to timely record the acquisition of (b)(3) firearm.

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

- b) The licensee, by and through its agents and employees, failed to timely record the disposition of (b)(3) firearms.

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

- c) The licensee, by and through its agents and employees, failed to correctly record the serial numbers of (b)(3) firearms.

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

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

- a) Licensee shall enter the acquisition information of (b)(3) - 1 firearm into the A&D Record.

- b) Licensee shall enter the disposition information of (b)(3) - 112 firearms into the A&D Record.

- c) Licensee shall enter the correct serial number of (b)(3) - 112 firearms into the A&D Record.

- d) Licensee shall file Forms 4473 numerically when using the Transaction serial number in the A&D Record address area.

Report of Violations

Instructions

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Name of Proprietor YORKTOWN PAWN, LLC. YORKTOWN PAWN	Street Address 2713 George Washington Memorial Hwy.	City Yorktown	State VA	Zip Code 23693-	County York	Page 6 of 6 Pages
License/Permit/Registry Number <i>(If any)</i> 154199026M13212	Expiration Date 12/1/2016	Date(s) or Period of Inspection 12/22/2015 through 12/22/2016				

Inspection Results

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

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

Citation: 27 CFR 478.125(c)

Number: 7

Nature of Violation:

The licensee, by and through its agents and employees, failed to timely and accurately report the sale or other disposition of two or more pistols and/or revolvers to an unlicensed person. (b)(3) - 112
Forms 4473 cited, involving (b)(3) - 1 firearms.

Citation: 27 CFR 478.126a

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee shall immediately process an ATF Form 3310.4 and forward copies to the offices specified on the form. This was completed by COB the next business day.

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

Date

1-5-17

Signature and Title of ATF Officer

Date

1/5/17



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives
1011 Boulder Springs Drive
Suite 300, Richmond, VA 23225

January 10th, 2017

www.atf.gov

Yorktown Pawn LLC
T/A Yorktown Pawn
2713 George Washington Memorial Highway
Yorktown, VA 23693

FFL No. 1-54-199-02-6M-13212

Dear Mr. Trent Boullianne:

During a recent compliance inspection at your firearms business covering the audit review period 12/22/2015 through 12/22/2016 you were cited for violations of 27 Code of Federal Regulations, Part 478. A copy of the Report of Violations, Form 5030.5, issued at the time of the inspection is enclosed.

All violations were fully explained to you by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Industry Operations Investigator (b)(6). 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 Yorktown Pawn achieves future compliance.

If you have any questions regarding this matter, please contact Kim Thompson at (b)(6).

Sincerely yours,

(b)(6)

Enclosure

cc: Federal Firearms Licensing Center
Richmond Area Office

FIREARMS INSPECTION REPORT

Name: Yorktown Pawn LLC
Trade Name: Yorktown Pawn

UI#: 768035.2017.0084.B1B
FFL#: 1.54.199.02.6M.13212

Address: 2713 George Washington Memorial Highway
Yorktown, Virginia 23693 (York)

1 - Introduction

Inspection Profile:

On 12.22.2016, ATF Industry Operations Investigator (IOI) (b)(6) initiated a compliance inspection on Type 02, Federal Firearms Licensee (FFL) Yorktown Pawn LLC d/b/a Yorktown Pawn. Yorktown Pawn has not been the beneficiary of a previous compliance inspection (with a firearms inventory). The inclusive dates of the inspection were 12.22.2015- 12.22.2016. Assisting with the inspection was IOI (b)(6) and ATF Public Relations Officer, Ms. (b)(6). IOI (b)(6) primary contact during the inspection was Store Manager and Responsible Person Mr. Trent Boullianne. IOI (b)(6) gave the licensee no advanced notification of this inspection.

The last inspection found the FFL had made -0- firearms sales and was only operating as a pawnbroker without firearms. The scope of this inspection is to conduct a DE inspection to determine if FFL is compliant with ATF laws and regulations.

