

JW FIREARMS, LLC's FCI
FCI-29298
11/22/2021 05:07 PM
IO# (b)(6) Hartford (IO) Field Office

LICENSEE INFORMATION

| Licensee Name | RDS Key | License/Permit Number | License Type |
|------------------|------------|-----------------------|---------------------|
| JW FIREARMS, LLC | 6-06-05000 | 6-06-013-01-3H-05000 | 01 - Dealer License |

Business Type
Limited Liability Company (LLC)

Premises Address

Mailing Address

Premises Ownership Type
Leased/Rented

Same as Premises Address

Premises Location Type
Single Family Dwelling

Address
55 SPRING HILL ROAD
Unit N/A
STORRS, Connecticut 06268
TOLLAND United States

| Phone Type | Phone Number | Remarks |
|------------|-----------------|---------|
| Business | +1 860-617-4960 | |

| Email Address | Email Remarks |
|-----------------------|---------------|
| JWFirearmsLLC@att.net | |

RECOMMENDATIONS

Final Decision
Warning Conference

Deputy Assistant Director Megan Dumatt's Recommendation
Warning Conference

Details

I concur with the recommendation of DIO led warning conference in lieu of revocation. The case was presented to the Acting Director on October 25, 2021, and he concurs with the alternate recommendations. The extraordinary circumstances in this case are that the FFL had a telephone application in July 2020, this was the first inspection, the FFL failed to obtain 4473s and run NICS twice when return consignment firearms. The FFL self-initiated calling the customer, getting the firearms back, having the customer fill out 4473s and run NICS. The customer was not prohibited and received the firearms. There were no traces for this FFL.

Special Agent in Charge James Ferguson's Recommendation

Due to the circumstances surrounding the violations and the facts surrounding this FFL's actions and corrective actions, the Special Agent in Charge concurs with the recommendation for a warning conference.

Division Counsel (b)(6) Recommendation
Warning Conference

Details

Division Counsel concurs with the recommendation for a warning conference. There is insufficient evidence of willful violations of the GCA based on the information as presented in the DIO's justification and a review of the matter.

Director of Industry Operations Nicholas O'Leary's Recommendation
Warning Conference

Details

DIO concurs with the warning conference recommendation. A recall inspection should be held. This is the FFL's first inspection since the license was issued, and the qualification inspection was held via telephone due to COVID-19 field work restrictions. Because of the circumstances of the violations and this being the first compliance inspection, willfulness is not evident. The FFL took immediate corrective action for the failure to conduct background checks and the recipients of the firearms were not prohibited.

Area Supervisor (b)(6) Recommendation
Warning Conference

Details

Warning Conference and recall inspection is recommended as an alternate to revocation.

The licensee was cited for nine violations to include failure to complete a NICS/POC background check in three instances and failure to execute a 4473 for transferred firearms in instances.

This is the licensee's first compliance inspection since the FFL was issued in July 2020. The licensee was previously subject to a phone only application inspection on 7/7/2020.

Although these violations could negatively impact public safety, the licensee immediately completed corrective actions to mitigate the violations and was educated on

regulations to ensure future compliance.

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

Details

Warning Conference and recall inspection is recommended as an alternate to revocation.

The licensee was cited for nine violations to include failure to complete a NICS/POC background check in three instances and failure to execute a 4473 for transferred firearms in [redacted] instances. This is the licensee's first compliance inspection since the FFL was issued in July 2020. The licensee was previously subject to a phone application inspection on 7/7/2020.

Although these violations could negatively impact public safety, the licensee immediately completed corrective actions to mitigate the violations and was educated on regulations to ensure future compliance.

Inspection Findings

Records and Forms

- 3. Failure by the licensee to obtain complete and accurate information for any item(s) on Forms 4473, questions 11 & 12, or the buyer fails to sign and date the Form 4473 (to include failing to have the buyer recertify their answers if the transfer takes place on a different date than the original signature) in Section A on 5 percent or more of the Forms 4473 examined.
- 6. Failure to execute a Form 4473 for the return of a firearm that was consigned to the licensee; if the transferee is NOT prohibited.
- 7. Failure to execute a Form 4473 for the transfer of a firearm to a law enforcement officer for personal use; if the transferee is NOT prohibited.

NICS

- 1. Failure to conduct a NICS check or obtain alternative permit for the return of firearm that was consigned to the licensee.
- 2. Failure to conduct a NICS check or obtain alternative permit for the transfer of a firearm to a law enforcement officer for personal use.
- 7. Failure to record NICS or Point of Contact background check information on 10 percent or more of Forms 4473 examined, with a minimum of 10 instances.

ELIGIBILITY VERIFICATION

Business Information Verification

| Licensee Name | Business Type | Is the business valid? |
|------------------|---------------------------------|------------------------|
| JW FIREARMS, LLC | Limited Liability Company (LLC) | Yes |

Additional Findings

JW Firearms LLC is registered with the CT Secretary of State and is active at the premise of 55 Spring Hill Rd., Storrs, CT (attached). The LLC also holds a CT Dept. of Revenue Sales/Use Tax and is registered with the Town Clerk (attached). The property is residential in the suburbs of Storrs, CT.

