

STANLEY HUNTING CENTER LLC's FCI
FCL-32374
12/16/2022 06:14 PM
IO: (b)(6) Des Moines (IO) Satellite Office

GENERAL INFORMATION

IOI Hours Spent on Inspection
450.0
Due Date
2/18/22 1:00 AM

LICENSEE INFORMATION

Licensee Name STANLEY HUNTING CENTER LLC	RDS Key 5-42-04392	License/Permit Number 5-42-181-01-4A-04392	License Type 01 - Dealer License
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Business Type
Limited Liability Company (LLC)

Premises Ownership Type Owned	Premises Address 415 E MAIN ST, Unit N/A, LACONA, Iowa 50139
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Premises Location Type Required
Single Family Dwelling

Address
415 E MAIN ST
Unit N/A
LACONA, Iowa 50139
WARREN
United States

Address
415 E MAIN ST
Unit N/A
LACONA, Iowa 50139
WARREN
United States

Phone Type	Phone Number	Remarks
Business	+1 515-681-9881	
Fax	+1 641-534-4807	
Business	+1 515-681-1632	

Email Address	Email Remarks
(b)(6)	

Online Presence Type	Online Presence URL	Remarks
Website	stanleyhuntingcenter.com	

RECOMMENDATIONS

Final Decision Date
Revocation 10/21/2022

Details

Final Notice Issued 10/21/22
All FFL Records sent to OOBRC
License Revoked

Out of Business Records and Inventory Management

Licensee Records

✔ Submitted to the Federal Licensing Center

Licensee Inventory

✔ No inventory on hand

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

Details

Review held with DAD(IO) in 5/4/22. Concur with issuance of a notice of revocation.

Special Agent in Charge Frederic.Winsto (b)(6) Recommendation

Based upon the above violations and current policy, I concur.

Division Counsel (b)(6) Review

Details

There appears to be sufficient evidence to support willful violations, legally.

Industry Operations Investigator (b)(6) Recommendation

Revocation

Details

Per the DOJ Comprehensive Strategy to Prevent and Respond to Gun Crime and Ensure Public Safety, the inspection meets revocation standards based upon the following:

27 CFR 478.102(a): Failure to complete a NICS/POC background check warrants revocation. The licensee's response accepted an out of state conceal carry permit (one instance) and an outdated Iowa Peace Officer Cary Permit (one instance). A records check confirmed that neither purchaser was prohibited.

Other violations include untimely acquisition/disposition entries, and failure to complete the ATF Form 4473 as prescribed. Additionally, there are potential traceability issues relating to public safety as the licensee admitted to manufacturing and selling over 250 AR-15 style rifles without proper markings. As a result of this inspection, the licensee reported (b)(6) firearm as missing inventory.

Area Supervisor (b)(6) Recommendation

Revocation

Details

Based on IO (b)(6) findings and the guidelines contained in the administration's Comprehensive Strategy to Prevent and Respond to Gun Crime and Ensure Public Safety Stanley Hunting Center LLC's actions/violations warrant the recommendation of revocation.

I concur with IO (b)(6) recommendation of revocation.

Stanley Hunting Center LLC is succeeding partnership Stanley, Scott and Julie (5-42-01682) which was originally issued on 4/13/2008. This license went out of business in 2018 upon the creation/issuance of the current FFL. No compliance history until current inspection. There have been two qualification inspections with current responsible persons completed by different investigators which includes explained/signed Acknowledgement forms.

Industry Operations Investigator (b)(6) Recommendation

Revocation

Details

Revocation

The results of the investigation warrant revocation based on guidelines contained in the Administration's Comprehensive Strategy to Prevent and Respond to Gun Crime and Ensure Public Safety dated June 23, 2021. Several violations of the GCA were found however specifically Violation 9: 27 CFR 478.102(a): Failure to complete a NICS/POC background check warrants revocation. The licensee's response was "you (IO (b)(6)) pointed them out when you were here. We accepted an out of state carry permit and peace officer permit older than five years. I get what it is now; making sure it's within five years."

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.
- 2. Failure to timely and/or correctly maintain records of sales or other dispositions of (b)(6) percent or more of the licensee's total dispositions during the inspection period, with a minimum of (b)(6) instances.
- 8. Failure to execute a Form 4473 (Exception: Select findings 6 and 7 above for transfers to law enforcement officers for personal use and FFL responsible persons; if the transferee is NOT prohibited).

Firearms

- 1. Missing firearms after inventory reconciliation (e.g., no records of disposition, required or otherwise).

License Type

- 1. FFL is engaged in an activity not authorized by the Federal firearms license (e.g., engaging in manufacturing firearms without a manufacturer's license).

