

TOLOBU LLC's FCI
 FCI-25416
 12/17/2022 06:58 AM
 IOI: (b)(6) Forth Worth II (IO) Field Office

LICENSEE INFORMATION

Licensee Name TOLOBU LLC	RDS Key 5-75-10888	License/Permit Number 5-75-439-02-1F-10888	License Type 02 - Pawnbroker License
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Business Type
 Limited Liability Company (LLC)

Premises Ownership Type Leased/Rented	Premises Address 2609 NORTH MAIN ST, Unit N/A, FORT WORTH, Texas 76164
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Premises Location Type Required

Address
 2609 NORTH MAIN ST
 Unit N/A
 FORT WORTH, Texas 76164
 TARRANT
 United States

Address
 2609 NORTH MAIN ST
 Unit N/A
 FORT WORTH, Texas 76164
 TARRANT
 United States

Phone Type	Phone Number	Remarks
Business	+1 817-625-1691	
Fax	+1 817-625-0360	

RECOMMENDATIONS

Final Decision Date
 Revocation 11/05/2022

Details

Final Notice of Revocation was issued with effective date of 10/15/2022. The licensee was provided until 11/05/2022 to liquidate their inventory and complete the sale of the business. The license is revoked and all records were retrieved and will be forwarded to the ATF OOBRC.

Out of Business Records and Inventory Management

Licensee Records

✔ Submitted to an ATF Employee

ATF Employee Name
 IOI

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

Details

Briefed to DAD(IO) on 5/4/22. Concur with issuance of notice of revocation.

Deputy Assistant Director - PGA Jeffrey Boshek's Recommendation

Concur with DIO revocation recommendation.

Senior Attorney's Review

Details

Counsel concurs with recommendation of revocation

Director of Industry Operations Krissy Carlson's Recommendation
 Revocation

Details

Licensee Inventory

✔ Inventory sold to non-licensee or non-permittee

Revocation is recommended. This licensee failed to contact NICS for a required NICS check when a transfer was over 30 days old. Additionally, this licensee has several repeat violations.

Area Supervisor: (b)(6) Recommendation
Revocation

Details

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

Industry Operations Investigator: (b)(6) Recommendation
Revocation

Details

IO (b)(6) recommends Revocation.

The licensee was cited for violations of 27 CFR 478.125(e) in (b)(6) instances during the inspection conducted in 2018. The licensee was made aware of the record keeping requirements during the 2018 inspection and instructed to make corrections to the A&D record. The licensee did not make the necessary corrections to the A&D record and as a result the discrepancies were still present during this inspection. The licensee did not make any changes to their standard operating procedures for record keeping, which resulted in (b)(6) instances of violations of 27 CFR 478.125(e) cited during this inspection. The licensee was cited for (b)(6) instances of violations of 27 CFR 478.124(c)(3)(iv) during the 2018 inspection. The licensee was made aware of the requirements to record all NICS contact information on the ATF F 4473 during the 2018 inspection. The licensee was cited for (b)(6) instances of 27 CFR 478.124(c)(3)(iv) as a result of this inspection.

The licensee has not shown an improvement in meeting the record keeping requirements as set forth in the regulations.

The only responsible person on the license is Tommy Burt, who is the Member of the LLC. Mr. Burt is not regularly on the premises and explained to IO (b)(6) that he was not involved in the day-to-day operations of the business. Mr. Burt explained that Store Manager (b)(6) is the person responsible for day-to-day operations.

IO (b)(6) discussed the discrepancies noted in the A&D records with (b)(6). (b)(6) stated that the A&D discrepancies were the result of a computer glitch. Please note (b)(6) provided a similar reason for the A&D discrepancies found during the 2018 inspection. IO (b)(6) questioned (b)(6) why the corrections had not been made and he could not provide a reason. IO (b)(6) also discussed some of the A&D discrepancies identified during the current inspection with (b)(6). (b)(6) that could have been the result of the alleged computer glitch from 2018; however, were not cited during the 2018 inspection because the firearms were in inventory. IO (b)(6) specifically asked why those discrepancies were not identified during various inventories. (b)(6) could not provide a reason for not identifying and correcting those discrepancies.

IO (b)(6) also discussed the ATF Fs 4473 violations with (b)(6). IO (b)(6) asked him if the employees were provided training on the forms. (b)(6) said that training is provided. IO (b)(6) provided the licensee with guidance for completing the ATF Fs 4473 correctly.

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.
- 11. Failure to retain required GCA records for transferred firearms for period of time specified by regulation.

Firearms

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

NICS

- 5. Failure to initiate a new NICS check when a transaction is not completed within the 30-day period from the date NICS was initially contacted.
- 6. Failure to record NICS or Point of Contact background check information on (b)(6) percent or more of Forms 4473 examined, with a minimum of (b)(6) instances.

FFL History

- 1. The current inspection reveals repeated similar violation(s) for which the FFL has been cited in a Report of Violations within the previous 5 years and there has been NO significant improvement.

ELIGIBILITY VERIFICATION

Business Information Verification

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

Additional Findings

IO (b)(6) queried the Texas Secretary of State (TXSOS) online database and determined that the business is currently listed as active.

