

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Golden Nugget Pawn, LLC 325 Stanford Street Lancaster, KY 40444, Garrard		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 775025-2016-0092-B1B		
		3. PERMIT/LICENSE NUMBER 461079027D04044	4a. TARGET DATE 9/30/2016	4b. TARGET HOURS
		5. REQUESTED BY (SIGNATURE, TITLE AND DATE) 09/30/2016		
6. ATF OFFICER(S) ASSIGNED (b)(6) - Lead Investigator				
7. ASSIGNED BY (SIGNATURE, TITLE AND DATE) (b)(6), Area Supervisor, 10/09/2015				
8. PURPOSE/SPECIAL INSTRUCTIONS Conduct full Compliance Inspection. FY 2016 Discretionary.				
9. INSPECTION RESULTS <input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC				
NO. OF VIOLATIONS	8	NO. OF REFERRALS		10. TRAVEL EXPENSES (OPTIONAL)
NO. OF TECS CHECKS	2	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 Submitted on: 01/21/2016 On October 21 2015, Senior Investigator (SI) (b)(6), and Industry Operations Investigator (IOI) (b)(6), conducted an unannounced Firearms Compliance Inspection (Type 02- Pawnbroker) of Golden Nugget Pawn, LLC based in Lancaster, KY. Present, and Identified, was Owner/Responsible Person (RP) Paul Rigsby (b)(6) Recommendation: Viols WL Only and Recall Inspection. The licensee was cited for 8 violations of CFR Part 478. A full inventory was done, along with a review of the licensee's Record of Acquisition and Disposition. Additionally, all ATF Forms 4473 were reviewed for completeness and accuracy. Also revealed during the inspection, (b)(3) firearm in the Acquisition and Disposition Record, was listed as an open disposition. The (b)(3) 112 Public Law 55 125 STAT 552 was not located in physical inventory, nor located on an ATF Form 4473. A Theft/Loss Report was submitted by RP Paul Rigsby. (b)(3) 112 Public Law 55 was later correctly identified as being manufactured by (b)(3) 112 Public Law 55 125 by the National Tracing Center- Theft/Loss Report Branch (ROV 2, Exhibit 3, Worksheet 1). On November 25 2015 SI (b)(6), and IOI (b)(6), held a closing conference with RP/Owner Paul Rigsby. The RP was issued a Report of Violations, which was explained and signed by the RP. Regulatory requirements were reviewed with the licensee. Additionally, the Acknowledgement of Federal Firearms Regulations was explained and signed by RP Paul Rigsby Viols WL ONLY and Recall Inspection				
12. TIME ACCOUNTING DATA				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)				
OCT 2015		47.00		
NOV 2015		52.00		
JAN 2016		28.00		
ATF OFFICER'S SUBTOTAL		127.00		ATF OFFICER'S SIGNATURE
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)				
OCT 2015		60.00		
NOV 2015		40.00		

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Golden Nugget Pawn, LLC 325 Stanford Street Lancaster, KY 40444, Garrard	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 775025-2016-0092-B1B		
	3. PERMIT/LICENSE NUMBER 461079027D04044	4a. TARGET DATE 9/30/2016	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE) 09/30/2016		

12. TIME ACCOUNTING DATA

ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b)(6)
JAN 2016	31.00
ATF OFFICER'S SUBTOTAL	131.00
ATF OFFICER'S SIGNATURE	
TOTAL HOURS	258.00

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Compliance inspection was conducted from 10/21/15 to 11/25/15. Inspection resulted in the issuance of an ROV for 8 violations of 27 CFR 478. Warning Letter issued to the licensee on 1/21/16 by Area Supervisor (b)(6).

Viols WL ONLY and Recall Inspection

☒ REVIEWED

☒ CONCUR

☒ SEE COMMENTS

☒ FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 01/26/2016
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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 Golden Nugget Pawn, LLC	Street Address 325 Stanford Street	City Lancaster	State KY	Zip Code 40444-	County Garrard	Page 1 of 8 Pages
License/Permit/Registry Number <i>(If any)</i> 461079027D04044	Expiration Date 4/1/2017	Date(s) or Period of Inspection 10/21/2015 through 11/25/2015				

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:

Licensee failed to retain (b)(3)112 ATF Form 4473's for a period of not less than 5 years after the date of the initial NICS inquiry. The licensee failed to retain (b)(3) ATF Form 4473's in which the licensee contacted NICS and in each instance the NICS inquiry resulted in a Denial of the transaction. The (b)(3) denied transactions that were missing from the licensee's records were as follow:

Date	NTN	Transferee's name	Denial Date
(b)(3)	(b)(3)	112 Public Law 55 125	STAT 552 (b)(6)

