

DAVID LEE NORRIS 's FCI  
FCL-30642  
05/23/2022 10:28 AM  
IOI (b)(6) Columbus III (IO) Field Office

**LICENSEE INFORMATION**

Applicant Name  
DAVID LEE NORRIS  
(Sole Proprietor)

RDS Key  
4-31-09757

License/Permit Number  
4-31-023-01-2H-09757

License Type  
01 - Dealer License

Business Type  
Sole Proprietorship

**Premises Address**

**Mailing Address**

Premises Ownership Type  
Owned

Same as Premises Address

Premises Location Type  
Single Family Dwelling

Address  
4516 BOSART RD  
Unit N/A  
SPRINGFIELD, Ohio 45503-0000  
CLARK United States

Phone Type	Phone Number	Remarks
Business	+1 937-605-5180	

Email Address	Email Remarks
(b)(6)	

**RECOMMENDATIONS**

Final Decision  
Revocation  
Date  
05/11/2022

Details

License Revoked. On 4/28/2022, ATF issued a Notice to Revoke License. Licensee timely requested a hearing but withdrew that request in writing on 5/10/2022. Licensee acknowledged that the withdrawal would result in a Final Notice of Revocation. The Final Notice of Revocation was issued 5/11/2022. All firearm records were obtained by IOI (b)(6), and they will be sent to the OOBRC.

**Out of Business Records and Inventory Management**

**Licensee Records**

**Licensee Inventory**

✔ Submitted to an ATF Employee

✔ Inventory transferred to self

ATF Employee Name  
IOI (b)(6)

Deputy Assistant Director - Industry Operations Curtis Gilbert's Recommendation  
Revocation

Details

Briefing held with DAD(IO) on 4/28/2022. Concur with recommendation of revocation.

Acting Special Agent in Charge (b)(6) Recommendation

I concur with the recommendation of revocation in accordance with the Administrative Action policy as well as the Presidential Administrative Comprehensive Strategy to Prevent and Respond to Gun Crime and Ensure Public Safety.

Staff Attorney (b)(6) gov's Review

Details

Sufficient evidence of willful violatoinis warranting revocation

Director Industry Operations Judyth.LeDoux (b)(6) Recommendation  
Revocation

Details

The DIO concurs with recommendation for revocation. Justification and details in support of the recommendation are set forth in the 8C which has been submitted for entry in the MCP.

Area Supervisor (b)(6) Recommendation  
Revocation

Details  
DAVID LEE NORRIS dba NORRIS GUNS 4-31-09757

AS (b)(6) concurs with IOI (b)(6)'s recommendation of Revocation of DAVID LEE NORRIS' Federal firearms license (FFL). On 9/30/2021, IOI (b)(6) completed a firearms compliance inspection. DAVID LEE NORRIS has been licensed since 1978 and has been inspected several times. Licensee's previous inspection in January 2018 resulted in no violations.

Licensee was cited for nine (9) violations of the Gun Control Act, including:

- (1) Licensee transferred firearms to a non-licensee without completing an ATF Form 4473 and conducting a NICS background check.
- (2) Licensee falsified required records as follows:
  - (a) Licensee recorded in his A&D Record that he transferred firearms to an FFL on March 27, 2021, when he actually transferred the firearms to a non-licensee on February 27, 2021, without completing an ATF Form 4473 and NICS background check.
  - (b) Licensee replied to an ATF trace request and (b)(3) (112 Public Law 55 125 Stat 552)
- (3) Licensee failed to create required GCA records when he repeatedly transferred firearms from his personal collection and failed to comply with the provisions of 478.125a, to include recording the acquisition and disposition of the firearms in his A&D Record and recording the acquisitions and dispositions into a personal firearms collection bound record.

Onsite Work Summary:

Total # of ATF F 4473 Reviewed = [ ]  
 Total # of Open Dispositions in A & D Record [ ]  
 Total # of Firearms in Inventory = 7  
 Total # of Firearms Missing after Reconciliation = 0  
 Total # of Acquisitions in the Last 12 Months = (b)(4)  
 Total # of Dispositions in the Last 12 Months = (b)(4)  
 Industry Operations Investigator (b)(6)'s Recommendation  
 Revocation

Details

Recommend Revocation.

Revocation is recommended for the following reasons:

- (1) Licensee transferred firearms to a non-licensee without completing an ATF Form 4473 and conducting a NICS background check.
- (2) Licensee falsified required records as follows:
  - (a) Licensee recorded in his A&D Record that he transferred firearms to an FFL on March 27, 2021 when he actually transferred the firearms to a non-licensee on February 27, 2021 without completing an ATF Form 4473 and NICS background check.
  - (b) Licensee replied to an ATF trace request and (b)(3) (112 Public Law 55 125 Stat 552)
- (3) Licensee failed to create required GCA records when he repeatedly transferred firearms from his personal collection and failed to comply with the provisions of 478.125a, to include recording the acquisition and disposition of the firearms in his A&D Record, and recording the acquisitions and dispositions into a personal firearms collection bound record.

Licensee has held the FFL since 1978. His inspection history is as follows:

Inspection History:

Date of Inspection: January 2, 2018  
 Type of Inspection: Compliance Inspection  
 UI#: 773035-2018-0027  
 Inspection Results: No Violations  
 Violations Cited: None

Date of Inspection: November 30, 2011  
 Type of Inspection: Compliance Inspection  
 UI#: 773015-2012-0070  
 Inspection Results: No Violations  
 Violations Cited: None

Date of Inspection: April 9, 2008  
 Type of Inspection: Compliance Inspection  
 UI#: 773015-2008-0318  
 Inspection Results: No Violations  
 Violations Cited: None

Licensee's long and favorable inspection history is contradicted by his decades-long failure to maintain required GCA records with regard to personal collection firearms. In addition, Licensee's falsification of required GCA records and his failure to complete an ATF Form 4473 and NICS background check on a non-licensee are egregious violations for which Licensee failed to provide sufficient mitigation. For the foregoing reasons, revocation is recommended.

Inspection Findings

Records and Forms

- 3. Failure by the licensee to obtain complete and accurate information for any item(s) on Forms 4473, questions 11 & 12, or the buyer fails to sign and date the Form 4473 (to include

failing to have the buyer recertify their answers if the transfer takes place on a different date than the original signature) in Section A on [redacted] percent or more of the Forms 4473 examined.

