

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) RTT Firearms LLC RTT Firearms 1465 Countryside Avenue - Unit 100 Lake Havasu City, AZ 86403, Mohave	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 785050-2017-0061-B1B		
	3. PERMIT/LICENSE NUMBER 986015078G09221	4a. TARGET DATE 1/31/2017	4b. TARGET HOURS 70
	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, 11/22/2016

8. PURPOSE/SPECIAL INSTRUCTIONS

Conduct a full scope SWB-DE compliance inspection while evaluating for trafficking indicators; Assure compliance with current provisions of GCA. In vetting information provided by the attached referral, investigate manufacturer processes and scrutinize recordkeeping for proper adherence to the GCA. *NOTE: Retain hardcopies of issued ROV (if any) and/or Ack of Regs for file retention.

9. INSPECTION RESULTS		<input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	14	NO. OF REFERRALS	(b) (3) - Public Law	2111 - PER DIEM	
NO. OF TECS CHECKS	19	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 CDTYSON - Industry Operations Investigator

Submitted on: 06/12/2017

Revocation is recommended based on knowingly making false representation with respect to information required on ATF Forms 4473. (b) (3) - Public Law 112-55, 116 Stat. 553

Viols and Revocation / Denial of Renewal App

12. TIME ACCOUNTING DATA

ATF OFFICER'S NAME (MONTH, YEAR, HOURS)		(b) (6)
DEC 2016	31.00	
JAN 2017	70.00	
FEB 2017	48.00	
MAR 2017	25.00	
APR 2017	30.00	
MAY 2017	9.00	
JUN 2017	16.50	
JUL 2017	1.00	
AUG 2017	6.00	
ATF OFFICER'S SUBTOTAL	236.50	ATF OFFICER'S SIGNATURE
TOTAL HOURS	236.50	

Assignment and Report

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13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Field inspection performed 12/14/16-02/10/17; a ROV was issued for twelve recordkeeping violations, a single conduct of business violation and a single licensing violation. Although the licensee's false representation (b)(6) ATF Forms 4473 merits Revocation by policy, it is alternatively recommended that the license receive a Warning Conference (with a Recall Inspection) as (1.) although the licensee performed the transactions away from his licensed premises, a full NICS check was run (with none of the purchasers being prohibited) and a 4473 completed for (b)(6) transactions, (2.) the licensee had a filed and pending COA for the previously-licensed, off-premise location where the identified transactions occurred, (3.) (b)(6) improper transactions occurring after the COA application was received by the FFLC, (4.) the violation for conducting business at a location other than the licensed premises (itself) merits a Warning Conference, and (5.) (b)(6) remaining identified violations merit a Warning Letter or less in response.

With HQ/DAD concurrence, a DIO-led WC was held with the licensee on 08/01/17; a WC follow-up letter was sent to the licensee (via certified post with return receipt) on 08/11/17. A Recall inspection has staged for compliance reassessment; no further field action required at this time.

Viols WC with WL and Recall

☒ REVIEWED

☐ CONCUR

☒ SEE COMMENTS

☒ FINAL DISPOSITION

SIGNATURE AND TITLE

(b)(6) - Area Supervisor

REVIEW DATE

05/22/2017

REVIEW COMMENTS AND RECOMMENDATION

A full scope compliance inspection was conducted December 14, 2016 through February 10, 2017. During the inspection it was determined that on (b)(6) separate occasions the licensee sold firearms away from his licensed business premises. All (b)(6) transactions occurred at the licensee's previously licensed business premises located in Marysville, Utah. The licensee previously held a FFL at the Utah location from June 25, 2015 through June 27, 2016. However, on June 27, 2016 a Change of Address (COA) application moving this FFL to the current premises in Lake Havasu City, Arizona was approved. From June 27, 2016 through December 14, 2016 the Utah location did not hold any FFL. During that time, on (b)(6) separate transactions (b)(6) firearms were sold from the Utah location. All sales were confirmed through forward traces. Each of the corresponding ATF Forms 4473 for these sales indicated on questions 31 and 32 that the sales were made by the Lake Havasu City FFL. The licensee admitted that these sales occurred at the unlicensed business premises.

Although the licensee conducted business away from his licensed business premises, all sales were completed on an ATF Form 4473 and the required NICS check was conducted appropriately. Additionally, this is the licensee's first compliance inspection. Due to these reasons, I am making an alternate recommendation of DIO Warning Conference in lieu of Revocation.

DIO Warning Conference was held with the licensee on August 1, 2017. A post DIO Warning conference was sent to the licensee on August 8, 2017.

Viols DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED

☐ CONCUR

☒ SEE COMMENTS

☐ FINAL DISPOSITION

SIGNATURE AND TITLE

MSMITCHEM - Director of Industry Operations

REVIEW DATE

06/27/2017

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 RTT Firearms LLC RTT Firearms	Street Address 1465 Countryshire Avenue - Unit 100	City Lake Havasu City	State AZ	Zip Code 86403-	County Mohave	Page 1 of 6 Pages
License/Permit/Registry Number <i>(If any)</i> 986015078G09221		Expiration Date 7/1/2018	Date(s) or Period of Inspection 06/27/2016 through 12/14/2016			

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 obtain and record all required transferee information (b)(3)-Public Law 112-55 (25 Stat. 853) ATF Forms 4473.

Citation: 27 CFR 478.124(c)(1)

Number: 8

Nature of Violation:

Failure to record or correctly record all required firearm identification information on ATF Forms 4473.  ATF

Citation: 27 CFR 478.124(c)(4)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

: SIOI (b) (6) instructed the licensee to ensure the transferee completes or correctly completes all required information in all future transactions.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

: SIOI (b) (6) instructed the licensee to make a copy of the page needing correction, initial and date the correction on the copy and insert the corrected copy into the original, if substantiating information was available to support the correction. SIOI (b) (6) advised the licensee to ensure all required firearms information is properly recorded in all future transactions.