Attachment(s):
Business Entity Verification.pdf
Business Information Verification.pdf

Property Ownership Verification

Premises Ownership Type Leased/Rented	Premises Location Type Store Front	Has the property ownership been verified? Yes
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Address
2609 NORTH MAIN ST
Unit N/A
FORT WORTH, Texas 76164
TARRANT
United States

Additional Findings
The property is leased.

IO [b)(6)] was allowed to review the lease agreement between the property owner and Tolobu LLC. The lease agreement allows the licensee to operate the business and conduct firearm transfers from the property. Please see RENTAL/LEASE VERIFICATION Section for a copy of the lease agreement.

Attachment(s):
Property Ownership Verification.pdf

Trade Name/DBA Verification

Trade Name/DBA NORTHSIDE PAWN	Is the trade name/DBA registered? Yes
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Additional Findings
Certificate of Assumed Name filed with the TXSOS and is active in all counties.

Attachment(s):
Business Information Verification.pdf

Rental/Lease Verification

Is the proposed business activity permitted by the property owner?
Yes

Additional Findings
Mr. Burt provided IO [b)(6)] a copy of the lease agreement. The licensee agreement was extended.

Attachment(s):
Lease Agreement.pdf

Zoning Information Verification

Is the proposed business activity in compliance with zoning?
Yes

Additional Findings
IO [b)(6)] reviewed the City of Fort Worth Zoning, the licensee is in compliance with the zoning ordinances.

Attachment(s):
City of Fort Worth Zoning.pdf

APPOINTMENT DETAILS

Interview Date
05/07/2021
Address
2609 NORTH MAIN ST, Unit N/A, FORT WORTH, Texas 76164

Responsible Attendee(s)	Non-Responsible Person(s)
TOMMY LLOYD BURT	(Deactivated)
	(Deactivated)

RESPONSIBLE PERSON(S)

TOMMY LLOYD BURT

Name TOMMY LLOYD BURT	Gender Male	Race White	Ethnicity Not Hispanic or Not Latino
Date of Birth [b)(6)]	SSN [b)(6)]	Job Title MEMBER	

Physical Identifiers

Height	Weight	Hair Color	Eye Color
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Place of Birth

Country
United States Of America

State
(b)(6)

City

Home Address

(b)(6)

United States

Additional Names

Citizenship

United States

ID Type	Country	State	ID Number
Driver's License	United States	Texas	(b)(6)
Phone Type	Phone Number		Remarks
Mobile	(b)(6)		

Criminal History Check

Date Criminal History Check Conducted
04/19/2021

Criminal History Check Comments
IC (b)(6) conducted the CCH.

Mr. Burt is not prohibited. (b)(6)

NON-RESPONSIBLE PERSON(S)

Name	Date of Birth	Job Title
		Assistant Manager
Name	Date of Birth	Job Title
		Store Manager

INTERVIEW QUESTIONNAIRE

What is the proposed business activity?
The business is a pawn shop. The licensee makes retail transfers of firearms and various consumer goods. The licensee also deals in pawn transactions.

Do they need an additional license or permit?
No

Who are their primary suppliers?
Customers

Other State or Local Permits

Type	Number	Expiration
Pawnbroker License	153262	

Business Activities

Pawnbroker
Retail

Selected Operational Security Measures

Controlled Access to Keys
Suspicious persons/activities reporting protocols

SECURITY WALKTHROUGH

Inspection Area Description
The premises is a pawn shop, the entire premises is open to inspection. Firearms are kept in a locked display case, an open display case and a vault type storage room.

Primary Activity
Retail

GPS Coordinates

Latitude
32.79198

Selected Physical Security Measures

Alarm Monitoring (with Cellular Back-Up)
Bars on Doors
Bars on Windows
Concrete Balusters or Other Barrier in front of location
Fenced Area

Glass Breakage Detection
Local Audible Alarm
Lockable Display Rack(s)/Case(s)
Locked Gates
Safe(s)/Vault(s)
Security Cameras
Window Film/Tinting/Mirroring

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
77

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

Total Number of Dispositions in the Last 12 Months

Onsite Start Date

Onsite End Date

Number of Reported Lost/Stolen Firearms During Inspection Period

Total Number of Traces During Inspection Review Period

Total Number of Those Traces That Were Unresolved

Inspection Period Start Date

Inspection Period End Date

Number Of Traces Resolved By IOI

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

Additional Comments

IOI (b)(6) initiated a firearms compliance inspection on May 7, 2021. The inspection period was May 1, 2020 to May 6, 2021. IOI (b)(6) commenced the inspection on August 02, 2021. No other ATF personnel nor any federal, state, or local authorities were involved in the inspection. The inspection was not generated for any specific reason and was a routine compliance inspection.