No hidden ownership.

Attachment(s):

- IMG_7786Trade Name.JPG
- IMG_7790Dept of Revenue.JPG
- IMG_7787Sec of state.JPG
- onlineBusinessSearch.pdf

Property Ownership Verification

| Premises Ownership Type | Premises Location Type | Has the property ownership been verified? |
|-------------------------|------------------------|---|
| Leased/Rented | Single Family Dwelling | Yes |

Address

55 SPRING HILL ROAD
Unit N/A
STORRS, Connecticut 06268
TOLLAND United States

Additional Findings

The premise of 55 Spring Hill Rd., Storrs, CT is residential and own by RP Jeffrey Ward and (b)(6) lower level has been converted to office and retail space.

No formal lease agreement executed for the home business.

Attachment(s):

- recordcard.pdf

Rental/Lease Verification

Is the proposed business activity permitted by the property owner?

Yes

Additional Findings

The premise of 55 Spring Hill Rd., Storrs, CT is residential and own by RP Jeffrey Ward and his (b)(6) lower level has been converted to office and retail space. No formal lease agreement executed for the home business.

Attachment(s): recordcard.pdf

Zoning Information Verification

Is the proposed business activity in compliance with zoning? Yes

Additional Findings

JW Firearms LLC operates from (b)(6) which is in 2020 which is valid (attached).

Attachment(s): IMG_7785Zoningpermit.JPG

APPOINTMENT DETAILS

Interview Date 08/27/2021

Address: 55 SPRING HILL ROAD, Unit N/A, STORRS, Connecticut 06268

Remarks: A/S granted permission to contact home operators, part-time prior to site visit.

Responsible Attendee(s)

JEFFREY ALAN WARD

Non-Responsible Person(s)

No Items

RESPONSIBLE PERSON(S)

JEFFREY ALAN WARD

| | | | |
|-------------------|--------|------------------|----------------------------|
| Name | Gender | Race | Ethnicity |
| JEFFREY ALAN WARD | Male | White | Not Hispanic or Not Latino |
| Date of Birth | SSN | Job Title | |
| (b)(6) | (b)(6) | OWNER / OPERATOR | |

Physical Identifiers

| | | | |
|--------|--------|------------------------|-----------|
| Height | Weight | Hair Color | Eye Color |
| (b)(6) | (b)(6) | Gray or Partially Gray | Blue |

Place of Birth

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

Home Address

(b)(6)

Additional Names

Citizenship

United States

| ID Type | Country | State | ID Number |
|-----------------------|---------------|---------|-----------|
| Driver's License | United States | (b)(6) | (b)(6) |
| State ID Card | United States | (b)(6) | (b)(6) |
| Phone Type | Phone Number | Remarks | |
| Mobile | (b)(6) | | |
| Email Address | Email Remarks | | |
| jwfirearmsllc@att.net | | | |

Criminal History Check

Date Criminal History Check Conducted

Criminal History Check Comments
NCIC/NLETS revealed no hits.

INTERVIEW QUESTIONNAIRE

What is the proposed business activity?

The Type 01 FFL #6-06-05000 has been held since 7/13/20. JW Firearms LLC offers sales of new and used handguns and long guns. A large portion of his business is generated through customer online ordering and shipping to other FFLs out of state. The licensee transfers directly to known customers, local LE officers and relatives. The licensee also sells holsters, components and less than lethal items.

Do they need an additional license or permit?

No

Who are their primary suppliers?

Suppliers since 7/13/20 comprised, customers on consignment (b)(4)

Other State or Local Permits

| Type | Number | Expiration |
|--------------------------------|----------------------------------|------------|
| Home Occupation Permit/License | Z-20-0011 | |
| State/Local Business License | 2020-00003821 (Trade Name) | |
| State/Local Business License | 1343211 (JW Firearms LLC) | |
| State Firearms License/Permit | Permit to Sell Pistols/Revolvers | |
| State Sales Tax | (b)(3)(26 USC § 6103) | |
| Other | | |
| State Firearms License/Permit | 1045009 | |

Business Activities

Internet Sales/Transfers

Retail

Internet Sales/Transfers Website

gunbroker.com

Selected Operational Security Measures

Controlled Access to ATF Recordkeeping

Controlled Access to Keys

Current & Active Security Plan

Designated Security Coordinator

SUPPLEMENTAL QUESTIONNAIRE

General Business Operations

If there is a security system, who has access to the security codes?

(b)(6)

Who has keys to the premises?

RP Jeffrey Ward has keys to FFL area.

Who has keys to locked inventory?

RP Jeffrey Ward

Who is operating the business on a day-to-day basis?

RP Jeffrey Ward

Is financial backing provided by anyone that is not a responsible person on the license/permit?

No

Are any employees known to be prohibited?

