

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) LOCK, VIRGINIA T Lock's Phila. Gun Exchange 6700 ROWLAND AVE PHILADELPHIA, PA 19149, PHILADELPHIA		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 766020-2016-0365-B1B		
		3. PERMIT/LICENSE NUMBER 823101019M01580	4a. TARGET DATE 4/18/2017	4b. TARGET HOURS
		5. REQUESTED BY (SIGNATURE, TITLE AND DATE) 40.03196; 075.05342		
6. ATF OFFICER(S) ASSIGNED (b)(6) - Lead Investigator				
7. ASSIGNED BY (SIGNATURE, TITLE AND DATE) (b)(6) , Area Supervisor, 08/29/2016				
8. PURPOSE/SPECIAL INSTRUCTIONS CONDUCT DE COMPLIANCE INSPECTION UTILIZING GUIDELINES SET FORTH IN IO MANUAL IN CONJUNCTION WITH THEFT LOSS INVESTIGATION. LICENSEE IS A DEMAND LETTER RECIPIENT, PLEASE ENSURE THE APPROPRIATE PAPERWORK HAS BEEN SUBMITTED AS REQUIRED AND DOCUMENT SUCH IN THE REPORT.				
9. INSPECTION RESULTS <input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC				
NO. OF VIOLATIONS	2	NO. OF REFERRALS	8	2111 - PER DIEM
NO. OF TECS CHECKS	47	NO. OF TECS HITS	23	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: 04/18/2017 Violts WL ONLY and No Recall Inspection				
12. TIME ACCOUNTING DATA				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b)(6)				
NOV 2016 7.00				
DEC 2016 13.00				
JAN 2017 113.50				
FEB 2017 76.00				
MAR 2017 43.00				
APR 2017 26.00				
ATF OFFICER'S SUBTOTAL		278.50	ATF OFFICER'S SIGNATURE	
TOTAL HOURS		278.50		

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13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

As a result of a DE Compliance Inspection, a Report of Violations was issued for violation of 27 CFR 478.126a, repeat from 2011 and 2007, and 27 CFR 478.125(e), repeat from 2011 and 2000. The licensee has previously been subject of a DIO Led WC within the previous five years, 9/2012, and the current inspection reveals repeated similar violations but with significant improvement concerning the violation in which the WC was held. In the inspection which resulted in the DIO Led WC the licensee failed to report the multiple sale of handguns on (b)(3) occasions when required to report (b)(3) such multiple sales of handguns representing a 40.7% error rate. During the current inspection, the licensee failed to report the multiple sale of handguns on (b)(3) occasions when required to report (b)(3) such multiple sales of handguns representing a 3.5% error rate or over a 37% improvement rate. During the current inspection over 2900 ATF Forms 4473s were reviewed yielding no violations and in the inspection which resulted in a DIO Led WC there were (b)(3) errors cited after reviewing 1800 forms. A full inventory was conducted on approximately 2200 firearms and (b)(3) firearms were reported missing to the NTC which represented 1% of the inventory and .75% of the dispositions during the review period. None of the (b)(3) missing firearms were traced to crimes and were attributed to administrative errors. (b)(3) of the (b)(3) missing firearms were acquired within the last five years. It is to be noted that a concurrent Firearms Theft investigation took place during the compliance inspection as the FFL was burglarized (b)(3) times where (b)(3) handguns were stolen and a team of IOIs had to conduct several inventories. The licensee was associated with (b)(3) traces during the inspection period, is a demand letter recipient, and is timely reporting the demand letter data to the NTC. There were (b)(3) referrals of information forwarded to the CGIC concerning possible straw purchasers. The two violations cited if not repetitive warrant a WL to be issued. It has been over five years since the licensee was last cited for any violation including a multiple sales violation as well as an A & D violation. In view of the above it is recommended that a WL be issued with a recall inspection to ensure future compliance and accountability of the licensee's firearms inventory alternate to holding a WC.