9. Failure to execute a Form 4473 (Exception: Select findings 6, 7, and 8 above for consignment sales, transfers to law enforcement officers for personal use, and FFL responsible persons; if the transferee is NOT prohibited).

10. Failure to create or discontinue use of required GCA records.

13. Falsify records required under the GCA or making a false or fictitious written statement in the FFL's required records or in applying for a firearms license.

**NICS**

4. Failure to conduct a NICS check or obtain an alternate permit.

**ELIGIBILITY VERIFICATION**

**Business Information Verification**

**Property Ownership Verification**

Premises Ownership Type	Premises Location Type	Has the property ownership been verified?
Owned	Single Family Dwelling	Yes

Address  
4516 BOSART RD  
Unit N/A  
SPRINGFIELD, Ohio 45503-0000  
CLARK United States

Additional Findings  
The Clark County Auditor's website verified that the business premises are owned by David and [redacted] (b)(6)

Attachment(s):  
4-31-0975; [redacted] (b)(6) Property Card.pdf

**Trade Name/DBA Verification**

Trade Name/DBA	Is the trade name/DBA registered?
NORRIS GUNS	No

Additional Findings  
The Ohio Secretary of State's website verified that Licensee has not registered the trade name "Norris Guns." IOI [redacted] (b)(6) advised him during the closing conference that he could register the trade name or have it removed from the license. Licensee advised that he planned to register it. As of November 23, 2021 the trade name has not been registered.

**Contact Information**

Name	Date Contacted
[redacted] (b)(6)	10/01/2021

Organization  
Ohio Secretary of State

Job Title  
Secretary of State

Phone Type	Phone Number	Remarks
Business	+1 614-466-2655	

Attachment(s):

**Zoning Information Verification**

Is the proposed business activity in compliance with zoning?  
Yes

Additional Findings  
Confirmation with [redacted] (b)(6), Planner/Deputy Zoning Inspector, Clark County, revealed that Licensee is in compliance with zoning. Licensee is located in Moorefield Township, and Clark County administers zoning for the township. [redacted] (b)(6) explained that home occupation permits are required to operate businesses in residential areas. However, she said that because Licensee has been operating from the premises since 1978, he is grandfathered in under prior zoning codes which did not require permits.

**Contact Information**

Name	Date Contacted
[redacted] (b)(6)	10/01/2021

Organization  
Clark County Planning and Zoning

Job Title  
Planner/Deputy Zoning Inspector

Phone Type	Phone Number	Remarks
Business	(b)(6)	

Attachment(s):

**APPOINTMENT DETAILS**

Interview Date

09/30/2021

Address

4516 BOSART RD, Unit N/A, SPRINGFIELD, Ohio 45503-0000

**Responsible Attendee(s)**

**Non-Responsible Person(s)**

DAVID LEE NORRIS

No Items

**RESPONSIBLE PERSON(S)**

DAVID LEE NORRIS

Name	Gender	Race	Ethnicity
DAVID LEE NORRIS	Male	White	Not Hispanic or Not Latino

Date of Birth	SSN	Job Title
(b)(6)		OWNER

**Physical Identifiers**

Height	Weight	Hair Color	Eye Color
	(b)(6)		

**Place of Birth**

Country	State	City
United States Of America	(b)(6)	

**Home Address**

(b)(6)

**Additional Names**

**Citizenship**

United States

ID Type	Country	State	ID Number
Driver's License	United States	Ohio	(b)(6)

Phone Type	Phone Number	Remarks
Mobile	(b)(6)	

Email Address	Email Remarks
(b)(6)	

**Criminal History Check**

Date Criminal History Check Conducted  
09/29/2021

Criminal History Check Comments

IOI (b)(6) conducted a deconfliction analysis on September 29, 2021 and determined that no conflicts existed with the inspection. Specifically, (1) N-Force disclosed no active or pending ATF Criminal Enforcement (CE) investigations involving Licensee, (2) the Dayton Satellite Office and Columbus II Crime Gun Intelligence Center (CGIC) disclosed no potential ATF CE investigations into Licensee, and (3) National Crime Information Center (NCIC) and the Ohio Law Enforcement Gateway (OHLEG) queries of Licensee disclosed no prohibiting information.

**INTERVIEW QUESTIONNAIRE**

What is the proposed business activity?

Licensee engages in gunsmithing and conducts transfers of new and used handguns, long guns and receivers. He stated that he attends gun shows, but he does not set up a table. Instead, he will sit down with another FFL, put his license out and sell firearms occasionally. Licensee stated that he also sells firearms from his personal collection. Licensee conducts transfers with other FFLs and maintains copies of licenses on file. Licensee has not used FFL EZ Check. There have been no transfers to law enforcement on letterhead. Licensee does not manufacture firearms or ammunition, import or export firearms, deal in black powder, deal over the internet, deal in NFA firearms, and is not a major distributor for wholesalers. Licensee is familiar with straw purchases and reported no known attempts.

Do they need an additional license or permit?

No

Who are their primary suppliers?

Licensee does not have primary suppliers. He generally receives firearms as transfers from special order internet sales.

**Business Activities**

Selected Operational Security Measures

No items

Retail

Gunsmith

Gun Show Participant

**PREMISES INFORMATION**

Inspection Area Description

(b)(6)

Primary Activity

Selected Physical Security Measures

Retail

(b)(6)

GPS Coordinates

Latitude

39.98726

Longitude

-83.75374

**ONSITE SUMMARY**

Total Number of ATF Form 4473s for Inspection Review Period

Total Number of ATF F 4473 Reviewed

Total Number of Open Dispositions in A & D Record

Total Number of Firearms in Inventory

7

Actual Number of Firearms Verified

Number of Firearms Missing Before Reconciliation

Total Number of Firearms Missing After Reconciliation

0

Total Number of Acquisitions in the Last 12 Months

(b)(4)

Total Number of Dispositions in the Last 12 Months

(b)(4)

Onsite Start Date

Onsite End Date

Number of Reported Lost/Stolen Firearms During Inspection Period

Total Number of Traces During Inspection Review Period

Total Number of Those Traces That Were Unresolved

Inspection Period Start Date

Inspection Period End Date

Number Of Traces Resolved By IOI

[Click Here to See List of Perfected Traces](#)

**Additional Comments**

NORRIS has held the license since 1978. His most recent compliance inspection was in 2018, and it resulted in no violations and no further action. NORRIS maintains a bound book for his A&D Record. He has had the same bound book since his license was issued in 1978. The bound book entries are in the proper format. Acquisitions and dispositions are entered on the same day firearms are received or disposed. Zero (0) firearms thefts/losses have been reported in the past 12 months. Other than the issues discussed below, there were no trafficking indicators found in the A&D Record. NORRIS had [redacted] trace in the past 12 months. NORRIS was cited for four (4) violations related to the A&D Record, as discussed below.