NICS

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

ELIGIBILITY VERIFICATION

Business Information Verification

Licensee Name Business Type Is the business valid?
STANLEY HUNTING CENTER LLC Limited Liability Company (LLC) Yes

Additional Findings
Member-managed LLC with both members listed as RPs on FFL.

Attachment(s):
Cert of Org.pdf

Property Ownership Verification

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

Address
415 E MAIN ST
Unit N/A
LACONA, Iowa 50139
WARREN
United States

Additional Findings
Dwelling owned by Scott and Julie Stanley.

Attachment(s):
Beacon - Warren County, IA - Parcel Report_ 51220220686.pdf

Zoning Information Verification

Is the proposed business activity in compliance with zoning?
Yes

Attachment(s):
Zoning Allowance from Application.pdf

APPOINTMENT DETAILS

Interview Date
11/03/2021

Address
415 E MAIN ST, Unit N/A, LACONA, Iowa 50139

Responsible Attendee(s)

JULIA LYNN STANLEY
SCOTT JOSEPH STANLEY

Non-Responsible Person(s)

No Items

RESPONSIBLE PERSON(S)

JULIA LYNN STANLEY

Name Gender Race Ethnicity
JULIA LYNN STANLEY Female White Not Hispanic or Not Latino

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

Physical Identifiers

Height Weight Hair Color Eye Color

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	Iowa	(b)(6)
Phone Type	Phone Number		Remarks
Mobile	(b)(6)		
Email Address			Email Remarks
(b)(6)			

Criminal History Check

Date Criminal History Check Conducted
10/28/2021

Criminal History Check Comments
No hits. Conducted by IRS (b)(6)

SCOTT JOSEPH STANLEY

Name	Gender	Race	Ethnicity
SCOTT JOSEPH STANLEY	Male	White	Not Hispanic or Not Latino
Date of Birth	SSN	Job Title	
(b)(6)	(b)(6)	VP	

Physical Identifiers

Height	Weight	Hair Color	Eye Color
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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	Iowa	(b)(6)
Phone Type	Phone Number		Remarks
Mobile	(b)(6)		
Email Address			Email Remarks
(b)(6)			

Criminal History Check

Date Criminal History Check Conducted
10/28/2021

Criminal History Check Comments
No hits. Conducted by IRS (b)(6)

INTERVIEW QUESTIONNAIRE

What is the proposed business activity?
The licensee sells new and used retail firearms from a converted addition to the Stanley residence. The licensee admitted to improperly manufacturing AR-15 style rifles while licensed as an 01 Dealer FFL. Consignment sales are also offered. The bulk of the licensee's business is through qualifying event banquets in the central Iowa area. The licensee typically

conducts 8 banquets annually to include multiple chapters of Ducks Unlimited and Pheasant's Forever (b)(4) of business activity are new long guns.

Do they need an additional license or permit?
No

Who are their primary suppliers?
(b)(4)

Business Activities

Internet Sales/Transfers
Retail

Internet Sales/Transfers Website

www.stanleyhuntingcenter.com

Selected Operational Security Measures

Controlled Access to ATF Recordkeeping

Controlled Access to Keys

SECURITY WALKTHROUGH

Inspection Area Description

(b)(6)

Primary Activity
Retail

GPS Coordinates

Latitude
41.18981

Longitude
-093.38032

Selected Physical Security Measures

Bars on Windows

Alarm Monitoring (with Cellular Back-Up)

Deadbolts

Motion Sensors

Safe(s)/Vault(s)

Security Cameras

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
263

Actual Number of Firearms Verified

Number of Firearms Missing Before Reconciliation

Total Number of Firearms Missing After Reconciliation

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
11/03/2021

Onsite End Date
03/22/2022

Number of Reported Lost/Stolen Firearms During Inspection Period
0

Total Number of Traces During Inspection Review Period

(b)(4)

Total Number of Those Traces That Were Unresolved
0

Inspection Period Start Date
11/01/2020

Inspection Period End Date
11/01/2021

Number Of Traces Resolved By IOI
0

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

Compliance History

Date of Inspection: 12/07/2018
Type of Inspection: Firearms Application Inspection
UI#: 779080-2018-0175
Inspection Results: Application Issued
Cited Violations: N/A

Date of Inspection: 02/14/2018
Type of Inspection: DE; Collect records for National Tracing Center
UI#: 779080-2018-0248

Additional Comments

IOI (b)(6) conducted 100% physical inventory of the firearms. The licensee had 263 firearms in inventory and open entries in the A&D records. The A&D records were in the proper format yet lacked some of the required information. Some entries were not timely made, specifically entries relating to consignment firearms received. The licensee had the practice of acquiring firearms for consignment sales. The firearms would only be recorded in the A&D record when sold to a buyer. The date acquired would be the date of sale which may not be the true date it was acquired by the licensee. If the firearm was returned to the original consigner, it was never entered into the A&D record. This issue was discussed with Mr. and Mrs. Stanley during the onsite inspection by IOI (b)(6) Mr. and Mrs. Stanley were informed of the proper manner in which to conduct consignment operations. Thirteen firearms were found in inventory which were in on consignment at the time of the onsite inspection. Those firearms were added to the A&D record.

