

IRUNGUNS LLC's FCI  
FCI-28290  
01/21/2022 03:52 PM  
IO (b)(6) Phoenix III (IO) Field Office

LICENSEE INFORMATION

Licensee Name	RDS Key	License/Permit Number	License Type
IRUNGUNS LLC	9-86-05682	9-86-015-08-1J-05682	08 - Importer of Firearms License
Business Type Limited Liability Company (LLC)			

Premises Address Mailing Address

Premises Ownership Type  
Owned

Premises Location Type  
Store Front

RECOMMENDATIONS

Final Decision  
Warning Conference

Deputy Assistant Director Megan Bennett's Recommendation  
Warning Conference

Details

A briefing was held with the Director on December 8, 2021, regarding the recommendation of warning conference in lieu of revocation. The Director approved the alternate recommendation as the following extraordinary circumstances exist: the employee who conducted the transaction of accepting a TX concealed carry permit in lieu of running NICS had already been fired and the FFL had already retrained the rest of his employees on the requirements of background checks.

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

I concur with the recommendations. The FFL identified and took steps, prior to any inspection, to terminate an employee for that employee's violations. The FFL also took additional steps to train his other/new employees on the rules and regulations as they relate to the business.

Division Counsel (b)(6) Review

Details

I concur with the recommendations of the IOI, AS and DIO.

Director of Industry Operations Kristina Babcock's Recommendation  
Violations Only

Details

Concur with the alternate recommendation of Violations only and Recall inspection. The licensee did accept an out of state CCW which merits revocation however it was one instance and the licensee immediately terminated the employee that accepted the out of state CCW and has educated the staff on the full requirements for over the counter transfers and background checks.

Area Supervisor (b)(6) Recommendation:

Violations Only

Details

Field inspection performed 07/13/21; a ROV was issued for five record-keeping violations (three of which are low-volume repeat violations), a single conduct of business violation and a single administrative violation. Although the licensee's acceptance of an out-of-state CCW (thus not performing a NICS background check) merits Revocation, it is alternatively recommended that the licensee be issued a ROV and be subject to a recall inspection due to (1.) the infraction being committed by an employee who was terminated prior to the inspection for related performance problems/errors, (2.) a retroactively performed background check verified that the purchaser is/was not prohibited, and (3.) the licensee proactively educated their new transfer-conducting staff about the full requirements for over-the-counter transfers and background checks.

Industry Operations Investigator (b)(6) Recommendation:

Violations Only

Details

On 5/11/2021 IO (b)(6) conducted an onsite compliance investigation of Irunguns LLC, 9-86-05682, a Type 08 Manufacturer of Firearms and SOT holder. IO (b)(6) was tasked with evaluating for trafficking indicators (b)(7)(E) and assuring compliance with current provisions of GCA. IO (b)(6) performed the inspection in conjunction with FCI-26568 and FCI-26975. It was determined For the Love of Guns, FFL:9-86-09567 was used solely to acquire firearms with a different company name to be sold directly to Irunguns, FFL: 9-86-05682. Jason and (b)(6) have opened a new FFL, Mirror Image Laser Engraving dba M.I.L.E, FFL :9-86-16311 in an attempt to phase out For the Love of Guns and use M.I.L.E. to acquire firearms to sell directly to Irunguns, L.L.C.. All of his GCA firearms were transferred to this 08 FFL (b)(6) (b)(7)(C) firearms have been retained on the 07 FFL (b)(6), (b)(7)(C)

(b)(6), (b)(7)(C)

Although the Licensee failed to conduct a NICS check and accepted an out-of-state CCW from Texas, IO (b)(6) verified he terminated the employee that made the error and trained his current employees on proper procedure. IO (b)(6) conducted a NICS check resulting in no prohibiting findings for the individual with the TX CCW. For this reason, IO (b)(6) recommends a Violations Only/ Recall within a year for this 08 FFL.

Inspection Findings

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

**ELIGIBILITY VERIFICATION**

**Business Information Verification**

Licensee Name IRUNGUNS LLC	Business Type Limited Liability Company (LLC)	Is the business valid? Yes
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Additional Findings  
The business is active and in good standing via the Arizona Corporation Commission website.

