

MICHIGAN POLICE EQUIPMENT CO's FCI

FCI-16149

05/12/2022 10:30 AM

IO: (b)(6) Grand Rapids II (IO) Field Office

LICENSEE INFORMATION

Licensee Name	RDS Key	License/Permit Number	License Type
MICHIGAN POLICE EQUIPMENT CO	4-38-22789	4-38-045-01-2B-22789	01 - Dealer License

Business Type
Corporation

Premises Address

Mailing Address

Premises Ownership Type
Owned

Same as Premises Address

Premises Location Type
Store Front

Address
6521 LANSING RD
Unit N/A
CHARLOTTE, Michigan 48813-0000
EATON United States

Phone Type	Phone Number	Remarks
Business	+1 517-322-0443	
Fax	+1 517-322-0491	

RECOMMENDATIONS

Final Decision
Warning Conference

Deputy Assistant Director - Industry Operations Hans Hummel's Recommendation
Warning Conference

Details

Briefed to the Director on 3/28/22. Determined the following circumstances were extraordinary: 1) the transaction warranting revocation was one where the firearm was transferred beyond 30 days from the initiation of the NICS Check, however the transfer did occur within 30 days of the FBI Overturning their initial NICS Response to a "Proceed"; 2) The sole Responsible Person [who was the sole RP of the company during the time that ALL violations occurred] died during the inspection and the business was subsequently assumed by a new RP - the deceased RP's wife who was not previously an RP (ie when violations occurred); 3) Pandemic's effect on the duration of the inspection spanning 18 months.

Proceed with a DIO Led Warning conference and Recall.

Special Agent in Charge Paul Vanderploeg's Recommendation

Reviewed and concur with recommendations

Senior Attorney (b)(6) Review

Details

Legal Review Complete

Director of Industry Operations Benjamin Mendoza's Recommendation
Warning Letter

Details

The sole violation (27 CFR 478.102(c)) which merits revocation under ATF O 5370.1E was due to the transfer of a firearm more than 30 days after a NICS check was initiated. The NICS check at issue was initiated on 9/24/19 and resulted in an immediate denial. On 10/18/19 the FBI overturned the denial and issued a Proceed. The customer returned to purchase the firearm on 11/15/19, within 30 days of the date his denial was overturned. However, the 30-day period governing the transfer began on the date of the NICS denial, not its overturn. This rare set of circumstances contributed to the licensee's misunderstanding of the 30-day NICS validity period.

Bill Parks, the founder and sole Responsible Person for this company, died on 6/10/20 after the inspection had begun and while fieldwork on the inspection was suspended for a prolonged period due to the COVID-19 pandemic and the (b)(6). All violations were committed under Mr. Parks' management of the business. Parks' widow, Sena Parks, assumed control of the business after her husband's death and was added to the license as its sole RP (President) on 6/22/20. Ms. Parks acknowledged the Report of Violations on behalf of the business during the 9/29/21 closing conference, but she was not a RP when violations were committed and was not personally involved in the violation which merits revocation.

It is also worth noting that after the violations were issued at the 9/29/21 closing conference, ATF renewed the license on 1/15/22. Issuance of a Notice of Revocation based solely on violations which ATF knew about prior to renewing the license would be a contradictory regulatory action difficult to justify.

None of the other violations merits more than a warning letter under ATF O 5370.1E. Therefore, I recommend a warning letter due to the extraordinary circumstances described above.

Area Supervisor (b)(6) Recommendation
Warning Letter

Details

Concur with SIO's (b)(6) recommendation.

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

Details

One violation of failure to initiate a new NICS check when a transaction is not completed within the 30-day period rose to the level of Revocation. Based on the following the already completed administration recommendation to issue a Warning Letter is recommended; This assignment was issued and onsite fieldwork was initiated prior to COVID (all fieldwork ceased due to mandatory telework and was extended due to (b)(6)) and during COVID the only Responsible Person on the license (corporation) passed away. The wife was on the corporation and an employee but was not a Responsible Person. She was dealing with the estate of her deceased husband, which caused the delay in closing the assignment. The wife decided to maintain the FFL and SIO's (b)(6) conducted the closing with her and issued the violations. Also the wife was not a RP at the time and was not personally involved in the transaction that caused the violation, I believe this to be extraordinary circumstances and feel the Warning Letter should stand. Also if not for COVID this assignment would have been completed and closed prior to any change in administrative action/policy changes being made.