The licensee maintains a handwritten A&D record. The licensee has been recording only the FFL name from where a firearm was acquired and possibly a private citizen's phone number on the acquisition side. Some dispositions lacked an address or FFL number also instances of this occurred during the inspection period. See Violation 4. While onsite, IOI (b)(6) provided a copy of the ATF Quick Reference Guide and showed Mr. and Mrs. Stanley an example of a properly maintained A&D record. Mr. Stanley stated he understood what was lacking and had a plan for adding required information to future firearm entries.

After inventory reconciliation, the licensee filed an ATF Theft Loss Form for one unaccounted firearm as a result of this inspection. That Form is an attachment in Spartan.

Per the VCAB Report, the licensee is associated with trace request since receiving this FFL. It was completed to an individual buyer.

IOI (b)(6) did not discover any trafficking issues or firearms with obliterated serial numbers.

The licensee had Firearms Transaction Records (ATF Form 4473s Revision 2020) completed during the 12 month investigation period. IOI (b)(6) reviewed 100% of the ATF Form 4473s.

The licensee failed to complete a Firearms Transaction Record (ATF Form 4473) when returning consigned firearms to the consignee. It is unknown how many Forms were failed to be completed as the licensee returned the firearms without entries in the A&D Record. See Violation 3.

The licensee failed to complete an ATF Form 4473 per the instructions in instances. In instances, Item 23 was incorrect and in instance Item 6 was incomplete. See Violation 5.

The licensee failed to verify or record an identification document in Item 26a on the ATF Form 4473 in instances. See Violation 6.

In instances, the licensee failed to record NICS contact information. See Violation 7.

In instances the licensee failed to sign and date an ATF Form 4473. See Violation 8.

In instances, the licensee accepted a non-qualifying NICS alternative permit in lieu of a background check. An out-of-state conceal carry permit was accepted once and an Iowa Peace Officer carry permit older than five years was also accepted once. See Violation 9.

While onsite, IOI (b)(6) reviewed how to complete an ATF Form 4473 with the Stanleys. Items were highlighted and questions were answered.

Considering both of the non-qualifying NICS exemption documents provided on the Forms 4473 for the inspection period, criminal history checks were conducted on the buyers. Both were confirmed to not be prohibited.

No transfers to law enforcement agencies occurred during the inspection period.

Number of Transferee Background Checks

2

Attachment(s)

Report of Violations.pdf

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
1 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) by close of the same business day, for all applicable future multiple sales.	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
2 27 CFR 478.41(b): Failure to be licensed as a dealer, manufacturer or importer of firearms Number of Instances: 1	Cease and desist engaging in activities not authorized by current license type.	Scott and Julia Stanley admit to manufacturing over 250 completed rifles from lower receivers without the proper ATF Federal Firearms License. These firearms were then offered for sale to the general public. These firearms lack the proper markings (Name and City/State) of the manufacturer.
3 27 CFR 478.124(a): Failure to execute an ATF F 4473 ATF Forms 4473 Number of Instances:	Should consignment firearms be returned to the original consignee, complete an ATF Form 4473 on all future transactions. Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.	Record Management

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.
Complete and submit ATF Form 3310.11 - Firearms Inventory Theft/Loss Report.

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

4

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

Acquisition Recorded, but not Timely/Correct, M4-02949/3, RECEIVER

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

		<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473: <input type="checkbox"/></p> <p>Number of Instances: <input type="checkbox"/></p>	<p>Complete all forms as prescribed.</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>Ensure that the required transferor/seller printed name and title is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D.</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)(3)(i): Failure to verify or record Identification document on ATF F 4473</p> <p>ATF Forms 4473: <input type="checkbox"/></p> <p>Number of Instances: <input type="checkbox"/></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>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>27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473</p> <p>ATF Forms 4473: <input type="checkbox"/></p> <p>Number of Instances: <input type="checkbox"/></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>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</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 D.</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>27 CFR 478.102(a): Failure to complete a NICS/POC background check</p> <p>ATF Forms 4473: 2 Number of Instances: 2</p>	<p>Alternate NICS documents which are acceptable in Iowa are State of Iowa Peace Office IDs issued within five years of the sale - OR - a State of Iowa-issued Professional/Non-Professional Permit to Carry or Acquire weapons. 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: (b)(6) NICS Violation: (b)(6)</p>

