

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Bryan, Joseph Thomas Superior Ordnance 1114 Gahanna Parkway Gahanna, OH 43230, Franklin	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 773015-2016-0399-B1B			
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">3. PERMIT/LICENSE NUMBER 431049078H05289</td> <td style="width: 33%;">4a. TARGET DATE 9/30/2016</td> <td style="width: 33%;">4b. TARGET HOURS</td> </tr> </table>	3. PERMIT/LICENSE NUMBER 431049078H05289	4a. TARGET DATE 9/30/2016	4b. TARGET HOURS
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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, 03/23/2016

8. PURPOSE/SPECIAL INSTRUCTIONS
 Conduct full manufacturer of firearms inspection. Refer to IO Manual Chapter C - Firearms Inspections and FY 16 Domain Assessment. Ensure licensee has filed all AFMERs, if any are missing obtain them during inspection. Conduct 100% inventory and ATF Form 4473 review unless authorized in advanced by Area Supervisor and DIO.

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	7	NO. OF REFERRALS		2111 - PER DIEM	
NO. OF TECS CHECKS		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: 03/29/2016
 ALTERNATE RECOMMENDATION. IO **(b)(6)** disclosed seven (7) violations, all dealing with the acquisition and disposition (A&D) record and ATF Forms 4473. Though percentages would indicate a warning conference is recommended, a warning letter is recommended for the following reasons:

1. This is FFL's first inspection, and FFL has not even been issued for 12 months;
2. Licensee has only had **(b)(5) 112 PUBLIC** ATF Forms 4473;
3. Nearly all firearms in inventory are restricted for transfers to non-licensees (post-1986 machine guns) so little business has actually been conducted;
4. All errors were immediately rectified.

For these reasons, IO **(b)(6)** recommends a warning letter simply be issued. Since FFL holds both Type 07 and 08 FFLs, inspections will be conducted regularly.

Viols WL ONLY and No Recall Inspection

12. TIME ACCOUNTING DATA			
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b)(6)	
MAR 2016	7.00		
ATF OFFICER'S SUBTOTAL	7.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS	7.00		

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5. REQUESTED BY (SIGNATURE, TITLE AND DATE)				

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Agree with IOIs recommendation of Alternate from Warning Conference to Warning Letter and No Recall based on following:

Seven violations were disclosed, all dealing with the acquisition and disposition (A&D) record and ATF Forms 4473. Though percentages would indicate a warning conference is recommended, a warning letter is recommended for the following reasons:

This is FFL's first inspection, and FFL has not even been issued for 12 months; Licensee has only had three (3) ATF Forms 4473; Nearly all firearms in inventory are restricted for transfers to non licensees (post 1986 machine guns) so little business has actually been conducted; All errors were immediately rectified.

Since FFL holds both Type 07 and 08 FFLs, inspections will be conducted regularly.

Viols WL ONLY and Recall Inspection

REVIEWED
 CONCUR
 SEE COMMENTS
 FINAL DISPOSITION

SIGNATURE AND TITLE (b)(6) - Area Supervisor	REVIEW DATE 03/30/2016
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REVIEW COMMENTS AND RECOMMENDATION

Viols WL ONLY and Recall Inspection

REVIEWED
 CONCUR
 SEE COMMENTS
 FINAL DISPOSITION

SIGNATURE AND TITLE JALEDoux - Director Industry Operations	REVIEW DATE 03/31/2016
----------------------------------------------------------------	---------------------------

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 Bryan, Joseph Thomas Superior Ordnance	Street Address 1114 Gahanna Parkway	City Gahanna	State OH	Zip Code 43230-	County Franklin	Page 1 of 4 Pages
License/Permit/Registry Number <i>(If any)</i> 431049078H05289		Expiration Date 8/1/2018	Date(s) or Period of Inspection 03/28/2016 through 03/28/2016			

Inspection Results

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

Number: 1

Nature of Violation:

Failure to ensure (b)(3) 112 PubL ATF Form 4473 was accurately completed. Specifically, licensee failed to ensure the non-licensee filling out Section A of ATF Form 4473 was the actual transferee. (b)(3) 112 Public Law 55 125 STAT 552 .

Citation: 27 CFR 478.21(a)

Date Corrections to be Made:
(If not corrected immediately)

Corrective Action to be Taken: Licensee shall ensure ATF Forms 4473 are completed as prescribed by regulation and by form instructions. Licensee shall not transfer firearms to any transferee that indicates he/she is not the actual buyer of the firearm, as indicated on Section A, Item 11a of the ATF Form 4473.

Number: 3

Nature of Violation:

Failure to accurately record identification document (ID) information in Section B of ATF Form 4473 on (b)(3) 112 PubL forms. Specifically, (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: Licensee shall ensure a valid identification document is obtained and recorded properly on ATF Form 4473 in Section B. If address on primary identification does not match address, supplemental government-issued identification is required and must be recorded in Item 20b.

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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: 4

Nature of Violation:

Failure to record NICS information in Section B of ATF Form 4473 on (b)(3) 112 PHS forms. Specifically, licensee failed to:

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

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

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee shall ensure that for all transactions with non-licensees NICS will be contacted prior to making the transfer and all NICS information is recorded properly on ATF Form 4473.

Number: 5

Nature of Violation:

Failure to maintain an accurate acquisition record with regard to (b)(3) 112 PHS firearm. Specifically, licensee failed to ensure a firearm that was in inventory was accurately reflected as such.

Citation: 27 CFR 478.123(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee shall fix acquisition record. All acquisitions must be recorded within seven (7) days of acquisition and be accurate.

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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: 6

Nature of Violation:

Failure to maintain an accurate disposition record to other licensees with regard to firearm (b)(3) 112 Public Law 55 125 STAT 552

Citation: 27 CFR 478.123(b)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee shall enter disposition. All dispositions must be recorded within seven (7) days of acquisition and be accurate.

Number: 7

Nature of Violation:

Failure to maintain an accurate disposition record to non-licensees with regard to firearm (b)(3) 112 Public Law 55 125 STAT 552

Citation: 27 CFR 478.123(d)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee shall enter disposition. All dispositions must be recorded within seven (7) days of acquisition and be accurate.

Report of Violations

Instructions

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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 ensure transferee completed Section A of ATF Form 4473 properly on  forms.
Specifically, licensee failed to ensure transferee answered Item 11d on  form.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Prior to making an over-the-counter transfer of a firearm to a non-licensee, the licensee shall every time thoroughly review an ATF Form 4473 to ensure transferee has completed the form correctly. The individual in this violation who did not answer question 11d was investigated and determined not to be prohibited.

Citation: 27 CFR 478.124(c)(1)

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

550 Main Street, Room 8-507
Cincinnati, OH 45202

773015: (b)(6)
5373

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Joseph Thomas Bryan
Superior Ordnance
1114 Gahanna Parkway
Gahanna, OH 43230

4-31-049-07-8H-05289

Dear Mr. Bryan:

During a recent compliance inspection at your firearms business covering the period of June 17, 2015, through March 28, 2016, you were cited for violations of 27 Code of Federal Regulations, Part 478. A copy of the Report of Violations, Form 5030.5, issued at the time of the inspection is enclosed.

All violations were fully explained to you by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) 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.

Joseph Thomas Bryan

Should you have any questions regarding this matter, please contact Investigator (b)(6) (b)(6).

Sincerely,

(b)(6)
Area Supervisor

Enclosure

cc: National Licensing Center
Cincinnati II (IO) Field Office
Correspondence File