Attachment(s):  
Articles of organization Irunguns.pdf  
more filing documents for Irunguns.pdf  
Irunguns LLC documents.pdf

**Property Ownership Verification**

Premises Ownership Type Owned	Premises Location Type Store Front	Has the property ownership been verified? Yes
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Address  
No data available

Additional Findings  
The property is owned by the responsible person, Jason Lane.

Attachment(s):  
Property ownership Kiowa Blvd.pdf

**Trade Name/DBA Verification**

Trade Name/DBA IRUNGUNS LLC/IRG	Is the trade name/DBA registered? No
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Additional Findings  
The trade name is not registered and is not required to be in Arizona.

Attachment(s):  
Registering Trade Name not Required.pdf

**Zoning Information Verification**

Is the proposed business activity in compliance with zoning?  
Yes

Additional Findings  
The Licensee must have a valid Lake Havasu City Business License to be in compliance with local zoning ordinances.

Attachment(s):  
IRUNGUNS LLC - Business License - Expires December 31 2021.pdf

**APPOINTMENT DETAILS**

Interview Date  
05/11/2021

Address

**Responsible Attendee(s)**

JASON TODD LANE  
**(b)(6)**

**Non-Responsible Person(s)**

**(b)(6)**

**RESPONSIBLE PERSON(S)**

**JASON TODD LANE**

Name JASON TODD LANE	Gender Male	Race White	Ethnicity Not Hispanic or Not Latino
Date of Birth <b>(b)(6)</b>	SSN <b>(b)(6)</b>	Job Title MANAGING MEMBER	

**Physical Identifiers**

Height  
(b)(6)

Weight  
(b)(6)

Hair Color  
Bald

Eye Color  
Hazel

**Place of Birth**

Country  
Canada

Province  
(b)(6)

City

**Home Address**

(b)(6)

**Additional Names**

**Citizenship**

Canada

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

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

Email Address	Email Remarks
(b)(6)	

**Criminal History Check**

Date Criminal History Check Conducted  
05/11/2021

Criminal History Check Comments  
IO (b)(6) conducted criminal history checks via JWIN resulting in no prohibiting findings.

(b)(6)

(Deactivated)

Name  
(b)(6)

Gender  
Female

Race  
White

Ethnicity  
Not Hispanic or Not Latino

Date of Birth  
(b)(6)

SSN  
(b)(6)

Job Title  
Import/Export Compliance Manager

**Physical Identifiers**

Height  
(b)(6)

Weight  
(b)(6)

Hair Color  
Brown

Eye Color  
Blue

**Place of Birth**

Country  
United States Of America

State  
(b)(6)

City

**Home Address**

(b)(6)

**Additional Names**

**Citizenship**

United States

ID Type	Country	State	ID Number
Driver's License	United States	(b)(6)	(b)(6)
Phone Type	Phone Number		Remarks
Mobile	(b)(6)		
Business	+1 928-505-6794		
Email Address			Email Remarks
(b)(6)			
(b)(6)			

**Criminal History Check**

Date Criminal History Check Conducted  
05/11/2021

Criminal History Check Comments  
IO (b)(6) conducted criminal history checks via JWIN resulting in no prohibiting findings.

(b)(6)

(Deactivated)

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

**Physical Identifiers**

Height	Weight	Hair Color	Eye Color

**Place of Birth**

Country	City

**Home Address**

(b)(6)

**Additional Names**

**Citizenship**

United States

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

**Criminal History Check**

Date Criminal History Check Conducted  
05/11/2021

Criminal History Check Comments  
IO (b)(6) conducted criminal history checks via JWIN resulting in no prohibiting findings.

**NON-RESPONSIBLE PERSON(S)**

Name	Date of Birth	Job Title
(b)(6)		

**INTERVIEW QUESTIONNAIRE**

What is the proposed business activity?

