

## Assignment and Report

|   |   |
|---|---|
| 1. OPERATING NAME AND ADDRESS<br>(INCLUDE ZIP CODE AND COUNTY)<br><br>MODERN METAL FINISHING INC.<br>110 Willenbrock Rd.<br>Oxford, CT 06478, New Haven | 2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.)<br><p style="text-align: center;">762055-2016-0135-B1B</p> 3. PERMIT/LICENSE NUMBER    4a. TARGET DATE    4b. TARGET HOURS<br><p style="text-align: center;">606009076C00180                      9/30/2016                      40</p> 5. REQUESTED BY (SIGNATURE, TITLE AND DATE) |
|---|---|

6. ATF OFFICER(S) ASSIGNED

(b)(6) - Assigned Investigator  
 (b)(6) - Assigned Investigator  
 (b)(6) - Lead Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)

(b)(6), Area Supervisor, 12/08/2015

8. PURPOSE/SPECIAL INSTRUCTIONS

FMI.

| 9. INSPECTION RESULTS  |   | <input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC | 10. TRAVEL EXPENSES (OPTIONAL) |                     |
|------------------------|---|---|--------------------------------|---------------------|
| NO. OF VIOLATIONS      | 2 | NO. OF REFERRALS  |                                | 2111 - PER DIEM     |
| NO. OF TECS CHECKS     | 1 | NO. OF TECS HITS  |                                | 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: 03/21/2017  
 Licensee technically falls within the current guidelines for a Warning Conference based on the following violation:  
 •failing to properly mark firearms as a licensed manufacturer

However, it should be noted that the licensee is not the original manufacturer of the firearm frames and conducts secondary manufacturing activities as a sandblaster and coater of firearms for other manufacturers, including (b)(4) in the violation cited. (b)(3) frames were acquired from Charter Arms for anodizing that were serialized but did not have the Name of the Manufacturer, City or State stamped on the firearms. The licensee, after consultation with ATF immediately contacted Charter to have them return to pick up the firearms and have them properly marked. The licensee also immediately conducted a training program with his employees to teach them to examine the firearms upon receipt at the factory to make sure they are properly marked before they conduct work on the firearms.

Based on the above mitigating factors a Warning Letter and No Recall is recommended in lieu of the Warning Conference.  
 Violts WL ONLY and No Recall Inspection

| 12. TIME ACCOUNTING DATA                |        |                         |  |
|---|--------|-------------------------|--|
| ATF OFFICER'S NAME (MONTH, YEAR, HOURS) | (b)(6) |                         |  |
| FEB 2017                                | 10.00  |                         |  |
| ATF OFFICER'S SUBTOTAL                  | 10.00  | ATF OFFICER'S SIGNATURE |  |
| ATF OFFICER'S NAME (MONTH, YEAR, HOURS) | (b)(6) |                         |  |
| FEB 2017                                | 18.00  |                         |  |
| ATF OFFICER'S SUBTOTAL                  | 18.00  | ATF OFFICER'S SIGNATURE |  |
| ATF OFFICER'S NAME (MONTH, YEAR, HOURS) | (b)(6) |                         |  |
| FEB 2016                                | 20.00  |                         |  |
| FEB 2017                                | 81.00  |                         |  |
| MAR 2017                                | 42.00  |                         |  |

## Assignment and Report

|   |   |
|---|---|
| 1. OPERATING NAME AND ADDRESS<br>(INCLUDE ZIP CODE AND COUNTY)<br><br>MODERN METAL FINISHING INC.<br>110 Willenbrock Rd.<br>Oxford, CT 06478, New Haven | 2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.)<br><p style="text-align: center;">762055-2016-0135-B1B</p> 3. PERMIT/LICENSE NUMBER    4a. TARGET DATE    4b. TARGET HOURS<br><p style="text-align: center;">606009076C00180                      9/30/2016                      40</p> 5. REQUESTED BY (SIGNATURE, TITLE AND DATE) |
|---|---|

| 12. TIME ACCOUNTING DATA                |        |
|---|--------|
| ATF OFFICER'S NAME (MONTH, YEAR, HOURS) | (b)(6) |
| JUN 2017                                | 7.00   |
| ATF OFFICER'S SUBTOTAL                  | 150.00 |
| TOTAL HOURS                             | 178.00 |
| ATF OFFICER'S SIGNATURE                 |        |

### 13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Modern Metal Finishing Inc.  
 FMI, 6-06-00180  
 IOI T: (b)(6)  
 Final N-Force query 3/20/2017, no hits.