Viols WL ONLY and Recall Inspection

☒ REVIEWED ☐ CONCUR ☒ SEE COMMENTS ☐ FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Area Supervisor	Digitally signed by (b)(6) (b)(6) Date: 2017.05.30 13:13:58 -04'00'	REVIEW DATE 04/18/2017
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REVIEW COMMENTS AND RECOMMENDATION

The compliance investigation disclosed two (2) repeat violations (i.e. (b)(3) unreported MSS, (b)(3) HGs and (b)(3) missing guns), which due to the compliance history of this licensee, per the AA policy subjects the license to revocation if willful. However, given the noticeable compliance improvement since the last administrative action in 2011, the missing guns being apparently attributed to clerical errors, and considering that the violations are negligible relative to the business volume, concur with the A/S's analysis and alternate recommendation of a WL with Recall in lieu of revocation.

Viols WL ONLY and Recall Inspection

☒ REVIEWED ☐ CONCUR ☒ SEE COMMENTS ☐ FINAL DISPOSITION

SIGNATURE AND TITLE JFORELLANA - Director, Industry Operations	REVIEW DATE 05/17/2017
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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 LOCK, VIRGINIA T	Street Address 6700 ROWLAND AVE	City PHILADELPHIA	State PA	Zip Code 19149-	County PHILADELPHIA	Page 1 of 1 Pages
License/Permit/Registry Number (If any) 823101019M01580		Expiration Date 12/1/2019	Date(s) or Period of Inspection 12/01/2016 through 03/09/2017			

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:

Licensee failed to record the disposition of (b)(3) 112 Public Law 55 125 STAT firearms in the Acquisition and Disposition (A & D) Record. There were (b)(3) 112 Public Law 55 125 STAT firearms with open entries in the A & D Record that were not present in physical 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)

Licensee completed and submitted an ATF Form 3310.11, Loss Report, for the missing firearms. In the future, licensee shall record timely the acquisition and disposition of firearms in the A & D Record.

Number: 2

Nature of Violation:

Licensee failed to complete and file Report of Multiple Sale or Other Disposition of Pistols and Revolvers, ATF Form 3310.4, in (b)(3) 112 Public instances.

Citation: 27 CFR 478.126a

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee immediately prepared the Multiple Handgun Sale Forms that were then forwarded to ATF. Licensee will ensure in the future that ATF Forms 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers, are completed and filed.

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

Virginia P. Lock

Date

03-09-17

Signature and Title of ATF Officer

(b)(6)

ATF
[Signature] DOJ

Date

3-9-2017



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Lansdale Area Office

www.atf.gov

766020: (b)(6)
5373
8-23-01580

May 30, 2017

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Virginia Lock
Lock's Phila. Gun Exchange
6700 Rowland Avenue
Philadelphia, Pa 19149
FFL 8-23-101-01-9M-01580

Dear Mrs. Lock:

During a recent compliance inspection at your firearms business covering the period of December 1, 2016, through March 9, 2017, you were cited for two (2) violations: 27 CFR 478.125(e) REPEAT, and 27 CFR 478.126a REPEAT. These violations were discussed with you during the inspection.

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 were advised to review your ATF Forms 4473s more vigilantly to ensure that you report all multiple sales of handguns on ATF F 3310.11 as required. You were also advised to account for your firearms inventory more efficiently as (b)(3) 112 Public Law 55 125 STAT 552 (b)(6) firearms were reported missing as a result of the compliance inspection. You further indicated that corrective actions would be taken to eliminate future violations relative to these issues.

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 **imperative** that you account for your firearms inventory efficiently and that you report all multiple sales of handguns on ATF F 3310.11 as required as both of these business practices have a direct impact on public safety and should be taken very seriously. **Furthermore both of the violations cited were repetitive from the past inspections and you attended Warning Conferences and received Warning Letters in 2012, 2007, 2003, and 2000 for similar repetitive violations.**

Virginia Lock
Lock's Phila. Gun Exchange

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 me, or an Industry Operations Investigator at the Lansdale Area Office at (215) 362-1840.

Sincerely yours

(b)(6)

Area Supervisor

Enclosure

cc: Federal Firearms Licensing Center