The business activity is sales of new and used long guns and handguns to individuals known to the Licensee as well as the general public. The Licensee also exports and imports firearms to and from Canada monthly using his personal RV. The Licensee also has a manufacturer's FFL as well as (b)(3)(26 USC § 6103) items have been sol to individuals yet. The Licensee intends to acquire a modular range at a later date as well.

Do they need an additional license or permit?

No

Who are their primary suppliers?

(b)(4)

Other State or Local Permits

Type	Number	Expiration
State Sales Tax	(b)(3)(26 USC § 6103)	12/31/21
State/Local Business License	21-00037783	12/31/21

Business Activities

(b)(3)(26 USC § 6103)

Internet Sales/Transfers

Retail

Selected Operational Security Measures

(b)(4)

Internet Sales/Transfers Website

www.irunguns.ca

www.irunguns.com

www.irunguns.biz

PREMISES INFORMATION

Inspection Area Description

The inspection area is a warehouse with an attached storefront located in Lake Havasu City (b)(4)

Interviews take place in the rear warehouse. Firearms transactions take place in the storefront. Records are stored electronically.

Primary Activity

Manufacturing

Selected Physical Security Measures

Alarm Monitoring (with Cellular Back-Up)

Deadbolts

Floodlights

Glass Breakage Detection

Local Audible Alarm

Lockable Display Rack(s)/Case(s)

Motion Sensors

Pull Down Gates

Safe(s)/Vault(s)

Security Cameras

GPS Coordinates

Latitude

Longitude

ONSITE SUMMARY

Total # of ATF F 4473 Reviewed

Total # of Open Dispositions in A & D Record

Total # of Firearms in Inventory

494

Total # of Firearms Missing after Reconciliation

0

Total # of Acquisitions in the Last 12 Months

(b)(4)

Total # of Dispositions in the Last 12 Months

(b)(4)

Import Documents Verified

Yes

NFA Documents Verified

Additional Comments

Additional On Site Summary Info:

Suspicious (WOC) Firearm Checks: 8

Suspicious (WOC) Firearm Hits: 0

Suspicious Person Checks: 26

Suspicious Person Hits: 0 (See below list)

Traces Successful: 0

Traces Unsuccessful: [redacted]  
 Traces Resolved: [redacted] onsite (see attached)  
 NICS Cross-Checked with 4473s (Date Range: 02/14/21 -05/14/21): 181, 4 denials, 52 verified. \*\* All denials are retained in a separate folder.  
 Reported Theft/Loss: 0  
 Date of Last Theft/Loss Report: N/A  
 Non-Reported Thefts/Losses (including date): N/A  
 Total Reported Multiple Sales (for Inspection Period): [redacted]  
 Non-Reported Multiple Handgun Sales: [redacted] reported while onsite)  
 Non-Reported Multiple Certain Long Gun Sales: 0  
 Non-Reported AFMER(s): N/A

IO [redacted] ran the following list of possible suspicious purchasers in eTrace returning the attached or below listed results:

NAME TRACES MULTI SALES

[redacted]

**(b)(3) (112 Public Law 55 125 Stat 552),(b)(6),(b)(7)(C)**

**ATTACHMENTS:**

[redacted] emails, forms, and queries

-Traces completed onsite for Irunguns

-Canadian ban information

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

Number of Transferee Background Checks

1

Attachment(s)

Report of Violations.pdf

Report of Violations.pdf

Licensee Response to Violations Report.pdf

**REPORT OF VIOLATIONS**

Regulation	Corrective Actions	Instance Details
27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers  ATF Forms 4473 [redacted] Number of Instances: [redacted]	Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) for all non-reported multiple sales identified as a result of this inspection.  Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) by close of the same business day, for all applicable future multiple sales.	<p><b>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</b></p>
27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473  ATF Forms 4473 [redacted] Number of Instances: [redacted]	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><b>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</b></p>