Business Profile:

Yorktown Pawn is a full service pawn shop. Yorktown Pawn, pawns and retails firearms, tools, electronics, yard equipment, DVDs, etc., (no ammo); Yorktown Pawn buys and sells coins, jewelry, gold and silver. Yorktown Pawn does not display their firearms inventory in traditional show cases or gun racks. Yorktown Pawn secures all firearms, 24/7, in multiple gun safes, located in a back room. Yorktown Pawn advertises some, not all, available firearms on an erasable chalk board on the sales floor.

During the inspection period, Yorktown Pawn acquired (b)(4) firearms, (b)(4) handguns, and (b)(4) long guns. Yorktown Pawn disposed (b)(4) firearms, (b)(4) handguns and (b)(4) long guns. On 12.22.2016, Yorktown Pawn possessed (b)(4) firearms in inventory; of which, 100% of the firearms were used.

IOI (b)(6) verified that Yorktown Pawn holds a Type 02 FFL that is appropriate for the type of business activity. The FFL originated on 11.7.2013, and expired on 12.1.2016. At the time of this inspection, Yorktown Pawn is on a 60 day Letter of Authorization extension, until a recommendation for FFL renewal is approved by the Richmond II Area Supervisor.

FIREARMS INSPECTION REPORT

Name: Yorktown Pawn LLC
Trade Name: Yorktown Pawn

UI#: 768035.2017.0084.B1B
FFL#: 1.54.199.02.6M.13212

Yorktown Pawn's primary supplier of firearms is private individuals via defaulted pawns. Yorktown Pawn does not sell firearms at gun shows or on the internet. Yorktown Pawn is in compliance with State and local laws and does not maintain off-site storage. Yorktown Pawn's EIN is (b)(3) - 26 USC 6103 (verified) and DIN is (b)(3) - 26 USC 6103

Yorktown Pawn has no web address, but can be found on Facebook.

Ownership and Control:

Members of the LLC are Mr. Michael DeLuca and Mr. Michael Shields who co-own Yorktown Pawn, LLC.

Yorktown Pawn has two employees, Mr. Trent Boullianne and Mr. Charles King, no prohibitive disabilities through NCIC/NLETS/NForce.

Yorktown Pawn, LLC is active and in good standing with the Virginia State Corporation Commission; ID S440159-4, filing date of 2/6/2013

Variance:

Yorktown Pawn has no variance and requested no variance during the inspection.

2 - Recommendation

Viols WL ONLY with No Recall Inspection

IOI (b)(6) recommendation is based on the failure of the licensee to timely record the required disposition entries for 9.3% of the licensee's total dispositions. A failure by the licensee to record any ID on 3.1% of Forms 4473 examined. And, a failure by the licensee to file multiple sales reports when legally required from (b)(6) multiple sales.

IOI (b)(6) recommends renewal of Yorktown Pawn LLC's FFL.

3 - Inspection History

IOI (b)(6) conducted these inspections.

Date of Inspection:	7.16.2014
Type of Inspection:	Compliance
UI#:	768025.2014.0285.B1B
Inspection Results:	<i>No Viols No Further Action No Referrals</i>
Cited Violations:	None (No firearms in inventory)

FIREARMS INSPECTION REPORT

Name: Yorktown Pawn LLC
Trade Name: Yorktown Pawn

UI#: 768035.2017.0084.B1B
FFL#: 1.54.199.02.6M.13212

Date of Inspection: 10.21.2013
Type of Inspection: Qualification
UI#: 768035.2014.0285.B1B
Inspection Results: *Application Approved*
Cited Violations: None

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


On 12.22.2016, Yorktown Pawn's manual A&D Record revealed (b)(3) open entries. (Pawn Master is available and simultaneously documented) Investigators conducted a full inventory and compared the inventory against the A&D record. The inventory consisted of 52 firearms. The A&D book is in the proper format, most required information is accurate and the entries made, except as noted below.

Open entries	(b)(3)
Late dispositions	(b)(3)
Late acquisition	(b)(3)
Total firearms	52

IOI (b)(6) directed the licensee to immediately enter the below late and incorrect entries into the A&D Record (**Worksheet 1, Violation 6, and ROV**).

