

GAME CHANGER OUTDOORS LLC's FCI
 FCI-30914
 04/29/2022 10:01 AM
 IO of (b)(6), Raleigh (IO) Satellite Office

LICENSEE INFORMATION

Licensee Name GAME CHANGER OUTDOORS LLC	RDS Key 1-56-13287	License/Permit Number 1-56-013-01-2C-13287	License Type 01 - Dealer License
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Business Type
Limited Liability Company (LLC)

Premises Address

Premises Ownership Type
Leased/Rented

Premises Location Type
Store Front

Mailing Address

Address
 P O BOX 238
 Unit N/A
 BELHAVEN, North Carolina 27810
 United States

Address
 831 US 264 BYPASS
 Unit N/A
 BELHAVEN, North Carolina 27810
 BEAUFORT United States

Phone Type	Phone Number	Remarks
Business	+1 252-945-8724	
Mobile	(b)(6)	

Email Address	Email Remarks
(b)(6)	

RECOMMENDATIONS

Final Decision
 Revocation
 Date
 04/25/2022

Details

Revocation Hearing Held on 4-12-22. FFL did not attend.

Counts 1-8 were found to be willful and counts 9-12 were not ruled upon due to the fact that they were not presented during the hearing. A Final Notice of Revocation was issued with an effective date of April 25, 2022.

Licensee's records have already been confirmed to have been submitted to OOB.

FFLC notified to update FLS with a status of revoked.

Out of Business Records and Inventory Management

Licensee Records

✔ Submitted to the Federal Licensing Center

Deputy Assistant Director - Industry Operations Megan Bennett's Recommendation
 Revocation

Details

I concur with the recommendation of revocation.

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

SAC concurrence with the Admin Action of Revocation.

Division Counsel (b)(6) Review

Details

Reviewed and ACC Memo prepared

Director of Industry Operations Stephen Albro's Recommendation
 Revocation

Licensee Inventory

✔ Inventory transferred to self

Details

Twelve violations cited including the acceptance of an out of state CCW permit as an alternative to NICS. Case is recommended for revocation.

Area Supervisor: (b)(6) Recommendation
Revocation

Details

Licensee has been in business since 2019 and this is the first compliance inspection. As a result of the inspection there were 12 violations issued. While the two violations for the untimely acquisitions in excess of (b)(6) and failure to report multiple sales in excess of (b)(6) instances warrants a WL being issued, the violation where the FFL accepted a Texas Concealed Carry Permit in lieu of NICS check rose to the level of revocation.

While the IOI (b)(6) recommended an alternate of WC ILO REV, based on the current AA policy the AS is recommending the recommendation of REVOCATION.

Industry Operations Investigator: (b)(6) Recommendation
Warning Conference

Details

Recommendation: A Warning Conference is recommended as an alternate recommendation in lieu of Revocation for the following reasons:

1. The Federal Firearms License was issued in 2019. The current inspection is the first compliance inspection conducted on the license.
2. There were 12 violations cited for the current inspection.
 - a. A Warning Letter is warranted for two violations, untimely acquisitions in excess of (b)(6) and failure to report multiple sales in excess of (b)(6) instances.
 - b. Revocation is warranted for failure to conduct a NICS check or obtain an alternative permit and the transferee is not prohibited. On 4/8/2021, the licensee accepted a Texas Concealed Carry Permit in lieu of NICS check. A CCH Background check was conducted on the buyer, which resulted in no prohibitions.
 - c. A Violation only is warranted for the other violations.
3. Even though there were recordkeeping and traceability issues (b)(6) instances of A&D untimely acquisition, (b)(6) instances of A&D untimely disposition, and (b)(6) instances of unreported multiple sales, it only rose to a level of a Warning Letter.
4. There was one NICS violation cited.
 - a. A Revocation is warranted for one (1) instance of failure to conduct a NICS background check or obtain an alternative permit and the transferee is not prohibited.
5. No prohibitive transactions. No overall public safety violations.
- 6.

FLS Updates:

- Email updated to (b)(6)
- Business hours changed to: Mon - Sat 0830 - 1830, Sun 1200-1500

Last Onsite Date: 11/3/2021.

Inspection Findings

Records and Forms

1. Failure to timely and/or correctly maintain records of receipt, manufacture, importation or other acquisition of (b)(6) percent or more of the licensee's total acquisitions during the inspection period, with a minimum of (b)(6) instances.

NICS

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

Failure to Report

1. Failure to file Reports of Multiple Sale or Other Disposition of Pistols and Revolvers (F 3310.4) or Reports of Multiple Sales or Dispositions of Certain Rifles (F 3310.12) (Southwest Border states only) when legally required and with a minimum of (b)(6) instances.

ELIGIBILITY VERIFICATION

Business Information Verification

Licensee Name	Business Type	Is the business valid?
GAME CHANGER OUTDOORS LLC	Limited Liability Company (LLC)	Yes

Additional Findings

Game Changer Outdoors LLC is registered with North Carolina Secretary of State and shows a current-active status. The 2020 Annual Report shows the following persons as managing member (b)(6) and RP Shane T Griekspoor.

RP Griekspoor advised that although (b)(6) is a managing member of the company (b)(6) and will not have anything to do with the day-to-day operations.

