

## Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Sully's Pawn Shop & Trading Post, LLC 730 W Bankhead St. New Albany, MS 38652, Union	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 777070-2017-0249-B1B		
	3. PERMIT/LICENSE NUMBER 164145029M04607	4a. TARGET DATE 5/12/2017	4b. TARGET HOURS
	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, 04/12/2017

8. PURPOSE/SPECIAL INSTRUCTIONS  
The results of an onsite assist CE THEFT assignment disclosed numerous record keeping errors and failure to report a theft within 48 hours as required by regulation. Therefore, the inspection scope was expanded from limited to full and a DE assignment was issued as a result. See related THEFT UI# 777070-2017-0240.

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	8	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS	24	NO. OF TECS HITS	1	2112 - P.O.A.	
NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES		2113 - COMM. AIR	
		\$ VALUE OF TAX DECREASES		2114 - RENTAL CAR	
NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS		2115 - GPV EXPENSES	
NO. OF CLAIMS		\$ VALUE OF CLAIMS		2116 - MISC.	
NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED		TOTAL \$ FOR INSP.	

11. ATF OFFICER'S RECOMMENDATION  
Submitted by (b)(6) - Industry Operations Investigator

Submitted on: 05/05/2017

Viols WL ONLY and Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
APR 2017	18.00		
MAY 2017	26.00		
ATF OFFICER'S SUBTOTAL	44.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	44.00		

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION  
Viols WL ONLY and No Recall Inspection

<input checked="" type="checkbox"/> REVIEWED	<input checked="" type="checkbox"/> CONCUR	<input type="checkbox"/> SEE COMMENTS	<input checked="" type="checkbox"/> FINAL DISPOSITION
SIGNATURE AND TITLE (b)(6) - Area Supervisor		REVIEW DATE 06/05/2017	

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	3. PERMIT/LICENSE NUMBER 164145029M04607	4a. TARGET DATE 5/12/2017	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

ROUTING SEQUENCE AND DATE

- ☐ 1. \_\_\_\_\_  
☐ 2. \_\_\_\_\_  
☐ 3. \_\_\_\_\_  
☐ 4. \_\_\_\_\_

CONTROL FILE POSTED DATE \_\_\_\_\_

## Report of Violations

### Instructions

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

Name of Proprietor Sully's Pawn Shop & Trading Post, LLC	Street Address 730 W Bankhead St.	City New Albany	State MS	Zip Code 38652-	County Union	Page 1 of 4 Pages
License/Permit/Registry Number <i>(If any)</i> 164145029M04607		Expiration Date 12/1/2019		Date(s) or Period of Inspection 04/10/2017 through 04/19/2017		

### 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:

The licensee failed to provide all information called for as indicated by the headings on ATF Form 4473.

- In (b)(3) 112 Public instances, Item 11a was answered "No," indicating that the purchaser was not the actual transferee of the firearm.
- In (b)(3) 112 Public instance, Item 11a was blank.
- In (b)(3) 112 Public instance each, Items 22 and 23 were blank.

Citation: 27 CFR 478.21(a)

#### Date Corrections to be Made:

*(If not corrected immediately)*

**Corrective Action to be Taken:** The licensee was instructed to provide all information called for as indicated by the headings on ATF Form 4473.

*(If not corrected immediately)*

## Report of Violations

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Name of Proprietor Sully's Pawn Shop & Trading Post, LLC	Street Address 730 W Bankhead St.	City New Albany	State MS	Zip Code 38652-	County Union	Page 2 of 4 Pages
License/Permit/Registry Number <i>(If any)</i> 164145029M04607		Expiration Date 12/1/2019	Date(s) or Period of Inspection 04/10/2017 through 04/19/2017			

### 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 failed to obtain all required answers from the transferee prior to the transfer of a firearm.