The licensee has had two previous inspections:

Type of Inspection: Firearms Qualification
UI#: 781080-2015-0299 B1B
Date: April 21, 2015
Inspection Results: Application Approved
Cited Violations: None

Type of Inspection: Southwest Border Initiative Firearms Compliance
UI#: 781080-2018-0598 B1B
Date: August 22, 2018
Inspection Results: Violations ROV Only No Recall Inspection – Alternative Recommendation from a Warning Letter
Cited Violations: 27 CFR 478.124(c)(3)(iv) instances
27 CFR 478.125(e) instances

The licensee completed manual ATF Fs 4473 and files the forms by date. The licensee utilizes a computerized A&D system. According to Mr. Burt and (b)(6) the A&D system is embedded in the Point-of-Sale system (POS) and changes in one or reflected in the other. IOI (b)(6) discussed the procedures for recording acquisitions with Mr. Burt (b)(6) and the employees. IOI (b)(6) was told that when a firearm is acquired, either through a direct purchase or through a pawn loan, an employee must enter the firearm information into the POS or A&D system. IOI (b)(6) deduced that the acquisition information can be entered by utilizing one of at least two methods:

1. Employees can query the item or the individual from whom the firearm is being acquired and then copy previously entered information for the individual or the firearm and make changes to the information as necessary.
2. Employees can enter the individual and/or firearm information into the system as if the individual and/or firearm was not a previous customer.

The A&D system would then create an inventory reference number, when the firearm was a direct purchase the reference number begins with a P and if the firearm was pawned the reference number begins with an L and includes the loan number. The reference number is printed on the item tag that is affixed to all items in the store. If the employee opted to copy previously entered information, any errors or omissions in the previous entry would be copied into the new entry, which resulted in multiple instances of 27 CFR 478.125e violations for incorrect or incomplete acquisition information. Please note, IOI (b)(6) the licensee for multiple instances of 27 CFR 478.125e violations for incorrect or incomplete acquisition information, IOI (b)(6) did not cite for every instance; however, IOI (b)(6) did require the licensee to correct every instance.

IOI (b)(6) asked the employees if they were able to make any changes or corrections to the information after it was entered into the POS or A&D system, they explained that only a manager or assistant manager could make any changes or corrections. IOI (b)(6) observed that in several instances employees recorded notes in the A&D system explaining that (b)(6) had made a change or correction. IOI (b)(6) asked (b)(6) if he was able to make changes or corrections in the A&D system, (b)(6) indicated that he would have what he

referred to as "Tech Support" make changes and that he was not capable of such actions. Please note, that IOI (b)(6) had the licensee make corrections to the A&D system and (b)(6) indicated that he had taken care of the corrections, he did not specify the actions taken to make the corrections.

IOI (b)(6) asked Mr. Burt (b)(6) and the employees to explain the procedure for recording firearm dispositions. IOI (b)(6) deduced that to record firearm dispositions, employees could utilize multiple methods. The employees indicated that only managers recorded firearm dispositions. IOI (b)(6) determined that the licensee recorded dispositions by using one of at least two methods:

1. Employees could query the individual and/or the firearm information then select an entry to record the disposition for that particular entry.
2. Employees could enter the reference number for the firearm and then record the disposition information for that particular entry.

If the employees opted to utilize method 1 and query the individual and/or firearm information the query results were not necessarily displayed in chronological order by date and the query results did not necessarily return only open entries. The employees would need to search the results to select the correct corresponding acquisition entry to ensure the firearm disposition was accurately and timely recorded.

IOI (b)(6) determined that in multiple instances, dispositions were not recorded timely due to the employees utilizing method 1 and selecting entries that did not correctly correspond to the specific acquisition entry/transaction. When IOI (b)(6) conducted the initial A&D to 4473 comparison, IOI (b)(6) noted instances in which firearm disposition information was not recorded, was not recorded timely, or was not correct. During the initial A&D to 4473 comparison, IOI (b)(6) noted that in most instances in which the initial NICS response was "Delay", and the firearm was transferred on a later date, the recorded disposition date in the A&D record was incorrect, the recorded disposition date would reflect the initial certification date listed on the 4473. Due to the multiple errors identified during the initial A&D to 4473 comparison, IOI (b)(6) chose to expand the time period for comparisons. Once IOI (b)(6) expanded the time period, IOI (b)(6) identified multiple instances in which a pawned firearm would have a disposition date of a year or more after the firearm was originally pawned. IOI (b)(6) asked the licensee what a normal term was for a pawn loan, the licensee explained that the term is generally 60 days. The licensee also explained that if the pawn loan was renewed, the term was generally extended another 60 days; if the pawn loan was renewed, a new loan would be issued which resulted in a new loan number and a new firearm reference number. IOI (b)(6) noted that in some instances when a pawned firearm was redeemed more than 60 days after the original loan was issued, the loan number listed in the A&D record had not changed nor had the reference number. IOI concluded that in several instances, the pawn loan had been redeemed and an ATF F 4473 had been completed; however, the firearm disposition was not recorded in the A&D record and the entry was left open. If the individual pawned the firearm again, the licensee would record the disposition date of the open entry as the same date the firearm was pawned again and then the firearm acquisition date would be recorded as the same as the disposition date for the previous open entry.

IOI (b)(6) asked (b)(6) the Assistant Manager, if the POS system updated the loan number and firearm reference number in the A&D system when a loan was renewed. (b)(6) explained that she believed that the POS system was supposed to automatically update the loan number and reference number in the A&D system; however, she noticed that the POS system did not normally update the information, so someone had to manually update the information. (b)(6) indicated that (b)(6) was the person responsible for making corrections or changes to the A&D record.