Inspection Findings

Records and Forms

- 2. Failure to timely and/or correctly maintain records of sales or other dispositions on 5 percent or more of the licensee's total dispositions during the inspection period, with a minimum of [] instances.

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.

ELIGIBILITY VERIFICATION

Business Information Verification

Licensee Name	Business Type	Is the business valid?
MICHIGAN POLICE EQUIPMENT CO	Corporation	Yes

Additional Findings

Attachment(s):
corporate verification.pdf

Property Ownership Verification

Premises Ownership Type	Premises Location Type	Has the property ownership been verified?
Owned	Store Front	Yes

Address
6521 LANSING RD
Unit N/A
CHARLOTTE, Michigan 48813-0000
EATON United States

Attachment(s):
property verification.pdf

Zoning Information Verification

Is the proposed business activity in compliance with zoning?
Yes

Additional Findings
no changes to zoning since last inspection; licensee in compliance with current zoning ordinances

Contact Information

Name: (b)(6) Date Contacted: 10/02/2019

Organization:
Windsor Charter Township

Job Title:
Clerk

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

Attachment(s):

APPOINTMENT DETAILS

Interview Date
02/03/2020

Address
6521 LANSING RD, Unit N/A, CHARLOTTE, Michigan 48813-0000

Responsible Attendee(s)

Non-Responsible Person(s)

WILLIAM J PARKS
Sena Ann Parks

(b)(6) (Deactivated)

RESPONSIBLE PERSON(S)

WILLIAM J PARKS

Name WILLIAM J PARKS	Gender Male	Race White	Ethnicity
Date of Birth (b)(6)	SSN (b)(6)	Job Title PRESIDENT	

Physical Identifiers

Height	Weight	Hair Color	Eye Color
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Place of Birth

Country United States Of America	State Michigan	City
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Home Address

(b)(6)

Additional Names

Citizenship

United States

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

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

Criminal History Check

Date Criminal History Check Conducted
10/03/2019

Criminal History Check Comments
no results

Sena Ann Parks

Name Sena Ann Parks	Gender Female	Race White	Ethnicity Hispanic or Latino
Date of Birth (b)(6)	SSN (b)(6)	Job Title President	

Physical Identifiers

Height (b)(6)	Weight (b)(6)	Hair Color Brown	Eye Color Brown
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Place of Birth

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

(b)(6)

Additional Names

Citizenship

United States

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

Criminal History Check

Date Criminal History Check Conducted
09/23/2021

Criminal History Check Comments
No hits.

Reason for Adding Responsible Person

Responsible Person is:
Corporate Director or Officer

Comments
Additional corporate officer being added as William Parks has passed away in 2020

NON-RESPONSIBLE PERSON(S)

(b)(6)

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

INTERVIEW QUESTIONNAIRE

What is the proposed business activity?
sells long guns, handguns and (b)(3)(26 USC § 6103) to primarily law enforcement agencies and police officers as personal firearms.

Do they need an additional license or permit?
No

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

Business Activities

(b)(3)(26 USC § 6103)

- Internet Sales/Transfers
- Drop Shipments
- Retail
- Gunsmith
- Law Enforcement Sales

Selected Operational Security Measures

- Controlled Access to ATF Recordkeeping
- Controlled Access to Keys
- Suspicious persons/activities reporting protocols

Internet Sales/Transfers Website

michiganpoliceequipment Facebook page

PREMISES INFORMATION

Inspection Area Description
back building which is a store (b)(6)

The building closest to the road is the office/administrative building where records are maintained including ATF requirement records.