There were [redacted] ATF Forms 4473 on hand for the period of inspection. A NICS audit log check disclosed one (1) NICS response (denied) for Licensee within the scope of inspection, with no discrepancies disclosed. NORRIS takes the Ohio CCW permit in lieu of NICS background checks. The Violent Crime Analysis Bureau (VCAB) disclosed zero (0) reported multiple handgun sales for NORRIS in the past 12 months. IOI [redacted] discovered zero (0) multiple handgun sales within the past 12 months, with no discrepancies disclosed. NORRIS was cited for five (5) violations related to the ATF Form 4473, as discussed below.

**(b)(4),(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)**

# (b)(4),(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

## (b)(3) (112 Public Law 55 125 Stat 552)

Because the information recorded in the A&D Record did not match the ATF Form 4473 for (b)(6), IOI (b)(6) contacted NORRIS by phone and e-mail and requested he complete a trace on the (b)(6) firearms. NORRIS responded to IOI (b)(6) via e-mail and his response led to IOI (b)(6)'s SAR. NORRIS responded to IOI (b)(6) via e-mail on September 23, 2021 as follows:

NORRIS stated that he sold the below firearms to FFL (b)(4) on March 27, 2021 at the C&E Gun Show in Springfield, Ohio:

## (b)(3) (112 Public Law 55 125 Stat 552)

During his discussions with IOI (b)(6), NORRIS explained that he transferred the firearms to (b)(6) and claimed that (b)(6) stated he was with (b)(4). NORRIS also claimed that he asked for a copy of the license from (b)(6), but that (b)(6) did not have one. NORRIS did not complete an ATF Form 4473 and a NICS background check on (b)(6). IOI (b)(6) spoke with NORRIS by phone subsequent to NORRIS' e-mail response and NORRIS stated, "in an effort to be fully transparent and honest, I gave the guns to (b)(6) on February 27, 2021 not March 27, 2021."

IOI (b)(6) asked (b)(6) about his contact with NORRIS. (b)(6) reported that NORRIS contacted him around the end of February or beginning of March 2021, asking for a copy of his license. (b)(6) advised that NORRIS said he needed a copy of the license because he was going to be transferring firearms to (b)(4) for transfer to (b)(6). That is, (b)(6) reported that he believed he was going to receive firearms from NORRIS in the future, that were to be transferred from (b)(4) to (b)(6). (b)(6) said that he provided a copy of the license to NORRIS in response to an e-mail NORRIS sent on March 2, 2021. (b)(6) said that (b)(6) is not associated with (b)(4) and is not authorized to act on its behalf. (b)(6) also said that he has never been to the C&E Gun Show and that NORRIS did not say anything about past transfers to (b)(4) at the C&E Gun Show or otherwise.

IOI (b)(6) initiated the compliance inspection on NORRIS on September 30, 2021. IOI (b)(6) assisted IOI (b)(6) with the compliance inspection. Also present during the inspection were IOI (b)(6) and SA (b)(6). IOI (b)(6) and SA (b)(6) interviewed NORRIS regarding his knowledge of (b)(6), due to the investigation of (b)(6) for firearms trafficking.

IOI (b)(6) reviewed NORRIS' A&D Record and noted that (b)(3) (112 Public Law 55 125 Stat 552) were in the A&D Record and disposed to (b)(4) on March 27, 2021. (b)(4) was in the A&D Record but was disposed to NORRIS' personal collection on March 20, 2007, and identified as a personal collection firearm in the e-mail to IOI (b)(6). The (b)(3) (112 Public Law 55 125 Stat 552) was not in the A&D Record, and NORRIS listed it as a personal collection firearm in his e-mail response to IOI (b)(6). Comparison of the firearms in (b)(4) A&D Record with the firearms in NORRIS' e-mail response revealed the following: the (b)(3) (112 Public Law 55 125 Stat 552) firearms matched, although (b)(4) had some of the serial numbers wrong. (b)(3) (112 Public Law 55 125 Stat 552) in NORRIS' e-mail did not appear in the (b)(4) Record. (b)(3) (112 Public Law 55 125 Stat 552) did not appear in NORRIS' e-mail response or his A&D Record, and he said he never transferred those firearms to (b)(6).

IOI (b)(6) interviewed NORRIS on September 30, 2021 and again on October 6, 2021 regarding the transfers to (b)(6) and the conflicting information detailed above. NORRIS explained to IOI (b)(6) that (b)(6) said he was with (b)(4) and he did not complete an ATF Form 4473 and NICS background check on him because he thought he was transferring firearms to an FFL. He confirmed that (b)(6) did not present a copy of the license. NORRIS said he contacted (b)(4) directly to get a copy of their license. NORRIS stated that when he called (b)(4) he told them that he needed a copy of their license because he had transferred firearms to them "last weekend at the C&E Gun Show in Springfield, Ohio." NORRIS acknowledged that he has frequented gun shows for years but denied knowing (b)(6) despite (b)(6) prolifically buying firearms at shows NORRIS attended. NORRIS said that the only contact he had with (b)(6) was on February 27, 2021 at the C&E Gun Show in Springfield, Ohio. He had no explanation for why (b)(6) went to (b)(4) on May 3, 2021 and asked for firearms to be transferred from NORRIS to (b)(6). NORRIS stated that he originally reported to IOI (b)(6) that he transferred firearms to (b)(4) on March 27, 2021, but that it was an inadvertent error. He said (b)(6)'s statements to IOI (b)(6) about NORRIS asking for a copy of the (b)(4) license for a future transfer were "complete bull." However, NORRIS could not explain why (b)(6) would be motivated to lie about the circumstances under which he provided his license. NORRIS also had no explanation for (b)(6)'s statement that he had never been to the C&E Gun Show and repeated that he mentioned transfers to (b)(6)'s license at the C&E Gun Show when he spoke to him by phone. NORRIS also stated that he has been selling firearms from his personal collection without putting them in his A&D Record for years. He said that the discussion with IOI (b)(6) was the first time he ever heard of having to log personal firearms in his A&D Record, and claimed that no one ever said anything like that in any of his other compliance inspections. IOI (b)(6) and (b)(6) instructed NORRIS in detail on record keeping requirements for sole proprietor FFLs.