No employees

Are any employees associated with a previously denied/revoked/surrendered license/permit?

No employees

PREMISES INFORMATION

Inspection Area Description

JW Firearms LLC operates from the single family dwelling located in a residential area of rural Storrs, CT. The property is occupied by RP Jeffrey Ward and (b)(6). The business activity takes place in the lower level of the home which has been renovated to include an office, glass cases to secure firearms and ammunition (b)(6). (b)(6) The business space is an estimate of 800 sqft.

No other businesses are conducted from the premises (b)(6). No other safety issues were identified. No off site storage is utilized.

Primary Activity

Retail

GPS Coordinates

Latitude

41.78436

Longitude

072.22690

Selected Physical Security Measures

(b)(6)

(b)(6)

INTERVIEW NOTES

On 8/2/2021, RAC (b)(6) confirmed no issues or conflicts with CE to prevent the inspection from occurring. NFORCE query, no data (b)(6) with part-time hours, inspection announced. Onsite start date 8/27/21 and end date 9/3/21. The licensee consented to an inspection outside business hours (attached). A 100% inventory and ATF F 4473 review was performed. The licensee is not an SOT payer. Online lead query revealed no trace or multiple sale data.

ONSITE SUMMARY

Total # of ATF F 4473 Reviewed

Total # of Open Dispositions in A & D Record

Total # of Firearms in Inventory
16

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)

Additional Comments

On 8/2/2021, RAC (b)(6) confirmed no issues or conflicts with CE to prevent the inspection from occurring. NFORCE query, no data (b)(6) with part-time hours, inspection announced. Onsite start date 8/27/21 and end date 9/3/21. The licensee consented to an inspection outside business hours (attached). A 100% inventory and ATF F 4473 review was performed. The licensee is not an SOT payer.

There were (b)(6) ATF F 4473s on file for the inspection period of 7/13/20 to 8/27/21. No trafficking indicators were identified. 16 firearms were traced through the A&D record with no discrepancies noted. Due to issues with DESPP SLFU Authorization system, NTN's could not be verified. The licensee acquired (b)(6) GCA firearms and disposed of (b)(6) GCA Firearms.

The review revealed instances where the licensee failed to obtain an ATF F 4473 and/or NICS authorization prior to the firearm transfer.

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

A query of e-trace confirmed there were no traces, no unsuccessful traces and no multiple sales reported during the inspection period. A record review revealed unreported multiple sale involving the transfer of (b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

The licensee was issued and acknowledged receipt of the Report of Violations on 9/3/21 (attached).

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

REPORT OF VIOLATIONS

| Regulation | Corrective Actions | Instance Details |
|--|--|--|
| 27 CFR 478.129(b): Failure to retain ATF F 4473 1 Number of Instances: 0 | The licensee is having (b)(6) return the firearms previously on consignment and completing an ATF F 4473 and NICS check prior to return. | |
| 27 CFR 478.102(a): Failure to complete a NICS/POC background check ATF Forms 4473: 3 Number of Instances: 3 2 | The licensee is having (b)(6) return the firearms previously on consignment and complete an ATF F 4473 and NICS check prior to return. The licensee is retrieving the firearm thought to be an exempt antique from (b)(6) and completing an ATF F 4473 and NICS check prior to return. 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. | NICS Violation NICS Violation NICS Violation (b)(6) |
| 27 CFR 478.126a: Failure to report multiple sales or other | Complete and submit ATF Form 3310.4 (Report | (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) |

| | | |
|---|--|--|
| <p>3</p> <p>dispositions of pistols and revolvers</p> <p>ATF Forms 4473 Number of Instances:</p> | <p>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>4</p> <p>27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearms</p> <p>Number of Instances:</p> | <p>Accurately, completely & timely record all required future firearm acquisition information. 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.</p> | <p>(b)(3) (112 Public Law 55 125 Stat 552)</p> |
| <p>5</p> <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)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p> |
| <p>6</p> <p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473 Number of Instances:</p> | <p>Complete all forms as prescribed. Correct/Update photocopies of all specified ATF Form 4473 discrepancies, in accordance with form headings and instructions. Ensure that all ATF Form 4473 items, as required by form headings and instructions, are accurately completed on all future transactions. Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions. Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified. Ensure that the required transferor/seller printed name and title is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D. Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p> | <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p> |
| <p>7</p> <p>27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473</p> <p>ATF Forms 4473 Number of Instances:</p> | <p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions. Ensure that all required transferee/buyer identification information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p> | <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p> |
| <p>27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473</p> | <p>Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p> | <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p> |

| | | | |
|----|---|--|--|
| 8 | ATF Forms 4473 Number of Instances: | | (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) |
| 9 | 27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an 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 the required transferor/seller signature and date of transfer is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D. | (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) |
| 10 | 27 CFR 478.124(a): Failure to execute an ATF F 4473 ATF Forms 4473 Number of Instances: | The return of any consigned firearm to the consignor not only requires a disposition entry into the record but also requires that an ATF F 4473 and a NICS check be completed prior to the return of consigned firearms. Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions. | (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) |