IOI (b)(6) discussed this with Store Manager (b)(6) stated that the POS system records the transfer of a firearm in the A&D record once the financial transaction is completed, even if the firearm is not disposed that day. (b)(6) maintained that the POS system records the disposition and the only way to correct the disposition date was to contact "tech support" for the POS system.

IOI (b)(6) explained to Mr. Burt the licensee or employees of the licensee should make the corrections and/or changes to the A&D record. IOI (b)(6) explained to Mr. Burt (member of Tolobu LLC) and (b)(6) that the A&D record should not be dependent on the POS system to record acquisition and disposition information per ATF Ruling 2016-1. Please note, that IOI (b)(6) has concluded that the A&D record system utilized by the licensee does meet the conditions specified in ATF Ruling 2016-1; however, the licensee may not possess adequate knowledge of the functionality of the system.

Due to the multiple errors in A&D record, IOI (b)(6) manually and electronically cross-referenced each entry in the A&D record to other acquisition and disposition entries of the firearms to determine the correct acquisition and disposition dates. IOI (b)(6) compared ATF F 4473s to the A&D record to ensure that the information in the required records was correctly recorded. IOI (b)(6) did not review any ATF Fs 4473 for violations that were not completed during the inspection period (5/01/2020 to 05/06/2021), IOI (b)(6) only reviewed the forms to conduct A&D comparisons.

IOI (b)(6) also conducted a forward trace of all firearms transferred to Defender Outdoors to confirm that the licensee was accurately recording disposition information in the A&D record. IOI (b)(6) did not identify any discrepancies as a result of the forward trace.

As noted, IOI (b)(6) identified multiple weaknesses in the licensee's internal controls. IOI (b)(6) discussed those weaknesses with Mr. Burt and (b)(6) during the inspection and again during the closing conference. IOI (b)(6) provided the licensee with guidance regarding best business practices to improve their internal controls.

As a result of this inspection (b)(6) firearm was reported lost. The FFL incident number is (b)(6) (031112 Public Law 55 125 Stat 552)

IOI (b)(6) recommends that a recall inspection be completed within 12-18 months.

The licensee did not conduct any transfers that would meet the requirements of the Demand Letter 3 program.

IOI (b)(6) did not identify any straw purchasers or any firearms transferred to prohibited people during the inspection.

IOI (b)(6) verified 29 NTN during the inspection. No discrepancies were noted.

IOI (b)(6) did not submit any referrals or generate any reports of suspicious activity.

- N/A

If a Recall is recommended, indicate suggested target time for completion.

- A recall inspection should be conducted within the next 12 - 18 months.

On 11/5/2021, the licensee requested that IOI (b)(6) provide training to the employees on the proper procedures for utilizing a manual A&D record and for completing the ATF F 4473. IOI (b)(6) provided the requested training on 11/17/2021.

Attachment(s)

Report of Violations.pdf

Report of Violations.pdf

Report of Violations.pdf

Licensee Response to Violations Report.pdf

Licensee Response to Violations Report.pdf

Firearm Theft Loss List.pdf

REPORT OF VIOLATIONS

Regulation	Corrective Actions	Instance Details
<p>27 CFR 478.102(c): Failure to initiate a new NICS check after 30-day lapse of initial check</p> <p>ATF Forms 4473: 1 Number of Instances: 1</p>	<p>Execute and accurately record (on an ATF Form 4473) a new NICS/POC background check, after any 30-day expiration of a previously conducted NICS/POC check, on all future over-the-counter firearm transactions.</p>	<p>NICS Violation (b)(6)</p>
<p>27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers</p> <p>ATF Forms 4473: [redacted] Number of Instances: [redacted]</p>	<p>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.</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>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>27 CFR 478.129(b): Failure to retain ATF F 4473</p> <p>ATF Forms 4473: [redacted] Number of Instances: [redacted]</p>	<p>In the future insure that all firearm transfers are recorded on the ATF Form 4473 and/or the A&D record.</p> <p>Identify and separately retain all denied (completed and future) ATF Forms 4473, for a period not less than 5 years.</p> <p>Organize and maintain ATF Forms 4473 in alphabetical, chronological, or numerical order where NICS was contacted, but no firearm transfer took place, for a period not less than 5 years.</p> <p>Retain ATF Forms 4473 for a period of not less than 20 years after the date of sale or disposition.</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</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: [redacted]</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>Amend/Update electronic A&D record to conform with conditions set forth under ATF Ruling 2016-1.</p> <p>Complete and submit ATF Form 3310.11 - Firearms Inventory Theft/Loss Report.</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>

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

<p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473 <input type="text"/> Number of Instances: <input type="text"/></p>	<p>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>Ensure that the most up-to-date version of the ATF Form 4473 is used for all future over-the-counter transactions.</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)(iv): Failure to record NICS contact information on an ATF F 4473</p> <p>ATF Forms 4473 <input type="text"/> Number of Instances: <input type="text"/></p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p> <p>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 transferee/buyer nonimmigrant alien exception documentation is obtained, accurately recorded on, and retained with 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>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>