THEFT/LOSS REPORT

Acquisition Date	Category	Type	Manufacturer	Importer	Model	Caliber/Gauge	Serial Number
(b)(3) (112 Public Law 55 125 Stat 552)							

LICENSEE RESPONSE REPORT

Regulation	Corrective Actions	Licensee Response	Status Details
<p>27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers</p> <p>ATF Forms 4473 Number of Instances:</p>	<p>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.</p>	<p>Mr. Stanley stated he and his wife were "waiting to get this [the review of the Report of Violations] over with."</p> <p>Mr. Stanley further stated, "We talked about it when you were here. It was a misunderstanding. I thought I had more than the close of business. We've corrected that at this point. We want to do this correctly."</p>	<p>Status Licensee Notified</p> <p>Verified Method Phone</p> <p>Date Licensee Notified 03/22/2022</p>
<p>27 CFR 478.41(b): Failure to be licensed as a dealer, manufacturer or importer of firearms</p> <p>Number of Instances:</p>	<p>Cease and desist engaging in activities not authorized by current license type.</p>	<p>Mr. Stanley stated, "This was a big misunderstanding. I've been trying to educate customers. I haven't built any since. I have severed my relationship with (b)(6) hurt my business."</p>	<p>Status Licensee Notified</p> <p>Verified Method Phone</p> <p>Date Licensee Notified 03/22/2022</p>
<p>27 CFR 478.124(a): Failure to execute an ATF F 4473</p> <p>ATF Forms 4473 Number of Instances:</p>	<p>Should consignment firearms be returned to the original consignee, complete an ATF Form 4473 on all future transactions.</p> <p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>Mr. Stanley stated he understood the violation. "I hadn't read enough to understand. The day after you were here I logged in all the consignment guns. We have stopped doing it wrong."</p>	<p>Status Licensee Notified</p> <p>Verified Method Phone</p> <p>Date Licensee Notified 03/22/2022</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:</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</p>	<p>Mr. Stanley stated, "We have changed a couple things we do. On acquisition receipt info, we wrote just the name. Now we write the name and FFL number. Most we have given the entire number. Otherwise we write the name</p>	<p>Status Licensee Notified</p> <p>Verified Method Phone</p> <p>Date Licensee Notified</p>

4		firearm acquisition information. Amend/Update A&D Record to accurately record all required firearm disposition information. Complete and submit ATF Form 3310.11 - Firearms Inventory Theft/Loss Report.	and complete address. We were shortening the type column. I know how to fix things now and not use whiteout. We were doing too much and trying to get what you need."	03/22/2022
5	27 CFR 478.21(a): Failure to complete forms as prescribed ATF Forms 4473: [] Number of Instances: []	Complete all forms as prescribed. Ensure that all ATF Form 4473 items, as required by form headings and instructions, are accurately completed on all future transactions. Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions. 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. Ensure that the required transferor/seller printed name and title is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D. Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.	Mr. Stanley stated these were clerical errors. "It makes sense."	Status Licensee Notified Verified Method Phone Date Licensee Notified 03/22/2022
6	27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473 ATF Forms 4473: [] Number of Instances: []	Ensure that all required transferee/buyer identification information is obtained and accurately recorded on all future ATF Forms 4473, Section B. Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section B. Ensure that all required NICS alternative permit information is obtained and accurately recorded on all future ATF Forms 4473, Section B.	Mr. Stanley stated "Instead of an Iowa Drivers License, we put an Iowa Carry Permit like a dumb dumb. That makes sense. We are double-checking now."	Status Licensee Notified Verified Method Phone Date Licensee Notified 03/22/2022
7	27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473 ATF Forms 4473: [] Number of Instances: []	Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section B.	"We forgot to fill it in after they got back to us," stated Mr. Stanley.	Status Licensee Notified Verified Method Phone Date Licensee Notified 03/22/2022
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 D.	"That was us. Only consolation in my mind is we forgot to sign the form. We know who it went to," stated Mr. Stanley.	Status Licensee Notified Verified Method Phone Date Licensee Notified 03/22/2022
9	27 CFR 478.102(a): Failure to complete a NICS/POC background check ATF Forms 4473: 2 Number of Instances: 2	Alternate NICS documents which are acceptable in Iowa are State of Iowa Peace Office IDs issued within five years of the sale - OR - a State of Iowa-issued Professional/Non-Professional Permit to Carry or Acquire weapons. 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. Stanley stated, "You pointed them out when here. We accepted an Out of State Carry Permit and knowing Peace Officer permits. I get what it is now. We are making sure the Peace Officer permit is within five years."	Status Licensee Notified Verified Method Phone Date Licensee Notified 03/22/2022