In addition, the licensee failed to retain a 4473 following a NICS check in which the transfer was Delayed by NICS. The FBI NICS Center noted that a NICS check that was conducted by the licensee on (b)(3) 112 Public Law 55 125 STAT 552, was changed from a Proceeded to a Delayed. The NICS Center attempted to call the FFL with a status change to Delay after he received a Proceed. The FFL advised the NICS Center that the buyer did not want to buy the firearm so the FFL tore up the 4473 even though it had a proceed status. FFL was not able to change the status on the 4473 and will not be able to accept the final status if/when it's given. He advised that's what he does when they do not wish to purchase.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee was instructed to retain all ATF Form 4473's involving NICS Denials for a period of not less than 5 years as required by regulation. Licensee was also advised to retain all 4473's when the licensee initiates a NICS check for a proposed firearms transaction but the sale, delivery, or transfer of the firearm is not made.

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

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Name of Proprietor Golden Nugget Pawn, LLC	Street Address 325 Stanford Street	City Lancaster	State KY	Zip Code 40444-	County Garrard	Page 2 of 8 Pages
License/Permit/Registry Number <i>(If any)</i> 461079027D04044	Expiration Date 4/1/2017	Date(s) or Period of Inspection 10/21/2015 through 11/25/2015				

Inspection Results

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

Citation: 27 CFR 478.129(b)

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ATF E-Form 5030 5
Revised April 2005

Report of Violations

Instructions

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Name of Proprietor Golden Nugget Pawn, LLC	Street Address 325 Stanford Street	City Lancaster	State KY	Zip Code 40444-	County Garrard	Page 3 of 8 Pages
License/Permit/Registry Number <i>(If any)</i> 461079027D04044	Expiration Date 4/1/2017	Date(s) or Period of Inspection 10/21/2015 through 11/25/2015				

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:

Licensee failed to make required entries in the Record of Acquisitions and Dispositions as required. The following discrepancies were noted:

In ^{(b)(3) 112} instances, the licensee failed to record the disposition of a firearm in the Record of Acquisitions and Dispositions not later than 7 days following the date of such transfer. The firearms that had not been recorded as dispositions in the record were as follow:

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

In ^{(b)(3) 11} instance, the serial number for a firearm was incorrectly recorded in the Record of Acquisitions and Dispositions. (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)

Licensee made immediate corrective action by recording the disposition information for the five firearms that had been previously transferred (book item numbers 779, 181, 11, 5, and 12) and also immediately corrected the serial number for book entry #1315. The licensee also immediately submitted prepared and submitted ATF Form 3310.11, Federal Firearms Licensee Firearms Inventory Theft/Loss Report for one firearm missing from inventory.

Report of Violations

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Name of Proprietor Golden Nugget Pawn, LLC	Street Address 325 Stanford Street	City Lancaster	State KY	Zip Code 40444-	County Garrard	Page 4 of 8 Pages
License/Permit/Registry Number (If any) 461079027D04044	Expiration Date 4/1/2017	Date(s) or Period of Inspection 10/21/2015 through 11/25/2015				

Inspection Results

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

In ^{(b)(3) 1} instance, ^{(b)(3) 1} firearm in the Record of Acquisitions and Dispositions with no disposition recorded was not located during the physical inventory of firearms and was not found on an ATF Form 4473. (b)(3) 112 Public Law 55 125 STAT 552

Citation: 27 CFR 478.125(e)

Report of Violations

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Name of Proprietor Golden Nugget Pawn, LLC	Street Address 325 Stanford Street	City Lancaster	State KY	Zip Code 40444-	County Garrard	Page 5 of 8 Pages
License/Permit/Registry Number <i>(If any)</i> 461079027D04044	Expiration Date 4/1/2017	Date(s) or Period of Inspection 10/21/2015 through 11/25/2015				

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

Number: 3

Nature of Violation:

Failure to ensure proper completion of ATF Forms 4473. On [REDACTED] forms, the licensee failed to properly complete ATF Forms 4473.

On [REDACTED] instances, the licensee failed to complete section 24 (Buyers Signature). On [REDACTED] instances, the licensee failed to complete section 25 (Recertification Date). On [REDACTED] instances, the licensee failed to complete section 30a (Total Number of Firearms). On [REDACTED] instances, the licensee failed to complete section 30b (Pawn Redemption). On [REDACTED] instances, the licensee failed to complete section 35 (Transferor's/Seller's Title). On [REDACTED] instances, the licensee failed to complete section 33 (Transferor's/Seller's Name). On [REDACTED] instance, the licensee failed to complete section 31 (Trade/Corporate Name and Address of Transferor). On [REDACTED] instance, the licensee failed to complete section 10a (Ethnicity). On [REDACTED] instance, the licensee failed to complete section 18 (Type of Firearm(s) to be Transferred). Additionally, on [REDACTED] instances, the licensee incorrectly completed section 22 (NFA NICS Exemption).