- In (b)(3) 112 Public instance, Item #2 was incomplete.
- In (b)(3) 112 Public instance, Item #3 was blank.
- In (b)(3) 112 Public instance, the transferee answered "yes" to question 11c, "Have you ever been convicted in any court of a felony, or any crime for which the judge could imprison you for more than one year?"
- In (b)(3) 112 Public instance, Question 11d was left Blank.
- In (b)(3) 112 Public instances, Question 11i was left Blank.
- In (b)(3) 112 Public instances, the transferee answered "yes" to question 11i, "Have you ever been convicted in any court of a misdemeanor crime of domestic violence?"
- In (b)(3) 112 Public instances, the transferee answered "yes" to question 12b, "Have you ever renounced your United States Citizenship?"
- In (b)(3) 112 Public instances each, Items 12b, 12c, and 12d.1 were Blank.
- In (b)(3) 112 Public instance, Item #17 was blank.

\*Note: All purchasers answering "yes" to prohibitive questions were ran in OpenFox, with no prohibiting information disclosed.

Citation: 27 CFR 478.124(c)(1)

#### Date Corrections to be Made:

*(If not corrected immediately)*

**Corrective Action to be Taken:** The licensee was instructed to obtain all required answers from the transferee prior to the transfer of a firearm.

*(If not corrected immediately)*



## Report of Violations

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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 Sully's Pawn Shop & Trading Post, LLC	Street Address 730 W Bankhead St.	City New Albany	State MS	Zip Code 38652-	County Union	Page 3 of 4 Pages
License/Permit/Registry Number <i>(If any)</i> 164145029M04607		Expiration Date 12/1/2019		Date(s) or Period of Inspection 04/10/2017 through 04/19/2017		

### Inspection Results

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

<b>Number:</b> 3	<b>Date Corrections to be Made:</b> <i>(If not corrected immediately)</i>
<b>Nature of Violation:</b> The licensee failed to verify and/or list the Identification of the transferee prior to the transfer of a firearm. • In (b)(3) 112 Pub instance, Item 20a was incorrect.	<b>Corrective Action to be Taken:</b> The licensee was instructed to obtain, verify, and list the Identification of the transferee prior to the transfer of a firearm. <i>(If not corrected immediately)</i>
<b>Citation:</b> 27 CFR 478.124(c)(3)(i)	
<b>Number:</b> 4	<b>Date Corrections to be Made:</b> <i>(If not corrected immediately)</i>
<b>Nature of Violation:</b> The licensee failed to record the information received from NICS on ATF Form 4473. • In (b)(3) 112 Pub instances, Item 21d was blank. • In (b)(3) 112 Pub instances, Item 19d was blank.	<b>Corrective Action to be Taken:</b> The licensee was instructed to record the information received from NICS on ATF Form 4473. <i>(If not corrected immediately)</i>
<b>Citation:</b> 27 CFR 478.124(c)(3)(iv)	
<b>Number:</b> 5	<b>Date Corrections to be Made:</b> <i>(If not corrected immediately)</i>
<b>Nature of Violation:</b> The licensee failed to identify the firearm being transferred on ATF Form 4473. • In (b)(3) 112 Pub instances, Item #27 (Type of Firearm), was blank.	<b>Corrective Action to be Taken:</b> The licensee was instructed to identify the firearm being transferred on ATF Form 4473. <i>(If not corrected immediately)</i>
<b>Citation:</b> 27 CFR 478.124(c)(4)	

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

Instructions

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Name of Proprietor	Street Address	City	State	Zip Code	County	Page 4 of 4 Pages
Sully's Pawn Shop & Trading Post, LLC	730 W Bankhead St.	New Albany	MS	38652-	Union	

License/Permit/Registry Number (If any)	Expiration Date	Date(s) or Period of Inspection
164145029M04607	12/1/2019	04/10/2017 through 04/19/2017

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:

The licensee failed to prepare a report of Multiple Sales or Other Disposition (ATF Form 3310.4) for handgun transactions when two (2) or more handguns are purchased within five (5) business days, in instance, involving handguns.

Citation: 27 CFR 478.126a

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee prepared and submitted ATF Form 3310.4 for the unreported multiple sale.

