

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Wild Goose Sports Inc 1117 North Broadway Rochester, MN 55906, Olmstead	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) <p style="text-align: center;">778035-2015-0104-B1B</p> 3. PERMIT/LICENSE NUMBER 4a. TARGET DATE 4b. TARGET HOURS <p style="text-align: center;">341109017E13648</p> 5. REQUESTED BY (SIGNATURE, TITLE AND DATE)
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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, 12/07/2015

8. PURPOSE/SPECIAL INSTRUCTIONS

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC	10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	10	NO. OF REFERRALS	2	2111 - PER DIEM
NO. OF TECS CHECKS	15	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: 07/21/2016

Viols and Revocation / Denial of Renewal App

12. TIME ACCOUNTING DATA		
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b) (6)	
JAN 2016	8.00	
ATF OFFICER'S SUBTOTAL	8.00	ATF OFFICER'S SIGNATURE
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b) (6)	
JAN 2016	18.00	
ATF OFFICER'S SUBTOTAL	18.00	ATF OFFICER'S SIGNATURE
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b) (6)	
JAN 2016	18.50	
FEB 2016	46.00	
MAR 2016	31.50	
APR 2016	7.00	
SEP 2016	8.00	
ATF OFFICER'S SUBTOTAL	111.00	ATF OFFICER'S SIGNATURE
TOTAL HOURS	137.00	

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Wild Goose Sports Inc 1117 North Broadway Rochester, MN 55906, Olmstead	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) <p style="text-align: center;">778035-2015-0104-B1B</p> 3. PERMIT/LICENSE NUMBER 4a. TARGET DATE 4b. TARGET HOURS <p style="text-align: center;">341109017E13648</p> 5. REQUESTED BY (SIGNATURE, TITLE AND DATE)
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13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

I concur with the Investigator's recommendation of Revocation based on the preponderance of repeat violations cited over multiple past inspections, the fact that a ATF F 4473 was falsified in an attempt to deceive the Investigator with regard to reconciliation of firearms unaccounted for, and the fact that the licensee has had two WC's and a WL issued over the past ten years.

Viols and Revocation / Denial of Renewal App

REVIEWED
 CONCUR
 SEE COMMENTS
 FINAL DISPOSITION

SIGNATURE AND TITLE (b) (6) Area Supervisor	REVIEW DATE 05/17/2016
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REVIEW COMMENTS AND RECOMMENDATION

The inspection disclosed numerous violations, including (among others) failure to timely or accurately record the receipt and/or disposition of a firearms **(b) (3) - Public Law 112-55 (125 Stat. 552)**, failure to properly execute ATF Forms 4473 and conduct background checks, and altering an ATF Form 4473 and falsely documenting in the A&D record the transfer of four firearms (returned to consignee). Consideration is warranted for revocation based on the facts surrounding a particular transaction **(b) (3)** firearms and the subsequent actions of the licensee and his employees (falsification of a 4473 and the A&D record for the return of these firearms to a consignee). However potentially insufficient evidence supporting these violations warrants the DIO Warning Conference.

Viols DIO (or Delegate) Held WC ILO Revocation

REVIEWED
 CONCUR
 SEE COMMENTS
 FINAL DISPOSITION

SIGNATURE AND TITLE HCHUMMEL - Director, Industry Operations	REVIEW DATE 08/30/2016
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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 Wild Goose Sports Inc	Street Address 1117 North Broadway	City Rochester	State MN	Zip Code 55906-	County Olmstead	Page 1 of 5 Pages
License/Permit/Registry Number <i>(If any)</i> 341109017E13648		Expiration Date 5/1/2017	Date(s) or Period of Inspection 01/26/2016 through 04/01/2016			

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 business was conducted at licensed premise, an instate gun show, or a qualifying event.

-There was one transfer of two firearms to a Federal Firearms Licensee at an out of state gun show.

Citation: 27 CFR 478.50

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Licensee will ensure that transfers of firearms occur at the licensed premise, an instate gun show, or another qualifying event.

Number: 2

Nature of Violation:

Failure to contact NICS and wait the stipulated time prior to the transfer of a firearm or initiate a new NICS check after 30 days.

- There were 2 instances where the licensee did not conduct a NICS check prior to the transfer of a firearm

- There was 1 instance where the licensee transferred a firearm after a NICS check had expired.