Forwarded to DIO for consideration of alternate recommendation from Warning Conference to Warning Letter, No Recall. Alternate recommendation approved by DIO 3/24/2017.

FMI Inspection completed, onsite end date 3/17/2017. Two violations cited, one of which warrants administrative action:

Current ATF guidelines warrant a Warning Conference based on the following violation:

27 CFR 478.92(a)(1)(ii) - Failure to properly mark firearms as a licensed manufacturer

However, it should be noted that the licensee is not the original manufacturer of the firearm frames and conducts secondary manufacturing activities as a sandblaster and coater of firearms for other manufacturers (b)(4). In the violation cited (b)(6) frames were acquired from Charter Arms for anodizing that were serialized but did not have the Name of the Manufacturer, City or State stamped on the firearms. The licensee, after consultation with ATF immediately contacted Charter to have them return to pick up the firearms and have them properly marked. The licensee also immediately conducted a training program with his employees to teach them to examine the firearms upon receipt at the factory to make sure they are properly marked before they conduct work on the firearms.

Based on the above mitigating factors a Warning Letter and No Recall is recommended in lieu of the Warning Conference.

Viols WL ONLY and No Recall Inspection

REVIEWED   
  CONCUR   
  SEE COMMENTS   
  FINAL DISPOSITION

|   |             |
|---|-------------|
| SIGNATURE AND TITLE   | REVIEW DATE |
| (b)(6) - Area Supervisor  | 03/24/2017  |
| Digitally signed by (b)(6)<br>Date: 2017.03.29 13:11:05 -04'00' |             |

REVIEW COMMENTS AND RECOMMENDATION

I agree with the recommendation.

Viols WL ONLY and No Recall Inspection

REVIEWED   
  CONCUR   
  SEE COMMENTS   
  FINAL DISPOSITION

|  |             |
|--|-------------|
| SIGNATURE AND TITLE                        | REVIEW DATE |
| KEHOUCHENS - Director, Industry Operations | 03/24/2017  |

ROUTING SEQUENCE AND DATE

1. \_\_\_\_\_  
 2. \_\_\_\_\_  
 3. \_\_\_\_\_  
 4. \_\_\_\_\_

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





U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

---

450 Main Street, Room 610  
Hartford, CT 06103

[www.atf.gov](http://www.atf.gov)

March 22, 2017

**CERTIFIED MAIL  
RETURN RECEIPT**

762055: (b)(6)  
5300

**WARNING LETTER**

Mr. Bruno Perin,  
President  
Modern Metal Finishing Inc.  
110 Willenbrock Road  
Oxford, CT 06478  
FFL# 6-06-009-07-9C-00180

Dear Mr. Perin:

During a recent compliance inspection at your firearms business covering the period of February 13, 2016, through February 13, 2017, 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 inspection is enclosed.

All violations were fully explained to you by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) 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 efforts to reduce violent crime and ensure the public's safety. It is essential that you comply with all Federal laws and regulations that govern your firearms business. 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 Area Supervisor (b)(6) at (860) 240-3400.

Sincerely yours,

(b)(6)

Area Supervisor

Enclosure

cc: National Licensing Center  
Hartford I/O Office

Report of Violations

Instructions

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

|   |                      |                                       |       |          |           |           |
|---|----------------------|---------------------------------------|-------|----------|-----------|-----------|
| Name of Proprietor                      | Street Address       | City                                  | State | ZIP Code | County    | Page 1 of |
| Modern Metal Finishing INC              | 110 Willenbrock Road | Oxford                                | CT    | 06478    | New Haven | 2 Pages   |
| License/Permit/Registry Number (if any) | Expiration Date      | Date(s) or Period of Inspection       |       |          |           |           |
| 6-06-009-07-9C-00180                    | 03/01/2016           | February 13, 2016 - February 13, 2017 |       |          |           |           |