Number: 7

Nature of Violation:

The licensee failed to accurately maintain the Acquisition & Disposition Record.  
•After inventory reconciliation, firearms were missing from Inventory.

Citation: 27 CFR 478.125(e)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee completed and submitted ATF Form 3310.11 Theft/Loss Report for the missing firearms.

Number: 8

Nature of Violation:

The licensee failed to report the theft of a firearm to ATF within 48 hours of the time of discovery of the theft.

Citation: 27 CFR 478.39a

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee was instructed to report a theft or loss of a firearm within 48 hours of the time of discovery.

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

Date

Signature and Title of ATF Officer

Date

For Official Use Only

October 9 2019 Production

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ATF E-Form 5030 5  
Revised April 2005



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives  
100 W. Capitol, Suite 1403  
Jackson, MS 39269

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www.atf.gov

777070: (b)(6)  
5373

June 05, 2017

**WARNING LETTER**

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Sully's Pawn Shop & Trading Post LLC  
ATTN: Mr. William Allen Sullivan Jr.  
P O Box 1907  
New Albany, MS 38652  
RE: 1-64-145-02-9M-04607

Dear Mr. Sullivan:

During a recent compliance inspection at your firearms business covering the period of November 03, 2016 through April 10, 2017, you were cited for violations of 27 Code of Federal Regulations, Part 478. The violations were discussed with you during the inspection. A copy of the Report of Violations, Form 5030.5, issued at the time of the inspection is enclosed.

All of the violations were fully explained to you by the Bureau of Alcohol Tobacco Firearms and Explosives (ATF) Investigator. You indicated that you understood the requirements of the firearms laws and regulations. You further indicated 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, will be considered as willful and may result in the revocation of your license.

Please ensure that future compliance is achieved. Should you have any further questions regarding this matter, please contact (b)(6).

Sincerely Yours,

(b)(6)

Area Supervisor

Enclosure

Cc: National Licensing Center  
Jackson II Field Office



# FIREARMS INSPECTION REPORT

**Name:** Sully's Pawn Shop & Trading Post LLC  
**Trade Name:**

**UI#:** 777070-2017-0249-B1B  
**FFL#:** 1-64-145-02-9M-04607

**Address:** 730 W. Bankhead St.  
New Albany, MS 38652, Union

## 1 - Introduction

### Inspection Profile:

On April 10, 2017, Industry Operations Investigator (IOI) (b)(6) initiated a Theft Investigation assignment on Sully's Pawn Shop & Trading Post LLC, Pawnbroker of Firearms, due to a theft that occurred on December 27, 2016. Due to the licensee failing to notify ATF within the required 48 hours from the time of discovery of the theft, and numerous record keeping errors disclosed during the theft investigation, Area Supervisor (b)(6) issued a Full Compliance, DE inspection to run concurrently. The period of inspection was from 11/03/2016 to 04/10/2017 due to the licensee receiving his initial FFL on 11/03/2016. Mr. William Allen Sullivan Jr., owner and sole responsible person, was interviewed during the inspection. Mr. Sullivan was identified by valid Mississippi Driver's License (b)(6).

The assignment was issued as a Disposition Emphasis, Full Compliance inspection.

### Business Profile:

Sully's Pawn Shop & Trading Post LLC operates as a pawnbroker in the city of New Albany, MS. The licensee is a pawnshop, dealing in various items for sale and pawn, to include firearms and firearms accessories. During the last five (5) months, the licensee acquired (b)(4) firearms (b)(4) long guns, forty percent (b)(4) handguns). During the same five (5) month period, the licensee disposed of approximately (b)(4) firearms. Of the firearms disposed, approximately (b)(4) were used firearms. The licensee's primary suppliers of new firearms are various distributors to include, but not limited to, (b)(4) (b)(4). The licensee's primary supplier of used firearms are individually pawned firearms. The licensee does not conduct business at gun shows. The licensee does not have a website, but they do utilize their Facebook page to advertise firearms in their inventory. The licensee does not make sales to law enforcement agencies or to individual law enforcement officers utilizing the Certification Letter. The licensee does not conduct any other business at this location, nor do they have any other ATF permits or licenses. The licensee has held a Federal Firearms License since November 03, 2016. The licensee does not utilize any off-site storage.