At the conclusion of the closing conference on October 6, 2021, NORRIS advised IOI (b)(6) that he has not been able to sleep since the interview on September 30, 2021. He also said that he felt physically ill and that he might vomit. He walked IOI (b)(6) to the door and stood on the front porch as IOI (b)(6) walked down the sidewalk and stopped to talk to NORRIS' wife. IOI (b)(6) looked back to observe NORRIS appearing to be in mild physical distress, alternating between standing with his hands on his hips, and then bending over at the waist to hold onto the porch railing as if he was going to be sick. NORRIS then abruptly opened the screen door to the house and moved quickly inside. He failed to return as IOI (b)(6) talked with his wife outside.

In summary, NORRIS transferred at least (b)(6) firearms to (b)(6), a non-licensee, at the C&E Gun Show on February 27, 2021. NORRIS claims that he never met (b)(6) prior to February 27, 2021, despite both frequenting gun shows in Springfield, Ohio, (b)(6) being a prolific firearms trafficker, and NORRIS frequently selling firearms from his personal collection at the gun shows. NORRIS recorded in his A&D Record that the firearms he transferred to (b)(6) were transferred to (b)(4) despite (b)(6) failing to produce a copy of the license or any other evidence that he was associated with (b)(4). NORRIS obtained a copy of the (b)(4) license by falsely stating to (b)(6) that he would be sending firearms to him in the future for transfer to (b)(6). NORRIS falsely recorded in his A&D Record that he transferred the firearms on March 27, 2021. NORRIS falsely stated to IOI (b)(6) in his September 23, 2021 e-mail that he transferred firearms to (b)(4) on March 27, 2021. (b)(6) subsequently corrected the date to February 27, 2021 while speaking to IOI (b)(6) on the phone, suggesting that his original statement was intentionally untrue by prefacing the new information with the phrase "in an effort to be fully transparent and honest." NORRIS stated to IOI (b)(6) that he told (b)(6) he needed a copy of his license due to a transfer of firearms to (b)(4) at the C&E Gun Show in Springfield, Ohio on February 27, 2021. (b)(6) stated that NORRIS asked for a copy of his license for a future transfer, that (b)(6) has never been to the C&E Gun Show, and that NORRIS never made such statements to him.

Licensee was cited for a total of nine (9) violations as a result of the inspection, as follows:

(1) 27 CFR 478.128(c): False statement made by a licensee on any ATF record. Licensee knowingly made false statements or representations with respect to (b)(6) firearms he transferred on February 27, 2021 to (b)(6), a non-licensee, without completing an ATF Form 4473 and conducting a NICS background check, as follows:

(a) Licensee falsely recorded in his A&D Record that he transferred the (b)(6) firearms to FFL (b)(3) (112 Public Law 55 125 Stat 552) on March 27, 2021; and

(b) Licensee falsely stated in a September 23, 2021 reply to an ATF e-mail that he transferred the (b)(6) firearms to FFL (b)(4) on March 27, 2021.

# (b)(3) (112 Public Law 55 125 Stat 552)

(2) 27 CFR 478.102(a): Failure to complete a NICS/POC background check. Specifically, Licensee transferred firearms to (b)(6), a non-licensee, on February 27, 2021 without completing a NICS background check.

Queries of NCIC, OHLEG and ANR failed to reveal any prohibiting information or NICS denials for (b)(6).

(3) 27 CFR 478.124(a): Failure to execute an ATF F 4473. Specifically, Licensee transferred firearms to (b)(6), a non-licensee, on February 27, 2021 without completing an ATF Form 4473.

(4) 27 CFR 478.125a: Failure to properly sell/dispose of personal collection firearm(s). Licensee transferred firearms from his personal firearm collection without complying with the provisions of 478.102 and recording the disposition on an ATF Forms 4473, and failing to comply with the provisions of 478.125a, as follows: (1) maintained the firearm as part of the personal collection for 1 year from the date the firearm was transferred from the business inventory into the personal collection or otherwise acquired as a personal firearm; (2) recorded in the bound record prescribed by 478.125(e) the receipt of the firearm into the business inventory or other acquisition; (3) recorded the firearm as a disposition in the bound record prescribed by 478.125(e) when the firearm was transferred from the business inventory into the personal firearms collection or otherwise acquired as a personal firearm; and (4) entered the sale or other disposition of the firearm from the personal firearms collection into a bound record, identifying the firearm transferred by recording the name of the manufacturer and importer (if any), the model, serial number, type, and the caliber or gauge, and showing the date of the sale or other disposition, the name and address of the transferee, or the name and business address of the transferee if such person is a licensee, and the date of birth of the transferee if other than a licensee. In addition, the licensee shall cause the transferee, if other than a licensee, to be identified in any manner customarily used in commercial transactions (e.g. a drivers license).

(5) 27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearms. Specifically:

(a) Licensee failed to record the disposition of a firearm in (b)(3) (112 Public Law 55 125 Stat 552) instance, reconciled (b)(3) (112 Public Law 55 125 Stat 552).

(b) Licensee failed to properly record the disposition of firearms in (b)(3) (112 Public Law 55 125 Stat 552) instances, reconciled. Specifically, Licensee recorded that he transferred the firearms to FFL (b)(4) (b)(3) (112 Public Law 55 125 Stat 552) and (b)(3) (112 Public Law 55 125 Stat 552) and (b)(3) (112 Public Law 55 125 Stat 552).

(c) Licensee failed to record the acquisition or disposition of a firearm in (b)(3) (112 Public Law 55 125 Stat 552) instance, reconciled. Specifically, Licensee acquired the firearm and transferred it to (b)(6) (b)(6) without recording the acquisition or disposition in the A&D Record (b)(3) (112 Public Law 55 125 Stat 552).

(6) 27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473. Specifically, Licensee failed to ensure that the transferee completely and accurately responded to Item 21.1.1. (b)(6) on the ATF Form 4473 in (b)(6) instances.

Queries of NCIC, OHLEG and ANR failed to reveal any prohibiting information or NICS denials for (b)(6).