Citation: 27 CFR 478.102(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee will ensure that a NICS check is completed prior to the transfer of a firearm and that a new NICS check is performed for all transfers over 30 days old.

Report of Violations

Instructions

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Name of Proprietor Wild Goose Sports Inc	Street Address 1117 North Broadway	City Rochester	State MN	Zip Code 55906-	County Olmstead	Page 2 of 5 Pages
License/Permit/Registry Number <i>(If any)</i> 341109017E13648		Expiration Date 5/1/2017	Date(s) or Period of Inspection 01/26/2016 through 04/01/2016			

Inspection Results

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 accurately record information in the A&D Record instances.

- (b)(3) - Public instance where a firearm was transferred with no acquisition or disposition on the A&D Record
- (b)(3) - Public instances where acquisition was not recorded prior to inspection or recorded as logged out in inventory
- (b)(3) - Public instances where disposition information was recorded but not timely and/or correctly
- (b)(3) - Public instances where there was a failure to enter disposition information for a firearm or it was a duplicate entry
- (b)(3) - Public Law 112 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 will ensure all firearm acquisitions and dispositions are recorded accurately and timely in the A&D Record.

Number: 4

Nature of Violation:

Failure to obtain a properly completed ATF Form 4473.

- There were (b)(3) - Public Law with errors on questions 11d, 11e, 11k, 11l, and/or 17.

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)

The licensee will ensure that a properly completed ATF Form 4473 is completed prior to the purchase of a firearm and that the ATF Form 4473 is completed prior to the NICS check.

Report of Violations

Instructions

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Name of Proprietor Wild Goose Sports Inc	Street Address 1117 North Broadway	City Rochester	State MN	Zip Code 55906-	County Olmstead	Page 3 of 5 Pages
License/Permit/Registry Number <i>(If any)</i> 341109017E13648		Expiration Date 5/1/2017	Date(s) or Period of Inspection 01/26/2016 through 04/01/2016			

Inspection Results

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

Number: 5

Nature of Violation:

Failure to properly record NICS transaction information on the ATF Form 4473.

- There ^{(b)(7)(F) - Public Law} forms where question 21a was incorrect.

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)

The licensee will ensure that NICS information is properly documented prior to the transfer of a firearm.

Number: 6

Nature of Violation:

Failure by licensee to date the ATF Form 4473.

- Ther ^{(b)(7)(F) - Public Law} forms where question 36 was incorrect.

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)

The licensee will ensure that the ATF Form 4473 is properly completed prior to the transfer of a firearm.

Report of Violations

Instructions

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Name of Proprietor Wild Goose Sports Inc	Street Address 1117 North Broadway	City Rochester	State MN	Zip Code 55906-	County Olmstead	Page 4 of 5 Pages
License/Permit/Registry Number (If any) 341109017E13648	Expiration Date 5/1/2017	Date(s) or Period of Inspection 01/26/2016 through 04/01/2016				

Inspection Results

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

Number: 7

Nature of Violation:

Failure to complete and/or timely submit the Report of Multiple Sale or Other Disposition of Pistols and Revolvers, ATF 3310.4.

- There [redacted] instance where the ATF F3310.4 was not submitted
- There [redacted] instance where the ATF F3310.4 was not timely submitted

Citation: 27 CFR 478.126a

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Ensure that the ATF F3310.4 is properly and timely submitted when it is required.

Number: 8

Nature of Violation:

Failure to complete forms as indicated in instructions.

- There [redacted] with errors on question 11a

Citation: 27 CFR 478.21(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee will ensure the ATF Form 4473 is properly completed prior to the transfer of a firearm.

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 Wild Goose Sports Inc	Street Address 1117 North Broadway	City Rochester	State MN	Zip Code 55906-	County Olmstead	Page 5 of 5 Pages
License/Permit/Registry Number (If any) 341109017E13648	Expiration Date 5/1/2017	Date(s) or Period of Inspection 01/26/2016 through 04/01/2016				

Inspection Results

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

Number: 9

Nature of Violation:

Failure to have ATF Form 4473 completed prior to disposition of firearm.