Citation: 27 CFR 478.21(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

• IOI (b)(6) specifically instructed the licensee on the correct completion of ATF Forms 4473. Licensee agreed to complete ATF Forms 4473 completely and accurately in the future.

Report of Violations

Instructions

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Name of Proprietor Golden Nugget Pawn, LLC	Street Address 325 Stanford Street	City Lancaster	State KY	Zip Code 40444-	County Garrard	Page 6 of 8 Pages
License/Permit/Registry Number <i>(If any)</i> 461079027D04044	Expiration Date 4/1/2017	Date(s) or Period of Inspection 10/21/2015 through 11/25/2015				

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:

Failure to ensure proper completion of ATF Forms 4473. On ^{(b)(6)} forms, the licensee failed to properly complete ATF Form 4473.

On ^{(b)(6)} instances, the licensee failed to ensure correct completion of section 1 (Transferee's Full Name). On ^{(b)(6)} instance, the licensee failed to ensure correct completion of section 2 (Place of Birth). On ^{(b)(6)} instance, the licensee failed to ensure proper completion of section 13 (State of Residence). Lastly, on ^{(b)(6)} instances, the licensee failed to ensure completion of section 17 (Certification Date).

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)

IOI ^{(b)(6)} specifically instructed the licensee on the correct completion of ATF Forms 4473. Licensee agreed to complete ATF Forms 4473 completely and accurately in the future.

Number: 5

Nature of Violation:

Failure to ensure proper completion of ATF Forms 4473. On ^{(b)(6)} forms, the licensee failed to ensure proper completion of ATF Form 4473.

On ^{(b)(6)} instances, the licensee failed to accurately complete section 20a (Identification Document.

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

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

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

IOI ^{(b)(6)} specifically instructed the licensee on the correct completion of ATF Forms 4473. Licensee agreed to complete ATF Forms 4473 completely and accurately in the future.

Report of Violations

Instructions

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Name of Proprietor Golden Nugget Pawn, LLC	Street Address 325 Stanford Street	City Lancaster	State KY	Zip Code 40444-	County Garrard	Page 7 of 8 Pages
License/Permit/Registry Number (If any) 461079027D04044		Expiration Date 4/1/2017		Date(s) or Period of Inspection 10/21/2015 through 11/25/2015		

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:

Failure to ensure proper completion of ATF Forms 4473. On (b)(3) forms, the licensee failed to ensure NICS information was completed properly and accurately.

On (b)(3) instance, the licensee failed to complete section 21a (NICS Date). In (b)(3) instances, the licensee failed to complete section 21c (NICS Response). In (b)(3) instances, the licensee failed to complete section 21d (NICS Delayed Response). Lastly, in (b)(3) instances, the licensee failed to complete section 21e (Post Transfer NICS Information).

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)

IOI (b)(6) specifically instructed the licensee on the correct completion of ATF Forms 4473. Licensee agreed to complete ATF Forms 4473 completely and accurately in the future.

Number: 7

Nature of Violation:

Failure to ensure proper completion of ATF Forms 4473. On (b)(3) forms, the licensee failed to accurately complete ATF Forms 4473.

In (b)(3) instances, the licensee failed to complete section 34 (Transferor's/Seller's Signature). Also, in (b)(3) instances, the licensee failed to complete section 36 (Date Transferred).

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)

IOI (b)(6) specifically instructed the licensee on the correct completion of ATF Forms 4473. Licensee agreed to complete ATF Forms 4473 completely and accurately in the future.

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

Instructions

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Name of Proprietor Golden Nugget Pawn, LLC	Street Address 325 Stanford Street	City Lancaster	State KY	Zip Code 40444-	County Garrard	Page 8 of 8 Pages
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License/Permit/Registry Number (If any) 461079027D04044	Expiration Date 4/1/2017	Date(s) or Period of Inspection 10/21/2015 through 11/25/2015
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Inspection Results

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

Number: 8

Nature of Violation:

Failure to comply with time limitation on NICS checks. In instance, on ATF Form 4473 dated (b)(3), (b)(7)(F) Public, a new NICS check was not conducted when transferring a firearm after the 30 calendar day window. The initial NICS check was conducted on 05/01/2015, and examination of the A&D Record revealed that the firearm was transferred on (b)(3), (b)(7)(F) Public Law 112-232.