Attachment(s):

NC SOS Game Changer.pdf

Property Ownership Verification

Premises Ownership Type	Premises Location Type	Has the property ownership been verified?
Leased/Rented	Store Front	Yes

Address
831 US 264 BYPASS
Unit N/A
BELHAVEN, North Carolina 27810
BEAUFORT United States

Additional Findings

Electronic records available from Beaufort County's website show the property owner as (b)(6)

Attachment(s):

Beaufort Co Property Records Game Changer.pdf

Rental/Lease Verification

Is the proposed business activity permitted by the property owner?

Yes

Additional Findings

Currently, Mr. Griekspoor says he only has a verbal agreement with property owner (b)(6) and there is no written lease (b)(6)

At the time of the FFL qualification, a letter from the property owner and LLC partner (b)(6) allows the FFL at the premises.

Attachment(s):

Lease Verification - Permission.pdf

Zoning Information Verification

Is the proposed business activity in compliance with zoning?

Yes

Additional Findings

A letter from the Town of Belhaven says that the sale of firearms is permissible by the FFL.

Attachment(s):

Zoning Verification.pdf

APPOINTMENT DETAILS

Interview Date

10/14/2021

Address

831 US 264 BYPASS, Unit N/A, BELHAVEN, North Carolina 27810

Responsible Attendee(s)

Non-Responsible Person(s)

SHANE THOMAS GRIEKSPoor

No Items

(b)(6) (Deactivated)

RESPONSIBLE PERSON(S)

SHANE THOMAS GRIEKSPoor

Name	Gender	Race	Ethnicity
SHANE THOMAS GRIEKSPoor	Male	White	Not Hispanic or Not Latino
Date of Birth	SSN	Job Title	
(b)(6)	(b)(6)	OWNER	

Physical Identifiers

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

Place of Birth

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

Home Address

(b)(6)

Additional Names

Alias Type

Citizenship

ID Type	Country	State	ID Number
Driver's License	United States	North Carolina	(b)(6)
Phone Type	Phone Number		Remarks
Mobile	(b)(6)		
Email Address			Email Remarks
(b)(6)			

Criminal History Check

Date Criminal History Check Conducted
09/30/2021

Criminal History Check Comments
IO: (b)(6) conducted a check using FLS, N-Force, and NCIC with negative wants and prohibitions.

SHANE THOMAS GRIEKSPoor

(Deactivated)

Name	Gender	Race	Ethnicity
(b)(6)	(b)(6)	(b)(6)	(b)(6)
Date of Birth	SSN	Job Title	
(b)(6)	(b)(6)	MEMBER/MANAGER	

Physical Identifiers

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

Place of Birth

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

Home Address

(b)(6)

Additional Names

Alias Type

Citizenship

United States

ID Type	Country	State	ID Number
Driver's License	United States	North Carolina	(b)(6)
Phone Type	Phone Number		Remarks
Mobile	(b)(6)		
Email Address			Email Remarks
(b)(6)			

Criminal History Check

Date Criminal History Check Conducted
09/30/2021

Criminal History Check Comments
IO: (b)(6) conducted a check using FLS, N-Force, and NCIC with negative wants and prohibitions.

INTERVIEW QUESTIONNAIRE

What is the proposed business activity?

On 10/14/2021, IO (b)(6) initiated an unannounced inspection for Game Changer Outdoors LLC, located at 831 US 264 Bypass, Belhaven, North Carolina (BEAUFORT). Contact was made with sole Responsible Person Shane Griekspoor who assisted with the inspection. Mr. Griekspoor was identified with the N.C. driver's license documented in Spartan. The inspection scope covered 10/14/2020 through 10/13/2021. The onsite inspection was conducted 10/14/2021 through 10/15/2021, with the closing conference held on 11/03/2021. Prior to the inspection, NFORCE, FLS, and NSPECT queries for the responsible person resulted in negative findings. The Dealer of Firearms Other Than Destructive Devices (Type 01) was issued on 02/13/2019 and is appropriate for the activities conducted. Mr. Griekspoor is usually the only employee, but from time to time he hires other employees, who may help with firearm transactions. Hidden ownership is not suspected.

Game Changer Outdoors LLC offers a variety of sporting goods, firearms, ammunition, ammunition reloading supplies, along with livestock feed. They buy and sell new and used firearms, as well as conducting minor gunsmithing. Gunsmithing activities include repairs, scope mounting, cleaning, and some mechanical drop in parts like triggers. Mr. Griekspoor reloads ammunition only for himself and only sells reloading supplies to the public. Reloading supplies include smokeless powder and no black powder. He is not interested in selling black powder. IO (b)(6) informed Mr. Griekspoor that he would need an explosives permit if he ever decided to sell black powder. Typically, they keep an inventory of 10 firearms. Clientele is the general public. Mr. Griekspoor currently has one employee, who will occasionally assist with ATF F 4473s.

The FFL has a website www.gamechangeroutdoorstore.com, which is no longer in use. Mr. Griekspoor said someone had made fraudulent charges, costing the FFL thousands of dollars. So, Mr. Griekspoor stopped using the website and thought it was no longer assessable. As of this inspection, the website was still assessable and items viewed, but could not be purchased.

Mr. Griekspoor is not associated with any other FFL. No other FFLs or businesses will be co-located.

Inventory- A 100% inventory was taken of 23 firearms, with none missing from inventory.