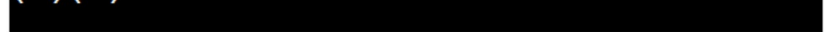
Late dispositions are as follows:

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



Late acquisition is as follows:

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



Incorrect A&D Record entries are as follows:

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



FIREARMS INSPECTION REPORT

Name: Yorktown Pawn LLC
Trade Name: Yorktown Pawn

UI#: 768035.2017.0084.B1B
FFL#: 1.54.199.02.6M.13212

IOI (b)(6) determined the licensee has no segregation of function or division of duties. The licensee has no written, sound system of practices, or policies demonstrated by a consistent application of formal or informal procedures to ensure the accuracy of the record keeping system. As a two person operation, the two employees are mutually responsible for ensuring timely A&D Record entries, taking inventory, and ensuring the accuracy of the A&D Record.

Investigators traced 30 disposition entries in the A&D record and verified that the licensee obtained and completed an ATF Form 4473 for each entry and traced 30 Fs 4473 to the A&D Record to check for A&D Record and Form 4473 accuracy. IOI (b)(6) chose the month of March 2016 to compare within the A&D record. There were no discrepancies.

Yorktown Pawn filed no theft/loss reports during the reporting period or as a result of this inspection.

5 - ATF Forms 4473 – NICS & Other Dispositions

During the reporting period, Yorktown Pawn executed (b)(6) ATF Forms 4473 (denied). Investigators reviewed 100% of the Fs 4473 for errors. Investigators determined (b)(6) forms were in error (45%) with (b)(6) instances (**Worksheet 2, Violations 1-5, and ROV**). The licensee files Fs 4473 alphabetical.

The licensee files Forms 4473 alphabetical using the buyer's last name. The licensee maintains a separate file folder for each buyer, in which all forms are inserted. e.g. F4473, SP65, sales invoice, pawn paperwork, redemption paperwork, etc. The licensee uses the Form SP65 number in the F4473 "Transferor's Transaction Serial Number" box and in the A&D Record address line. The A&D Record instructions clearly instruct that if you use a Transferor's Transaction Serial Number in the address line in the A&D Record, one must file Forms 4473 numerically (**Violation 6, and ROV**). To correct this error, the licensee chose to insert the address into the A&D Record and file Fs 4473 chronologically.

There is no segregation of function or division of duties in processing and reviewing Fs 4473. The two employees are the only persons reviewing the forms. The licensee has no sound system of practices or policies demonstrated by a consistent application of formal or informal procedures to ensure the accuracy of the Forms 4473. The forms are reviewed one time prior to filing. IOI (b)(6) encouraged the licensee to review the forms two to three times before filing to preclude future errors. This was a topic of discussion at the Closing Conference. The licensee agreed to review the forms by two employees before the buyer departs the premises and then again once a month.

FIREARMS INSPECTION REPORT

Name: Yorktown Pawn LLC
Trade Name: Yorktown Pawn

UI#: 768035.2017.0084.B1B
FFL#: 1.54.199.02.6M.13212

IOI (b)(6) contacted the Virginia State Police for the Firearms Transaction Program Statement Inquiries for the months of October, November, and December, 2016. Investigators cross-checked 11 transactions with no discrepancies.

The licensee correctly transferred firearms to other FFLs and uses FFL eZCheck.

6 - Multiple Sales

The Crime Gun Analysis Branch FFL Master Query listed zero (0) multiple sales during the inspection period. Investigators discovered (b)(6) unreported multiple sales involving (b)(6) firearms. IOI (b)(6) directed the licensee to immediately complete the Multiple Sale or Other Disposition of Pistols and Revolvers (ATF Form 3310.4) (**Worksheet 2, Violation 7, and ROV**). The licensee completed this task by the close-of-business the next day.

7 - Suspicious/Prohibited Purchasers

IOI (b)(6) requested an analysis of firearms traces, theft or loss reports, and multiple sale information from the Violent Crimes Analysis Branch. IOI (b)(6) analyzed the trace history of the licensee for the past three years.