LICENSEE RESPONSE REPORT

| Regulation | Corrective Actions | Licensee Response | Status Details |
|--|--|---|--|
| 27 CFR 478.129(b): Failure to retain ATF F 4473 Number of Instances: 0 | The licensee is having (b)(6) return the firearms previously on consignment and completing an ATF F 4473 and NICS check prior to return. | The licensee did not realize the consignment return required and ATF F 4473 and NICS authorization. The licensee did record the transaction in his A & D. | Status Correction Verified Verified Method In Person Date Correction Verified 09/03/2021 |
| 27 CFR 478.102(a): Failure to complete a NICS/POC background check ATF Forms 4473: 3 Number of Instances: 3 | The licensee is having (b)(6) return the firearms previously on consignment and complete an ATF F 4473 and NICS check prior to return. The licensee is retrieving the firearm thought to be an exempt antique from (b)(6) and completing an ATF F 4473 and NICS check prior to return. 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 did not realize the consignment return required and ATF F 4473 and NICS authorization. The licensee believed the transaction for (b)(6) | Status Correction Verified Verified Method In Person Date Correction Verified 09/03/2021 |
| 27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers ATF Forms 4473 Number of Instances: | Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) for all non-reported multiple sales identified as a result of this inspection. Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) by close of the same business day, for all applicable future multiple sales. | The licensee mistakenly thought the requirement to file a form was 3 or more firearms not 2. | Status Correction Verified Verified Method In Person Date Correction Verified 09/03/2021 |
| 27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearms Number of Instances: | Accurately, completely & timely record all required future firearm acquisition information. Accurately, completely & timely record all required future firearm disposition information. Amend/Update A&D Record to accurately record all required firearm acquisition information. Amend/Update A&D Record to accurately record all required firearm disposition information. | This was an oversight. Requirements understood. | Status Correction Verified Verified Method In Person Date Correction Verified 09/03/2021 |
| 27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473 | Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions. | The licensee understands the requirements to ensure accuracy on ATF F 4473. The licensee thought the | Status Correction Verified |

| | | | | |
|----|--|---|--|--|
| 5 | ATF Forms 4473 Number of Instances: [] | 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. | firearm for (b)(6) } was an exempt antique. | Verified Method In Person Date Correction Verified 09/03/2021 |
| 6 | 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. Ensure that all ATF Form 4473 items, as required by form headings and instructions, are accurately completed on all future transactions. Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions. Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified. Ensure that the required transferor/seller printed name and title is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D. Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions. | The licensee understands the requirements to properly record required information. This was an oversight. | Status Correction Verified Verified Method In Person Date Correction Verified 09/03/2021 |
| 7 | 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 and accurately recorded on all future ATF Forms 4473, Section B. | The licensee understands requirements. Missing the data was an oversight. | Status Correction Verified Verified Method In Person Date Correction Verified 09/03/2021 |
| 8 | 27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473 ATF Forms 4473 Number of Instances: [] | Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section B. | The licensee understands requirements. Missing the data was an oversight. | Status Licensee Notified Verified Method In Person Date Licensee Notified 09/03/2021 |
| 9 | 27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an 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 the required transferor/seller signature and date of transfer is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D. | The licensee understands requirements. Missing the data was an oversight. Licensee will contact the customer. | Status Licensee Notified Verified Method In Person Date Licensee Notified 09/03/2021 |
| 10 | 27 CFR 478.124(a): Failure to execute an ATF F 4473 ATF Forms 4473 Number of Instances: [] | The return of any consigned firearm to the consignor not only requires a disposition entry into the record but also requires that an ATF F 4473 and a NICS check be completed prior to the return of consigned firearms. Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions. | The licensee did not realize the consignment return to the person it was received required an ATF F 4473 and NICS authorization. The licensee did record the transaction in his A & D. | Status Correction Verified Verified Method In Person Date Correction Verified 09/03/2021 |

CLOSING CONFERENCE

Review Regulations conducted offline
(9/3/2021)

09/03/2021

Closing Conference Additional Notes

On 9/2/21-NCIC/NLETS on Jeffrey Ward revealed no data.

On 9/3/21, IO (b)(6) held a closing conference with RP Jeffrey Ward. In addition to reviewing the Report of Violations, discussions included adding (b)(6) as a responsible person. RP Jeffrey Ward was provided with Part B-Questionnaire and FD-258 cards. RP Jeffrey Ward is submitting the request to add (b)(6) directly to the FFLC.

Reviewed with and provided the following to RP Jeffrey Ward ensure future compliance.