(7) 27 CFR 478.21(a): Failure to complete forms as prescribed. Licensee failed to ensure that the transferee completely and accurately responded to Item 23 ((b)(6)) on the ATF Form 4473 in (b)(6) instance.

Queries of NCIC, OHLEG and ANR failed to reveal any prohibiting information or NICS denials for (b)(6).

(8) 27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473. Specifically, Licensee failed to completely and accurately respond to Item 36 on the ATF Form 4473 in (b)(6) instances (b)(6).

(9) 27 CFR 478.121(c): Making false entry, omitting entry, or failing to properly maintain required recordkeeping. Licensee knowingly made false entries in his Acquisition and Disposition Record (A&D Record) with respect to (b)(6) firearms he transferred on February 27, 2021 to (b)(6), a non-licensee, without completing an ATF Form 4473 and conducting a NICS background check. Specifically, Licensee falsely recorded in his A&D Record that he transferred the (b)(6) firearms to FFL (b)(4) (b)(4) on March 27, 2021 (b)(3) (112 Public Law 55 125 Stat 552) (b)(3) (112 Public Law 55 125 Stat 552).

IOI (b)(6) queried a total of 26 firearms in NCIC and eTrace, including all firearms identified above as associated with (b)(6). No pertinent information was returned except as follows. NCIC reflects that the (b)(3) (112 Public Law 55 125 Stat 552) (transferred from NORRIS' personal collection to (b)(6)) was recovered by the Clark County, Ohio Sheriff's Office on March 24, 2021, less than 30 days after NORRIS transferred the firearm to (b)(6). The firearm does not appear in eTrace. IOI (b)(6) forwarded the information to SA (b)(6) due to the open investigation on (b)(6).

IOI (b)(6) conducted NCIC/NLETS criminal history checks on a total of (b)(6) individuals, including (b)(6), and transferees (b)(6) identified above. No prohibiting information was identified. (b)(6) suspicious activity report (b)(6) was generated and submitted to CGIC, as discussed below.

IOI (b)(6) noted that (b)(6) had purchased (b)(6) firearms NORRIS in 2021 and a total of (b)(6) firearms since 2018. Many of the firearms were repeat purchases of the same or similar firearms. IOI (b)(6) also noted that (b)(6) was the subject of (b)(3) (112 Public Law 55 125 Stat 552) (b)(3) (112 Public Law 55 125 Stat 552).

## (b)(3) (112 Public Law 55 125 Stat 552)

IOI (b)(6) queried (b)(6) through the ATF Federal Licensing System (FLS) and did not identify any records associated with him. IOI (b)(6) also queried N-Force and no ATF CE open or pending cases involving (b)(6) were revealed. Finally, IOI (b)(6) researched (b)(6) through eTrace and discovered the traces referenced above. No other information was identified. Due to the short time to crime traces and the repeat purchases of the same or similar firearms, IOI Miller submitted the above information to ATF Columbus CGIC.

NORRIS confirmed that the Youth Handgun Safety Act poster is visible to customers during transactions. The Youth Handgun Safety Act pamphlets and gun locks are on hand for distribution as necessary.

There were no additional findings during the inspection.

Attachment(s)

Report of Violations.pdf

Report of Violations.pdf

Report of Violations.pdf

Licensee Response to Violations Report.pdf

REPORT OF VIOLATIONS

Regulation	Corrective Actions	Instance Details
<p>27 CFR 478.128(c): False statement made by a licensee on any ATF record</p> <p>Number of Instances: <input type="text"/></p>	<p>Cease and desist from engaging in deceptive practices.</p>	<p>Licensee knowingly made false statements or representations with respect to <input type="text"/> firearms he transferred on February 27, 2021 to <input type="text"/> (b)(6) a non-licensee, without completing an ATF Form 4473 and conducting a NICS background check, as follows:</p> <p>(1) Licensee falsely recorded in his A&amp;D Record that he transferred the <input type="text"/> firearms to FFL <input type="text"/> (b)(4) on March 27, 2021; and</p> <p>(2) Licensee falsely stated in a September 23, 2021 reply to an ATF e-mail that he transferred the <input type="text"/> firearms to FFL <input type="text"/> (b)(4) (4-31-07841) on March 27, 2021.</p> <p><b>(b)(3) (112 Pub. L. 55 125 Stat 552) - per ATF</b></p>
<p>27 CFR 478.102(a): Failure to complete a NICS/POC background check</p> <p>ATF Forms 4473: 1 Number of Instances: 1</p>	<p>Execute a required NICS/POC background check for all future over-the-counter firearm transactions.</p>	<p>NICS Violation, <input type="text"/> (b)(6) 2/27/2021</p>
<p>27 CFR 478.124(a): Failure to execute an ATF F 4473</p> <p>ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/></p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p><b>(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)</b></p>
<p>27 CFR 478.125a: Failure to properly sell/dispose of personal collection firearm(s)</p> <p>Number of Instances: <input type="text"/></p>	<p>Amend/Update A&amp;D Record to accurately record all required firearm disposition information.</p> <p>Resume proper maintenance of required acquisition and disposition record.</p> <p>Accurately, completely &amp; timely record all required future firearm acquisition information.</p>	<p>Acquisition Not Recorded (Reconciled), Disposition Not Recorded (Reconciled), Licensee transferred firearms from his personal firearm collection without complying with the provisions of 478.102 and recording the disposition on an ATF Form 4473, and failing to comply with the provisions of 478.125a, as follows: (1) maintained the firearm as part of the personal collection for 1 year from the date the firearm was transferred from the business inventory into the personal collection or otherwise acquired as a personal firearm; (2) recorded in the bound record prescribed by 478.125(e) the receipt of the firearm into the business inventory or other acquisition; (3) recorded the firearm as a disposition in the bound record prescribed by 478.125(e) when the firearm was transferred from the business inventory into the personal firearms collection or otherwise acquired as a personal firearm; and (4) entered the sale or other disposition of the firearm from the personal firearms collection into a bound record, identifying the firearm transferred by recording the name of the manufacturer and importer (if any), the model, serial number, type, and the caliber or gauge, and showing the date of the sale or other disposition, the name and address of the transferee, or the name and business address of the transferee if such person is a licensee, and the date of birth of the transferee if other than a licensee. In addition, the licensee shall cause the transferee, if other than a licensee, to be identified in any manner customarily used in commercial transactions (e.g. a drivers license).</p>
<p>27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearms</p> <p>Number of Instances: <input type="text"/></p>	<p>Accurately, completely &amp; timely record all required future firearm disposition information.</p> <p>Amend/Update A&amp;D Record to accurately record all required firearm disposition information.</p>	<p><b>(b)(3) (112 Public Law 55 125 Stat 552)</b></p>
<p>27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473</p> <p>ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/></p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p><b>(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)</b></p>
<p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/></p>	<p>Ensure that all ATF Form 4473 items, as required by form headings and instructions, are accurately completed on all future transactions.</p>	<p><b>(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)</b></p>