A&D Book- The licensee maintains a prefabricated bound Acquisition and Disposition record book, which was in the proper format. Mr. Griekspoor had several firearms that their acquisitions were not timely logged into the A&D book. Most of the untimely acquisitions were firearms acquired for gunsmithing, transfers or special orders for customers which the firearm was acquired and disposed of the same day, or Mr. Griekspoor's personal firearms which were on display for sale. The licensee stated that when a firearm is acquired or disposed of, the firearm information is usually entered into the A&D book the same day for acquisitions, but sometimes a couple days for the dispositions. There were instances of acquisition errors and instances of dispositions errors identified during the compliance inspection by IO (b)(6). A full firearm to A&D entry inventory was conducted during the inspection. All firearms on hand were compared to the open entries in the A&D Record. The inventory revealed a total of 23 firearms in inventory and open entries in the A&D Record. The inventory resulted in a violation for failure to maintain accurate and timely acquisitions and dispositions. For the inspection scope, they acquired approximately firearms and disposed of approximately firearms.

Often customers who special ordered firearms would track their shipment and arrive at the FFL after their firearm showed delivered to the FFL. However, USPS does not make deliveries to the shop and Mr. Griekspoor must get the packages at the post office. When this occurs, Mr. Griekspoor usually leaves the customer at the shop, gets the package from the post office, then returns to the shop where he disposes the firearm to the customer. Mr. Griekspoor said that this would make him rush and he would occasionally forget to log the acquisition and/or disposition of the firearm in the A&D book. He also said that occasionally he would record the firearm information from the box or invoice, instead of the firearm. This caused inaccurate firearm information to be recorded on the ATF F 4473 and/or the A&D book. IO (b)(6) explained the need for accurate and timely acquisitions and dispositions, on both the ATF F 4473 and A&D book, for tracing purposes. As well as the need for firearm information to match on both the ATF F 4473 and A&D book.

ATF F 4473- The ATF F 4473 are filed numerically, by transaction serial number. Mr. Griekspoor is responsible for reviewing all completed ATF Forms 4473 for errors and omissions. A 100% review of the forms was conducted. There were forms with instances of error/omission identified during the review by IO (b)(6).

NICS- The inspection revealed Mr. Griekspoor used an out of state, Texas Concealed Carry Permit (CCP), in lieu of a NICS background check. Mr. Griekspoor said he did not realize he could not take out-of-state CCPs. IO (b)(6) completed a CCH background check on the Texas buyer (b)(6) and found no prohibitions. Mr. Griekspoor conducts NICS background checks both electronically and telephonically.

Other- At the time of the inspection, the Mr. Griekspoor was compliant with the 2005 Child Safety Lock Act. He also maintains a supply of firearm locks available for sale to customers. He was partially compliant with the Federal Youth Handgun Safety Act (YHSA) and North Carolina General Statute 14-315.2, posting the YHSA poster and providing the NC notice, but did not provide the YHSA notice or have the NC sign posted. Both the poster and notice were provided and discussed during the inspection. Additionally, there were occasions, involving instances, where Mr. Griekspoor received one North Carolina Pistol Purchase Permit (NC PP) for the purchase of multiple handguns. NC State law requires one NC PP per handgun.

Multiple Sale/Suspicious Purchasers/Trace Activity- On 10/13/2021, the Violent Crime Analysis Branch conducted a Firearms Trace History query for Game Changer Outdoors, LLC (FFL # 1-56-13287) for the time period of 10/13/2020 to 10/13/2021. The query scope had no results to report for the above FFL. No suspicious or prohibited purchasers were identified during the inspection. At the beginning of the inspection Mr. Griekspoor told IO (b)(6) that there were no multiple handgun firearm transactions. However, unreported multiple sales, involving firearms, were identified during the inspection. After the unreported multiple sale transactions were identified, Mr. Griekspoor immediately completed the multiple sales forms and submitted them to ATF and Beaufort County Sheriff's Office. No referrals were generated from this inspection.

On 9/30/2021, a NICS FFL Audit Log query revealed nine transactions for this licensee with one denial on file. There were no reportable issues found during the NICS Audit log review.

Inspection history, not to exceed 5-years: This is the first compliance inspection, since becoming licensed in 2019.

Do they need an additional license or permit?

No

Who are their primary suppliers?

Game Changer Outdoors LLC uses the following primary supplier: (b)(4)

Business Activities

Selected Operational Security Measures

Controlled Access to ATF Recordkeeping

Internet Sales/Transfers

Retail

Gunsmith

Internet Sales/Transfers Website

No website. Transfers only.

PREMISES INFORMATION

Inspection Area Description

The business premises is a storefront, located in Town of Belhaven. It is suitable for the activities conducted. No off-site storage is utilized. Mr. Griekspoor was notified of ATF's right of entry and that the records, inventory, and premises are subject to inspection. There are no safety concerns to note. GPS finds the address without issue. FFL related activities are conducted in the front of the store. Firearms are stored in the front of the store and gunsmithing firearms are kept in the back. Handguns in the front of the store are kept in cases and long guns on the wall. ATF records are stored in his office.

The premises is alarmed and monitored by ADS Security. There are a total of nine security cameras, five in the interior and four on the exterior of the premises. All cameras can be view by Mr. Griekspoor, either on his cellular phone or a monitor in his office. Only two of the interior cameras are ADS Security and can be view by them. The other cameras are owned by Mr. Griekspoor and the camera footage is stored for 14 days on a hard drive located in Mr. Griekspoor's office. ADS's footage is stored in the cloud. Occasionally, Mr. Griekspoor will keep a loaded firearm under the counter.