Forms:

ATF F 7-Part B; Responsible Person Questionnaire
ATF F 4473-Firearms Transaction Record and continuation sheet
ATF F 3310.4-Report of Multiple Sale Pistols/Revolvers
ATF F 3310.6-Interstate Firearms Shipment Theft/Loss Report
ATF F 3310.11-Inventory Theft/Loss Report
ATF F 5300.38-Application for an Amended Federal Firearms License
ATF F 5320.20-NFA Transport
ATF F 5630.7-Special Tax Registration and Return NFA
ATF F 3, F 4, F 5, F 9, F10

Pamphlets/Infographics:

ATF E-Regs --How to locate them
ATF I 5300.1-Youth Handgun Safety Act Poster
ATF I 5300.2-Youth Handgun Safety Notice
ATF I 5300.23A -- Important Notice to Dealers and Other Participants at This Gun Show
ATF I 3310.2-Protective Orders and Federal Firearms Prohibitions
ATF I 3310.3-Misdemeanor Crimes of Domestic Violence and Federal Firearms Prohibitions
ATF I 3310.4- Federal Firearms Prohibitions under 18 U.S.C. 922(g) (4)-Person Adjudicated as a Mental Defective or Committed to a Mental Institution
-ATF Contact Information (BFD/HQ/LE)
-Have A Tip? (Reporting and Mobile Application)
-How to Properly Destroy Firearms
-What do IOI's do?
-Minimum Age for Gun Sales and Transfers
-Fact Sheet Compliance Inspection & Revocation Process
-How ATF Traces Firearms
-DESPP-State of Connecticut Special Licensing and Firearms Information, permits, forms, FAQ, NICS registration requirements
-DESPP Assault Weapon Information, Q & As, FAQs Regarding P.A. 13-3 As Amended by P.A. 13-220
-DESPP/DPS Forms: 0419-C; 3-C-1; 3C, 414C and 67
-NICS Guide for Appealing a Firearm Transfer
-NICS Delay/Deny
-NICS Voluntary Appeal File
-FAQ NICS and other questions from public website

News Letter:

News Letter index July 2020

Open Letters to FFLs:

September 2004-Assault Weapon, Import Information
April 2006-Child Safety Lock Act
July 2008-Temp. Assignment to unlicensed person.
July 2009-Selling or Delivering Frames or Receivers
September 2011-Medical Marijuana
April 2020-Information for licensees

Publications:

ATF P 3312.8-Personal Firearms Record
ATF P 3312.10-ATF NTC Information for FFL's
ATF P 3317.2-Safety & Security for FFL's
ATF P 3317.7- Disaster Preparedness for FFL's
ATF P 5300.4 FFL Regulations Reference Guide
ATF P 5300.11-Curio & Relics
ATF P 5300.15-FFL Quick Reference and Best Practice Guide
ATF P 5300.21-Best Practices Private Sellers
ATF P 5310.1-Gun Free School Zone Notice
ATF P 5310.2-Do I Need a License to Buy and Sell Firearms?
ATF P 5320.8-NFA Handbook & Separately Chapter 6, 7
ATF P 5380.1- Loss Prevention for FFL Retailers
ATF P 5380.2-How to Conduct a Firearms Inventory

Rulings:

80-21, 95-3, 2001-5, 2005-4, 2009-1, 2009-2, 2010-1, 2010-10, 2011-4, 2015-1, 2016-1, 2016-2, 2020-1, 2020-2

From public website: www.atf.gov

-FFL Guide Facilitating Private Sales
-NTC Facts
-Antiques FAQ and list those regulated by GCA
-3D Printing Technology of Firearms
-DOJ/DHS Advisory-Black Powder, Black Powder Substitutes & Smokeless Powder
-Black Powder Q & A and regulations subject to permit/license
-DOJ NICS Deny/Delay Pamphlet
-GCA firearm definition/illustration
-Binary explosives Information
-Are paintball and/or Airgun Sound Suppressors NFA?
-Q&A Silencer
-NFA Law Letter
-FFL EZ Check Search Page
-IRS Publication 1544
-What Qualifies as an Antique?
-FAQ Firearms
-Receiver Blanks with Q & A
-Firearm Identification and definitions including SBR, SBS
-Reloading Ammunition Q & A, TTB Material-TTB Contact, TTB Gunsmith and FAET Information

- Out of Business Requirements
- 12/12/18 DOJ Bump-Stock Type Devices Final Rule
- 478.53 Change in Trade Name
- 478.54 Change in Control
- 478.94 Sales between licensees
- 478.134 Sales to Law Enforcement
- Facts & Figures from 2019

Other
Information and publication links to www.atf.gov

Attachment(s)

Attendee(s)

JEFFREY ALAN WARD

WARNING CONFERENCE

Scheduling Letter

Assigned To
(b)(6)

Delivery Method
Hand-Delivery

Recipient Name: Jeffrey A. Ward
Delivery Date: 10/31/2021 07:51 PM

Additional Notes

A/S (b)(6) provided RP Jeffrey A. Ward with Warning Conference scheduling letter via email and requested response from licensee confirming receipt.