Citation: 27 CFR 478.102(c)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

IOI (b)(6) specifically instructed the licensee on the correct completion of ATF Forms 4473. Licensee agreed to complete ATF Forms 4473 completely and accurately in the future.

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

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411

ATF E-Form 5030 5
Revised April 2005



**U.S. Department of Justice
Bureau of Alcohol, Tobacco,
Firearms and Explosives**

1040 Monarch Street, Suite 250
Lexington, Kentucky 40513

www.atf.gov

January 21, 2016

775025: (b)(6)
5300

Mr. Paul E. Rigsby
Owner, Golden Nugget Pawn, LLC
214 Davis Avenue
Lancaster, KY 40444

Dear Mr. Rigsby:

During a recent compliance inspection at your firearms business covering the period of October 21, 2014 through October 21, 2015, you were cited for violation of 27 Code of Federal Regulations, Part 478. A copy of the Report of Violations, ATF Form 5030.5, issued at the time of the inspection is enclosed.

All violations were fully explained to 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 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 Investigator (b)(6) at (b)(6) (b)(6).

Sincerely yours,

(b)(6)

Area Supervisor
Lexington II (IO) Field Office

Enclosure

cc: Firearms Licensing Center
Director, Industry Operations
Lexington II (IO) Field Office

FIREARMS INSPECTION REPORT

Name: Golden Nugget Pawn, LLC
Trade Name:

UI#: 775025-2016-0092
FFL#: 4-61-079-02-7D-04044

Address: 325 Stanford Street
Lancaster, KY 40444

1 - Introduction

Inspection Profile:

On October 21 2015, Senior Investigator (SI) (b)(6), and Industry Operations Investigator (IOI) (b)(6), conducted an unannounced Firearms Compliance Inspection (Type 02- Pawnbroker) of Golden Nugget Pawn, LLC based in Lancaster, KY. Present, and Identified, was Owner/Responsible Person (RP) Paul Rigsby (KY DL (b)(6)).

Business Profile:

Golden Nugget Pawn, LLC possesses an ATF issued Type 02, Pawnbroker license. The current business involves the pawn, and sale, of firearms obtained from various sources, such as (b)(4). There is currently a modest inventory obtained, of under 200 firearms. There are no gun shows or websites being utilized for firearms transactions. There are no other businesses being operated from the business premises. Also, the current license type is appropriate for business being conducted.

Ownership and Control:

Golden Nugget Pawn, LLC is operated by Owners, and Responsible Persons, Paul and Debbie Rigsby. There were no unreported changes of ownership, or hidden ownership, were found during the course of inspection.

Variance:

No need for a variance request was noted.

2 - Recommendation

Viols WL Only and Recall Inspection.

3 - Inspection History

The FFL has the following inspection history under license 4-61-04044.

Date and Type of Inspection: 12/17/2010, Qualification Inspection

UI#: 775025-2011-0066

Inspection Results:

Application Approved.

Cited Violations:

FIREARMS INSPECTION REPORT

Name: Golden Nugget Pawn, LLC
Trade Name:

UI#: 775025-2016-0092
FFL#: 4-61-079-02-7D-04044

N/A

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

A complete review of the Golden Nugget, LLC yielded the discovery of (b)(3) firearms, with dispositions not recorded within (7) days of the date of transfer. The entries found to be in violation were as follows (ROV 2, Worksheet 1):

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

Also revealed during the inspection, (b)(3) - 112 Public Law 55 125 Stat 552 firearm in the Acquisition and Disposition Record, was listed as an open disposition. (b)(3) - 112 Public Law 55 125 Stat 552 was not located in physical inventory, nor located on an ATF Form 4473. A Theft/Loss Report was submitted by RP Paul Rigby. The firearm was later correctly identified as being manufactured by (b)(3) - 112 Public Law 55 125 Stat 552 (ROV 2, Exhibit 3, Worksheet 1)

There were 129 firearms in inventory, with (b)(3) - 112 Public Law 55 125 Stat 552 open dispositions. There were (b)(4) acquisitions within the last 12 months, along with (b)(4) dispositions (Worksheet Informational Page). The A&D record itself was in the proper format and it contained all required information. Review of the A&D record revealed no issues of trafficking or obliterated and altered serial numbers.

