U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY)	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.)		
TD PRO TECH INC GUNS R US 259 E BARNETT RD, SUITE J MEDFORD ,OR 97501, JACKSON	787040-2016-0039-B1B		
	3. PERMIT/LICENSE NUMBER	4a. TARGET DATE	4b. TARGET HOURS
	993029016B03912	2/22/2017	
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

6. ATF OFFICER(S) ASSIGNED
(b) (6) Lead Investigator
(b) (6) - Assigned Investigator
(b) (6) Assigned Investigator
(b) (6) Assigned Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b) (6) Area Supervisor, 10/04/2015

8. PURPOSE/SPECIAL INSTRUCTIONS
CONDUCT FULL RECALL COMPLIANCE INSPECTION. DIO WC II O REVOCATION HELD IN JUNE 2014. LICENSEE HAS SHORT TIME TO CRIME TRACE HISTORY (4 MONTHS AVERAGE F (b)(3)-Public Law 111-259 (125 Stat. 552) CES). SEE MEDFORD PD REPORT REFERENCING LACK OF COOPERATION BY LICENSEE TO PD INVESTIGATION.

9. INSPECTION RESULTS		☐ CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	8	NO. OF REFERRALS	(b)(3)-Public Law 112-55 (125 Stat. 552)	2111 - PER DIEM	
NO. OF TECS CHECKS	2	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 b (b) (6) - Industry Operations Investigator

Submitted on: 07/12/2016
On 10/26/2015, Industry Operations Investigato (b) (6) met with Jonathan Purtzer, President of TD Pro Tech Inc. d/b/a Guns R Us, at the licensed premises, located at 259 E. Barnett Road, Suite J, Medford, Oregon 97501, to conduct a Full Recall firearms compliance inspection. The Recall inspection was initiated due to a prior compliance inspection resulting in a Director Industry Operations (DIO) Warning Conference in lieu of Revocation. TD Pro Tech Inc. (hereafter referenced as licensee) holds a Type 01 Dealer of Firearms Federal Firearms License (FFL).

Investigato (b) (6) identified himself as a Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Investigator and presented his credentials. Mr. Purtzer provided (b) (6) as identification.

Investigator (b) (6) ssued a Report of Violations. Investigator (b) (6) recommends revocation of the licensee's FFL due to all violations disclosed during the inspection were repeat violations from a prior compliance inspection which resulted in a DIO Warning Conference. Licensee was cited for the following:
•27 CFR 478.21(a) – Forms Prescribed. Repeat violation cited on 04/15/2014.
•27 CFR 478.124(c)(1) – Firearms Transaction Record. Repeat violation cited on 04/15/2014.
•27 CFR 478.124(c)(3)(i) – Firearms Transaction Record. Repeat violation cited on 04/15/2014.
•27 CFR 478.124(c)(3)(iv) – Firearms Transaction Record. Repeat violation cited on 04/15/2014.
•27 CFR 478.124(c)(5) – Firearms Transaction Record. Repeat violation cited on 04/15/2014.
•27 CFR 478.102(a) – NICS Background Check. Repeat violation cited on 04/15/2014.
•27 CFR 478.125(e) – Firearms Receipt and Disposition by Dealers. Repeat violation cited on 04/15/2014.
•27 CFR 478.126a – Reporting Multiple Sales or Other Disposition of Pistols and Revolvers. Repeat violation cited on 04/15/2014.

Please see Inspection Portfolio and Exhibits for further information.
Viols and Revocation / Denial of Renewal App

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12. TIME ACCOUNTING DATA

ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b) (6)

OCT	2015	28.50
NOV	2015	43.00
DEC	2015	13.00
JAN	2016	7.00
FEB	2016	1.50
APR	2016	3.00
MAY	2016	2.00
JUN	2016	3.00
JUL	2016	1.00
NOV	2016	1.00
FEB	2017	3.00

ATF OFFICER'S SUBTOTAL 106.00 | ATF OFFICER'S SIGNATURE

ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b) (6)

OCT	2015	7.00

ATF OFFICER'S SUBTOTAL 7.00 | ATF OFFICER'S SIGNATURE

ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b) (6)

OCT	2015	8.00

ATF OFFICER'S SUBTOTAL 8.00 | ATF OFFICER'S SIGNATURE

ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b) (6)