# FIREARMS INSPECTION REPORT

Name: Sully's Pawn Shop & Trading Post LLC  
Trade Name:

UI#: 777070-2017-0249-B1B  
FFL#: 1-64-145-02-9M-04607

The business premises are located at 730 W. Bankhead St. New Albany, MS. 38652. The licensee has all necessary state and local licenses to conduct business in the state of Mississippi and the city of New Albany. All state and local licenses are up to date and valid.

## Ownership and Control:

Sully's Pawn Shop & Trading Post LLC is a limited liability company in good standing with the Mississippi Secretary of State. Mr. William Allen Sullivan Jr. is listed as the Manager. Mr. Sullivan is the only listed responsible person on the license, which concurs with FLS. There have been no changes in control or ownership of the business and no hidden ownership is suspected.

## Variance:

Sully's Pawn Shop & Trading Post does not currently hold any variances, nor did they request any.

## 2 - Recommendation

Report of Violation, Warning Letter Only and Recall Inspection.

## 3 - Inspection History

The licensee has had two (2) inspections within the last five (5) years. The results of the last two inspections are as follows:

Date of Inspection:	04/10/2017
Type of Inspection:	Theft Investigation
UI#:	777070-2017-0240-B1B
Inspection Results:	No Violations, No Further Action, No Referrals
Cited Violations:	None

Date of Inspection:	09/21/2016
Type of Inspection:	Qualification
UI#:	777070-2016-0413-B1B
Inspection Results:	Approve Application, Type 02 License Issued
Cited Violations:	None.

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

A full inventory was conducted where all of the firearms in inventory were compared to the A&D record. The licensee maintains a written record A&D Record. All entries were in the proper format.

# FIREARMS INSPECTION REPORT

**Name:** Sully's Pawn Shop & Trading Post LLC  
**Trade Name:**

**UI#:** 777070-2017-0249-B1B  
**FFL#:** 1-64-145-02-9M-04607

The physical count revealed that there were three hundred seventy-five (375) firearms in inventory. The A&D Record showed that there were (b)(3) - 112 Public Law 55 125 Stat 552 (b)(3) - 112 open spaces. For the exception of noted discrepancies, all entries were timely made and all required information was accurate. A review of the Acquisition and Disposition Record revealed (b)(3) - 112 Public Law 55 125 Stat 552 discrepancies. For a detailed discussion of those violations, see **Section 13 Violations, Report of Violations, Violation #7, Worksheet #1, and Exhibit #7.**

IOI (b)(6) traced (b)(3) - 112 Public Law 55 125 Stat 552 firearms from acquisition through disposition through the licensee's records with no discrepancies found. No illegal firearms, or firearms with obliterated serial numbers, were discovered. No trafficking indicators were disclosed during the inspection. There was (b)(3) - 112 Public Law 55 125 Stat 552 theft loss reported during the inspection period for the theft of (b)(3) - 112 Public Law 55 125 Stat 552 firearms. **(Reference Exhibit #8)** There was also a theft loss reported as a result of this inspection, Theft/Loss (b)(3) - 112 Public Law 55 125 Stat 552. That theft loss was for (b)(3) - 112 Public Law 55 125 Stat 552 firearms found to be missing from inventory after inventory reconciliation. Those (b)(3) - 112 Public Law 55 125 Stat 552 firearms were found to not be associated with the December 27, 2016 theft.

The licensee's standard operating procedures as it relates to the A&D and Inventory is as follows:

The licensee states that he enters the firearm information into the A&D record as soon as the firearm is received into inventory. Once the firearm is transferred, he logs the firearms out of the A&D record within a few days of the transfer.