		(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
8	<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. 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>
9	<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>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.</p>
10	<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: []</p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions. 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>

THEFT/LOSS REPORT

Acquisition Date	Category	Type	Manufacturer	Importer	Model	Caliber/Gauge	Serial Number
(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)							

LICENSEE RESPONSE REPORT

Regulation	Corrective Actions	Licensee Response	Status Details
<p>27 CFR 478.102(c): Failure to initiate a new NICS check after 30-day lapse of initial check</p> <p>ATF Forms 4473: 1 Number of Instances: 1</p>	<p>Execute and accurately record (on an ATF Form 4473) a new NICS/POC background check, after any 30-day expiration of a previously conducted NICS/POC check, on all future over-the-counter firearm transactions.</p>	<p>(b)(6) explained that the instance was due to employee oversight.</p> <p>(b)(6) will provide training on the ATF F 4473 to insure future compliance.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 08/02/2021</p>
<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) 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.</p>	<p>(b)(6) explained that the instance was due to employee oversight.</p> <p>(b)(6) will provide training on the ATF F 4473 to insure future compliance.</p> <p>An ATF F 3310.4 was completed and submitted on 07/22/2021.</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 08/02/2021</p>
<p>27 CFR 478.129(b): Failure to retain ATF F 4473</p> <p>ATF Forms 4473: [] Number of Instances: []</p>	<p>In the future insure that all firearm transfers are recorded on the ATF Form 4473 and/or the A&D record. Identify and separately retain all denied (completed and future) ATF Forms 4473, for a period not less than 5 years. Organize and maintain ATF Forms 4473 in alphabetical, chronological, or numerical order where NICS was contacted,</p>	<p>(b)(6) stated that neither firearm was pawned on their corresponding acquisition dates and should not have been in the A&D record.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified</p>

3	<p>but no firearm transfer took place, for a period not less than 5 years. Retain ATF Forms 4473 for a period of not less than 20 years after the date of sale or disposition.</p>		08/02/2021	
4	<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. 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. Amend/Update electronic A&D record to conform with conditions set forth under ATF Ruling 2016-1. Complete and submit ATF Form 3310.11 - Firearms Inventory Theft/Loss Report.</p>	<p>(b)(6) stated that the incorrect and missing types/models/calibers and gauges was due to employee error. (b)(6) stated that he has trained all employees on the correct way to record firearm information in the A&D record.</p> <p>(b)(6) stated that regarding the incorrect disposition dates, the disposition dates were recorded in the A&D record when the pawn loan was redeemed even if the firearm was not transferred. (b)(6) explained that in the future when a firearm pawn redemption is completed and the pawn system logs the firearm out, that the employee will go into the A&D system and delete the disposition date to reflect that the firearm had not been transferred. When the firearm is transferred the disposition date will be recorded in the A&D record at that time.</p> <p>(b)(6) explained that he believes the firearm that was lost was actually stolen but he can't prove that. An ATF Form 3310.11 will be submitted on 8/2/2021.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 08/02/2021</p>
5	<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. 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. Ensure that the most up-to-date version of the ATF Form 4473 is used for all future over-the-counter transactions. Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>(b)(6) explained that the instances were due to employee oversight.</p> <p>(b)(6) will provide training on the ATF F 4473 to insure future compliance.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 08/02/2021</p>
6	<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. 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 transferee/buyer nonimmigrant alien exception documentation is obtained, accurately recorded on, and retained with all future ATF Forms 4473, Section B. Execute a required NICS/POC background check for all future over-the-counter firearm transactions. 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.</p>	<p>(b)(6) explained that the instances were due to employee oversight.</p> <p>(b)(6) will provide training on the ATF F 4473 to insure future compliance.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 08/02/2021</p>
7	<p>27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473</p> <p>ATF Forms 4473: [] Number of Instances: []</p>	<p>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. Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>(b)(6) explained that the instances were due to employee oversight.</p> <p>(b)(6) will provide training on the ATF F 4473 to insure future compliance.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 08/02/2021</p>
	<p>27 CFR 478.124(c)(3)(i): Failure to</p>	<p>(b)(6) explained that the instance</p>	<p>Status</p>	

8	<p>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>was due to employee oversight.</p> <p>(b)(6) will provide training on the ATF F 4473 to insure future compliance.</p>	<p>Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 08/02/2021</p>
9	<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>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 transfer is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D.</p>	<p>(b)(6) explained that the instances were due to employee oversight.</p> <p>(b)(6) will provide training on the ATF F 4473 to insure future compliance.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 08/02/2021</p>
10	<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:</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)(6) explained that the instance was due to employee oversight.</p> <p>(b)(6) will provide training on the ATF F 4473 to insure future compliance.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 08/02/2021</p>

REFERRAL(S)