Inspection Results


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

| Number | USC or CFR Citation    | Nature of Violation  | Corrective Action to be Taken (If not corrected immediately)  | Date Corrections to be Made (If not corrected immediately) |
|--------|------------------------|--|---|--|
| 1.     | 27 CFR 478.92(a)(1)(H) | <p>Firearm markings. The licensee, an ATF licensed Firearms Manufacturer, performed manufacturing activities on behalf of other manufacturers (blasting, anodizing, coating and/or plating services) and failed to mark the firearms with their Name of Manufacturer and City and State in approximately (b)(6) instances. Specifically, On February 14, 2017, the licensee was found in possession of (b)(6) revolver frames that were acquired from Charter Arms on February 7, 2017, that did not contain the required markings and/or the markings were not legible or deep enough (only a serial number was found on the firearms).</p> <p>Specifically, in (b)(6) of these instances the Name of the Manufacturer, City and State was not visible at all (Serial Numbers: (b)(3) 112 Public Law 55 125 STAT 552</p> <p>In (b)(6) of these instances the Name of the Manufacturer, City and State were only slightly visible and/or were not deep enough (Serial Number (b)(3) 112 Public Law 55 125 STAT 552 (b)(3) 112 Public Law 55 125 STAT 552). These firearms were stamped as manufactured by Frank Roth, Stratford, CT.</p> | <p>Licensee was reminded that as a licensed firearms manufacturer they must legibly engrave their company name and City &amp; State, and/or must abide by ATF Ruling 2009-5, which allows the licensee to adopt the markings of the original manufacture; provided they are marked in accordance with 27 CFR 478.92, and provided they abide by the conditions of this ruling; to include notification to ATF of their performing manufacturing activities on behalf of another licensed manufacturer.</p> <p>On February 15, 2017, the owner of Charter Arms (b)(3) 112 Public Law 55 125 STAT 552 was instructed to pick up the firearms and have them brought back to Frank Roth to have the proper markings engraved on the firearms. The licensee was also reminded that he may not transfer frames to anyone unless they contain all the required markings pursuant to 27 CFR 478.92(a)(2).</p> | Immediately  |

|                 |        |   |         |
|-----------------|--------|---|---------|
| I Have Received | (b)(6) | Signature (Proprietor's signature and title)  | Date    |
| Signature and   | (b)(6) | President 3/17/17 Modern Metal Finishing, Inc | 3/17/17 |
|                 |        | ATF IOI                                       | 3/17/17 |

Copy 1 - Proprietor's Copy

ATF E-Form 5030.3  
Revised April 2003

| SENDER: COMPLETE THIS SECTION  | COMPLETE THIS SECTION ON DELIVERY   |                     |
|--|---|---------------------|
| <ul style="list-style-type: none"> <li>■ Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul> | A. Signature <span style="float: right;"><input type="checkbox"/> Agent<br/><input type="checkbox"/> Addressee</span><br><b>X</b>   |                     |
| 1. Article Addressed to:<br><br><div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>Mr. Bruno Perin,<br/>Modern Metal Finishing Inc.<br/>110 Willenbrock Road<br/>Oxford, CT 06478</p> </div>  | B. Received by ( <i>Printed Name</i> )  | C. Date of Delivery |
| 2. Article Number<br>( <i>Transfer from service label</i> )  | D. Is delivery address different from item 1? <input type="checkbox"/> Yes<br>If YES, enter delivery address below: <input type="checkbox"/> No<br><br>   |                     |
| PS Form 3811, July 2013  | 3. Service Type<br><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Priority Mail Express™<br><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise<br><input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery<br><br>4. Restricted Delivery? ( <i>Extra Fee</i> ) <input type="checkbox"/> Yes |                     |
|  | 7012 3050 0000 6997 0429  |                     |
|  | Domestic Return Receipt   |                     |



**U.S. DEPARTMENT OF JUSTICE  
BUREAU OF ALCOHOL, TOBACCO, FIREARMS  
AND EXPLOSIVES**

OFFICIAL BUSINESS  
PENALTY FOR PRIVATE USE \$300



Mr. Bruno Perin,  
Modern Metal Finishing Inc.  
110 Willenbrock Road

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Bruno Perin,  
Modern Metal Finishing Inc.  
110 Willenbrock Road  
Oxford, CT 06478

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  Addressee  
**X**

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail®  Priority Mail Express™  
 Registered  Return Receipt for Merchandise  
 Insured Mail  Collect on Delivery

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number  
(Transfer from service label)

7012 3050 0000 6997 0429

PS Form 3811, July 2013

Domestic Return Receipt

**U.S. Postal Service™  
CERTIFIED MAIL™ RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

|   |        |
|---|--------|
| Postage   | \$ .46 |
| Certified Fee                                     |        |
| Return Receipt Fee<br>(Endorsement Required)      |        |
| Restricted Delivery Fee<br>(Endorsement Required) |        |
| Total Postage & Fees                              | \$     |

Postmark  
Here

Sent To **Mr. Bruno Perin,**  
**Modern Metal Finishing Inc.**  
Street, Apt. No., or PO Box No. **110 Willenbrock Road**  
City, State, ZIP+4 **Oxford, CT 06478**

PS Form 3800, August 2006

See Reverse for Instructions

7012 3050 0000 6997 0429  
7012 3050 0000 6997 0429