- There was 1 instance where an ATF Form 4473 was not completed for the return of four consigned firearms
- There was 1 instance where an ATF Form 4473 was not completed for the return of a Thompson Center Encore rifle

Citation: 27 CFR 478.124(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken: The licensee will ensure that an ATF Form is completed prior to the transfer of a firearm.
(If not corrected immediately)

Number: 10

Nature of Violation:

Failure by licensee when he knowingly allowed his employees to alter an ATF Form 4473 to indicate four additional firearms were transferred on a particular transaction. Licensee also falsely documented the transfer of the additional four firearms incorrectly in his Acquisition and Disposition Record.

- There were [REDACTED] firearms added to an existing ATF F4473 that was then presented to IOI (b) (7) to prove that a proper disposition of firearms had occurred.

Citation: 27 CFR 478.128(c)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken: The licensee will ensure no other firearms are added to an ATF F4473 after a transaction has been completed.
(If not corrected immediately)

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



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

30 East Seventh Street, Suite 1900
St. Paul MN 55101

www.atf.gov

778035:KLM
5300

September 20, 2016

Wild Goose Sports, Inc.
ATTN: Mr. Ralph Hettig
1117 N. Broadway
Rochester, MN 55906

FFL# 3-41-109-01-7E-13648

Dear Mr. Hettig:

During a compliance inspection at your firearms business conducted January – April 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.

You should be aware that any willful violations of the Gun Control Act may result in revocation of your Federal firearms license. As a result of the recently cited violations, it is important that we have a meeting with you to discuss the violations found. The conference will be held on Tuesday, September 27, 2016 at 10:00 a.m. at 30 East 7th Street, St. Paul MN 55101. The agenda for the meeting will include a discussion of the reasons for the violations, a review of the legal requirements, and a discussion of steps to be taken by you to ensure future compliance. Although we do not believe it necessary, legal counsel may assist you at your own expense if you so choose. Please bring with you a written compliance plan outlining the changes and internal controls that you have implemented (will be implementing) to ensure future compliance.

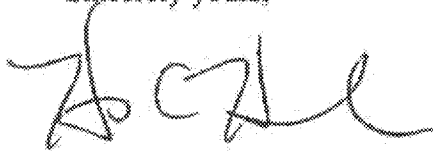
The records you are required to maintain and the business operations you conduct are important to law enforcement in our continuing efforts to reduce violent crime and protect the public. It is essential that you comply with all Federal laws and regulations that govern your firearms business to aid in this effort to combat violent crime.

We will conduct a follow-up inspection in the future. Any violations, either repeat or otherwise, could be viewed as willful and may result in the revocation of your license.

Wild Goose Sports, Inc.
Mr. Ralph Hettig
3-41-13648
Page 2

When you arrive at the building, Senior Operations Officer (b) (6) will meet you in the atrium on the first floor of the building. Please contact (b) (6) at (b) (6) if you have any questions. We look forward to meeting with you to resolve these issues.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'H. Hummel', written in a cursive style.

Hans Hummel
Director, Industry Operations

Enclosure

cc: Area Supervisor

UI: 778035-2015-0104-B1B

Amended ROV

Report of Violations

Instructions

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Name of Proprietor Wild Goose Sports Inc.	Street Address 8117 North Broadway	City Rochester	State MN	Zip Code 55906	County Olmsted	Page 1 of 6 Pages
License/Permit/Registry Number (If any) 34199017813648		Expiration Date 5/1/2013	Date(s) or Period of Inspection 01/26/2010 through 02/23/2010			

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 business was conducted at licensed premises, on license gun show, or a qualifying event.
 - There was one transfer of two firearms to a Federal Firearms Licensee at an out of state gun show.
 Citation: 27 CFR 478.108(a)(1)

Date Correction to be Made: If not corrected immediately
 Corrective Action to be Taken: Licensee will ensure that transfers of firearms occur at the licensed premises, an in-state gun show, or another qualifying event.

Number: 2
 Nature of Violation: Failure to ensure NICS and was not completed time prior to the transfer of a firearm to initiate new NICS check after 30 days.
 - There were 2 instances where the licensee did not initiate a NICS check prior to the transfer of a firearm.
 - There was 1 instance where the licensee completed a firearm after a NICS check had expired.
 Citation: 27 CFR 478.102(a)

Date Correction to be Made: If not corrected immediately
 Corrective Action to be Taken: The licensee will ensure that a NICS check is completed prior to the transfer of a firearm and that a new NICS check is performed for all transfers over 30 days old.