Primary Activity
Retail

Selected Physical Security Measures

(b)(6)

GPS Coordinates

Latitude
42.66350
Longitude
-084.67300

ONSITE SUMMARY

Total Number of ATF Form 4473s for Inspection Review Period

Total Number of ATF 4473 Reviewed
[redacted]

Total Number of Open Dispositions in A & D Record
[redacted]

Total Number of Firearms in Inventory
2291

Actual Number of Firearms Verified

Number of Firearms Missing Before Reconciliation

Total Number of Firearms Missing After Reconciliation
[redacted]

Total Number of Acquisitions in the Last 12 Months
(b)(4)

Total Number of Dispositions in the Last 12 Months
(b)(4)

Onsite Start Date

Onsite End Date

Number of Reported Lost/Stolen Firearms During Inspection Period

Total Number of Traces During Inspection Review Period

Total Number of Those Traces That Were Unresolved

Inspection Period Start Date

Inspection Period End Date

Number Of Traces Resolved By IOI

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

(b)(3)(26 USC § 6103)

NEA Documents Verified
[redacted]

Additional Comments
inventory as of 3/28/2020

The licensee ultimately had [redacted] open entry discrepancies where all but [redacted] was transferred to either another licensee, a police department/law enforcement agency or to an individual via ATF F 4473. [redacted] firearm could not be accounted for and a Theft/Loss form was filed with ATF's National Tracing Center on 9/29/2021 (date of closing conference). Copy attached in Spartan. The licensee was cited for a 27 CFR 478.125(e) violation and all discrepancies in the A&D record were verified to be corrected.

The VCAB report was obtained for the period 1/31/2019 - 1/31/2020. The report included [redacted] trace requests (including [redacted] duplicate, [redacted] not to individuals (but coded [redacted] which states traced to FFL that does not have records prior to 20 years--which is not accurate). Information on the [redacted] traces was obtained from the licensee and forwarded to the National Tracing Center separate from Spartan. The report also listed [redacted] multiple handguns sales involving [redacted] firearms. No unreported Multiple Handgun Sales were discovered.

NICS FFL Audit was obtained and all "proceed" responses were verified to the licensee's records and the denied responses for the 5 years prior to the onsite inspection was completed with no discrepancies noted.

(b)(3)(26 USC § 6103) No discrepancies were found.

Number of Transferee Background Checks
1

Attachment(s)
Report of Violations.pdf

Licensee Response to Violations Report.pdf

Firearm Theft Loss List.pdf

REPORT OF VIOLATIONS

Regulation	Corrective Actions	Instance Details
27 CFR 478.102(c): Failure to initiate a new NICS check after 30-day lapse of initial check ATF Forms 4473: 1 Number of Instances: 1	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.	NICS Violation, (b)(6)
27 CFR 478.129(b): Failure to	Retain ATF Forms 4473 for a period of not less	

retain ATF F 4473

than 20 years after the date of sale or disposition.

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

2

ATF Forms 4473
Number of Instances

27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearms

Number of Instances

All corrections to untimely dispositions were verified with the licensee's A&D record by SIOI (b)(6)
Accurately, completely & timely record all required future firearm disposition information.
Resume proper maintenance of required acquisition and disposition record.
Complete and submit ATF Form 3310.11 - Firearms Inventory Theft/Loss Report.

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

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

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

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

	Form 4473 on all future firearm transactions.		
5	<p>27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473</p> <p>ATF Forms 4473: <input type="checkbox"/> Number of Instances: <input type="checkbox"/></p>	<p>Licenses retains a copy of the transferee's identification document with the respective ATF F 4473 but either failed to record the information on the ATF F 4473 or an incorrect expiration date. Licensee is to record all appropriate and accurate identification information on the ATF F 4473 on future transfers.</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>	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
6	<p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473: <input type="checkbox"/> Number of Instances: <input type="checkbox"/></p>	<p>Ensure that all ATF Form 4473 items, as required by form headings and instructions, are accurately completed on all future transactions.</p> <p>Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions.</p> <p>Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified.</p> <p>Ensure that the required transferor/seller printed name and title is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D.</p> <p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
7	<p>27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473</p> <p>ATF Forms 4473: <input type="checkbox"/> Number of Instances: <input type="checkbox"/></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>	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
8	<p>27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473</p> <p>ATF Forms 4473: <input type="checkbox"/> Number of Instances: <input type="checkbox"/></p>	<p>Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p>	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