Conference Details

Warning Conference Lead
Nicholas O'Leary

Representing ATF
Nicholas O'Leary (b)(6)

Conference Date/Time
11/15/2021 01:30 PM

Responsible person(s) representing the licensee
JEFFREY ALAN WARD

Conference Address
21 Oak Street Suite 303, Unit N/A, Hartford, Connecticut 06106

Follow-Up Letter Details

Violation #2 – 27 CFR 478.102(a): Failure to complete a NICS/POC background check in three instances.
Violation #10 – 27 CFR 478.124(a): Failure to execute an ATF Form 4473 in _____ instances.

Response: During the conference, you acknowledged that you failed to complete ATF Forms 4473 and NICS background checks prior to completing the transfer of consigned firearms, to include a firearm that you suspected of being classified as an antique manufactured prior to 1898. You stated that you understand these requirements and going forward you will make sure to complete an ATF Form 4473 and NICS background check before transferring firearms, including the return of consignments.

DIO O'Leary emphasized to you the importance of adhering to NICS requirements as failing to do so can negatively impact public safety. You were reminded of your responsibility to execute the ATF Form 4473 accurately and completely, to include reviewing all information provided by the transferee, making applicable corrections properly, entering NICS information properly, and signing and dating the form prior to transfer. You were provided with a copy of the ATF Newsletter published in September 2013, which contains information pertaining to NICS procedures and best practices for licensees. Further, A/S (b)(6) provided you information related to firearms definitions and antique firearms from the ATF Frequently Asked Questions section of ATF's website. Lastly, DIO O'Leary informed you that future violations for failing to perform the required NICS check will result in revocation of your license.

Violation #3 – 27 CFR 478.126a: Failure to report multiple sales or other disposition of pistols and revolvers in _____ instance.

Response: During the conference, you stated that you misread the instructions on the ATF F 4473 and believed the requirement in Section A was to report multiple sales of three or more pistols/revolvers to the same buyer at one time or in a period of five business days. DIO O'Leary and SIO (b)(6) clarified instructions on the ATF F 4473 and provided you with guidance on the requirement of completing the ATF F 3310.4 Report of Multiple Sale or Other Disposition of Pistols or Revolvers. You were reminded to monitor sales over multiple days and encouraged to develop your own internal controls related to this requirement so that all multiple handgun sales are reported as mandated by law. You stated you understand the requirement for reporting multiple sales involving two or more handguns and going forward you will review transfer records each evening to ensure you maintain compliance by timely submitting completed ATF F 3310.4.

Violation #4 – 27 CFR 478.125(e): Failure to maintain an accurate, complete and timely acquisition and disposition (A&D) record of firearms in two instances.

Response: During the conference, you acknowledged that you failed to correctly record the acquisition and disposition information and that going forward you would take steps to ensure that you are properly maintaining your A&D records. You further stated you have implemented an internal audit procedure by checking the entries in your A&D records each evening to ensure all entries are accurate and timely recorded. You also stated that you will conduct a physical inventory each month to verify accountability as well as required information is correctly recorded.

DIO O'Leary, A/S (b)(6) and SIO (b)(6) advised you to record firearms information into the A&D directly from the markings on the firearm. They encouraged implementing a tagging system on your inventory and conducting frequent inventories. They discussed your option of using electronic A&D records and some of the benefits of such a system. They also discussed how it is still incumbent on you to ensure your records are accurate and up to date.

- Violation #5 – 27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473 in _____ instances.
- Violation #6 – 27 CFR 478.21(a): Failure to completed form as prescribed in _____ instances.
- Violation #7 – 27 CFR 478.124(c)(3)(i): Failure to record identification document on ATF F 4473 in _____ instance.
- Violation #8 – 27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473 in _____ instances.
- Violation #9 – 27 CFR 478.124(c)(5): Failure by transferor to sign and date an ATF F 4473 on _____ instance.

Response: During the conference, you acknowledged you have reviewed the instructions on the ATF F 4473. You stated that you have created a template cutout of an ATF F 4473 to help you review the form and ensure required information is complete and accurate prior to transferring a firearm. You stated you were checking the buyer's responses before completing a NICS check. You stated that you are willing to consider obtaining a commercial template or computerized program for customers to complete the ATF Form 4473 with the goal of eliminating any errors made on the form.

DIO O'Leary emphasized the importance of reviewing the ATF Form 4473 completely prior to transferring a firearm as well as reading the instructions for completion of the form contained in the last three pages of the form. A second "set of eyes" review of the form prior to transfer was also suggested. In addition, DIO O'Leary and SIO (b)(6) provided you with specific instructions on how to properly make corrections on the ATF F 4473, both for information provided by the transferee and information completed by the ATF.

DIO O'Leary provided you with copies of ATF Newsletters published in March 2013, September 2013, and June 2021. The mentioned newsletters reference informational material to assist licensees with best practices while conducting inventories, compliance pertaining to completing an ATF F 4473, and maintaining A&D records properly. You indicated you have

signed up for electronic notifications through www.atf.gov, reviewed e-regulations and previous handouts provided by IOIs. DIO O'Leary and A/S (b)(6) encouraged you to contact ATF with any questions pertaining to regulatory requirements and/or classification of firearms prior to engaging in any activities. DIO O'Leary and SIO (b)(6) recommended that you periodically review your standard operating procedures (SOP) to make them stronger and avoid repeat violations. You stated that you will continue to review regulations, ATF website Q&As on a more frequent basis, and will contact ATF directly for assistance if necessary.