5 - ATF Forms 4473 – NICS & Other Dispositions

When comparing the FFL Audit Log to ATF Forms 4473 on file, it became apparent that violations existed with the licensee's record keeping. Further investigation revealed that the licensee failed to retain seven ATF Form 4473's for a period of not less than 5 years after the date of the initial NICS inquiry. The licensee failed to retain (b)(3) P ATF Form 4473's in which the licensee contacted NICS and in each instance the NICS inquiry resulted in a Denial of the transaction. The (b)(3) P denied transactions that were missing from the licensee's records were as follows:

FIREARMS INSPECTION REPORT

Name: Golden Nugget Pawn, LLC
Trade Name:

UI#: 775025-2016-0092
FFL#: 4-61-079-02-7D-04044

Date	NTN	Transferee's name	Denial Date
(b)(3) - 112 Public Law 55 125 Stat 552, (b)(6)			

In addition, the licensee failed to retain a 4473 following a NICS check in which the transfer was Delayed by NICS. The FBI NICS Center noted that a NICS check that was conducted by the licensee on 11/10/14, NICS Transaction # 2R89-GV8, was changed from a Proceeded to a Delayed. The NICS Center attempted to call the FFL with a status change to Delay after he received a Proceed. The FFL advised the NICS Center that the buyer did not want to buy the firearm so the FFL tore up the 4473 even though it had a proceed status (ROV 1, Exhibit 2, Worksheet 2 (2012 Edition))

Also, during the course of inspection, there were (b)(3) ATF Forms 4473 reviewed, of those, there were (b)(3) found to contain the following violations.

- On (b)(3) instances, the licensee failed to complete section 24 (Buyers Signature). On (b)(3) instances, the licensee failed to complete section 25 (Recertification Date). On (b)(3) instances, the licensee failed to complete section 30a (Total Number of Firearms). There were an additional (b)(3) ATF 4473 Forms that contained only the 30a violation, but weren't referenced on Worksheet 2. On (b)(3) instances, the licensee failed to complete section 30b (Pawn Redemption). On (b)(3) instances, the licensee failed to complete section 35 (Transferor's/Seller's Title). On (b)(3) instances, the licensee failed to complete section 33 (Transferor's/Seller's Name). On (b)(3) instance, the licensee failed to complete section 31 (Trade/Corporate Name and Address of Transferor). On (b)(3) instance, the licensee failed to complete section 10a (Ethnicity). On (b)(3) instance, the licensee failed to complete section 18 (Type of Firearm(s) to be Transferred). Additionally, on (b)(3) instances, the licensee incorrectly completed section 22 (NFA NICS Exemption). (ROV 3, Exhibits 5, 10, 12, 14, 15, and Worksheet 2 (2012 Edition)).
- Also, on (b)(3) instances, the licensee failed to ensure correct completion of section 1 (Transferee's Full Name). On (b)(3) instance, the licensee failed to ensure correct completion of section 2 (Place of Birth). On (b)(3) instance, the licensee failed to ensure proper completion of section 13 (State of Residence). Lastly, on (b)(3) instances, the licensee failed to ensure completion of section 17 (Certification Date). (ROV 4, Exhibits 15, 12, 11, 10, 8, and Worksheet 2 (2012 Edition)).

FIREARMS INSPECTION REPORT

Name: Golden Nugget Pawn, LLC
Trade Name:

UI#: 775025-2016-0092
FFL#: 4-61-079-02-7D-04044

- On (b)(3) instances, the licensee failed to accurately complete section 20a (Identification Document. On (b)(3) form, dated 05/01/2015, 20a was left blank. On (b)(3) - 112 Public Law form, dated 02/28/2015, 20a was not recorded completely and accurately (ROV 5, Exhibits 14, 10, and Worksheet 2 (2012 Edition)).
- On (b)(3) instance, the licensee failed to complete section 21a (NICS Date). In (b)(3) instances, the licensee failed to complete section 21c (NICS Response). In (b)(3) instances, the licensee failed to complete section 21d (NICS Delayed Response). Lastly, in (b)(3) instances, the licensee failed to complete section 21e (Post Transfer NICS Information). (ROV 6, Exhibits 15, 13, 6, 5, 4, and Worksheet 2 (2012 Edition)).
- In (b)(3) instances, the licensee failed to complete section 34 (Transferor's/Seller's Signature). Also, in (b)(3) instances, the licensee failed to complete section 36 (Date Transferred). (ROV 7, Exhibits 12, 9, 7, 6, 5, and Worksheet 2 (2012 Edition)).

Lastly, in (b)(3) instance, on ATF Form 4473 dated 5/1/2015, a new NICS check was not conducted when transferring a firearm after the 30 calendar day window. The initial NICS check was conducted on 05/01/2015, and examination of the A&D Record revealed that the firearm was transferred on (b)(3) - 112 Public Law 55 125 S. (ROV 8, Exhibit 5, and Worksheet 2 (2012 Edition)).