<p>27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473</p> <p>ATF Forms 4473: [ ] Number of Instances: [ ]</p>	<p>Ensure that the required transferor/seller signature and date of transfer is obtained, validated and accurately recorded on all future ATF Forms 4473, Section E.</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>27 CFR 478.121(c): Making false entry, omitting entry, or failing to properly maintain required recordkeeping</p> <p>Number of Instances: [ ]</p>	<p>Cease and desist from engaging in deceptive practices.</p>	<p>Licensee knowingly made false entries in his Acquisition and Disposition Record (A&amp;D Record) with respect to: (b)(3) (112 Public Law 55 125 Stat 552)</p> <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>

**LICENSEE RESPONSE REPORT**

Regulation	Corrective Actions	Licensee Response	Status Details
<p>27 CFR 478.128(c): False statement made by a licensee on any ATF record</p> <p>Number of Instances: [ ]</p>	<p>Cease and desist from engaging in deceptive practices.</p>	<p>Licensee stated that he does not agree that he made false entries. He said his errors were not intentional, just mistakes. He stated that he believed (b)(6) was affiliated with FFL (b)(4) and that the first time he learned that was not true was when he spoke to IOIs in September 2021. He said he inadvertently recorded the wrong date of transfer because he misread the most recent disposition dates in his book and just recorded the wrong month without thinking. Licensee asked "will I have a license when we are done here, because that will kill me, this is my hobby?"</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 10/06/2021</p>
<p>27 CFR 478.102(a): Failure to complete a NICS/POC background check</p> <p>ATF Forms 4473: 1 Number of Instances: 1</p>	<p>Execute a required NICS/POC background check for all future over-the-counter firearm transactions.</p>	<p>Licensee stated "I guess I trusted a guy and being in law enforcement I shouldn't have."</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 10/06/2021</p>
<p>27 CFR 478.124(a): Failure to execute an ATF F 4473</p> <p>ATF Forms 4473: [ ] Number of Instances: [ ]</p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>Licensee stated "I guess I trusted a guy and being in law enforcement I shouldn't have."</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 10/06/2021</p>
<p>27 CFR 478.125a: Failure to properly sell/dispose of personal collection firearm(s)</p> <p>Number of Instances: [ ]</p>	<p>Amend/Update A&amp;D Record to accurately record all required firearm disposition information. Resume proper maintenance of required acquisition and disposition record. Accurately, completely &amp; timely record all required future firearm acquisition information.</p>	<p>Licensee stated this is a little confusing. He agreed that he sold personal firearms for years without going through his FFL. He said no one ever told him that he had to sell personal firearms through his FFL.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 10/06/2021</p>
<p>27 CFR 478.125(e): Failure to maintain an accurate/complete/timely</p>	<p>Accurately, completely &amp; timely record all required future</p>	<p>Licensee stated he will fix the mistakes immediately.</p>	<p>Status Licensee Notified</p>

5	acquisition and disposition record of firearms Number of Instances: [ ]	firearm disposition information. Amend/Update A&D Record to accurately record all required firearm disposition information.		Verified Method In Person Date Licensee Notified 10/06/2021
6	27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473 ATF Forms 4473: [ ] Number of Instances: [ ]	Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.	Licensee stated the mistakes are disappointing. He said its a big deal to him because it affects his license.	Status Licensee Notified Verified Method In Person Date Licensee Notified 10/06/2021
7	27 CFR 478.21(a): Failure to complete forms as prescribed ATF Forms 4473: [ ] Number of Instances: [ ]	Ensure that all ATF Form 4473 items, as required by form headings and instructions, are accurately completed on all future transactions.	Licensee stated he understood the violation. He said he was reviewing his forms and found that error.	Status Licensee Notified Verified Method In Person Date Licensee Notified 10/06/2021
8	27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473 ATF Forms 4473: [ ] Number of Instances: [ ]	Ensure that the required transferor/seller signature and date of transfer is obtained, validated and accurately recorded on all future ATF Forms 4473, Section E.	Licensee inquired whether he can have the transferee correct the form now. He said he would contact them and have them correct a photocopy.	Status Licensee Notified Verified Method In Person Date Licensee Notified 10/06/2021
9	27 CFR 478.121(c): Making false entry, omitting entry, or failing to properly maintain required recordkeeping Number of Instances: [ ]	Cease and desist from engaging in deceptive practices.	Licensee stated that he does not agree that he made false entries. He said his errors were not intentional, just mistakes. He stated that he believed [ ] (b)(6) [ ] and that the first time he learned that was not true was [ ] (b)(4) [ ] and that the first time he learned that was not true was when he spoke to IOIs in September 2021. He said he inadvertently recorded the wrong date of transfer because he misread the most recent disposition dates in his book and just recorded the wrong month without thinking. Licensee asked "will I have a license when we are done here, because that will kill me, this is my hobby?"	Status Licensee Notified Verified Method In Person Date Licensee Notified 10/06/2021

**CLOSING CONFERENCE**

Review Regulations conducted offline

( 10/6/2021 )

10/06/2021

Closing Conference Additional Notes

IOIs [ ] (b)(6) [ ] conducted the closing conference with Licensee on October 6, 2021. IOIs reviewed the Report of Violations and discussed the Acknowledgment of Federal Firearms Regulations with Licensee. IOIs [ ] (b)(6) [ ] answered all questions and discussed corrective actions and necessary steps to ensure future compliance.

There were no additional findings during the inspection.