Primary Activity
Retail

GPS Coordinates

Latitude
35.55230

Longitude
-076.62699

Selected Physical Security Measures

- Alarm Monitoring/Other Signage
- Window Film/Tinting/Mirroring
- Security Cameras
- Reinforced Heavy Duty Doors/Frames
- Motion Sensors
- Lockable Display Rack(s)/Case(s)
- Local Audible Alarm
- Deadbolts

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
23

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](#)

Attachment(s)

Report of Violations.pdf

Licensee Response to Violations Report.pdf

REPORT OF VIOLATIONS

Regulation	Corrective Actions	Instance Details
27 CFR 478.103(a): Failure to provide Youth handgun notice to handgun purchasers 1 Number of Instances: 1	Obtain, conspicuously post and provide Youth Handgun Safety Act notices for purchasers of handguns.	Mr. Griekspoor failed to provide the notice to handgun purchasers.
27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers 2 ATF Forms 4473: [redacted] Number of Instances: [redacted]	Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) for all non-reported multiple sales identified as a result of this inspection. Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) by close of the same business day, for all applicable future multiple sales.	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
27 CFR 478.58: Unlawful conference of rights and privileges under State or other	Comply with State or other laws.	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6) 3, and only received one NC Pistol Purchase Permit, in violation of state law. State law requires one NC Pistol Purchase Permit per handgun.

<p>law</p> <p>3 Number of Instances: <input type="text"/></p>		<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6) and only received one NC Pistol Purchase Permit, in violation of state law. State law requires one NC Pistol Purchase Permit per handgun.</p> <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6) and only received one NC Pistol Purchase Permit, in violation of state law. State law requires one NC Pistol Purchase Permit per handgun.</p> <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6) and only received one NC Pistol Purchase Permit, in violation of state law. State law requires one NC Pistol Purchase Permit per handgun.</p>
<p>4 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>Retrieve and accurately record (on an ATF Form 4473) a required final NICS/POC background check response prior to all future over-the-counter firearm transactions.</p>	<p>NICS Violation: <input type="text" value="(b)(6)"/></p>
<p>5 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 & timely record all required future firearm acquisition information.</p> <p>Accurately, completely & timely record all required future firearm disposition information.</p> <p>Amend/Update A&D Record to accurately record all required firearm acquisition information.</p> <p>Amend/Update A&D Record to accurately record all required firearm disposition information.</p> <p>Resume proper maintenance of required acquisition and disposition record.</p> <p>Create A&D Record from all available sources of record (i.e. invoices, work/claim tags, receipts, etc).</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>6 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>Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions.</p> <p>Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified.</p> <p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>27 CFR 478.124(c)(4): Failure to</p>		

<p>7</p> <p>record firearm information on 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>Ensure that all required firearm identification information is obtained and accurately recorded on all future ATF Forms 4473, Section D.</p> <p>Ensure that the required transferor/seller signature and date of transfer is obtained and accurately recorded on all future ATF Forms 4473, Section D.</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>8</p> <p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473 Number of Instances</p>	<p>Complete all forms as prescribed.</p> <p>Correct/Update photocopies of all specified ATF Form 4473 discrepancies, in accordance with form headings and instructions.</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>Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions.</p> <p>Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified.</p> <p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>9</p> <p>27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on 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>Ensure that all required transferee/buyer identification information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p> <p>Execute a required NICS/POC background check for all future over-the-counter firearm transactions.</p> <p>Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p> <p>Ensure that all required NICS alternative permit information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>10</p> <p>27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on 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>Execute a required NICS/POC background check for all future over-the-counter firearm transactions.</p> <p>Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p> <p>Ensure that all required NICS alternative permit information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>11</p> <p>27 CFR 478.131(a)(2): Failure to record on an ATF Form 4473 (or affix a copy of) NICS alternative permit info</p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p> <p>Ensure that a qualifying NICS alternative permit is properly obtained, validated, verified, and documented for all applicable future over-the-</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>

ATF Forms 4473 Number of Instances	counter firearm transactions.	
27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473	Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions. Ensure that the required transferor/seller signature and date of transfer is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D.	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
12 ATF Forms 4473 Number of Instances		

LICENSEE RESPONSE REPORT

Regulation	Corrective Actions	Licensee Response	Status Details
27 CFR 478.103(a): Failure to provide Youth handgun notice to handgun purchasers Number of Instances: 1	Obtain, conspicuously post and provide Youth Handgun Safety Act notices for purchasers of handguns.	Mr. Griekspoor did not remember he had to provide the notices.	Status Correction Verified Verified Method In Person Date Correction Verified 11/03/2021
27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers ATF Forms 4473 Number of Instances	Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) for all non-reported multiple sales identified as a result of this inspection. Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) by close of the same business day, for all applicable future multiple sales.	Mr. Griekspoor said he did not remember from his qualification meeting that it was a requirement.	Status Correction Verified Verified Method In Person Date Correction Verified 11/03/2021
27 CFR 478.58: Unlawful conference of rights and privileges under State or other law Number of Instances	Comply with State or other laws.	Mr. Griekspoor said he did not remember from his qualification meeting that it was a requirement and thought it was like a Conceal Carry Permit.	Status Licensee Notified Verified Method In Person Date Licensee Notified 11/03/2021
27 CFR 478.102(a): Failure to complete a NICS/POC background check ATF Forms 4473: 1 Number of Instances: 1	Execute a required NICS/POC background check for all future over-the-counter firearm transactions. Retrieve and accurately record (on an ATF Form 4473) a required final NICS/POC background check response prior to all future over-the-counter firearm transactions.	Mr. Griekspoor said he did not remember from his qualification meeting that it was a requirement only NC permits could be used in lieu of a background check.	Status Licensee Notified Verified Method In Person Date Licensee Notified 11/03/2021
27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearms Number of Instances	Accurately, completely & timely record all required future firearm acquisition information. Accurately, completely & timely record all required future firearm disposition information. Amend/Update A&D Record to accurately record all required firearm acquisition information. Amend/Update A&D Record to accurately record all required firearm disposition information. Resume proper maintenance of required acquisition and disposition record. Create A&D Record from all available sources of record (i.e. invoices, work/claim tags, receipts, etc).	Mr. Griekspoor said it was negligence on his part for not logging in or out the firearms.	Status Licensee Notified Verified Method In Person Date Licensee Notified 11/03/2021