Report of Violations

Instructions

Please write clearly 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 Wild Goose Sports Inc.	Street Address 8117 North Broadway	City Rochester	State MN	Zip Code 55906	County Olmsted	Page 2 of 6 Pages
License/Permit/Registry Number (If any) 34199017813648		Expiration Date 5/1/2013	Date(s) or Period of Inspection 01/26/2010 through 02/23/2010			

Inspection Results

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 accurately record information in the A&D Record.
 - [redacted] instances where a firearm was transferred with no acquisition or disposition on the A&D Record.
 - [redacted] instances where acquisition was not recorded prior to inspection or recorded as legal gun sale to inventory.
 - [redacted] instances where disposition information was recorded as non-legal gun sale or inventory.
 - [redacted] instances where there was a failure to cross disposition information for a firearm or it was a [redacted] missing from inventory.
 Citation: 27 CFR 478.133(c)

Date Correction to be Made: If not corrected immediately
 Corrective Action to be Taken: The licensee will ensure all firearm acquisition and disposition are recorded accurately and timely in the A&D Record.

Number: 4
 Nature of Violation: Failure to obtain a properly completed ATF Form 4473.
 - There [redacted] items with errors on questions 10a, 10b, 10c, 11, and/or 12.
 Citation: 27 CFR 478.133(c)

Date Correction to be Made: If not corrected immediately
 Corrective Action to be Taken: The licensee will ensure that a properly completed ATF Form 4473 is completed prior to the purchase of a firearm and that the 4473 Form 4473 is completed prior to the NICS event.

Report of Violations

Instructions

Please write clearly with a ball point pen when completing this form. ATF officers will prepare this form in duplicate. 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 Wind Gunns Sports Inc	Street Address 1117 North Broadway	City Rockstar	State AZ	Zip Code 85986	County Chandler	Page 2 of 6 Pages
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License/Permit/Registry Number (if any) 34100019011048	Expiration Date 3/1/2017	Date(s) or Period of Inspection 01/26/2016 through 02/23/2016
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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:

Citation: 27 CFR 478.124(a)(3)

Number: 1

Nature of Violation:

Failure to properly record NICS transaction information on the ATF Form 4473.

- There were 10 items where question 2(a) was answered.

Citation: 27 CFR 478.124(a)(3)(v)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee will ensure that NICS information is properly documented prior to the transfer of a firearm.

Number: 2

Nature of Violation:

Failure to instruct to use the ATF Form 4473

- There were 10 items where question 3c was answered.

Citation: 27 CFR 478.124(a)(3)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee will ensure that the ATF Form 4473 is properly completed prior to the transfer of a firearm.

Report of Violations

Instructions

Please write clearly with a ball point pen when completing this form. ATF officers will prepare this form in duplicate. 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 Wind Gunns Sports Inc	Street Address 1117 North Broadway	City Rockstar	State AZ	Zip Code 85986	County Chandler	Page 4 of 6 Pages
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License/Permit/Registry Number (if any) 34100019011048	Expiration Date 3/1/2017	Date(s) or Period of Inspection 01/26/2016 through 02/23/2016
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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: 1

Nature of Violation:

Failure to complete and/or timely submit the Report of Multiple Sale or Other Disposition of Firearms and Accessories, ATF Form 4473.

- There were 10 instances where the ATF Form 4473 was not submitted

- There were 10 instances where the ATF Form 4473 was not timely submitted

Citation: 27 CFR 478.126a

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

Ensure that the ATF Form 4473 is properly and timely submitted when it is required.

Number: 2

Nature of Violation:

Failure to complete forms as indicated in instructions.

- There were 10 items with errors on question 1(a)

Citation: 27 CFR 478.124

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

The licensee will ensure the ATF Form 4473 is properly completed prior to the transfer of a firearm.

Report of Violations

Instructions

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Name of Proprietor Wild Game Sports Inc.	Street Address 1117 North Broadway	City Rockport	State MD	Zip Code 21986-	County Chesapeake	Page 3 of 3 Pages
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License/Permit/Territory Number (if any) 341109017013648	Expiration Date 01/29/17	Inspection Period of Inspection 01/29/2016 through 02/25/2016
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Inspection Results

As a consequence of your presence, records and equipment has disclosed the following violations which have been explained to you:

Number: 8

Nature of Violation:

- Failure to have ATF Form 4473 completed prior to disposition of firearms.
- There was 1 instance where an ATF Form 4473 was not completed for the count of four registered firearms.
- There was 1 instance where an ATF Form 4473 was not completed for the count of a Thompson Center Game rifle.