Attachment(s)

Attendee(s)

DAVID LEE NORRIS

**EXHIBITS**

Inspection



### Notice to Revoke or Suspend License and/or Impose a Civil Fine

In the matter of License Number 4-31-023-01-2H-09757, as a/an

DEALER in Firearms (including gunsmiths) issued to:

Name and Address of Licensee *(Show number, street, city, State and ZIP Code)*

DAVID LEE NORRIS  
dba NORRIS GUNS  
4516 BOSART ROAD  
SPRINGFIELD OH 45503

**Notice is Hereby Given That:**

Pursuant to the statutory provisions and reasons stated in the attached page(s), the Director or his/her designee, Bureau of Alcohol, Tobacco, Firearms and Explosives, intends to take action on the license described above.

- The above identified license may be revoked pursuant to 18 U.S.C. 923(e), 922(t)(5) or 924(p).
- The above identified license may be suspended pursuant to 18 U.S.C. 922(t)(5) or 924(p).
- The above identified licensee may be fined pursuant to 18 U.S.C. 922(t)(5) or 924(p).

Pursuant to U.S.C. 923(f)(2) and/or 922(t)(5), you may file a request with the Director of Industry Operations, Bureau of Alcohol, Tobacco, Firearms and Explosives, at 230 West Street, Suite 400, Columbus OH 43215, in duplicate, for a hearing to review the revocation, suspension and/or fine of your license. The request must be received at the above address within 15 days of your receipt of this notice. Where a timely request for a hearing is made, the license shall remain in effect pending the outcome of the hearing; and if the license is due to expire, the license will remain in effect provided a timely application for renewal is also filed. The hearing will be held as provided in 27 CFR Part 478.

If you do not request a hearing, or your request for a hearing is not received by ATF on time, a final notice of revocation, suspension, and/or imposition of civil fine (ATF Form 5300.13) shall be issued.

Please see included brochure

Date <u>4/28/22</u>	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official Judyth A. LeDoux, Director of Industry Operations	Signature <b>(b)(6)</b>
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I certify that on the date shown below I served the above notice on the person identified below

- Certified mail to the address shown below.  
Tracking Number: 7017262000078840721 Or  Delivering a copy of the notice to the address shown below.

Date Notice Served <u>4/28/2022</u>	Title of Person Serving Notice Executive Assistant	Signature of Person Serving Notice <b>(b)(6)</b>
Print Name and Title of Person Served David Lee Norris, dba Norris Guns		Signature of Person Served <i>(if applicable)</i>

Address Where Notice Served  
4516 Bosart Road, Springfield OH 45503

Under the provisions of 18 U.S.C. § 923(e) and 27 C.F.R. § 478.73, notice is hereby given that the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") intends to revoke the Federal firearms license held by David Lee Norris d/b/a Norris Guns ("Licensee"). Specifically, the Director, Industry Operations, United States Department of Justice, ATF, Columbus Field Division, has reason to believe that Licensee willfully violated the provisions of the Gun Control Act of 1968, as amended, 18 U.S.C. Chapter 44, and the regulations issued thereunder, 27 C.F.R. Part 478 (collectively, "GCA") as described herein.

### **Violations**

On October 6, 2021, ATF completed a compliance inspection of Licensee's business that revealed the following:

1. Background Check Violations:

On one occasion, Licensee willfully transferred six firearms to an unlicensed person without first contacting the National Instant Criminal Background Check System ("NICS") and obtaining a unique identification number and/or waiting three days before allowing the transfer, in violation of 18 U.S.C. § 922(t) and 27 C.F.R. § 478.102. See Appendix.

2. Transfer to a Non-FFL without an ATF Form 4473

On  occasion, Licensee willfully sold or otherwise disposed of six firearms to an unlicensed person without recording the transaction on a Firearms Transaction Record, ATF Form 4473, in violation of 18 U.S.C. § 923(g)(4)(a) and 27 C.F.R. § 478.124(a). See Appendix.

3. False Statement in Records

On  occasions, Licensee knowingly and willfully made a false statement or representation with respect to information required to be kept in its records by the GCA, in violation of 18 U.S.C. § 924(a)(1)(A) and 27 C.F.R. § 478.128(c). See Appendix.

4. Failure to Record Acquisition and Disposition

On  occasion, Licensee willfully failed to record the acquisition and disposition of a firearm in its Acquisition and Disposition Record, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.125(e).

**Appendix**

**Violations 1 & 2: No Background Check and Transfer without an ATF Form 4473**

On February 27, 2021, Licensee transferred the following [ ] firearms to [ (b)(6) ], an unlicensed person, without contacting NICS or recording the transfers on an ATF Form 4473:

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

**Violation 3: False Statement in Records**

Licensee falsely identified [ (b)(4) ] as the transferee and falsely identified the date of transfer as March 27, 2021, in its Acquisition and Disposition Record for four of the above-identified firearms transferred to [ (b)(6) ] specifically:

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

**Violation 4: Failure to Record Acquisition and Disposition**

Licensee failed to record the acquisition and disposition of the following firearm in its Acquisition and Disposition Record:

**(b)(3) (112 Public Law 55 125 Stat 552)**

**Final Notice of Denial of Application, Revocation  
Suspension and/or Fine of Firearms License**

In the matter of:

The application for license as a/an \_\_\_\_\_, filed by:

or

License Number 4-31-023-01-2H-09757 as a/an  
DEALER in Firearms (including gunsmith), issued to:

Name and Address of Applicant or Licensee (Show number, street, city, state and Zip Code)

DAVID LEE NORRIS  
dba NORRIS GUNS  
4516 BOSART ROAD  
SPRINGFIELD, OH 45503

Notice is Hereby Given That:

- A request for hearing pursuant to 18 U.S.C. § 923(f)(2) and/or 922(t)(5) was not timely filed. Based on the findings set forth in the attached document, your
- license described above is revoked pursuant to 18 U.S.C., 923(e), 922(t)(5) or 924(p), effective:
    - 15 calendar days after receipt of this notice, or  immediately \_\_\_\_\_,
  - license is suspended for \_\_\_\_\_ calendar days, effective \_\_\_\_\_, pursuant to 18 U.S.C. § 922(t)(5) or 924(p).
  - licensee is fined \$ \_\_\_\_\_, payment due: \_\_\_\_\_, pursuant to 18 U.S.C. § 922(t)(5) or 924(p).
- After due consideration following a hearing held pursuant to 18 U.S.C. § 923(f)(2) and/or 922(t)(5), and on the basis of findings set out in the attached copy of the findings and conclusions, the Director or his/her designee concludes that your
- application for license described above is denied, pursuant to 18 U.S.C., 923(d).
  - application for renewal of license described above is denied pursuant to 18 U.S.C. 923(d), effective:
    - 15 calendar days after receipt of this notice, or  \_\_\_\_\_
  - license described above is revoked pursuant to 18 U.S.C., 923(e), 922(t)(5) or 924(p), effective:
    - 15 calendar days after receipt of this notice, or  \_\_\_\_\_
  - license is suspended for \_\_\_\_\_ calendar days, effective \_\_\_\_\_, pursuant to 18 U.S.C. § 922(t)(5) or 924(p).
  - licensee is fined \$ \_\_\_\_\_, payment due: \_\_\_\_\_, pursuant to 18 U.S.C. § 922(t)(5) or 924(p).