		(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
3	27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473  ATF Forms 4473: [ ] Number of Instances: [ ]	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, validated and accurately recorded on all future ATF Forms 4473, Section B.  (b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
4	27 CFR 478.102(a): Failure to complete a NICS/POC background check  ATF Forms 4473: 1 Number of Instances: 1	Execute a required NICS/POC background check for all future over-the-counter firearm transactions. Retrieve and accurately record (on an ATF Form 4473) a required final NICS/POC background check response prior to all future over-the-counter firearm transactions.  (b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
5	27 CFR 478.21(a): Failure to complete forms as prescribed  ATF Forms 4473: [ ] Number of Instances: [ ]	Complete all forms as prescribed. Correct/Update photocopies of all specified ATF Form 4473 discrepancies, in accordance with form headings and instructions.  (b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
6	27 CFR 478.131(a)(2): Failure to record on an ATF Form 4473 (or affix a copy of) NICS alternative permit info  ATF Forms 4473: [ ] Number of Instances: [ ]	Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions. Ensure that a qualifying NICS alternative permit is properly obtained, validated, verified, and documented for all applicable future over-the-counter firearm transactions.  (b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
7	27 CFR 478.122(a): Failure to maintain an accurate/complete/timely import or acquisition record  Number of Instances: [ ]	Accurately, completely & timely record all required future firearm acquisition information. Amend/Update A&D Record to accurately record all required firearm acquisition information.  (b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

**LICENSEE RESPONSE REPORT**

Regulation	Corrective Actions	Licensee Response	Status 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) 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.	The Licensee has put checks and balances in place. All multiple sales were submitted while IOI Lee was onsite.	Status: Correction Verified  Verified Method: In Person  Date Correction Verified: 07/13/2021
2 27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473  ATF Forms 4473: [ ] Number of Instances: [ ]	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.	The Licensee has terminated the previous employee that completed these forms. The Licensee stated he has assigned new user roles as well. The Licensee was unaware of the requirement for government utility.	Status: Licensee Notified  Verified Method: In Person  Date Licensee Notified: 07/13/2021
27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473  ATF Forms 4473: [ ]	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, validated and accurately recorded on all future ATF Forms 4473, Section B.	The Licensee has terminated the previous employee that completed these forms. The Licensee stated he has assigned new user roles as well. The Licensee was not aware of the	Status: Licensee Notified  Verified Method: In Person

3	Number of Instances: <input type="text"/>		requirement for government issued supplemental ID type.	Date Licensee Notified 07/13/2021
4	27 CFR 478.102(a): Failure to complete a NICS/POC background check  ATF Forms 4473: 1 Number of Instances: 1	Execute a required NICS/POC background check for all future over-the-counter firearm transactions. Retrieve and accurately record (on an ATF Form 4473) a required final NICS/POC background check response prior to all future over-the-counter firearm transactions.	The Licensee has terminated the previous employee that completed these forms. The Licensee has educated new staff about the requirements for background checks. The Licensee has more than one person reviewing forms now as well.	Status Licensee Notified  Verified Method In Person  Date Licensee Notified 07/13/2021
5	27 CFR 478.21(a): Failure to complete forms as prescribed  ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/>	Complete all forms as prescribed. Correct/Update photocopies of all specified ATF Form 4473 discrepancies, in accordance with form headings and instructions.	The Licensee has new checks in place now while the purchaser is still in store. The Licensee has two checks in place now too.	Status Licensee Notified  Verified Method In Person  Date Licensee Notified 07/13/2021
6	27 CFR 478.131(a)(2): Failure to record on an ATF Form 4473 (or affix a copy of) NICS alternative permit info  ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/>	Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions. Ensure that a qualifying NICS alternative permit is properly obtained, validated, verified, and documented for all applicable future over-the-counter firearm transactions.	The Licensee has educated the employee involved with this form. There are now extra checks in place.	Status Licensee Notified  Verified Method In Person  Date Licensee Notified 07/13/2021
7	27 CFR 478.122(a): Failure to maintain an accurate/complete/timely import or acquisition record  Number of Instances: <input type="text"/>	Accurately, completely & timely record all required future firearm acquisition information. Amend/Update A&D Record to accurately record all required firearm acquisition information.	The Licensee stated there was an issue with the import/export of the revolver. The Licensee has updated the A&D record appropriately. The revolver was originally overlooked.	Status Correction Verified  Verified Method In Person  Date Correction Verified 07/13/2021