6	<p>27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473</p> <p>ATF Forms 4473 Number of Instances: <input type="text"/></p>	<p>Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions.</p> <p>Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified.</p> <p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>Mr. Griekspoor did not know the severity of the consequences of making sure the customers accurately completed the forms.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 11/03/2021</p>
7	<p>27 CFR 478.124(c)(4): Failure to record firearm information on an ATF F 4473</p> <p>ATF Forms 4473 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>Ensure that all required firearm identification information is obtained and accurately recorded on all future ATF Forms 4473, Section D.</p> <p>Ensure that the required transferor/seller signature and date of transfer is obtained and accurately recorded on all future ATF Forms 4473, Section D.</p>	<p>The FFL would sometimes get the incorrect serial number from the invoice or the box.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 11/03/2021</p>
8	<p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473 Number of Instances: <input type="text"/></p>	<p>Complete all forms as prescribed.</p> <p>Correct/Update photocopies of all specified ATF Form 4473 discrepancies, in accordance with form headings and instructions.</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>Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions.</p> <p>Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified.</p> <p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>Mr. Griekspoor said it could have been from him rushing and not paying attention.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 11/03/2021</p>
9	<p>27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473</p> <p>ATF Forms 4473 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>Ensure that all required transferee/buyer identification information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p> <p>Execute a required NICS/POC background check for all future over-the-counter firearm transactions.</p> <p>Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p> <p>Ensure that all required NICS alternative permit information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p>	<p>Mr. Griekspoor said it could have been from him rushing and not paying attention.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 11/03/2021</p>
10	<p>27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473</p> <p>ATF Forms 4473 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>Execute a required NICS/POC background check for all future over-the-counter firearm transactions.</p> <p>Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p> <p>Ensure that all required NICS alternative permit information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p>	<p>Mr. Griekspoor said it could have been from him rushing and not paying attention.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 11/03/2021</p>
11	<p>27 CFR 478.131(a)(2): Failure to record on an ATF Form 4473 (or affix a copy of) NICS alternative permit info</p> <p>ATF Forms 4473 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>Ensure that a qualifying NICS alternative permit is properly obtained, validated, verified, and documented for all applicable future over-the-counter firearm transactions.</p>	<p>Mr. Griekspoor said it could have been from him rushing and not paying attention.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 11/03/2021</p>
	<p>27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473</p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p> <p>Ensure that the required transferor/seller signature and date of</p>	<p>Mr. Griekspoor said it could have been from him rushing and not paying attention.</p>	<p>Status Licensee Notified</p>

ATF Forms 4473 Number of Instances: 12	transfer is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D.	Verified Method In Person Date Licensee Notified 11/03/2021
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CLOSING CONFERENCE

(11/3/2021)
 11/03/2021

Closing Conference Additional Notes

During the closing conference on 11/3/2021, IO (b)(6) conducted a full review of ATF laws and regulations per the Acknowledgement of Federal Firearms Regulations Form with Responsible Person Mr. Griekspoor who certified receipt by digitally signing the form. Violations were disclosed and reviewed in detail. IO (b)(6) provided the required forms and posters noted in the Acknowledgement. Detailed instructions regarding the Acquisition and Disposition Record Book, the ATF Form 4473, ATF Form 3310.11 (FFL Theft/Loss Report), and ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) were explained during the interview. North Carolina G.S. 14-315, The Storage of Firearms to Protect Minors, law was provided, to include a copy of the required notice and example of the required poster. Mr. Griekspoor was encouraged to contact ATF for any questions or concerns in the future. IO (b)(6) also provided her business card, along with other ATF important contact numbers.

Attachment(s)

Attendee(s)

SHANE THOMAS GRIEKSPoor

EXHIBITS

Inspection

Category	Attachment Name
Correspondence	Spartan Notification RE: 1-56-13287 Inspection Results
Correspondence	Spartan Notification RE: 1-56-13287 Monitored Case
Correspondence	Spartan Notification RE: 1-56-13287 Monitored Case
Correspondence	Spartan Notification RE: 1-56-13287 Monitored Case
Correspondence	Spartan Notification RE: 1-56-13287 Monitored Case
Correspondence	Spartan Notification RE: 1-56-13287 Monitored Case
Correspondence	Spartan Notification RE: 1-56-13287 Monitored Case
Correspondence	Spartan Notification RE: 1-56-13287 Monitored Case
Correspondence	Spartan Notification RE: 1-56-13287 Monitored Case
UpdateLicensingCenter	Game Changer.Final8C.12.6(VCP).pdf
Correspondence	DIO Stephen Albro Returned Inspection FCI-30914
Correspondence	
Correspondence	Spartan Notification RE: 1-56-13287 Monitored Case
Correspondence	Spartan Notification RE: 1-56-13287 Monitored Case
ClosingConferenceSummary	Acknowledgment of Regulations.pdf
LicenseeResponseToViolationsPDF	Licensee Response to Violations Report.pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
ZoningVerification	Zoning Verification.pdf
RentalLeaseVerification	Lease Verification - Permission.pdf
PropertyOwnershipVerification	Beaufort Co Property Records Game Changer.pdf
BusinessVerification	NC SOS Game Changer.pdf