CLOSING CONFERENCE

Review Regulations conducted offline

(3/22/2022)

03/22/2022

Closing Conference Additional Notes

Inspection Profile:

On November 3, 2021, Senior Industry Operations Investigators (IOIs) (b)(6) of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) initiated an unannounced Firearms Compliance Investigation of Stanley Hunting Center LLC.

At the commencement of the investigation, IOI (b)(6) identified themselves as ATF and presented their credentials. Mr. Scott Stanley, Secretary and Responsible Person (RP) for the Federal Firearms License (FFL) was interviewed for this investigation. Mr. Stanley was identified by his Iowa Driver's License. Approximately two hours after commencing the onsite inspection, President Julia Stanley arrived at the premises. She was interviewed for this investigation. She was identified by her Iowa Driver's License (DL).

The scope of the inspection was to determine licensee's compliance with Federal firearms laws and regulations as an inspection following up a referral received from ATF KC III (b)(6)

The investigation period was from November 1, 2020 to November 3, 2021.

No other Federal, State, or local agencies participated in this inspection.

Business Profile:

The licensee holds an ATF FFL as a Type 01 – Dealer of Firearms Other than Destructive Devices. The licensee sells new and used retail firearms from a converted addition to the Stanley residence. The licensee admitted to improperly manufacturing AR-15 style rifles while licensed as an 01 Dealer FFL. Consignment sales are also offered. The bulk of the licensee's business is through qualifying event banquets in the central Iowa area. The licensee typically conducts 8 banquets annually to include multiple chapters of Ducks Unlimited and Pheasant's Forever (b)(4) of business activity are new long guns.

Since November 1, 2020, the licensee has acquired (b)(4) firearms which includes pistols, receivers, rifles and shotguns. The licensee sold/transferred (b)(4) firearms to the general public in the last 12 months.

Used or second-hand firearms represent (b)(6) of the licensee's business. The licensee doesn't have a primary supplier as they acquired firearms from any distributor which could fill an order due to supply issues relating to the recent pandemic.

Business is not reported to be conducted at gun shows.

The licensee has held this ATF license since January 1, 2018. Scott and Julie Stanley held a partnership FFL under 5-42-01-01682 from April 13, 2008 to March 5, 2018. The records of the previous FFL are maintained under this LLC FFL.

The licensee does not have any off-site storage.

Ownership and Control:

Stanley Hunting Center LLC is duly registered with the Iowa Secretary of State. The LLC is member-managed with both members listed as RPs on the FFL.

There have been no unreported changes to the ownership or control of the business. No indication of hidden ownership or unreported RPs were disclosed.

Variance:

No variances on file; none requested as a result of this inspection.

Recommendation

Revocation

The results of the investigation warrant revocation based on guidelines contained in the Administration's Comprehensive Strategy to Prevent and Respond to Gun Crime and Ensure Public Safety dated June 23, 2021. Several violations of the GCA were found however specifically Violation 9: 27 CFR 478.102(a): Failure to complete a NICS/POC background check warrants revocation. The licensee's response was "you (IOI (b)(6)) pointed them out when you were here. We accepted an out of state carry permit and peace officer permit older than five years. I get what it is now; making sure it's within five years."

ATF Forms 4473 – NICS & Other Dispositions

The licensee has (b)(6) Firearms Transaction Records (ATF Form 4473s Revision 2020) completed during the 12 month investigation period. IOI (b)(6) reviewed 100% of the ATF Form 4473s.

The licensee failed to complete a Firearms Transaction Record (ATF Form 4473) when returning consigned firearms to the consignee. It is unknown how many Forms were failed to be completed as the licensee returned the firearms without entries in the A&D Record. See Violation 3.

The licensee failed to complete an ATF Form 4473 per the instructions in (b)(6) instances. In (b)(6) instances, Item 23 was incorrect and in (b)(6) instance Item 6 was incomplete. See Violation 5.

The licensee failed to verify or record an identification document in Item 26a on the ATF Form 4473 in (b)(6) instances. See Violation 6.

In (b)(6) instances, the licensee failed to record NICS contact information. See Violation 7.

In (b)(6) instances the licensee failed to sign and date an ATF Form 4473. See Violation 8.