6 – Multiple Sales

During the course of inspection, it was revealed that no multiple sales have been conducted by the licensee. The licensee stated that he strictly doesn't do multiple sale transactions as a business policy.

7 – Suspicious/Prohibited Purchasers

There were no suspicious/prohibited purchasers identified during the inspection process.

8 – Trace Activity

No traces were requested during the inspection period.

9 – NFA/Importer/Collector/Manufacturer

FIREARMS INSPECTION REPORT

Name: Golden Nugget Pawn, LLC
Trade Name:

UI#: 775025-2016-0092
FFL#: 4-61-079-02-7D-04044

The licensee is not an NFA dealer. Also, the licensee does not conduct business as an importer, collector, or manufacturer.

10 - Referrals

No referrals were made.

11 - Other

The licensee was found to be in compliance with the Youth Handgun Safety Act, and Secure Gun Storage/Safety Devices.

12 - Closing Actions

On November 25 2015 SI (b)(6), and IOI (b)(6), held a closing conference with RP/Owner Paul Rigsby. The RP was issued a Report of Violations, which was explained and signed by the RP. Regulatory requirements were reviewed with the licensee. Additionally, the Acknowledgement of Federal Firearms Regulations was explained and signed by RP Paul Rigsby.

13 - Violations

1. 27 CFR 478.129(b)

Nature of Violation

Licensee failed to retain seven ATF Form 4473's for a period of not less than 5 years after the date of the initial NICS inquiry. The licensee failed to retain (b)(6) ATF Form 4473's in which the licensee contacted NICS and in each instance the NICS inquiry resulted in a Denial of the transaction. The (b)(6) denied transactions that were missing from the licensee's records were as follow:

Date	NTN	Transferee's name	Denial Date
(b)(6)			

In addition, the licensee failed to retain a 4473 following a NICS check in which the transfer was Delayed by NICS. The FBI NICS Center noted that a NICS check that was conducted by the licensee on 11/10/14, NICS Transaction # 2R89-GV8, was changed from a Proceeded to a Delayed. The NICS Center attempted to call the FFL

FIREARMS INSPECTION REPORT

Name: Golden Nugget Pawn, LLC
Trade Name:

UI#: 775025-2016-0092
FFL#: 4-61-079-02-7D-04044

with a status change to Delay after he received a Proceed. The FFL advised the NICS Center that the buyer did not want to buy the firearm so the FFL tore up the 4473 even though it had a proceed status. FFL was not able to change the status on the 4473 and will not be able to accept the final status if/when it's given. He advised that's what he does when they do not wish to purchase.

Licensee's Response

Licensee stated that he did not remember or know that he was required to retain NICS Denial forms. Licensee stated that he would retain all forms as required in the future.

Corrective Action

Licensee was instructed to retain all ATF Form 4473's involving NICS Denials for a period of not less than 5 years as required by regulation. Licensee was also advised to retain all 4473's when the licensee initiates a NICS check for a proposed firearms transaction but the sale, delivery, or transfer of the firearm is not made.

2. 27 CFR 478.125(e)

Nature of Violation

Licensee failed to make required entries in the Record of Acquisitions and Dispositions as required. The following discrepancies were noted:

In (b)(3)-Pub instances, the licensee failed to record the disposition of a firearm in the Record of Acquisitions and Dispositions not later than 7 days following the date of such transfer. The firearms that had not been recorded as dispositions in the record were as follow:

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

In (b)(3)-Pub instance, the serial number for a firearm was incorrectly recorded in the Record of Acquisitions and Dispositions. The serial number for book entry (b)(3) Pub law 112-55 125 Stat. 552, was incorrectly recorded as (b)(3) Pub law 112-55 125 Stat. 552, when in fact the serial number on the firearm was shown as (b)(3) Pub law 112-55 125 Stat. 552.

FIREARMS INSPECTION REPORT

Name: Golden Nugget Pawn, LLC
Trade Name:

UI#: 775025-2016-0092
FFL#: 4-61-079-02-7D-04044

In (b)(3) Pub instance, (b)(3) Pub firearm in the Record of Acquisitions and Dispositions with no disposition recorded was not located during the physical inventory of firearms and was not found on an ATF Form 4473. The missing firearm was shown in the Record Of Acquisition and Dispositions as a (b)(3) Pub law 112-55 125 Stat. 552 (b)(3) Pub, book entry # (b)(3) Pub (b)(3) Pub law 112-55 125 Stat. 552 (b)(3) Pub Theft/Loss Report Branch).

Licensee's Response

Licensee stated that he was not aware that he had failed to make the required disposition entries for the five firearms that had been transferred and was also unaware that the one incorrect serial number had been recorded in the book. The licensee stated that he had not conducted a physical inventory of his firearms since obtaining his license and was unaware of the fact that one firearm was missing from his inventory.