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

In the matter of License Number 1-56-13287, as a/an
Dealer in Firearms Other Than Destructive Devices _____ issued to:

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

Game Changer Outdoors LLC
831 US 264 BYPASS
Belhaven, NC 27810

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 3600 Arco Corporate Drive, Suite 500, Attention DIO Albro, Charlotte, NC 28273, 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	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official	Signature
12/18/22	Stephen B. Albro	STEPHEN ALBRO

Digitally signed by
STEPHEN ALBRO
Date: 2022.01.14 16:23:45
-05'00'

I certify that on the date shown below I served the above notice on the person identified below by:

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

Date Notice Served	Title of Person Serving Notice	(b)(6)
12/18/22	IA	

Print Name and Title of Person Served	Signature of Person Served (if applicable)
Shane T Griekspoor	

Address Where Notice Served
P O BOX 238 BELHAVEN, North Carolina 27810

Under the provisions of 18 U.S.C. § 923(e) and 27 C.F.R. § 478.73, notice is hereby given of the revocation of the Federal firearms license specified above, in that the Director, Industry Operations, United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), Charlotte Field Division, has reason to believe that Game Changer Outdoors LLC (hereinafter Game Changer), 831 US 264 Bypass, Belhaven, North Carolina 27810, 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.

Compliance History

On or about November 30, 2018, ATF conducted an application inspection with Licensee. At the conclusion of the inspection, Shane Greikspoor, Sole Responsible Person, reviewed and signed an Acknowledgment of Federal Firearms Regulations. ATF issued a Type 01 Dealer’s License shortly thereafter in or about February 2019.

Current Inspection

On October 14, 2021, ATF Industry Operations Investigator (b)(6) conducted a compliance inspection of the licensee’s premises. The inspection revealed the following:

1. Licensee willfully failed on one (1) occasion to conduct a NICS background check or obtain a valid NICS alternative permit in violation of 18 U.S.C. § 922(t) and 27 C.F.R. § 478.102(a). Licensee accepted a Concealed Carry Permit issued by another State instead of conducting a NICS background check.

<u>Date</u>	<u>Transferee</u>	<u>Error</u>
2/9/2021	(b)(6)	Accepted a Texas Concealed Carry Permit instead of conducting a NICS background

2. Licensee willfully failed on (b)(3) (112 Public Law 55 125 Stat 552) occasions to ensure that the transferee correctly recorded the required information in Section A of the ATF Form 4473 in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.124(c)(1).

<u>Date</u>	<u>Transferee</u>	<u>Error</u>
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

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

3. Licensee willfully failed on **(b)(3) (112 Public Law 55 125 Stat 552)** occasions to ensure that the ATF Form 4473 was complete and accurate as required prior to transferring a firearm violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.21a.

Date

Transferee

Error

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

4. Licensee willfully failed in **(b)(3) (112 Public Law 55 125 Stat 552)** instances to timely and/or accurately record the acquisition or disposition of firearms 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).

Firearm

Error

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

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

5. Licensee failed in instances to record firearm information on the ATF Form 4473 in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 124(c)(4).

<u>Date</u>	<u>Transferee</u>	<u>Error</u>
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

6. Licensee failed on seven (7) occasions to report the multiple sales or other dispositions of pistols or revolvers in violation of 18 U.S.C. § 923(g)(3)(A) and 27 C.F.R. § 478.126a.

<u>Date</u>	<u>Transferee</u>	<u>Error</u>
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

7. Licensee transferred multiple pistols or revolvers to a nonlicensee without obtaining a North Carolina pistol purchase permit for each firearm in violation of 18 U.S.C. § 923(b)(2).

<u>Transferee</u>	<u>Error</u>
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

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

8. Licensee failed on [REDACTED] occasions to verify and record identification documents on the ATF Form 4473 in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.124(c)(3)(i).

Date

Transferee

Error

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

9. License failed in [REDACTED] instances on [REDACTED] ATF Forms 4473 to record NICS contact information in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. §§ 478.102 (b) and 124(c)(3)(iv).

Date

Transferee

Error

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

10. Licensee failed on [REDACTED] occasion to record on the ATF Form 4473 or affix a copy of a NICS alternative permit in violation of 18 U.S.C. §§ 922 (t)(3), 923(g)(1)(A) and 27 C.F.R. § 478.131(a)(2).

Date

Transferee

Error

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

11. Licensee failed in [REDACTED] instances on [REDACTED] ATF Forms 4473 to sign and/or date the form in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.124(c)(5).

Date

Transferee

Error

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

12. Licensee failed to provide the Youth Handgun Notice to purchasers of pistols or revolvers in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.103(a).