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

There were (b)(3) - 112 Public Law 55 125 Stat 552 ATF Forms 4473 on file for the past five (5) months, to include (b)(3) - 112 Public Law 55 125 Stat 552 Denied forms. Transfers to other licensees were being conducted properly. There were no transfers to law enforcement agencies or law enforcement officers utilizing the certification letter. The FFL Audit Log contained one hundred seventy (170) NICS Transaction Numbers (NTN), which were confirmed for accuracy. A review of (b)(3) - 112 Public Law 55 125 Stat 552 on file revealed (b)(3) - 112 Public Law 55 125 Stat 552 violations. For a detailed discussion of those violations, see **Section 13 Violations, Report of Violations, Violations #1-5, Worksheet #2, Exhibits #1-5.)**

The licensee's standard operating procedures as it relates to the completion of ATF Forms 4473 and other dispositions is as follows:

For transfers to non-licensees, the licensee has the transferee complete Section A of the form. An employee will then fill out Section B of the form and perform a NICS check if applicable. Once a Proceed response has been received, the employee will complete the rest of the form and transfer the firearm. The licensee stated that it was obvious that



## FIREARMS INSPECTION REPORT

**Name:** Sully's Pawn Shop & Trading Post LLC  
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his employees were not reviewing Section A of the form, but that he will address the issue with all employees. For transfers to other licensees, the licensee will obtain a valid, certified copy of the licensee's FFL and then transfer the firearm to the other licensee. All transfers are immediately reflected in the licensee's written A&D record.

### **6 - Multiple Sales**

According to the Violent Crime Analysis Branch (VCAB) Report for Sully's Pawn Shop & Trading Post LLC, there were (b)(3) - 112 Public Law 55 126 Stat. Multiple Sales involving (b)(3) - 112 Public Law 55 126 Stat. handguns, associated with the licensee. There was (b)(3) - 112 Public Law 55 126 Stat. unreported multiple sale discovered during this inspection. The following discrepancy was disclosed:

The licensee failed to prepare ATF F 3310.4, Report of Multiple Sale or Other Disposition for Handgun transactions when two (2) or more handguns are purchased within five (5) business days in (b)(3) - 112 Public Law 55 126 Stat. instance involving (b)(3) - 112 Public Law 55 126 Stat. handguns.  
**(Reference Violation #6, Worksheet #2, Exhibit #6.)**

### **7 - Suspicious/Prohibited Purchasers**

There were six (6) suspicious purchasers identified during the inspection. These purchasers answered "Yes" to prohibitive questions in Section A of the form. All purchasers were run in NCIC/OpenFox. Five (5) of those purchasers had no prohibiting information disclosed. One (1) purchaser, (b)(6), (b)(7)(C)

(b)(6) IOI (b)(6) spoke with S/A (b)(6) Oxford Field Office. S/A (b)(6) stated that since no violation of the law occurred, his office would not pursue a case on (b)(6)

### **8 - Trace Activity**

According to the Violent Crime Analysis Branch (VCAB) Report for Sully's Pawn Shop & Trading Post LLC, there were zero (0) successful traces associated with the licensee in the past twelve (12) months. There were no unsuccessful traces.

A secondary market analysis of ten percent (10%) of the licensee's used firearms inventory, which amounted to seventeen (17) firearms was conducted resulting no hits.

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

Sully's Pawn Shop & Trading Post, LLC does not deal in NFA weapons, nor are they an Importer, Collector, or Manufacturer of firearms.

# FIREARMS INSPECTION REPORT

**Name:** Sully's Pawn Shop & Trading Post LLC  
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**UI#:** 777070-2017-0249-B1B  
**FFL#:** 1-64-145-02-9M-04607

## 10 - Referrals

No referrals were generated as a result of this inspection.

## 11 - Other

Sully's Pawn Shop & Trading Post LLC did have ATF I 5300.1 displayed in the business informing customers of youth handgun safety. Youth Handgun Safety Act Notice, ATF I 5300.2 was provided for all handgun sales.

Secure gun storage and safety devices were available to customers and all firearms in inventory were in a secure location at all times.

IOI (b)(6) conducted an NCIC check in OpenFox on all Responsible Persons with no prohibiting information being disclosed.