ID	Status	Agency	Outcome
R-10	Referral Approved	DDTC	Referral sent
R-100	Unfounded (Closed)		
R-1000	Referral Denied	ATF Detroit CGIC	
R-1001	Referral Denied	ATF&E	
R-1004	Referral Denied	Mobile Police Department	
R-1007	Referral Denied	Houston CGIC	
R-1013	Referral Approved	Michigan State Police, Firearms Records Unit	Referral sent
R-1014	Referral Denied	ATF	
R-1015	Referral Approved	Berlin Township	Referral sent
R-1017	Referral Approved	ATF	Referral sent
R-1018	Referral Approved	Bureau of ATF - St. Paul III CGIC	Referral sent
R-1019	Referral Approved	ATF	Referral sent
R-102	Referral Approved	ATF	Referral sent
R-1020	Referral Approved	NYS Department of Labor	Referral sent
R-1024	Referral Approved	ATF	Referral sent
R-1025	Referral Approved	ATF	Referral sent
R-1026	Referral Approved	ATF	Referral sent
R-1027	Referral Approved	ATF	Referral sent
R-1028	Referral Approved	ATF	Referral sent
R-1029	Referral Approved	ATF	Referral sent
R-103	Referral Approved	CGIC	Referral sent
R-1030	Referral Approved	ATF	
R-1031	Referral Approved	ATF	Referral sent
R-1032	Referral Approved	ATF	Referral sent

R-1033	Referral Approved	ATF	Referral sent
R-1034	Referral Approved	ATF	Referral sent
R-1035	Referral Denied	Frederick County Maryland	
R-1037	Referral Denied	ATF	
R-1038	Referral Approved	Frederick County Maryland	Referral sent
R-1039	Referral Approved	Bureau of Alcohol Tobacco Firearms and Explosives	Referral sent
R-104	Referral Approved	California Department of Justice, Bureau of Firearms	Referral sent
R-1040	Referral Approved	Bureau of Alcohol Tobacco Firearms and Explosives	Referral sent
R-1042	Referral Approved	Harris County Sheriff's Office	Referral sent
R-1043	Referral Approved	U.S. Department of Justice, Bureau of ATF	Referral sent
R-1045	Referral Approved	California Bureau of Firearms	Referral sent
R-1046	Referral Approved	Indianapolis Department of Business and Neighborhood Services	Referral sent
R-1047	Referral Approved	Prince George's County Permitting Enforcement	Referral sent
R-1049	Unfounded (Closed)		
R-1050	Unfounded (Closed)		
R-1053	Referral Approved	Dawson County, Nebraska	Referral sent
R-1056	Referral Approved	Miami Dade Police Department	Referral sent
R-1057	Referral Approved	ATF	Referral sent
R-1063	Referral Approved	ATF, St. Paul III Intell/St. Paul Division	Referral sent
R-1064	Referral Approved	ATF, St. Paul Division Group I	Referral sent
R-1067	Referral Denied	ATF	
R-1068	Referral Approved	Michigan State Police Records Unit	Referral sent
R-1069	Referral Approved	Bureau of ATF	Referral sent
R-107	Referral Approved	ATF	Referral sent
R-1070	Referral Denied	Seneca County Office Building	
R-1072	Referral Denied	ATF -- Created in Error	
R-1073	Referral Denied	ATF-Atlanta CGIC	
R-1074	Referral Approved	Federal Motor Carrier Safety Administration (DOT)	Referral sent
R-1075	Referral Approved	Lowndes County Probate Court	Referral sent
R-108	Referral Approved	Colorado Bureau of Investigation	Referral sent
R-1082	Referral Approved	Bureau of Alcohol Tobacco Firearms and Explosives	Referral sent
R-1086	Referral Approved	Prince George's County Permitting Enforcement	Referral sent
R-1087	Referral Approved	ATF	Referral sent
R-1088	Referral Approved	ATF	Referral sent
R-1089	Referral Denied	Lake County Sheriff's Office	
R-1091	Referral Approved	Coffee County Sheriff's Office	Referral sent
R-1092	Referral Approved	ATF	Referral sent
R-1093	Referral Denied	ATF - Ft. Pierce CE	
R-1094	Referral Denied	Bureau of Alcohol, Tobacco, Firearms and Explosives	
R-1095	Referral Approved	Bureau of Alcohol, Tobacco, Firearms & Explosives	Referral sent
R-1097	Referral Approved	Lake County Sheriff's Office	Referral sent
R-1098	Referral Approved	BATFE	Referral sent
R-1099	Referral Approved	Michigan State Police Firearms Records Unit	Referral sent
R-11	Referral Approved	Alcohol and Tobacco Tax and Trade Bureau	Referral sent
R-1103	Unfounded (Closed)		
R-1105	Referral Approved	Michigan State Police	Referral sent
R-1109	Referral Approved	The Commonwealth of Massachusetts Office of Attorney General	Referral sent