If, after the hearing and receipt of these findings, you are dissatisfied with this action you may, within 60 days after receipt of this notice, file a petition pursuant 18 U.S.C. § 923(f)(3), for judicial review with the U.S. District Court for the district in which you reside or have your principal place of business. If you intend to continue operations after the effective date of this action while you pursue filing for judicial review or otherwise, you must request a stay of the action from the Director of Industry Operations (DIO), Bureau of Alcohol, Tobacco, Firearms and Explosives, at \_\_\_\_\_

prior to the effective date of the action set forth above. You may not continue licensed operations unless and until a stay is granted by the DIO.

Records prescribed under 27 CFR Part 478 for the license described above shall either be delivered to ATF within 30 days of the date the business is required to be discontinued or shall be documented to reflect delivery to a successor. See 18 U.S.C. 923(g)(4) and 27 CFR § 478.127.

After the effective date of a license denial of renewal, revocation, or suspension, you may not lawfully engage in the business of dealing in firearms. Any disposition of your firearms business inventory must comply with all applicable laws and regulations. Your local ATF office is able to assist you in understanding and implementing the options available to lawfully dispose of your firearms business inventory.

Date 5/11/2022	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official Judyth A. LeDoux, Director, Industry Operations	Signature JUDYTH LEDOUX <small>Digitally signed by JUDYTH LEDOUX Date: 2022.05.11 11:49:53 -0400</small>
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I certify that, on the date below, I served the above notice on the person identified below by:

- Certified mail to the address shown below.      Or       Delivering a copy of the notice to the address shown below.  
 Tracking Number: 7017 2026 0000 7884 0561

Date Notice Served 5/11/2022	Title of Person Serving Notice (b)(6) Investigative Analyst	Signature of Person Serving Notice (b)(6)
Print Name and Title of Person Served		
Address Where Notice Served		

Note: Previous Edition is Obsolete

Page 2 – ATF Form 5300.13, Final Notice of Revocation of Firearms License

David Lee Norris d/b/a Norris Guns (“Licensee”) holds Federal firearms license #4-31-023-01-2H-09757, issued by the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) pursuant to the Gun Control Act of 1968 (“GCA”), as amended, 18 U.S.C. Chapter 44, and the regulations issued thereunder, 27 C.F.R. Part 478.

On April 28, 2022, ATF issued a Notice to Revoke License, ATF Form 5300.4 (4500), to Licensee via certified mail. The Notice alleged that Licensee willfully violated the GCA and regulations, and that Licensee could request a hearing within 15 days of receipt of the Notice. See 18 U.S.C. § 923(f)(2); 27 C.F.R. § 478.73(b). Licensee timely requested a hearing but withdrew that request in writing on May 10, 2022. Licensee acknowledged that the withdrawal would result in a Final Notice of Revocation.

For the reasons set forth in the Notice to Revoke License issued on April 28, 2022, the Federal firearms license held by David Lee Norris d/b/a Norris Guns is hereby REVOKED.

The records Licensee was required to keep pursuant to the GCA and regulations must be delivered to the ATF Out-of-Business Records Center, 244 Needy Road, Martinsburg, West Virginia 25405, or to any ATF office in the Columbus Field Division, within 30 days of the effective date of the revocation as required by 18 U.S.C. § 923(g)(4) and 27 C.F.R. § 478.127.

Dated this 11th day of May, 2022.

JUDYTH  
LEDOUX

Digitally signed by JUDYTH  
LEDOUX  
Date: 2022.05.11 13:32:49  
-04'00'

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Judyth A. LeDoux  
Director, Industry Operations  
Columbus Field Division  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
United States Department of Justice



**U.S. Department of Justice**

**Bureau of Alcohol, Tobacco,  
Firearms and Explosives**

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*Washington DC*

[www.atf.gov](http://www.atf.gov)

**IMPORTANT NOTICE**

**Selling Firearms AFTER Revocation, Expiration, or Surrender of an FFL**

Former Federal Firearms licensees (FFLs) who continue to sell firearms after the revocation, expiration, or surrender of their license are subject to the same rules as persons who have never been licensed in determining whether they are "engaged in the business" of selling firearms without a license in violation of 18 U.S.C. § 922(a)(1)(A). Accordingly, former licensees who wish to dispose of any remaining business inventory must adhere to the following guidance:

Business inventory must be disposed of by the former FFL in a manner that, objectively, does not constitute being engaged in the business of dealing in firearms using the same facts and circumstances test that would apply to persons who have never been licensed.

The preferred manner of disposition is for the former licensee to:

- Arrange for another FFL to purchase the business inventory (and other assets) of the business; or
- Consign the inventory to another FFL to sell on consignment, or at auction.

Should a former FFL decide against those options, he/she should be aware that future sales - whether from his/her personal firearms collection or otherwise - will be evaluated for a potential violation of 18 U.S.C. § 922(a)(1)(A), just as would occur with a person who had never been licensed.

If a former FFL is disposing of business inventory, the fact that no purchases are made after the date of license revocation, expiration, or surrender does not immunize him/her from potential violations of 18 U.S.C. § 922(a)(1)(A). Instead, business inventory acquired through repetitive purchases while licensed are attributed to the former FFL when evaluating whether subsequent sales constitute engaging in the business of dealing in firearms without a license.

ATF remains committed to assisting former licensees in complying with Federal firearms laws. If you have questions, please contact your local ATF office.

**CURTIS  
GILBERT** Digitally signed by  
CURTIS GILBERT  
Date: 2022.04.04  
16:12:22 -04'00'

Curtis Gilbert  
Deputy Assistant Director (Industry Operations)  
Field Operations