Corrective Action

Licensee made immediate corrective action by recording the disposition information for the (b)(3) Pub firearms that had been previously transferred (book item numbers (b)(3) Pub law 112-55 125 Stat. 552 (b)(3) Pub) and also immediately corrected the serial number for book entry # (b)(3) Pub. The licensee also immediately submitted prepared and submitted ATF Form 3310.11, Federal Firearms Licensee Firearms Inventory Theft/Loss Report for (b)(3) Pub firearm missing from inventory.

3. 27 CFR 478.21(a)

Nature of Violation

Failure to ensure proper completion of ATF Forms 4473. On (b)(3) Pub forms, the licensee failed to properly complete ATF Forms 4473.

On (b)(3) Pub instances, the licensee failed to complete section 24 (Buyers Signature). On (b)(3) Pub instances, the licensee failed to complete section 25 (Recertification Date). On (b)(3) Pub instances, the licensee failed to complete section 30a (Total Number of Firearms). On (b)(3) Pub instances, the licensee failed to complete section 30b (Pawn Redemption). On (b)(3) Pub instances, the licensee failed to complete section 35 (Transferor's/Seller's Title). On (b)(3) Pub instances, the licensee failed to complete section 33 (Transferor's/Seller's Name). On (b)(3) Pub instance, the licensee failed to complete section 31 (Trade/Corporate Name and Address of Transferor). On (b)(3) Pub instance, the licensee failed to complete section 10a (Ethnicity). On (b)(3) Pub instance, the licensee failed to complete section 18 (Type of Firearm(s) to be Transferred). Additionally, on (b)(3) Pub instances, the licensee incorrectly completed section 22 (NFA NICS Exemption).

Licensee's Response

Licensee stated initially that any mistakes made were a result of not being instructed on

FIREARMS INSPECTION REPORT

Name: Golden Nugget Pawn, LLC
Trade Name:

UI#: 775025-2016-0092
FFL#: 4-61-079-02-7D-04044

the proper completion of ATF Form 4473.

Corrective Action

IOI (b)(6) specifically instructed the licensee on the correct completion of ATF Forms 4473. Licensee agreed to complete ATF Forms 4473 completely and accurately in the future.

4. **27 CFR 478.124(c)(1)**

Nature of Violation

Failure to ensure proper completion of ATF Forms 4473. On [REDACTED] forms, the licensee failed to properly complete ATF Form 4473.

On [REDACTED] instances, the licensee failed to ensure correct completion of section 1 (Transferee's Full Name). On [REDACTED] instance, the licensee failed to ensure correct completion of section 2 (Place of Birth). On [REDACTED] instance, the licensee failed to ensure proper completion of section 13 (State of Residence). Lastly, on [REDACTED] instances, the licensee failed to ensure completion of section 17 (Certification Date).

Licensee's Response

Licensee stated initially that any mistakes made were a result of not being instructed on the proper completion of ATF Form 4473.

Corrective Action

IOI (b)(6) specifically instructed the licensee on the correct completion of ATF Forms 4473. Licensee agreed to complete ATF Forms 4473 completely and accurately in the future.

5. **27 CFR 478.124(c)(3)(i)**

Nature of Violation

Failure to ensure proper completion of ATF Forms 4473. On [REDACTED] forms, the licensee failed to ensure proper completion of ATF Form 4473.

On [REDACTED] instances, the licensee failed to accurately complete section 20a (Identification Document). On [REDACTED] form, dated 05/01/2015, 20a was left blank. On [REDACTED] form, dated 02/28/2015, 20a was not recorded completely and accurately.

Licensee's Response

Licensee stated initially that any mistakes made were a result of not being instructed on the proper completion of ATF Form 4473.

Corrective Action

FIREARMS INSPECTION REPORT

Name: Golden Nugget Pawn, LLC
Trade Name:

UI#: 775025-2016-0092
FFL#: 4-61-079-02-7D-04044

IOI (b)(6) specifically instructed the licensee on the correct completion of ATF Forms 4473. Licensee agreed to complete ATF Forms 4473 completely and accurately in the future.

6. **27 CFR 478.124(c)(3)(iv)**

Nature of Violation

Failure to ensure proper completion of ATF Forms 4473. On (b)(6) forms, the licensee failed to ensure NICS information was completed properly and accurately.

On (b)(6) instance, the licensee failed to complete section 21a (NICS Date). In (b)(6) instances, the licensee failed to complete section 21c (NICS Response). In (b)(6) instances, the licensee failed to complete section 21d (NICS Delayed Response). Lastly, in (b)(6) instances, the licensee failed to complete section 21e (Post Transfer NICS Information).