In (b)(6) instances, the licensee accepted a non-qualifying NICS alternative permit in lieu of a background check. An out-of-state conceal carry permit was accepted once and an Iowa Peace Officer carry permit older than five years was also accepted once. See Violation 9.

While onsite, IOI (b)(6) reviewed how to complete an ATF Form 4473 with the Stanleys. Items were highlighted and questions were answered.

Considering both of the non-qualifying NICS exemption documents provided on the Forms 4473 for the inspection period, criminal history checks were conducted on the buyers. Both were confirmed to not be prohibited.

No transfers to law enforcement agencies occurred during the inspection period.

Multiple Sales

IOI (b)(6) requested a Firearms Trace History from the Violent Crimes Analysis Branch (VCAB) for the period of November 1, 2018 through November 1, 2021. Contractor (b)(6) (b)(6) completed the request and indicated the licensee was associated with (b)(6) multiple sales involving (b)(6) firearms. No ATF Forms 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) were submitted. In (b)(6) instances, it was discovered the licensee was failing to submit the Multiple Sale Form by the close of business when the multiple sale occurred. The Forms were submitted the following day. See Violation 1. Regulations were reviewed with the Stanleys by IOI (b)(6).

No unreported multiple sales were encountered during the inspection.

Suspicious/Prohibited Purchasers

A review of the disposition records covering the inspection period did not reveal any suspicious and/or prohibited purchasers.

Trace Activity

According to the VCAB report, the licensee is associated with (b)(6) trace request which was completed to an individual purchaser. Fifteen firearms were selected for secondary market analysis with no results/hits.

NFA/Importer/Collector/Manufacturer

Licensee is not licensed as a manufacturer, collector or importer. The licensee does not possess an SOT nor reports doing business with NFA firearms.

Prior to initiating the onsite portion of the inspection, IOI (b)(6) reviewed the licensee's presence on social media. The licensee had recent Facebook posts detailing the "building of

AR-15s". These posts are uploaded into Spartan as attachments.

During the onsite inspection, IOI (b)(6) encountered five AR-15 rifles which were manufactured by Scott Stanley. Mr. Stanley admitted to taking a complete lower receiver and manufacturing a rifle and then offering it for sale to the general public. He stated he had done this in over 250 instances since the inception of this FFL. Manufactured firearms lacked the required markings (city and state) of the ultimate manufacturer. IOI (b)(6) discussed the regulations concerning manufacturing firearms with Mr. Stanley. The five rifles manufactured by Mr. Stanley are currently in a firearm safe at the FFL premises. Mr. Stanley agreed to cease the practice of manufacturing firearms without the proper FFL. See Violation 2.

Referrals

(b)(6)

Other

N-Force queries relating to Scott Stanley and Julia Stanley did not return any results.

Closing Actions

On November 3, 2021, IOIs (b)(6) reviewed the inspection findings with Scott and Julia Stanley. IOI (b)(6) discussed the violations found with the understanding a Report of Violations would be forthcoming. Mr. Stanley confirmed his willingness to comply with laws and ATF regulations related to the firearms business.

Following the inspection findings discussion, IOI (b)(6) reviewed all pertinent Federal laws and ATF regulations. The Stanleys had the opportunity to ask questions, express any concerns or clarify any doubts. All inquiries were answered and explained. The Stanleys were advised to utilize the www.atf.gov website as this provides tools and services to the firearms industry. IOI (b)(6) also provided her contact information should they have any further questions.

On November 16, 2021, IOI (b)(6) generated a Report of Violations and it was submitted for KCFD management approval. It was determined a (b)(6) instances of the A&D record violations were to be entered into Spartan and an updated ROV generated. On February 2, 2022, IOI (b)(6) completed generation of an updated ROV and a copy was sent to KCFD management for review and approval. On March 21, 2022 IOI (b)(6) received approval to issue the ROV. Later that day a copy was emailed to the licensee. On March 22, 2022, IOI (b)(6) telephonically reviewed the Report of Violations with Mr. Stanley with the approval of management. On March 22, 2022, IOI (b)(6) received a returned signed page 3 of the Report of Violations. A signed Acknowledgement of Federal Firearms Regulations was received that same day.