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

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License/Permit/Registry Number (If any) 986015078G09221	Expiration Date 7/1/2018	Date(s) or Period of Inspection 06/27/2016 through 12/14/2016
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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: 9

Nature of Violation:

Failure to properly sign and/or record the correct date of transfer of a firearm
Forms 4473.

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)

SIOI (b) (6) instructed the licensee to make a copy of the page needing correction, initial and date the correction on the copy and insert the corrected copy into the original ATF Form 4473.

Number: 10

Nature of Violation:

Failure to execute an ATF Form 4473 or .a "law letter" for the transfer of three firearms
instance

Citation: 27 CFR 478.124(a)

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

SIOI (b) (6) instructed the licensee that in all future transactions an ATF Form 4473 will have to be completed in the event a transfer is made to a law enforcement officer without a "law letter". The law letter needs to state the firearm is a duty weapon, the officer does not have any domestic violence misdemeanors, and be signed by the Chief of the agency.

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Revised April 2005

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License/Permit/Registry Number <i>(If any)</i> 986015078G09221		Expiration Date 7/1/2018		Date(s) or Period of Inspection 06/27/2016 through 12/14/2016		

Inspection Results

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

- Number:** 11

Nature of Violation: Failure to initiate a background check in the transfer of (b)(3)-Public Law 112-55 firearms (b)(3)-Public Law 112-55, 1125 instance.

Citation: 27 CFR 478.102(a)
- Date Corrections to be Made:**
(If not corrected immediately)

Corrective Action to be Taken: The licensee will ensure a background check is conducted or a "law letter" is obtained for all future transfers to law enforcement officers.
(If not corrected immediately)
- Number:** 12

Nature of Violation: Failure to record the identifying number of a purchaser's permit (b)(3)-Public Law 112-55, 1125 instance.

Citation: 27 CFR 478.131(a)(2)
- Date Corrections to be Made:**
(If not corrected immediately)

Corrective Action to be Taken: The licensee will ensure all required information is recorded in all future transactions.
(If not corrected immediately)
- Number:** 13

Nature of Violation: Failure to conduct the transfer of firearms at the address specified on the license (b)(3)-Public Law 112-55, 1125 Stat. 6501 instances.

Citation: 27 CFR 478.50
- Date Corrections to be Made:**
(If not corrected immediately)

Corrective Action to be Taken: SIOI (b) (6) advised the licensee that at no time will he conduct business except at the licensed premises or a sanctioned gunshow or gun event.
(If not corrected immediately)

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License/Permit/Registry Number <i>(If any)</i> 986015078G09221	Expiration Date 7/1/2018	Date(s) or Period of Inspection 06/27/2016 through 12/14/2016
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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: 14

Nature of Violation:
Knowingly making a false representation with respect to information required by **(b)(3)-Public Law 112-55 (125 Stat. 557)** ATF Forms 4473.

Citation: 27 CFR 478.128(c)

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

Corrective Action to be Taken:
(If not corrected immediately)

The licensee will ensure false statements or representations are not made in future transactions.

Number: 15

Nature of Violation:
Failure to record the manufacture or other acquisition of **(b)(3)-Public Law 112-55 (125 Stat. 557)** firearms in the Acquisition and Disposition (A&D) record. Failure to correctly record all required information on the manufacture or other acquisition of **(b)(3)-Public Law 112-55 (125 Stat. 557)** firearms in the A&D record.

Citation: 27 CFR 478.123(a)

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

Corrective Action to be Taken:
(If not corrected immediately)

SIOI **(b) (6)** instructed the licensee to correct the A&D errors, if supporting information was available to substantiate the correction.

Number: 16

Nature of Violation:
Failure to record the disposition of **(b)(3)-Public Law 112-55 (125 Stat. 557)** firearms to another licensee in the Acquisition and Disposition (A&D) Record. Failure to correctly record all required disposition information of **(b)(3)-Public Law 112-55 (125 Stat. 557)** firearms to another licensee in the A&D record.

Citation: 27 CFR 478.123(b)

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

Corrective Action to be Taken:
(If not corrected immediately)

SIOI **(b) (6)** instructed the licensee to correct the A&D errors, if supporting documentation was available to substantiate the correction.

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U.S. Department of Justice

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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: 17

Nature of Violation:
Failure to correctly record all required disposition information in the A&D Record.

Citation: 27 CFR 478.123(d)

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

Corrective Action to be Taken:
(If not corrected immediately)

(b) (6)

SIOI (b) (6) instructed the licensee to correct the A&D errors, if supporting documentation was available to substantiate the correction.

Number: 19

Nature of Violation:
Failure to verify and/or record proper transferee's identification documents ATF Forms 4473.

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)

(b) (6)

SIOI (b) (6) instructed the licensee to ensure identification is obtained and properly recorded on all future ATF Forms 4473.

Number: 20

Nature of Violation:
Failure to record all required NICS transaction information ATF Forms 4473.

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)

(b) (6)

SIOI (b) (6) instructed the licensee to ensure required NICS information is recorded in all future transactions.

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Revised April 2005

Report of Violations




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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: 21	Date Corrections to be Made: <i>(If not corrected immediately)</i>
Nature of Violation: Failure to furnish or obtain all information as required by headings and instructions  ATF Forms 4473.	Corrective Action to be Taken: <i>(If not corrected immediately)</i> SIOI  instructed the licensee (for transferor errors) to make a copy of the page needing correction, initial and date the correction on the copy and insert the corrected copy into the original. SIOI  advised the licensee to ensure the transferee records the correct information on all future transfers.
Citation: 27 CFR 478.21(a)	

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