IOI (b)(6) examined the licensee's records to determine if trafficking or straw purchase indicators were present. After analyzing the data, IOI (b)(6) determined there were no indicators of illegal transfers, trafficking or nexus to previous traces or Intel.

8 - Trace Activity

The Violent Crimes Analysis Branch (VCAB) FFL Master Query reported zero (0) successful traces in the last twelve months. IOI (b)(6) did not discover indicators of illegal transfers, trafficking or nexus to previous traces or Intel.

Yorktown Pawn acquired (b)(4) used firearms and disposed of (b)(4) used firearms.

9 - NFA/Importer/Collector/Manufacturer

Yorktown Pawn is not an importer, collector, or manufacturer and does not deal in NFA weapons.

10 - Referrals

This inspection yielded no referral information.

FIREARMS INSPECTION REPORT

Name: Yorktown Pawn LLC
Trade Name: Yorktown Pawn

UI#: 768035.2017.0084.B1B
FFL#: 1.54.199.02.6M.13212

11 - Other

The Violent Crime Analysis Branch has processed IOI (b)(6) request to provide an FFL history query for Yorktown Pawn, LLC (FFL #1-54-13212). There were no results to report for Yorktown Pawn, LLC (FFL #1-54-13212) for the time period of December 20, 2015 to December 20, 2016.

The Violent Crime Analysis Branch has also processed your request to provide Individual/Address history queries for Trent David BOULLIANNE (DOB: (b)(6), W/M) address listed as (b)(6); Michael Anthony DELUCA (DOB: (b)(6) W/M) address listed as (b)(6) and Michael Thomas SHIELDS (DOB (b)(6), W/M) address listed as (b)(6).
(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)

Attached is a Word document revealing the activity for (b)(6). The summary is as follows:

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

FIREARMS INSPECTION REPORT

Name: Yorktown Pawn LLC
Trade Name: Yorktown Pawn

UI#: 768035.2017.0084.B1B
FFL#: 1.54.199.02.6M.13212

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

There were no results to report for Trent David BOULLIANNE (DOB: (b)(6), W/M) or Michael Thomas SHIELDS (DOB: (b)(6), W/M).

The address history queries for (b)(6) did not reveal any results.

IOI (b)(6) reviewed the October 2016 version of the ATF Form 4473 with the applicants and informed them of the activation date of 1.16.2017.

IOI (b)(6) activated the "Receive Firearms Industry News Updates" using Mr. Boullianne's email address.

12 - Closing Actions

On 1.5.2017, IOI (b)(6) held a Closing Conference with Responsible Person, Mr. Trent Boullianne. IOI (b)(6) summarized each item on the Acknowledgement of Federal Firearms Regulations to the licensee's satisfaction and answered all questions. Mr. Boullianne signed the Acknowledgement verifying the information was explained and received a signed copy for his files (**Exhibit 1**).

On 1.5.2017, IOI (b)(6) issued a Report of Violations (ROV) to Yorktown Pawn. IOI (b)(6) discussed the violations and explained all violations cited during this inspection. IOI (b)(6) explained why they were violations, how to correct the violations and how to keep proper records in the future to avoid the violation from reoccurring. Mr. Boullianne signed the ROV verifying that IOI (b)(6) explained it to him. Mr. Boullianne stated that he understood the ROV. IOI (b)(6) provided Mr. Boullianne a signed copy of the ROV.

IOI (b)(6) cautioned Mr. Boullianne about the increasing incidents of theft and the importance of firearms security.

IOI (b)(6) provided ATF Publication 3317.2 (Rev Feb 2010)- Safety and Security Information for FELs.

13 - Violations

1. 27 C.F.R. § 478.21(a)

Nature of Violation:

The licensee, by and through its agents and employees, failed to execute Form 4473 as indicated by the headings on the form and the instructions on or pertaining to the form, (b)(3) forms with (b)(3) instances cited.