R-111	Referral Approved	Bureau of ATF - KCFD	Referral sent
R-1110	Referral Approved	The Commonwealth of Massachusetts Office of Attorney General	Referral sent
R-1111	Referral Approved	The Commonwealth of Massachusetts Office of Attorney General	Referral sent
R-1116	Referral Approved	ATF	Referral sent
R-1117	Referral Approved	Customs and Border Protection	Referral sent
R-1119	Referral Denied	Customs and Border Protection	
R-1120	Unfounded (Closed)		
R-1122	Referral Denied	Customs and Border Protection	
R-1124	Referral Approved	Riley County Police Department	Referral sent
R-1127	Referral Denied	Customs and Border Protection	
R-1129	Referral Approved	Minnesota State Fire Marshal Division	Referral sent
R-113	Referral Approved	ATF	Referral sent
R-1134	Referral Approved	Michigan State Police - Firearms Records Unit	Referral sent
R-114	Referral Approved	ATF	Referral sent
R-1145	Referral Approved	Bureau of Alcohol, Tobacco, Firearms, and Explosives	Referral sent
R-1146	Referral Approved	ATF	Referral sent
R-1150	Referral Approved	Oklahoma Tax Commission	Referral sent
R-1151	Unfounded (Closed)		
R-1153	Referral Approved	ATF-NY Group 7 (CGIC)	Referral sent
R-1156	Referral Approved	Bureau of Alcohol, Tobacco, Firearms, and Explosives	Referral sent
R-1157	Referral Approved	ATF	Referral sent
R-1159	Referral Approved	Bernalillo County Zoning	Referral sent
R-1161	Referral Approved	Bureau Of Alcohol, Tobacco, Firearms and Explosives	Referral sent
R-1165	Referral Approved	ATF- Richmond II, Field Office	Referral sent
R-1168	Referral Approved	ATF	Referral sent
R-1170	Unfounded (Closed)		
R-1178	Referral Denied	ATF	
R-118	Referral Approved	Bureau of Alcohol, Tobacco, Firearms and Explosives	Referral sent

CLOSING CONFERENCE

(9/2/2021)
09/02/2021

Closing Conference Additional Notes

Please note, Scans of ATF Forms 4473 containing violations are located in the Attachments and are numbered to reference each violation.

Attachment(s)

Attendee(s)

(b)(6)

EXHIBITS

Inspection

Category	Attachment Name
Correspondence	Spartan Notification RE: 5-75-10888 Inspection Results
FinalDecision	5-75-10888 Tolobu, LLC - Final Notice of Revocation.pdf
Correspondence	Spartan Notification RE: 5-75-10888 Monitored Case
Correspondence	Spartan Notification RE: 5-75-10888 Monitored Case
Correspondence	Spartan Notification RE: 5-75-10888 Monitored Case
Correspondence	Spartan Notification RE: 5-75-10888 Monitored Case
UpdateLicensingCenter	ATF Letter 7-13-22 Withdrawing Hearing Request.pdf
Correspondence	Spartan Notification RE: 5-75-10888 Monitored Case
Correspondence	Spartan Notification RE: 5-75-10888 Monitored Case

Correspondence	Spartan Notification RE: 5-75-10888 Monitored Case
Correspondence	Spartan Notification RE: 5-75-10888 Monitored Case
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Correspondence	Spartan Notification RE: 5-75-10888 Monitored Case
Correspondence	Spartan Notification RE: 5-75-10888 Monitored Case
Correspondence	Spartan Notification RE: 5-75-10888 Monitored Case
UpdateLicensingCenter	Initial 8c Tolobu LLC FCI-25416.docx
Correspondence	Spartan Notification RE: 5-75-10888 Monitored Case
Correspondence	Spartan Notification RE: 5-75-10888 Monitored Case
OnSiteSummaryInformation	Tolobu LLC Onsite Summary.docx
BusinessVerification	Business Entity Verification.pdf
LicenseeResponseToViolationsPDF	Licensee Response to Violations Report.pdf
ReturnedSignedROV	Report of Violations (002).pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
OnSiteSummaryInformation	FFL Theft_Loss Summary.pdf
ClosingConferenceSummary	Acknowledgment of Regulations.pdf
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
ViolationsPDF	Report of Violations.pdf
LicenseeResponseToViolationsPDF	Licensee Response to Violations Report.pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
Correspondence	
Correspondence	Action Required Concerning Your Federal Firearms Compliance Inspection
FirearmTheftLossList	Firearm Theft Loss List.pdf
RentalLeaseVerification	Lease Agreement.pdf
ZoningVerification	City of Fort Worth Zoning.pdf
TradeNameVerification	Business Information Verification.pdf
PropertyOwnershipVerification	Property Ownership Verification.pdf
BusinessVerification	Business Information Verification.pdf

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

In the matter of License Number 5-75-439-02-4F-10888, as a/an

Pawnbroker of Firearms Other Than Destructive Devices issued to:

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

Tolobu LLC
dba Northside Pawn
5-75-439-02-4F-10888
2609 N Mail Street
Fort Worth, Texas 76164

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 2501 South State Business Highway 121, Suite 300A, Convergence Building, Lewisville, Texas 75067, 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
05/16/2022	Krissy Carlson, Director, Industry Operations	Krissy Y. Carlson <small>Digitally signed by Krissy Y. Carlson Date: 2022.05.16 15:09:49 -0500</small>

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: 70192970 000171364346 Or Delivering a copy of the notice to the address shown below.