#### CLOSING CONFERENCE

Review Regulations conducted offline

( 7/13/2021 )

07/13/2021

Attachment(s)

#### Attendee(s)

JASON TODD LANE

#### WARNING CONFERENCE

##### Scheduling Letter

Delivery Method

Hand-Delivery

Recipient Name

Jason Lane

Delivery Date

12/17/2021 03:50 PM

Additional Notes

Due to COVID-19 field contact constraints the WC notification letter was generated and alternatively sent to the licensee via email (with delivery confirmation) on 12/17/21. WC tentative scheduled for 01/05/22 at 1:00pm. Delivery confirmation obtained on 12/17/21.

##### Conference Details

Warning Conference Lead

Representing ATF

(b)(6)  
Conference Date/Time  
01/13/2022 03:00 PM  
Conference Address  
40 N Central Ave, Phoenix, Arizona 85004

(b)(6)  
Responsible person(s) representing the licensee  
JASON TODD LANE  
Non-Responsible person(s) representing the licensee  
(b)(6)

Follow-Up Letter Details

(1.) Violation of 27 CFR 478.126(a): "Failure to report multiple sales or other dispositions of pistols and revolvers."

During the conference, you stated that – in order to address this violation and improve upon internal practices – you (a.) implemented the segregation of multi-sale 4473s for bulk reporting at the close of each business day, and you (b.) report all requisite multi-sales directly to ATF via email, with delivery confirmations printed and attached to corresponding 4473s. You stated further that your CDS electronic recordkeeping system alerts/prompts your sales associates to all qualifying purchases requiring a multiple sale reporting.

- (2.) Violation of 27 CFR 478.124(c)(1): "Failure to obtain a completed ATF F 4473."
- (3.) Violation of 27 CFR 478.124(c)(3)(i): "Failure to record Identification document on ATF F 4473."
- (4.) Violation of 27 CFR 478.21(a): "Failure to complete forms as prescribed."

During the conference, you stated that – in order to address these violations and improve upon ATF F 4473 completion and accuracy – you (a.) obtain and make copies of purchaser's identification and staple them to their corresponding ATF F 4473, you (b.) perform multiple ATF F 4473 reviews to include once during the transaction (by sales staff), then again by another staff member/manager before completing the physical transfer of a firearm, once again at the close of each business day, and then lastly at the end of each month, prior to filing your forms in bulk. You further stated that you will implement utilizing a 4473 overlay/template to aid in your review processes, as suggested during the conference.

- (5.) Violation of 27 CFR 478.102(a): "Failure to complete a NICS/POC background check."
- (6.) Violation of 27 CFR 478.131(a)(2): "Failure to record on an ATF Form 4473 (or affix a copy of) NICS alternative permit info."

During the conference, you stated that – in order to address this violation and improve upon ATF F 4473 completion and accuracy and to ensure no firearms are transferred to a prohibited person – you will (a.) ensure NICS eCheck results are transcribed onto every ATF Form 4473, as well as printed and stapled to each corresponding ATF F 4473, you (b.) now only accept AZ CCWs as NICS substitutes, and you, (c.) terminated the NICS-violating employee (b)(6) prior to this most recent inspection.

(7.) Violation of 27 CFR 478.122(a): "Failure to maintain an accurate/complete/timely import or acquisition record."

During the conference, you stated that – in order to address this violation and improve upon timely, correct, and accurate recordkeeping requirements – you (a.) have a dedicated employee for full A&D recordkeeping maintenance and oversight, you (b.) have export inventory reconciliation audits performed monthly (gun-to-book), and lastly that (c.) full inventory reconciliation audits are performed quarterly.

Additionally, it should be noted how you performed in-house staff training after (and as a result of) this most recent inspection, with the intention of training any new employees hired in the future. Further, you detailed and supplied us with both a self-generated compliance plan (created for your staff) to better address identified violations, as well as a stack of self-generated employee acknowledgment forms, which were certified by your staff in acceptance of their roles and responsibilities toward future compliance.