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Question 10a (Ethnicity) was answered blank (b)(3) times
Question 18 (Type of Firearm) was answered blank (b)(3) times
Question 25 (Recertification date) was answered in error (b)(3) times
Question 31 (Trade/corporate name) was answered blank (b)(3) time

Licensees Response:

As this was our first inspection and didn't know what to look for, we made a lot of mistakes, but I learned a lot from my mistakes. We will put more eyes on the forms and review them closer.

Corrective Action:

Licensee shall provide the correct and complete information for all errors identified. Make corrections to Forms 4473 on a copy of the affected Form 4473; corrections shall not be made to the original Form 4473.

Worksheet 2, ROV

3. **27 C.F.R. § 478.124(c)(3)(iv)**

Nature of Violation:

The licensee, by and through its agents and employees, transferred a firearm to a non-licensee without recording required NICS information on the Form 4473; (b)(3) forms with (b)(3) instances cited.

Question 21a (Date NICS initiated) was answered blank (b)(3) time
Question 21d (Response after a delayed response) was answered in error (b)(3) times

Licensees Response:

We will cross-check number 17 with 21a to ensure the dates correspond.

Corrective Action:

Licensee shall obtain and enter the missing NICS information; obtain missing Form 4473 NICS information by referring to the NICS information on the corresponding SP-65. Make Forms 4473 corrections on a copy of the affected Form 4473; make no corrections to the original Form 4473.

Worksheet 2, ROV

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5. **27 C.F.R. § 478.124(c)(5)**

Nature of Violation:

The licensee, by and through its agents and employees, failed to sign and date the Form 4473 certifying that the licensee does not know or have reason to believe the transferee is disqualified by law from receiving the firearm described on the Form 4473; 2 forms with [REDACTED] instances cited.

Question 36 (Transfer date) was answered in error [REDACTED] times

Licensee's Response:

We now understand, and we will not enter the date in number 36, until the firearm is actually transferred.

Corrective Action:

Licensee shall enter the missing information into the proper spaces on the Form 4473. Make corrections to Forms 4473 on a copy of the affected Form 4473; corrections shall not be made to the original Form 4473.

Worksheet 2, ROV

6. **27 C.F.R. § 478.125(e)**

Nature of Violation:

a) The licensee, by and through its agents and employees, failed to timely record the acquisition of [REDACTED] firearm.

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

b) The licensee, by and through its agents and employees, failed to timely record the disposition of [REDACTED] firearms.

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

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c) The licensee, by and through its agents and employees, failed to correctly record the serial numbers of (b)(3) firearms.

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

d) The licensee, by and through its agents and employees, failed to numerically file (b)(3) Forms 4473 when using the Forms 4473 Transaction serial number in the A&D Record address area.

Licensee's Response:

We understand our errors and everything has been corrected.

Corrective Action:

- a) Licensee shall enter the acquisition information of (b)(3) firearm into the A&D Record.
- b) Licensee shall enter the disposition information of (b)(3) firearms into the A&D Record.
- c) Licensee shall enter the correct serial number of (b)(3) firearms into the A&D Record.
- d) Licensee shall file Forms 4473 numerically when using the Transaction serial number in the A&D Record address area.

Worksheet 1 and ROV

7. 27 C.F.R. § 478.126a

Nature of Violation:

The licensee, by and through its agents and employees, failed to timely and accurately report the sale or other disposition of two or more pistols and/or revolvers to an unlicensed person, (b)(3) Forms 4473 cited, involving (b)(3) firearms.

Licensees Response:

We understand now the multiple sale forms must be completed. Each of the 6 late forms have been submitted to ATF and the State Police.

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Corrective Action:

Licensee shall immediately process an ATF Form 3310.4 and forward copies to the offices specified on the form. This was completed by COB the next business day.

Worksheet 2 and ROV

X

Industry Operations Investigator

Index of Worksheets and Exhibits

I. FLS

II. Narrative

III. Report of Violations (ROV)

IV. Workbook

- 1.) Information Page
- 2.) Inventory, A&D
- 3.) ATF Forms 4473 Review
- 4.) Other Statistics

V. Exhibits

- 1.) Acknowledgement of Federal Firearms Regulations