Citation: 27 CFR 478.124(a)

Date Corrections to be Made

(If not corrected immediately)

Corrective Action to be Taken: The licensee will ensure that an ATF Form is completed prior to the transfer of a firearm.
(If not corrected immediately)

Number: 10

Nature of Violation:

- Failure by licensee when he knowingly allowed his employees to alter an ATF Form 4473 or indicate four additional firearms were transferred on a particular transaction. Licensee also failed to document the transfer of the additional four firearms accurately in his Acquisition and Disposition Method.

- There were four additional firearms added to an existing ATF 4473 that was then presented to (b) (6) - prior that a proper disposition of firearm had occurred.

Date Corrections to be Made

(If not corrected immediately)

Corrective Action to be Taken: The licensee will ensure no other firearms are added to an ATF 4473 after a transaction has been completed.
(If not corrected immediately)

Report of Violations

Instructions

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Name of Proprietor Wild Game Sports Inc.	Street Address 1117 North Broadway	City Rockport	State MD	Zip Code 21986-	County Chesapeake	Page 6 of 6 Pages
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License/Permit/Territory Number (if any) 341109017013648	Expiration Date 01/29/17	Inspection Period of Inspection 01/29/2016 through 01/23/2016
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Inspection Results

As a consequence of your presence, records and equipment has disclosed the following violations which have been explained to you:

Citation: 27 CFR 478.124(a)

I have reviewed a Copy of this Report of Violation. (Proprietor's signature and title)

Signature and Title of ATF Officer

(b) (6)

101

Date: 4/01/16
Time: 4:01 PM



www.atf.gov

September 28, 2016

Wild Goose Sports Inc.
Attn: Ralph Hettig
1117 North Broadway
Rochester, MN 55906

FFL#3-41-109-01-7E-13648
U.I.# 778035-2015-0104-B1B

Dear Mr. Hettig:

This letter is a follow-up to the warning conference held with you on September 27, 2016 at 30 East Seventh Street, St. Paul, Minnesota. During this conference, the violations cited during the inspection conducted in January 2016 and the necessary corrective action to prevent the violations from reoccurring were discussed with you by Director, Industry Operations Hans Hummel, Area Supervisor (b) (6), and Industry Operations Investigator (b) (6) (b) (6).

You were given the opportunity to comment on the violations and what specific action you have taken to ensure that the violations will not reoccur. A copy of the Report of Violations is attached and the following are your responses to the violations.

Violation 1 referenced violations for conducting business at an out of state gun show. You referenced an unnamed court case where a judge had ruled that as long as prior arrangement was made for the purchase of the firearm, it could be transferred at an out of state gun show. Director, Industry Operations Hans Hummel explained that although there may be circumstances that would allow delivery of a firearm away from the licensed business premises, that firearms business is to be conducted at the location on the license or at an in-state gun show pursuant to the provisions of 478.100. Please see Question and Answer G20 (page 204) in the ATF Federal Firearms Regulation Reference Guide (ATF Publication 5300.4 Revised September 2014) for more specific guidance. You stated that you were only interested in conducting business that was completely in compliance and that you would not deliver firearms to FFL's at out of state gun shows.

Violation 2 referenced violations for a failure to contact NICS and wait the stipulated time prior to the transfer of a firearm or initiate a new NICS check after 30 days. You stated that you keep "Delays" in a separate file until you receive a "Proceed". You also stated that you and your other four employees will do the NICS check at the time of pickup. You also referenced the T/C Encore firearm and your mistaken belief that it was an unregulated firearm. You stated that you won't make that mistake again.

Wild Goose Sports, Inc.