OCT	2015	4.0

ATF OFFICER'S SUBTOTAL 4.00 | ATF OFFICER'S SIGNATURE

TOTAL HOURS 125.00

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TD PRO TECH INC GUNS R US 259 E BARNETT RD, SUITE J MEDFORD ,OR 97501, JACKSON	3. PERMIT/LICENSE NUMBER 993029016B03912	4a. TARGET DATE 2/22/2017	4b. TARGET HOURS
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13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Current inspection is a recall from a DIO Warning Conference conducted on 6/2/14 (delegated by the DIO to the A/S). Current inspection disclosed multiple repeat violations, including a repeat violation which warrants a Warning Conference - the failure to conduct a NICS background check prior to the transfer of a firearm to a non-licensee.
A/S concurs with IOI recommendation of Revocation since the licensee has previously been the subject of a DIO Warning Conference within the last two years and the current recall inspection warrants a Warning Conference for a similar, repeated violation.
As documented in the narrative report, the licensee's owner/Responsible Person Jonathan Purtzer is unlikely to be brought into voluntary compliance as demonstrated by his confrontational attitude towards law enforcement. Furthermore, after the onsite inspection was completed it was disclosed that Mr. Purtzer submitted a fraudulent law letter to obtain a 922(o) restricted machine gun. That machine gun was seized by ATF CE and the case is being reviewed for potential criminal prosecution.
Recommendation for revocation forwarded to DIO on this date.

UPDATED Recommendation 1/11/17

On 12/8/16 a change in control of the licensee occurred. Respons ble Person Alexander Neuman purchased all shares in the corporate entity from Jonathan Purtzer. Mr. Purtzer was the sole Respons ble Person on the license at the time of the inspection and the subsequent submission of the fraudulent law letter to obtain a 922(o) restricted machine gun. On 3/4/16 Mr. Neuman was added as a Responsible Person after purchasing a minority stake.
On 12/30/16 the FFLC updated FLS to reflect the deactivation of Mr. Purzer as a Responsible Person, following receipt of a notification letter that confirmed Mr. Purtzer is no longer affiliated with the licensee.
In consideration of the change in control and the fact that the repeat violation that the pending revocation is based on occurred prior to Mr. Neuman's addition as a Responsible Person, A/S (b) (6) recommends an alternate administrative action of DIO Warning Conference.

Viols DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED ☒ CONCUR ☒ SEE COMMENTS ☐ FINAL DISPOSITION

SIGNATURE AND TITLE	REVIEW DATE
(b) (6) Area Supervisor	06/24/2016

REVIEW COMMENTS AND RECOMMENDATION

**1/11/17 Change Recommendation to DIO Warning Conference

7/8/16 Concur with recommendation of Revocation.

Licensee has previously been the subject of a DIO Warning Conference within the last two years and the current recall inspection warrants a Warning Conference for a similar, repeated violation. Licensee is unlikely to be brought into voluntary compliance as demonstrated by his inspection history and confrontational attitude towards law enforcement.

Viols DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED ☐ CONCUR ☒ SEE COMMENTS ☒ FINAL DISPOSITION

SIGNATURE AND TITLE	REVIEW DATE
WJMILLER - Director, Industry Operations	07/08/2016

ROUTING SEQUENCE AND DATE

☐ 1. _____
☐ 2. _____
☐ 3. _____
☐ 4. _____

CONTROL FILE POSTED DATE _____

U.S. Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

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	
TD PRO TECH INC GUNS R US	259 E BARNETT RD, SUITE J	MEDFORD	OR	97501-	JACKSON	Page 1 of 4 Pages

License/Permit/Registry Number *(If any)*	Expiration Date	Date(s) or Period of Inspection
993029016B03912	2/1/2016	10/26/2015 through 10/29/2015

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:

ATF Forms 4473. Licensee had a total o [redacted] TF Form 4473 with this violation. In [redacted] nstance, the licensee failed to ensure that the purchaser record an answer for block 10a – Ethnicity.

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 comprehensively review all ATF Forms 4473 and ensure that all required information is recorded prior to making a transfer to a non-licensee.