**Warning Conference Documents**

Attachment	Date/Time
Warning Conference Employee Accountability Signatures.pdf	01/19/2022 03:39 PM
Spartan_FCI-28290.pdf	01/19/2022 03:39 PM
IRG Compliance Plan.pdf	01/19/2022 03:39 PM

**Follow-Up Letter**

Delivery Method  
Hand-Delivery  
Recipient Name                      Delivery Date  
Jason Lane                              01/20/2022 03:00 PM

Additional Notes

Due to COVID-19 field contact constraints the WC notification letter was generated and alternatively sent to the licensee via email (with delivery confirmation) on 01/20/22. Delivery confirmation obtained on 01/21/22.

**EXHIBITS**

**Inspection**

Category	Attachment Name
Correspondence	Spartan Notification RE: 9-86-05682 Inspection Results
WarningConferenceFollowUpLetter	Follow Up Letter.pdf
WarningConferenceAttachment	Warning Conference Employee Accountability Signatures.pdf
WarningConferenceAttachment	Spartan_FCI-28290.pdf
WarningConferenceAttachment	IRG Compliance Plan.pdf
Correspondence	Spartan Notification RE: 9-86-05682 Inspection Results
WarningConferenceSchedulingLetter	Scheduling Letter.pdf
Correspondence	Spartan Notification RE: 9-86-05682 Monitored Case
Correspondence	Spartan Notification RE: 9-86-05682 Monitored Case
Correspondence	Spartan Notification RE: 9-86-05682 Monitored Case
Correspondence	Spartan Notification RE: 9-86-05682 Monitored Case
Correspondence	Spartan Notification RE: 9-86-05682 Monitored Case
Correspondence	Spartan Notification RE: 9-86-05682 Monitored Case
Correspondence	DIO Kristina Babcock Returned Inspection FCI-28290
Correspondence	Spartan Notification RE: 9-86-05682 Monitored Case







December 14, 2021

**WARNING CONFERENCE**

IRUNGUNS LLC  
IRUNGUNS LLC/IRG

**Re:** Federal Firearms License Number: 9-86-05682

IRUNGUNS LLC,

As a result of a recent compliance inspection conducted by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) at your firearms business located at on 5/11/2021 through 07/13/2021, you were cited for violations of 27 Code of Federal Regulations, Part 478. The violations were discussed with you during the inspection. A copy of the Report of Violations, ATF Form 5030.5, issued at the time of the inspection is enclosed.

You should be aware that any willful violations of the Gun Control Act may result in revocation of your Federal firearms license. As a result of the recently cited violations, it is important that we have a meeting with you to discuss the violations found. The conference will be held at 40 N Central Ave, Phoenix, Arizona 85004 on 01/05/2022 at 1:00 PM. The agenda for the meeting will include a discussion of the reasons for the violations, a review of the legal requirements, and a discussion of steps to be taken by you to ensure future compliance. Although we do not believe it necessary, legal counsel may assist you at your own expense if you so choose. **Please bring with you documentation verifying the corrective action you have taken and any compliance plan you have developed to ensure these violations do not recur.**

Also, you are hereby notified that, pursuant to 18 U.S.C. § 930(a), no person may bring a firearm or other dangerous weapon into an ATF office. Possession of a firearm or other dangerous weapon in an ATF office may result in a fine of \$100,000 or imprisonment for not more than 1 year or both.

The records you are required to maintain and the business operations you conduct are important to law enforcement in our continuing effort to reduce violent crime and protect the public. It is essential that you comply with all Federal laws and regulations that govern your firearms business to aid in this effort to combat violent crime.

We will conduct a follow-up inspection in the future. Any violations, either repeat or otherwise, could be viewed as willful and may result in the revocation of your license.

Please contact Industry Operations Investigator (b)(6) or me at (b)(6) to confirm this appointment, and to ask any questions you may have regarding this conference. We look forward to meeting with you to resolve these issues.