Licensee's Response

Licensee stated initially that any mistakes made were a result of not being instructed on the proper completion of ATF Form 4473.

Corrective Action

IOI (b)(6) specifically instructed the licensee on the correct completion of ATF Forms 4473. Licensee agreed to complete ATF Forms 4473 completely and accurately in the future.

7. **27 CFR 478.124(c)(5)**

Nature of Violation

Failure to ensure proper completion of ATF Forms 4473. On (b)(6) forms, the licensee failed to accurately complete ATF Forms 4473.

In (b)(6) instances, the licensee failed to complete section 34 (Transferor's/Seller's Signature). Also, in (b)(6) instances, the licensee failed to complete section 36 (Date Transferred). Failure to ensure proper completion of ATF Forms 4473. On (b)(6) forms, the licensee failed to accurately complete ATF Forms 4473.

In (b)(6) instances, the licensee failed to complete section 34 (Transferor's/Seller's Signature). Also, in (b)(6) instances, the licensee failed to complete section 36 (Date Transferred).

Licensee's Response

Licensee stated initially that any mistakes made were a result of not being instructed on the proper completion of ATF Form 4473.

FIREARMS INSPECTION REPORT

Name: Golden Nugget Pawn, LLC
Trade Name:

UI#: 775025-2016-0092
FFL#: 4-61-079-02-7D-04044

Corrective Action

IOI (b)(6) specifically instructed the licensee on the correct completion of ATF Forms 4473. Licensee agreed to complete ATF Forms 4473 completely and accurately in the future.

8. 27 CFR 478.102(c)

Nature of Violation

Failure to ensure proper completion of ATF Forms 4473. On (b)(3) forms, the licensee failed to properly complete ATF Forms 4473.

On (b)(3) instances, the licensee failed to complete section 24 (Buyers Signature). On (b)(3) instances, the licensee failed to complete section 25 (Recertification Date). On (b)(3) instances, the licensee failed to complete section 30a (Total Number of Firearms). On (b)(3) instances, the licensee failed to complete section 30b (Pawn Redemption). On (b)(3) instances, the licensee failed to complete section 35 (Transferor's/Seller's Title). On (b)(3) instances, the licensee failed to complete section 33 (Transferor's/Seller's Name). On (b)(3) instance, the licensee failed to complete section 31 (Trade/Corporate Name and Address of Transferor). On (b)(3) instance, the licensee failed to complete section 10a (Ethnicity). On (b)(3) instance, the licensee failed to complete section 18 (Type of Firearm(s) to be Transferred). Additionally, on (b)(3) instances, the licensee incorrectly completed section 22 (NFA NICS Exemption).

Licensee's Response

Licensee stated initially that any mistakes made were a result of not being instructed on the proper completion of ATF Form 4473.

Corrective Action

IOI (b)(6) specifically instructed the licensee on the correct completion of ATF Forms 4473. Licensee agreed to complete ATF Forms 4473 completely and accurately in the future.

X

(b)(6)

Industry Operations Investigator

Index of Worksheets and Exhibits

FIREARMS INSPECTION REPORT

Name: Golden Nugget Pawn, LLC
Trade Name:

UI#: 775025-2016-0092
FFL#: 4-61-079-02-7D-04044

Worksheets

- **Informational Page**
- **WS1- Inventory and A&D Review Worksheet**
- **WS2- ATF Form 4473 (2008 Edition) Review Worksheet**
- **WS2- ATF Form 4473 (2012 Edition) Review Worksheet**
- **Statistical Page**

Exhibits

- **Ex1- Acknowledgement of Federal Firearms Regulations**
- **Ex2- NICS Audit Log**
- **Ex3- Theft/Loss Report**
- **Ex4- ATF Form 4473-** (b)(3) Pub law 112-55 125 Stat. 552
- **Ex5- ATF Form 4473/A&D Book Entry-** (b)(3) Pub law 112-55 125 Stat. 552
- **Ex6- ATF Form 4473-** (b)(3) Pub law 112-55 125 Stat. 552
- **Ex7- ATF Form 4473-**
- **Ex8- ATF Form 4473-**
- **Ex9- ATF Form 4473-**
- **Ex10- ATF Form 4473-** (b)(3) Pub law 112-55 125 Stat. 552
- **Ex11- ATF Form 4473-**
- **Ex12- ATF Form 4473-**
- **Ex13- ATF Form 4473-**
- **Ex14- ATF Form 4473-**
- **Ex15- ATF Form 4473-**