Number: 2

Nature of Violation:

ATF Forms 4473. Licensee had [redacted] ATF Forms 4473 with this violation.
In [redacted] nstances, licensee failed to ensure that the purchaser provide complete information in Block [redacted] nstance no County listed, 1 instance incomplete residence address).
In [redacted] nstance, licensee failed to ensure that the transferee record complete information for Place of Birth in Block 3.
I [redacted] nstance, licensee failed to ensure that the transferee record information for Block 17 – Certification Date.

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 comprehensively review all ATF Forms 4473 and ensure that all required information is recorded prior to making a transfer to a non-licensee.

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TD PRO TECH INC GUNS R US	259 E BARNETT RD, SUITE J	MEDFORD	OR	97501-	JACKSON	

License/Permit/Registry Number *(If any)*	Expiration Date	Date(s) or Period of Inspection
993029016B03912	2/1/2016	10/26/2015 through 10/29/2015

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:

ATF Forms 4473. O [redacted] orms, the licensee failed to accurately record the transferee's identification. The lic [redacted] orded "O" instead of "Oregon" or the recognized state abbreviation of "OR" when utilizing the transferee's Oregon issued driver's license or identification c [redacted] rms); when utilizing a Carry/Conceal permit, licensee recorded "Oregon Conceal Carry" and failed to record the County of Issuan [redacted] orm).

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

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

Corrective Action to be Taken: The licensee will comprehensively review all ATF Forms 4473 and ensure that all required information is recorded prior to making a transfer to a non-licensee. Licensee will ensure that purchaser identification is recorded correctly and completely.
(If not corrected immediately)

Number: 4

Nature of Violation:

ATF Forms 4473. Licensee had [redacted] ATF Form 4473 with this violation. In [redacted] instance, the licensee failed to record the correct date Oregon State Police (OSP) was contacted in order to initiate a NICS background check on the transferee in block 21a.

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

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

Corrective Action to be Taken: The licensee will comprehensively review all ATF Forms 4473 and ensure that all required information is recorded prior to making a transfer to a non-licensee.
(If not corrected immediately)

Number: 5

Nature of Violation:

ATF Forms 4473. Licensee had [redacted] ATF Form 4473 with this violation. In [redacted] instance, the licensee failed to record information for block 36 – Date of Transfe

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

Corrective Action to be Taken: The licensee will comprehensively review all ATF Forms 4473 and ensure that all required information is recorded prior to making a transfer to a non-licensee.
(If not corrected immediately)

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License/Permit/Registry Number *(If any)*	Expiration Date	Date(s) or Period of Inspection
993029016B03912	2/1/2016	10/26/2015 through 10/29/2015

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(c)(5)

Number: 6

Nature of Violation:
Licensee ha[redacted]stance of this violation. On one occasion, the licensee transferred a firearm and failed to conduct a NICS background check.

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

Corrective Action to be Taken: The licensee will conduct a NICS background check whenever required to do so.
(If not corrected immediately)

Citation: 27 CFR 478.102(a)

Number: 7

Nature of Violation:
Licensee ha[redacted]instances of this violation. The licensee had [redacted]ate acquisition entries. Firearms were in physical inventory but not recorded into the A&D record. The licensee had [redacted]nstance in which a firearm transfer occurred but the licensee failed to record the disposition in the A&D record within the prescribed time frame (e.g. Late Disposition).

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

Corrective Action to be Taken: The licensee corrected the A&D record by recording the late disposition information and recording late acquisitions during the inspection. The licensee will record required firearm acquisition and disposition information in the Acquisition & Disposition Record within the prescribed time frame.
(If not corrected immediately)

Citation: 27 CFR 478.125(e)

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License/Permit/Registry Number *(If any)*	Expiration Date	Date(s) or Period of Inspection
993029016B03912	2/1/2016	10/26/2015 through 10/29/2015

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:

On [redacted] ccasions, the licensee failed to report the multiple sale of handguns to a non[redacted]e as required on ATF Form 3310.4 – Report of Multiple Sale or Other Disposition of Pistols and Revolvers.

Citation: 27 CFR 478.126a

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

Corrective Action to be Taken: Licensee prepared and submitted the multiple sales report during the inspection. Licensee will ensure that all multiple sales of handguns to non-licensees will be reported within the required time frame.
(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

265

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