## 12 - Closing Actions

A closing conference was held with Mr. Allen Sullivan, Owner, on April 19, 2017. IOI (b)(6) issued the Report of Violations to Mr. Sullivan, which he subsequently signed. IOI (b)(6) reviewed the Acknowledgement of Federal Firearms Regulations with Mr. Sullivan. Mr. Sullivan signed the Acknowledgement of Federal Firearms Regulations. (Reference Exhibit #9)

## 13 - Violations

### 1. 27 CFR 478.21(a)

#### Nature of Violation:

The licensee failed to provide all information called for as indicated by the headings on ATF Form 4473.

- In (b)(3) - 112 Public L instance, Item 11a was answered "No," indicating that the purchaser was not the actual transferee of the firearm.
- In (b)(3) - 112 Public L instance, Item 11a was blank.
- In (b)(3) - 112 Public L instance each, Items 22 and 23 were blank.

#### Licensee's Response:

The licensee stated that he was unaware of all of the errors and mistakes that his employees were making and that he was going to address the issue with all of them and that he would personally start reviewing forms.



## FIREARMS INSPECTION REPORT

**Name:** Sully's Pawn Shop & Trading Post LLC  
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**FFL#:** 1-64-145-02-9M-04607

### **Corrective Action:**

The licensee was instructed to provide all information called for as indicated by the headings on ATF Form 4473.

**(Reference Violation #1, Worksheet #2, Exhibit #1.)**

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

#### **Nature of Violation:**

The licensee failed to obtain all required answers from the transferee prior to the transfer of a firearm.

- In (b)(3) - 112 Public L instance, Item #2 was incomplete.
- In (b)(3) - 112 Public L instance, Item #3 was blank.
- In (b)(3) - 112 Public L instance, the transferee answered "yes" to question 11c, "Have you ever been convicted in any court of a felony, or any crime for which the judge could imprison you for more than one year?"
- In (b)(3) - 112 Public L instance, Question 11d was left Blank.
- In (b)(3) - 112 Public L instances, Question 11i was left Blank.
- In (b)(3) - 112 Public L instances, the transferee answered "yes" to question 11i, "Have you ever been convicted in any court of a misdemeanor crime of domestic violence?"
- In (b)(3) - 112 Public L instances, the transferee answered "yes" to question 12b, "Have you ever renounced your United States Citizenship?"
- In (b)(3) - 112 Public L instances each, Items 12b, 12c, and 12d.1 were Blank.
- In (b)(3) - 112 Public L instance, Item #17 was blank.

**\*Note: All purchasers answering "yes" to prohibitive questions were ran in OpenFox, with no prohibiting information disclosed.**

#### **Licensee's Response:**

The licensee stated that he was unaware of all of the errors and mistakes that his employees were making and that he was going to address the issue with all of them. The licensee also stated that he would ensure that someone reviews Section A of the form prior to the transfer of firearm.

#### **Corrective Action:**

The licensee was instructed to obtain all required answers from the transferee prior to the transfer of a firearm.

**(Reference Violation #2, Worksheet #2, Exhibit #2.)**

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



## FIREARMS INSPECTION REPORT

**Name:** Sully's Pawn Shop & Trading Post LLC  
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**UI#:** 777070-2017-0249-B1B  
**FFL#:** 1-64-145-02-9M-04607

### **Nature of Violation:**

The licensee failed to verify and/or list the Identification of the transferee prior to the transfer of a firearm.

- In (b)(3) - 112 Public L instance, Item 20a was incorrect.

### **Licensee's Response:**

The licensee stated that he was unaware of all of the errors and mistakes that his employees were making and that he was going to address the issue with all of them and that he would personally start reviewing forms.

### **Corrective Action:**

The licensee was instructed to obtain, verify, and list the Identification of the transferee prior to the transfer of a firearm.

(Reference Violation #3, Worksheet #2, Exhibit #3.)

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

### **Nature of Violation:**

The licensee failed to record the information received from NICS on ATF Form 4473.