Date Notice Served	Title of Person Serving Notice	
05/17/2022	INVESTIGATIVE ANALYST (b)(6)	(b)(6)
Print Name and Title of Person Served		
Tolobu LLC dba Northside Pawn		
Address Where Notice Served		
2609 N Mail Street Fort Worth, Texas 76164		

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 Tolobu, LLC dba Northside Pawn (“Licensee”), a Pawnbroker in Firearms Other Than Destructive Devices. Specifically, the Director, Industry Operations, United States Department of Justice, ATF, Dallas 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 2015. The laws and regulations issued under the GCA were reviewed as part of the application inspection. Subsequently, ATF conducted a compliance inspection of Licensee in 2018, where the laws and regulations issued under the GCA were again reviewed with Licensee.

Current Inspection

On May 7, 2021, ATF began a compliance inspection of Licensee’s premises that revealed the following:

Acquisition and Disposition Record Violations:

1. On [redacted] occasions, Licensee willfully failed to timely and/or accurately record the acquisition and/or disposition information of firearms, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.125(e). See Attachment 1 and Attachment 2.

Background Check Violations:

2. On 1 occasion, Licensee willfully transferred a firearm to an unlicensed person without 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. Specifically, [redacted] (b)(3) (112 Public Law 55 125 Stat 552) without contacting NICS before the transfer.

Failure to Report Multiple Sales:

3. On [redacted] occasion, Licensee willfully failed to timely and/or accurately report the sale or other disposition of two or more pistols and/or revolvers during any five consecutive business days to an unlicensed person, in violation of 18 U.S.C. § 923(g)(3)(A) and 27 C.F.R. § 478.126a. Specifically, [redacted] (b)(3) (112 Public Law 55 125 Stat 552), (b)(6) [redacted] (b)(3) (112 Public Law 55 125 Stat 552) without completing a multiple sales report.

Failure to Retain Records:

- 4 On occasions, Licensee willfully failed to retain each Firearms Transaction Record, ATF Form 4473 for a period of not less than 20 years after the date of sale or disposition, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.129(b). Specifically,

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

ATF Form 4473 Violations:

- 5 On occasions, Licensee willfully failed to obtain a complete and/or accurate Firearms Transaction Record, ATF Form 4473, from the transferee prior to making an over-the-counter transfer of a firearm to a non-licensee, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.124(c)(1). See Appendix ¶ 1.

- 6 On occasion, 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). Specifically, in (b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

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

- 7 On occasions involving ATF Forms 4473, Licensee willfully transferred a firearm to a non-licensee without recording the date the Licensee contacted the National Instant Criminal Background Check System ("NICS"), any response provided by the system and/or any identification number provided by the system information 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 ¶ 2.

- 8 On occasion, Licensee willfully failed to completely and/or accurately identify the firearm to be transferred 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)(4). Specifically, Licensee transferred (b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

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

- 9 On occasions, Licensee willfully failed to sign and/or date the Firearms Transaction Record, ATF Form 4473 certifying that Licensee does not know or

have reason to believe the transferee is disqualified by law from receiving the firearm described on the Form, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.124(c)(5). Specifically:

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

- 10 On occasions, Licensee willfully failed to obtain/execute the Firearms Transaction Record, ATF Form 4473 as indicated by the headings on the Form and the instructions on or pertaining to the Form, in violation of 18 U.S.C. § 922(m) and 27 C.F.R. § 478.21(a). See Appendix ¶ 3.

APPENDIX

PARAGRAPH 1 – 27 CFR 478.124(c)(1): Failure to obtain a completed ATF Form 4473

Transferee's Name

Date of
Transaction

Discrepancy

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

PARAGRAPH 2 – 27 CFR 478.124(c)(3)(iv): Failure to record NICS information on ATF Form 4473

Transferee's Name

Date of
Transaction

Discrepancy

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

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

PARAGRAPH 3 – 27 CFR 478.21(a): Failure to complete Form 4473 as prescribed

Transferee's Name

Date of
Transaction

Discrepancy

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



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Dallas Field Division

July 18, 2022

www.atf.gov

Matthew J Smid, Attorney
Daniel, Moore, Evans, Biggs, Decker, and Smid
301 Commerce Street – Suite 2001
Fort Worth, Texas 76102

Re: Final Notice of Revocation for Tolobu LLC d/b/a Northside Pawn

Dear Mr. Smid:

Enclosed, please find The Final Notice or Denial of Application, Revocation, Suspension and/or Fine of Firearm License, ATF Form 5300.13 issued this date to Tolobu LLC d/b/a Northside Pawn (Northside Pawn). The revocation effective date is October 15, 2022. Until that time, Northside Pawn may only dispose of firearms. No additional acquisitions are authorized.

If you have any questions, please feel free to contact Division Counsel

(b)(6)

(b)(6)

Sincerely yours,

(b)(6)

Krissy Y. Carlson
Director, Industry Operations

Enclosure

**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 5-75-439-02-4F-10888 as a/an
Type 02 Pawnbroker, issued to:

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

Tolobu LLC
DBA Northside Pawn
2609 N Main Street
Fort Worth, Texas 76164

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 October 15, 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 2501 S. State Highway 121, Suite 300A, Convergence Building, Lewisville, Texas 75067, 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 7/18/2022	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official Krissy Y. Carlson	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: _____

Or

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

Date Notice Served	Title of Person Serving Notice	Signature of Person Serving Notice
Print Name and Title of Person Served		Signature of Person Served
Address Where Notice Served		

Note: Previous Edition is Obsolete