Follow-Up Letter

Delivery Method
Hand-Delivery
 Recipient Name Delivery Date
JEFFREY ALAN WARD 11/22/2021 07:00 AM

Additional Notes
 Warning Conference follow-up letter was emailed to the FFL on 11/22/2021 with instructions to provide response confirming receipt and review of the letter.

EXHIBITS

Inspection

| Category | Attachment Name |
|-----------------------------------|--|
| Correspondence | Spartan Notification RE: 6-06-05000 Inspection Results |
| WarningConferenceFollowUpLetter | Follow Up Letter.pdf |
| WarningConferenceFollowUpLetter | Follow Up Letter.pdf |
| WarningConferenceSchedulingLetter | Scheduling Letter.pdf |
| Correspondence | Spartan Notification RE: 6-06-05000 Monitored Case |
| Correspondence | |
| Correspondence | DIO Nicholas O'Leary Returned Inspection FCI-29298 |
| OnSiteSummaryInformation | ROV3.100721signed.pdf |
| ReturnedSignedROV | ROV3.100721signed.pdf |
| LicenseeResponseToViolationsPDF | Licensee Response to Violations Report.pdf |
| Correspondence | Information Concerning Your Federal License/Permit |
| Correspondence | |
| ViolationsPDF | Report of Violations.pdf |
| Correspondence | Spartan Notification RE: 6-06-05000 Inspection Results |
| WarningLetterReturnEmail | FFL Response confirmed receipt of WL and ROV on 9-13-2021.pdf |
| WarningLetterReturnEmail | Email to FFL -notification of issued WL and copy of ROV on 9-13-2021.pdf |
| WarningLetterReturnEmail | ATF Warning Letter to JW Firearms LLC 6-06-05000- FINAL.pdf |
| Correspondence | |
| Correspondence | Action required concerning your Federal Firearms License |
| WarningLetter | Warning Letter.pdf |
| LicenseeResponseToViolationsPDF | Licensee Response to Violations Report.pdf |
| ViolationCorrection | (b)(3) (112 Public Law 55 125 Stat 552),(b)(6) |
| ViolationCorrection | |
| ViolationCorrection | |
| ViolationCorrection | |
| ViolationCorrection | |
| OnSiteSummaryInformation | Consent to Inspect.pdf |
| OnSiteSummaryInformation | Report of Violations signed.pdf |
| ViolationsPDF | Report of Violations.pdf |
| ViolationsPDF | Report of Violations.pdf |
| ZoningVerification | IMG_7785Zoningpermit.JPG |
| RentalLeaseVerification | recordcard.pdf |
| PropertyOwnershipVerification | recordcard.pdf |
| BusinessVerification | IMG_7786Trade Name.JPG |
| BusinessVerification | IMG_7790Dept of Revenue.JPG |
| BusinessVerification | IMG_7787Sec of state.JPG |
| BusinessVerification | onlineBusinessSearch.pdf |
| ApplicationPDF | 6-06-05000 JW Firearms LLC Recall21.pdf |



October 29, 2021

WARNING CONFERENCE

JW FIREARMS, LLC
55 SPRING HILL ROAD
STORRS, Connecticut 06268

Re: Federal Firearms License Number: 6-06-05000

Dear Mr. Ward,

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 55 SPRING HILL ROAD, Unit N/A, STORRS, Connecticut 06268 on 8/27/2021 through 09/03/2021, 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 21 Oak Street Suite 303, Unit N/A, Hartford, Connecticut 06106 on 11/15/2021 at 1:30 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,

Nicholas E. O'Leary
Director of Industry Operations
Boston Field Division



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

*Boston Field Division
10 Causeway St., Room 791
Boston, Massachusetts 02222
www.atf.gov*

November 17, 2021

WARNING CONFERENCE FOLLOW UP

JW FIREARMS, LLC
55 SPRING HILL ROAD
STORRS, Connecticut 06268

Re: Federal Firearms License Number: 6-06-05000

Dear Mr. Ward,

This letter is a follow-up to the warning conference held with you on November 15, 2021, at 1:30 PM. During this conference, the violations cited during the inspection conducted on 8/27/2021 through 9/3/2021, and the necessary corrective action to prevent the violations from reoccurring were discussed. The following people were in attendance:

Representing the ATF Boston Field Division Field Division: Director of Industry Operations Nicholas O'Leary, Area Supervisor (b)(6) and Senior Industry Operations Investigator (b)(6)

Responsible person(s) representing the licensee: JEFFREY ALAN WARD

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:

Violation #2 – 27 CFR 478.102(a): Failure to complete a NICS/POC background check in three instances.