- In (b)(3) - 112 Public L instances, Item 21d was blank.
- In (b)(3) - 112 Public L instances, Item 19d was blank.

### **Licensee's Response:**

The licensee stated that he was unaware of all of the errors and mistakes that his employees were making and that he was going to address the issue with all of them and that he would personally start reviewing forms.

### **Corrective Action:**

The licensee was instructed to record the information received from NICS on ATF Form 4473.

(Reference Violation #4, Worksheet #2, Exhibit #4.)

#### 5. 27 CFR 478.124(c)(4)

### **Nature of Violation:**

The licensee failed to identify the firearm being transferred on ATF Form 4473.

- In (b)(3) - 112 Public L instances, Item #27 (Type of Firearm), was blank.

### **Licensee's Response:**

## FIREARMS INSPECTION REPORT

Name: Sully's Pawn Shop & Trading Post LLC  
Trade Name:

UI#: 777070-2017-0249-B1B  
FFL#: 1-64-145-02-9M-04607

The licensee stated that he was unaware of all of the errors and mistakes that his employees were making and that he was going to address the issue with all of them and that he would personally start reviewing forms.

Corrective Action:

The licensee was instructed to identify the firearm being transferred on ATF Form 4473.

(Reference Violation #5, Worksheet #2, Exhibit #5.)

6. 27 CFR 478.126a

Nature of Violation:

The licensee failed to prepare a report of Multiple Sales or Other Disposition (ATF Form 3310.4) for handgun transactions when two (2) or more handguns are purchased within five (5) business days, in (b)(3) - 112 Public Law instance, involving (b)(3) - 112 Public Law handguns.

Licensee's Response:

The licensee had no response for this violation.

Corrective Action:

The licensee prepared and submitted ATF Form 3310.4 for the unreported multiple sale. (Reference Violation #6, Worksheet #2, Exhibit #6.)

7. 27 CFR 478.125(e)

Nature of Violation:

The licensee failed to accurately maintain the Acquisition & Disposition Record.

- After inventory reconciliation, (b)(3) - 112 Public Law firearms were missing from Inventory.

Licensee's Response:

The licensee stated that he cannot understand how those firearms turned up missing. The licensee did state that he had some contractors in the store putting in cable at one point and that they were not supervised the entire time they were there.

Corrective Action:

The licensee completed and submitted ATF Form 3310.11 Theft/Loss Report for the missing firearms.

(Reference Violation #7, Worksheet #1, Exhibit #7.)

## FIREARMS INSPECTION REPORT

**Name:** Sully's Pawn Shop & Trading Post LLC  
**Trade Name:**

**UI#:** 777070-2017-0249-B1B  
**FFL#:** 1-64-145-02-9M-04607

8. **27 CFR 478.39a**

**Nature of Violation:**

The licensee failed to report the theft of a firearm to ATF within 48 hours of the time of discovery of the theft.

**Licensee's Response:**

The licensee stated that it was totally his fault, because he distinctly remembered IOI (b)(6) instructing him the closing conference of his qualification inspection of the requirement. The licensee stated that he just forgot to notify ATF, although he did report the theft to local authorities.

**Corrective Action:**

The licensee was instructed to report a theft or loss of a firearm within 48 hours of the time of discovery.

**(Reference Violation #8)**

X

Industry Operations Investigator

**Index of Worksheets and Exhibits**

1. Worksheet #1- A&D Review
2. Worksheet #2- ATF Forms 4473 Review
3. Exhibit #1- (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
4. Exhibit #2- (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
5. Exhibit #3- (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
6. Exhibit #4- (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
7. Exhibit #5- (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
8. Exhibit #6- (b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)
9. Exhibit #7- Acquisition and Disposition Record showing missing firearms.
10. Exhibit #8- Theft Loss ATF Incident (b)(3) - 112 Public Law 55 125 Stat 552
11. Exhibit #9- Acknowledgment of Federal Firearms Regulations

## FIREARMS INSPECTION REPORT

Name: Sully's Pawn Shop & Trading Post LLC  
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