**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 1-56-13287 as a/an
Dealer in Firearms other than Destructive Devices, issued to:

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

Game Changer Outdoors LLC
831 US 264 Bypass
Bellhaven, NC 27810

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 _____ .
 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 April 25, 2022
 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 3600 Arco Corporate Drive, Suite 500, Charlotte, NC 28273

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
4/25/2022

Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official
Stephen B. Albro, Director of Industry Operations

(b)(6)

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.
Tracking Number: 701 705300000 78959359

Or Delivering a copy of the notice to
the address shown below.

Date Notice Served
4/25/2022

Title of Person Serving Notice
IA

(b)(6)

Print Name and Title of Person Served
Shane Greikspoor

Address Where Notice Served
PO Box, 238, Belhaven, NC 27810

Note: Previous Edition is Obsolete

Game Changer Outdoors LLC (Licensee), 831 US 264 Bypass, Belhaven, North Carolina, 27810, a Dealer in Other Than Destructive Devices, (“Licensee”), holds Federal firearms license #1-56-13287 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 December 18, 2021, ATF issued a Notice of Revocation and/or Fines of License, ATF Form 4500, to the Licensee via certified mail. The Licensee timely requested a hearing to review that Notice. The hearing was scheduled for April 12, 2022 at the ATF Raleigh Field Office.

The hearing was conducted by ATF Director of Industry Operations (DIO) Stephen B. Albro. ATF was represented by Charlotte Division Counsel (b)(6) ATF Industry Operations Investigator (b)(6) appeared as a witness on behalf of the Government and ATF Area Supervisor (b)(6) observed. The Sole Responsible Person for Licensee, Shane Greikspoor, failed to appear for the hearing. The hearing was recorded and transcribed by the Government through a court reporter service. The Government offered testimony and exhibits.

Approximately sixty (60) minutes after the hearing began, Shane Greikspoor telephoned Investigator (b)(6) but she did not respond because she was presenting evidence. During a break in the proceeding, Investigator (b)(6) telephoned Mr. Greikspoor who advised that he had submitted Game Changer Outdoors’ Federal Firearms License and records to the Out of Office Records Center. DIO Albro restarted the hearing and Shane Greikspoor advised that he did not wish to participate in the hearing on behalf of Licensee and withdrew Licensee’s request for hearing on the record.

Findings of Fact

Having reviewed the record in this proceeding, I make the following findings:

1. At the hearing, ATF introduced evidence of a qualification inspection conducted at the licensed premises of Licensee on or about November 29, 2018. The document was a signed Acknowledgement of Federal Firearms Regulations dated November 29, 2018 demonstrating that ATF reviewed the legal requirements applicable to Licensee. *See* ATF Exhibit 5.
2. Following an October 14, 2021 compliance inspection, Investigator (b)(6) identified twelve (12) regulatory violations all of which were included in the Notice of Revocation of License issued to Licensee. *See* Government Exhibit 1.
3. As set forth in paragraph 1 of the Notice of Revocation, Licensee willfully failed on one (1) occasion to conduct a NICS background check or obtain a valid NICS alternative permit in willful violation of 18 U.S.C. § 922(t) and 27 CFR § 478.102(a). The Government produced testimony and a Firearms Transaction Record, ATF Form 4473 showing that the licensee transferred a G Force, GF22 model, 12-gauge shotgun to an individual who presented a License to Carry issued by the State of Texas. The Licensee did not conduct a NICS background check. *See* ATF Exhibit 6.

4. As set forth in paragraph 2 of the Notice of Revocation, Licensee willfully failed in (b)(3) (112 Public Law 55 125 Stat 552) instances to ensure that the transferee correctly recorded the required information on the ATF Form 4473 in willful violation of 18 U.S.C. § 923(g)(1)(A) and 27 CFR § 478.124(c)(1). During the hearing, the Government introduced testimony and (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473 to support the violations. *See* ATF Exhibits 7A – 7P.
5. As set forth in paragraph 3 of the Notice of Revocation, Licensee failed on (b)(3) (112 Public Law 55 125 Stat 552) occasions to ensure that the ATF Form 4473 was complete and accurate as required prior to transferring a firearm in willful violation of 18 U.S.C. § 923(g)(1)(A) and 27 CFR § 478.21a. The Government produced testimony and (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473 to support the violations. *See* ATF Exhibits 8A – 8W.
6. As set forth in paragraph 4 of the Notice of Revocation, Licensee failed in (b)(3) (112 Public Law 55 125 Stat 552) instances to timely and/or accurately record the acquisition or disposition of firearms 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). The Government produced testimony and photocopies of Licensee’s Acquisition and Disposition Records to support the violation. *See* ATF Exhibits 9A and 9B.
7. As set forth in paragraph 5 of the Notice of Revocation, Licensee failed in (b)(3) (112 Public Law 55 125 Stat 552) instances to record firearm information on the ATF Form 4473 in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 124(c)(4). The Government produced testimony and (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473 to support the violations. *See* ATF Exhibits 10A and 10B.
8. As set forth in paragraph 6 of the Notice of Revocation, Licensee failed on (b)(3) (112 Public Law 55 125 Stat 552) occasions to report the multiple sales or other dispositions of pistols or revolvers in violation of 18 U.S.C. § 923(g)(3)(A) and 27 C.F.R. § 478.126a. The Government produced testimony and (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473 to support the violations. *See* ATF Exhibits 11A – 11G.
9. As set forth in paragraph 7 of the Notice of Revocation, Licensee transferred multiple pistols or revolvers to a nonlicensee without obtaining a North Carolina pistol purchase permit for each firearm in violation of 18 U.S.C. § 923(b) (2). The Government produced testimony and (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473 to support the violations. *See* ATF Exhibits 12A and 12B.
10. As set forth in paragraph 8 of the Notice of Revocation, Licensee failed on (b)(3) (112 Public Law 55 125 Stat 552) occasions to verify and record identification documents on the ATF Form 4473 in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.124(c)(3)(i). The Government produced testimony and (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473 to support the violations. *See* ATF Exhibits 13A – 13D.
11. The Government did not produce evidence to support the violations set forth in paragraphs 9 thru 12 of the Notice of Revocation because Licensee withdrew the request