Violation #10 – 27 CFR 478.124(a): Failure to execute an ATF Form 4473 in [] instances.
Response: During the conference, you acknowledged that you failed to complete ATF Forms 4473 and NICS background checks prior to completing the transfer of consigned firearms, to include a firearm that you suspected of being classified as an antique manufactured prior to 1898. You stated that you understand these requirements and going forward you will make sure to complete an ATF Form 4473 and NICS background check before transferring firearms, including the return of consignments.

DIO O'Leary emphasized to you the importance of adhering to NICS requirements as failing to do so can negatively impact public safety. You were reminded of your responsibility to execute the ATF Form 4473 accurately and completely, to include reviewing all information provided by the transferee, making applicable corrections properly, entering NICS information properly and

signing and dating the form prior to transfer. You were provided with a copy of ATF Newsletter published in September 2013, which contain information pertaining to NICS procedures and best practices for licensees. Further, A/S (b)(6) provided you information related to firearms definitions and antique firearms from the ATF Frequently Asked Questions section of ATF's website. Lastly, DIO O'Leary informed you that future violations for failing to perform the required NICS check would result in revocation of your license.

Violation #3 – 27 CFR 478.126a: Failure to report multiple sales or other disposition of pistols and revolvers in () instance.

Response: During the conference, you stated that you misread the instructions on the ATF Form 4473 and believed the requirement in Section A was to report multiple sales of three or more pistols/revolvers to the same buyer at one time or in a period of five business days. DIO O'Leary and SIOI (b)(6) clarified instructions on the ATF F 4473 and provided you with guidance on the requirement of completing the ATF F 3310.4 Report of Multiple Sale or Other Disposition of Pistols or Revolvers. You were reminded to monitor sales over multiple days to ensure the transfers are reviewed for form submission requirements. You stated you understand the requirement for reporting multiple sales involving two or more handguns and going forward you will review transfer records each evening to ensure you maintain compliance by timely submitting completed ATF F 3310.4.

Violation #4 – 27 CFR 478.125(c): Failure to maintain an accurate, complete and timely acquisition and disposition record of firearms in () instances.

Response: During the conference, you acknowledged that you failed to correctly record the acquisition and disposition information and that going forward you would take steps to ensure that you are properly maintaining your A&D records. You further stated you have implemented an internal audit procedure by checking the entries in your A&D records each evening to ensure all entries are accurate and timely recorded. You also stated that you will conduct a physical inventory each month to verify accountability as well as required information is correctly recorded.

DIO O'Leary, A/S (b)(6) and SIOI (b)(6) advised you to record firearms information into the A&D directly from the markings on the firearm. They encouraged implementing a tagging system on your inventory and conducting frequent inventories. They discussed your option of using electronic A&D records and some of the benefits of such a system. They also discussed how it is still incumbent on you to ensure your records are accurate and up to date.

Violation #5 – 27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473 in () instances.

Violation #6 – 27 CFR 478.21(a): Failure to completed form as prescribed in () instances.

Violation #7 – 27 CFR 478.124(c)(3)(i): Failure to record identification document on ATF F 4473 in () instance.

Violation #8 – 27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473 in () instances.

Violation #9 – 27 CFR 478.124(c)(5): Failure by transferor to sign and date an ATF F 4473 on () instance.

Response: During the conference, you stated that you have created a template cutout of an ATF Form 4473 to help you review the form and ensure required information is complete and

accurate prior to transferring a firearm. You stated you were checking the buyer's responses before completing a NICS check. You stated that you are willing to consider obtaining a commercial template or computerized program for customers to complete the ATF Form 4473 with the goal of eliminating any errors made on the form.

DIO O'Leary emphasized the importance of reviewing the ATF Form 4473 completely prior to transferring a firearm as well as reading the instructions for completion of the form contained in the last three pages of the form. A second "set of eyes" review of the form prior to transfer was also suggested. In addition, DIO O'Leary and SIOI [redacted (b)(6)] provided you with specific instructions on how to properly make corrections on the ATF F 4473, both for information provided by the transferee and information completed by the FFL.

DIO O'Leary provided you with copies of ATF Newsletters published in March 2013, September 2013, and June 2021. The mentioned newsletters reference informational material to assist licensees with best practices while conducting inventories, compliance pertaining to completing an ATF F 4473 and maintaining A&D records properly. You indicated you have signed up for electronic notifications through www.atf.gov, reviewed e-regulations and previous handouts provided by IOIs. DIO O'Leary and A/S [redacted (b)(6)] encouraged you to contact ATF with any questions pertaining to regulatory requirements and/or classification of firearms prior to engaging in any activities. DIO O'Leary and SIOI [redacted (b)(6)] recommended that you periodically review your standard operating procedures (SOP) to make them stronger and avoid repeat violations. You stated that you will continue to review regulations, ATF website Q&As on a more frequent basis and will contact ATF directly for assistance if necessary.

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,



Nicholas E. O'Leary
Director of Industry Operations
Boston Field Division

Encl.: Report of Violations