Attachment(s)

Attendee(s)

SCOTT JOSEPH STANLEY

EXHIBITS

Inspection

Category	Attachment Name
Correspondence	Spartan Notification RE: 5-42-04392 Inspection Results
Correspondence	Spartan Notification RE: 5-42-04392 Monitored Case
Correspondence	Spartan Notification RE: 5-42-04392 Monitored Case
Correspondence	Spartan Notification RE: 5-42-04392 Monitored Case
Correspondence	Spartan Notification RE: 5-42-04392 Monitored Case
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Correspondence	Spartan Notification RE: 5-42-04392 Monitored Case
Correspondence	Spartan Notification RE: 5-42-04392 Monitored Case
UpdateLicensingCenter	Final 8c - Stanley Hunting Center.pdf
Correspondence	Spartan Notification RE: 5-42-04392 Monitored Case
Correspondence	Spartan Notification RE: 5-42-04392 Monitored Case
UpdateLicensingCenter	SHC Exhibit 8c.docx
LicenseeResponseToViolationsPDF	Licensee Response to Violations Report.pdf
OnSiteSummaryInformation	A&D Book for inspection period with errors.pdf
AdditionalBackgroundCheck	(b)(6).pdf
AdditionalBackgroundCheck	(b)(6).pdf
ViolationsPDF	Report of Violations.pdf
ViolationsPDF	Report of Violations.pdf
ViolationsPDF	Report of Violations.pdf
OnSiteSummaryInformation	Query Request #220247.pdf
OnSiteSummaryInformation	THEFT LOSS INCIDENT F20210001892.pdf
OnSiteSummaryInformation	FFL Audit Report 54204392.xlsx
ViolationsPDF	Report of Violations.pdf
ZoningVerification	Zoning Allowance from Application.pdf
PropertyOwnershipVerification	Beacon - Warren County, IA - Parcel Report_ 51220220686.pdf

SAR-1391

Category	Attachment Name
Correspondence	Industry Operations Report of Suspicious Activity(SAR-1391)

SAR-1393

Category	Attachment Name
Correspondence	Industry Operations Report of Suspicious Activity(SAR-1393)

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

In the matter of License Number 5-42-181-01-4A-04392 as a/an A Dealer Of Firearms

Other Than Destructive Devices issued to:

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

Stanley Hunting Center LLC
415 E. Main Street
Lacona, Iowa 50139

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 1251 NW Briarcliff Parkway, Suite 600 Kansas City Missouri 64116, 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
05/10/2022	William J. Miller Director, Industry Operations, ATF Kansas City Field Division	(b)(6)

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: 7020 1290 0001 6240 9582 or
- Delivering a copy of the notice to the address shown below.

Date Notice Served	Title of Person Serving Notice	Signature
5.10.22	Administrative Assistant	(b)(6)

Print Name and Title of Person Served
Stanley Hunting Center LLC

Address Where Notice Served
415 E. Main Street, Lacona, Iowa 50139

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 Stanley Hunting Center LLC ("Licensee"). Specifically, the Director, Industry Operations, United States Department of Justice, ATF, Kansas City 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.

Compliance History

ATF first issued a Federal firearms license to Licensee in 2018. The laws and regulations issued under the GCA were reviewed as part of the application inspection. It should be noted that the responsible persons, Scott and Julie Stanley, previously held a different Federal firearms license from 2008 to 2018 as a partnership.

Current Inspection

On November 3, 2021, ATF began a compliance inspection of Licensee's premises that revealed the following:

Acquisition and Disposition Record Violations:

1. On [] occasions, Licensee willfully failed to timely record the disposition of firearms, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.125(e). See Appendix ¶ 1.

Background Check Violations:

2. On two occasions, Licensee willfully transferred a firearm to an unlicensed person without first contacting the National Instant Criminal Background Check System ("NICS") and obtaining a unique identification number before allowing the transfer, in violation of 18 U.S.C. § 922(t) and 27 C.F.R. § 478.102. See Appendix ¶ 2.

ATF Form 4473 Violations:

3. On [] occasions, Licensee willfully transferred a firearm to a non-licensee without verifying the identity of the transferee by examining the identification document presented and noting the type on a Firearms Transaction Record, ATF Form 4473, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.124(c)(3)(i). See Appendix ¶ 3.
4. On [] occasions, Licensee willfully transferred a firearm to a non-licensee without recording the date the Licensee contacted NICS, any response provided by the system and/or any identification number provided by the system on the Firearms Transaction Record, ATF Form 4473, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.124(c)(3)(iv). See Appendix ¶ 4.

Engaged in Activity Not Authorized by License:

5. Licensee willfully engaged in an activity for which it was not licensed, in violation of 18 U.S.C. § 922(a)(1)(A) and 27 C.F.R. § 478.41. Specifically, although Licensee is licensed as a dealer in firearms, it engaged in the business of manufacturing firearms, to wit: Licensee admitted to manufacturing in excess of 250 completed rifles from lower receivers, later selling them to the general public without proper markings.