for hearing after the presentation of evidence supporting the violations contained in paragraphs 1 thru 8.

Conclusions of Law

Pursuant to the GCA, ATF may, after notice and opportunity for hearing, revoke a Federal firearms license if the licensee has willfully violated any provision of the GCA or the regulations issued thereunder. 18 U.S.C. § 923(e); 27 C.F.R. § 478.73. For purposes of 18 U.S.C. § 923, a “willful” violation occurs when the Licensee had knowledge of the GCA and either purposefully disregards the requirements or is plainly indifferent to them. *See Borchardt Rifle Corp. v. Cook*, 684 F.3d 1037, 1043 (10th Cir. 2012); *American Arms, Int’l v. Herbert*, 563 F.3d 78, 85 (4th Cir. 2009); *The General Store v. Van Loan*, 560 F.3d 920, 924 (9th Cir. 2009); *Armalite, Inc. v. Lambert*, 544 F.3d 644, 648 (6th Cir. 2008); *On Target Sporting Goods, Inc. v. Attorney General*, 472 F.3d 572 (8th Cir. 2007); *Article II Gun Shop, Inc. v. Gonzales*, 441 F.3d 492 (7th Cir. 2006); *Willingham Sports, Inc. v. BATF*, 415 F.3d 1274 (11th Cir. 2005). *See also, Bryan v. United States*, 524 U.S. 184, 197-198 (1998). In several instances, the courts have held that adverse action based on a single action is valid. *See, DiMartino v. Buckles, Dir. ATF*, 129 F. Supp. 2d 824, 827 (D. Md. 2001); *Benjamin v. Bureau of Alcohol, Tobacco and Firearms*, 771 F. Supp. 307, 311 (D. Or. 1991). It is not necessary that a licensee act with “bad purpose or evil motive.” *Article II Gun Shop, Inc. v. Gonzales*, 441 F.3d 492, 497-98 (7th Cir. 2006); *Prino v. Simon*, 606 F.2d 449, 451 (4th Cir. 1979) (“no showing of malicious intent is necessary” to show willfulness).

For the reasons stated below, I conclude that the Licensee willfully violated law and regulations set forth in the Notice of Revocation of License.

Shane Greikspoor, Sole Responsible Person for Licensee, knowingly and voluntarily declined to appear or participate in the scheduled hearing despite receiving the Notice of Hearing and several email correspondences about the hearing. *See* Government Exhibit 3 and ATF Exhibits 4A – 4D.

A federal firearms licensee has a duty to be cognizant of the rules and regulations issued by ATF and to follow those mandates. The Sole Responsible Person for Licensee participated in a qualification inspection 2018 and acknowledged that he was aware of Licensee’s responsibilities. It was apparent that the Licensee understood the responsibilities was plainly indifferent and purposefully disregarded the firearms laws and regulations.

I find that Licensee willfully violated 18 U.S.C. § 922(t) and 27 CFR § 478.102(a) when it failed to conduct a NICS background check or obtain a valid NICS alternative permit.

I find that Licensee willfully violated 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.124(c)(1) when it failed to ensure that the transferee correctly recorded the required information on the ATF Form 4473.

I find that Licensee willfully violated 18 U.S.C. § 922(g)(1)(A) and 27 C.F.R. §§ 478.21a when it failed to ensure that the ATF Form 4473 was complete and accurate as required prior to transferring a firearm.

I find that Licensee willfully violated 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.125(e) when it failed to timely and/or accurately record the acquisition and disposition of firearms in its Acquisition and Disposition Record.

I find that Licensee willfully violated 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 124(c)(4) when it failed to record firearm information of the ATF Form 4473.

I find that Licensee willfully violated 18 U.S.C. § 923(g)(3)(A) and 27 C.F.R. § 478.126a when it failed to report the multiple sales or other dispositions of pistols or revolvers.

I find that Licensee willfully violated 18 U.S.C. § 923(b) (2) when it transferred multiple pistols or revolvers to a nonlicensee without obtaining a North Carolina pistol purchase permit for each firearm.

I find that Licensee willfully violated 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.124(c)(3)(i) when it failed to verify and record identification documents on the ATF Form 4473.

I make no findings regarding the violations contained in paragraphs 9 thru 12 of the Notice of Revocation.

As such, I conclude that the Licensee willfully violated the provisions of the GCA and the regulations issued thereunder. Accordingly, as provided by 18 U.S.C. § 923(e) and 27 C.F.R. § 478.73, the Federal firearms license held by Game Changer Outdoors LLC is hereby REVOKED.



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Washington DC

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
Deputy Assistant Director (Industry Operations)
Field Operations