Violations 3 referenced violations for failure to accurately record information in the A&D Record. The violations included missing firearms firearm that was transferred with no acquisition or disposition information. Regarding the missing firearms, you stated that you don't believe that they were stolen from your shop. You believe it more likely that they were transferred to other FFLs and that you or your employees neglected to record the information for the transfer on the copy of the transferee's FFL which you obtained. You stated that sometimes you get busy or distracted and forget to write down the firearm information. Area Supervisor (b) (6) suggested that you write the firearm information on an ATF Form 4473 and attach the transferee's FFL to the ATF Form 4473. You stated that was a good idea as it made it easier for (b) (6) to log the firearm out with the other transfers via ATF Form 4473 to non-licensees. Regarding the firearm that was transferred with no acquisition or disposition information you stated that it was a mistake. You stated you now understand how to handle replacement firearms. You also produced a document that outlines how you plan to conduct a "quantity count" check. You described this check as a quick count of open entries versus number of firearms in inventory. You stated that this check may be done frequently (written plan specifies weekly) and that if a discrepancy is noted, a full inventory will be completed. Director, Industry Operations Hans Hummel recommended doing a more frequent, complete inventory (more frequently than once per year) to catch potential mistakes in the A&D Record. You concurred with this suggestion.

Violation 4, 5, 6, and 8 referenced violations for the failure to accurately complete the ATF Form 4473. Director, Industry Operations Hans Hummel stated that many of the errors on the forms were "date" related errors, both NICS dates and certification dates. You acknowledged that the errors had happened. You stated that your employee, (b) (6) was also surprised as it was his job to double check the ATF Forms 4473. Industry Operations Investigator (b) (6) suggested that some of the errors occurred because you become distracted by the phone or other customers while you are completing the ATF Form 4473. She suggested that you ignore the phone and other customers while you are completing the ATF Form 4473 to ensure that all the required information is correct and complete. You referenced your document with your proposed plan to fix the problem. In the document you stated you may begin using the electronic version of the ATF 4473 (E4473) to catch some of the errors. Industry Operations Investigator (b) (6) stated that the E4473 may not catch the errors which are most often made on your forms (certification dates and NICS dates). You stated you are going to do further checking on the E4473 before you use it. In addition to this, you requested training for employees on what to be looking for when completing an ATF Form 4473. Industry Operations Investigator (b) (6) offered to come to your business premises and conduct a training session for you and your employees.

Violation 7 referenced violations for the failure to complete and/or timely submit the Report of Multiple Sale or Other Disposition of Pistols and Revolvers. You stated that when you complete the form you are unable to fax them yourself. You stated you give them to a friend who would fax them for you. Industry Operations Investigator (b) (6) suggested that you email the forms into the National Tracing Center rather than ask someone else to fax them for

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you. You expressed interest and stated you are going to try to do it this way. Please utilize the e-mail address: stolenfirearmsprogrammanager@atf.gov.

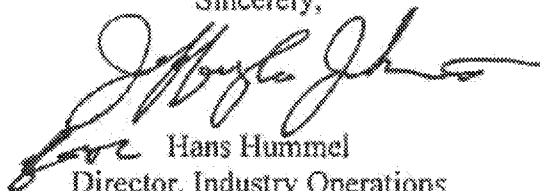
Violations 9 and 10 referenced a transaction involving the return of [REDACTED] onsigned firearms. This transaction involved your employee (b) (6) falsifying an ATF Form 4473 by attaching an additional [REDACTED] firearms to an existing ATF Form 4473. Director, Industry Operations Hans Hummel outlined the concern that he and others had regarding the integrity of your records when it is discovered that forms have been falsified. He stated that actions such as these can result in revocation of your FFL. You stated that you understand how serious this is and that you will speak (b) (6) regarding the situation.

Additionally at this conference, the letter dated September 24, 2013 sent after a previous warning conference with you was provided and reviewed. It was specifically pointed out that there were similar violations as were disclosed during this most recent inspection, and that the 2013 letter explicitly noted that future violations, repeat or otherwise, could be viewed as willful and may result in the revocation of your license. You acknowledged that you understood that these violations could be viewed as willful.

The violations for which you were cited could adversely impact law enforcement's ability to reduce violent crime and protect the public. You are reminded that future violations, repeat or otherwise, could be viewed as willful and may result in the revocation of your license. You may anticipate further inspections to ensure your compliance.

Please contact us if you have any questions concerning your responsibilities as a licensee or if you require further clarification about particular requirements of Federal firearms laws.

Sincerely,



Hans Hummel
Director, Industry Operations
Bureau of Alcohol, Tobacco, Firearms, and Explosives
St. Paul Field Division

Enclosure

cc: Federal Firearms Licensing Center
St. Paul II Area Office