Appendix

Appendix ¶ 1

Notice Paragraph 1 [478.125(e) Dispositions Not Timely Recorded Violations]:

Firearm Description	Serial Number	Discrepancy
(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)		

Appendix ¶ 2

Notice Paragraph 2 [478.102 Failure to Conduct NICS Check Violations]:

Transferee's Name	Date	Discrepancy	
1	(b)(6)	9/9/2021	Arizona conceal and carry permit impermissibly accepted in lieu of NICS check
2	(b)(6)	10/28/2021	Accepted Iowa peace officer permit that was issued over five years from date of purchase, whereas Iowa law requires permit to be issued within five years to be a valid alternative to NICS check

Appendix ¶ 3

Notice Paragraph 3 [478.124(c)(3)(i) Failure to Verify Identification Document on Form 4473 Violations]:

Transferee's Name	Date	Discrepancy
(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)		

Appendix ¶ 4

Notice Paragraph 4 [478.124(c)(3)(iv) Failure to Record NICS Information on Form 4473
Violations]:

Transferee's Name

Date

Discrepancy

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

**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 5-42-181-01-4A-04392 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)
Stanley Hunting Center LLC
415 E. Main Street
Lacona, Iowa 50139

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 upon receipt _____
 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 1251 NW Briarcliff Parkway, Suite 600 Kansas City Missouri 64116

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 10/24/2022	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official William J Miller, Director, Industry Operations, Kansas City Field Division	Signature (b)(6)
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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.
Tracking Number: 3020181D00051217401 Or Delivering a copy of the notice to the address shown below.

Date Notice Served <u>10/25/22</u>	Title of Person Serving Notice Administrative Assistant	Signature of Person Serving Notice (b)(6)
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Print Name and Title of Person Served Stanley Hunting Center LLC	Signature of Person Served
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Address Where Notice Served 415 E. Main Street, Lacona, Iowa 50139

Note: Previous Edition is Obsolete

Page 2 – ATF Form 5300.13, Final Notice of Denial of Application, Revocation,
Suspension and/or Fine of Firearms License

Stanley Hunting Center LLC, 415 E. Main Street, Lacona, Iowa 50139 (“Licensee”) holds Federal firearms license #5-42-181-01-4A-04392, a dealer in firearms other than destructive devices, 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 May 10, 2022, ATF issued a Notice of Revocation of License, ATF Form 4500 (“Initial Notice”), to Licensee, based upon violations discovered during an inspection conducted on November 3, 2021. This Notice was sent to Licensee’s known licensed business premises. Upon receipt of the Notice, Licensee timely requested a hearing on the matter on May 16, 2022.

A hearing was scheduled on October 6, 2022, at the ATF Kansas City Field Office located in Des Moines, Iowa. The hearing was conducted by ATF Kansas City Field Division Director, Industry Operations (“DIO”) William J. Miller. The Government was represented by ATF Kansas City Field Division Senior Attorney (b)(6) ATF Industry Operations Investigator (“IOI”) (b)(6) appeared as a witness on behalf of the Government.

Scott Stanley, a responsible person for the License, appeared at the hearing on behalf of Licensee. The hearing was recorded and transcribed through a court reporting service. The testimony provided by the parties at the hearing constitute the administrative record for this matter.

At the beginning of the hearing, Mr. Stanley indicated that he wished to surrender his license, rather than proceed with the presentation of evidence. Mr. Stanley indicated that he had previously liquidated his inventory and shut down his business, in anticipation of having his license revoked.

Mr. Stanley was questioned about his understanding of the hearing process and the rights afforded a licensee at that stage. Mr. Stanley indicated that he understood Licensee had a right to a hearing, a right to hear and confront the Government’s evidence, and to present evidence on behalf of Licensee. He further indicated that he understood that, prior to hearing any evidence, the hearing officer had not made any final decisions as to whether to revoke the License. Mr. Stanley stated he understood that he was surrendering his license pursuant to the Initial Notice of Revocation issued on May 10, 2022, knowingly and voluntarily electing not to proceed with the administrative hearing he previously requested, and that a Final Notice of Revocation would later be issued due to his decision not to contest the allegations contained within the Initial Notice.

Following the close of the recorded portion of the hearing, Licensee turned over his records to IOI (b)(6) pursuant to the requirements under 18 U.S.C. § 923(g)(4) and 27 C.F.R. § 478.127.

For the reasons set forth in the Notice of Revocation issued on May 10, 2022, the Federal firearms license held by Stanley Hunting Center LLC is hereby REVOKED under the provisions as provided by 18 U.S.C. § 923(e) and 27 C.F.R. §§ 478.73 and 478.74.



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

Curtis Gilbert
Deputy Assistant Director (Industry Operations)
Field Operations