Sincerely,  
(b)(6)  
Area Supervisor  
Phoenix III (IO) Field Office



January 20, 2022

WARNING CONFERENCE FOLLOW UP

IRUNGUNS LLC  
IRUNGUNS LLC/IRG

Re: Federal Firearms License Number: 9-86-05682

IRUNGUNS LLC,

This letter is a follow-up to the warning conference held with you on January 13, 2022 at 1:00 PM. During this conference, the violations cited during the inspection conducted on 5/11/2021 through 7/13/2021, and the necessary corrective action to prevent the violations from reoccurring were discussed. The following people were in attendance:

Representing the ATF Phoenix III (IO) Field Office Field Division: (b)(6)  
Responsible person(s) representing the licensee: JASON TODD LANE  
Non-Responsible person(s) representing the licensee: (b)(6)

You were given the opportunity to comment on the violations and what specific action you have taken to ensure that the violations will not reoccur. With respect to the cited violations, we are providing a summary of your response to each violation:

(1.) Violation of 27 CFR 478.126(a): "Failure to report multiple sales or other dispositions of pistols and revolvers."

During the conference, you stated that – in order to address this violation and improve upon internal practices – you (a.) implemented the segregation of multi-sale 4473s for bulk reporting at the close of each business day, and you (b.) report all requisite multi-sales directly to ATF via email, with delivery confirmations printed and attached to corresponding 4473s. You stated further that your CDS electronic recordkeeping system alerts/prompts your sales associates to all qualifying purchases requiring a multiple sale reporting.

(2.) Violation of 27 CFR 478.124(c)(1): "Failure to obtain a completed ATF F 4473."

(3.) Violation of 27 CFR 478.124(c)(3)(i): "Failure to record Identification document on ATF F 4473."

(4.) Violation of 27 CFR 478.21(a): "Failure to complete forms as prescribed."

During the conference, you stated that – in order to address these violations and improve upon ATF F 4473 completion and accuracy – you (a.) obtain and make copies of purchaser's identification and staple them to their corresponding ATF F 4473, you (b.) perform multiple ATF F 4473 reviews to include once during the transaction (by sales staff), then again by another staff member/manager before completing the physical transfer of a firearm, once again at the close of each business day, and then lastly at the end of each month, prior to filing your forms in bulk. You further stated that you will implement utilizing a 4473 overlay/template to aid in your review processes, as suggested during the conference.

(5.) Violation of 27 CFR 478.102(a): "Failure to complete a NICS/POC background check."

(6.) Violation of 27 CFR 478.131(a)(2): "Failure to record on an ATF Form 4473 (or affix a copy of) NICS alternative permit info."

During the conference, you stated that – in order to address this violation and improve upon ATF F 4473 completion and accuracy and to ensure no firearms are transferred to a prohibited person – you will (a.) ensure NICS eCheck results are transcribed onto every ATF Form 4473, as well as printed and stapled to each corresponding ATF F 4473, you (b.) now only accept AZ CCWs as NICS substitutes, and you, (c.) terminated the NICS-violating employee (b)(6) prior to this most recent inspection.

(7.) Violation of 27 CFR 478.122(a): "Failure to maintain an accurate/complete/timely import or acquisition record."

During the conference, you stated that – in order to address this violation and improve upon timely, correct, and accurate recordkeeping requirements – you (a.) have a dedicated employee for full A&D recordkeeping maintenance and oversight, you (b.) have export inventory reconciliation audits performed monthly (gun-to-book), and lastly that (c.) full inventory reconciliation audits are performed quarterly.

Additionally, it should be noted how you performed in-house staff training after (and as a result of) this most recent inspection, with the intention of training any new employees hired in the future. Further, you detailed and supplied us with both a self-generated compliance plan (created for your staff) to better address identified violations, as well as a stack of self-generated employee acknowledgment forms, which were certified by your staff in acceptance of their roles and responsibilities toward future compliance.

The violations for which you were cited could adversely impact law enforcement's ability to reduce violent crime and protect the public. You are reminded that future violations, repeat or otherwise, could be viewed as willful and may result in the revocation of your license. You may anticipate further inspections to ensure your compliance.

Please contact us if you have any questions concerning your responsibilities as a licensee or if you require further clarification about particular requirements of Federal firearms laws.

Sincerely,  
(b)(6)  
Area Supervisor  
Phoenix III (IO) Field Office