THEFT/LOSS REPORT

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

LICENSEE RESPONSE REPORT

Regulation	Corrective Actions	Licensee Response	Status Details
<p>27 CFR 478.102(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>Licensee is aware of the 30 day expiration time period and will ensure further compliance of this regulation.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 09/29/2021</p>

<p>27 CFR 478.129(b): Failure to retain ATF F 4473</p> <p>ATF Forms 4473 Number of Instances: <input type="text"/></p> <p>2</p>	<p>Retain ATF Forms 4473 for a period of not less than 20 years after the date of sale or disposition.</p>	<p>Licensee stated this was an oversight on their part and believes the forms to be misfiled prior to logging the dispositions out.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 09/29/2021</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: <input type="text"/></p> <p>3</p>	<p>All corrections to untimely dispositions were verified with the licensee's A&D record by SIO <u>(b)(6)</u>. Accurately, completely & timely record all required future firearm disposition information. Resume proper maintenance of required acquisition and disposition record. Complete and submit ATF Form 3310.11 - Firearms Inventory Theft/Loss Report.</p>	<p>Licensee stated the individual responsible the entries in the A&D record is no longer employed by the licensee. Reconciliations were conducted every year but the A&D record was not updated. Licensee (RP Sena Parks) will be the only one responsible for maintaining and updating the A&D record from now on and has scheduled what will be annual inventory of firearms and reconciliation of the A&D book starting November (2021).</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 09/29/2021</p>
<p>27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473</p> <p>ATF Forms 4473 Number of Instances: <input type="text"/></p> <p>4</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>Licensee stated they have a double check system at the time of the transaction and during the time period of the errors, they would get busy and would not take the time to double check the form. The licensee stressed upon the employees to stop everything, review the form and then have another employee double check the form prior to the customer leaving the business premises, which was been working better since the onsite inspection. Licensee is now also reviewing the forms at the time the firearm is logged out and the form is filed.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 09/29/2021</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: <input type="text"/></p> <p>5</p>	<p>Licensee retains a copy of the transferee's identification document with the respective ATF F 4473 but either failed to record the information on the ATF F 4473 or an incorrect expiration date. Licensee is to record all appropriate and accurate identification information on the ATF F 4473 on future transfers. 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>Licensee stated they have a double check system at the time of the transaction and during the time period of the errors, they would get busy and would not take the time to double check the form. The licensee stressed upon the employees to stop everything, review the form and then have another employee double check the form prior to the customer leaving the business premises, which was been working better since the onsite inspection. Licensee is now also reviewing the forms at the time the firearm is logged out and the form is filed.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 09/29/2021</p>
<p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473 Number of Instances: <input type="text"/></p> <p>6</p>	<p>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>Licensee stated they have a double check system at the time of the transaction and during the time period of the errors, they would get busy and would not take the time to double check the form. The licensee stressed upon the employees to stop everything, review the form and then have another employee double check the form prior to the customer leaving the business premises, which was been working better since the onsite inspection. Licensee is now also reviewing the forms at the time the firearm is logged out and the form is filed.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 09/29/2021</p>
<p>27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473</p> <p>ATF Forms 4473 Number of Instances: <input type="text"/></p> <p>7</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>	<p>Licensee stated they have a double check system at the time of the transaction and during the time period of the errors, they would get busy and would not take the time to double check the form. The licensee stressed upon the employees to stop everything, review the form and then have another employee double check the form prior to the customer leaving the business premises, which was been working better since the onsite inspection. Licensee is now also reviewing the forms at the time the firearm is logged out and the form is filed.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 09/29/2021</p>

<p>27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473</p> <p>ATF Forms 4473 Number of Instances</p> <p>8</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>Licensee stated they have a double check system at the time of the transaction and during the time period of the errors, they would get busy and would not take the time to double check the form. The licensee stressed upon the employees to stop everything, review the form and then have another employee double check the form prior to the customer leaving the business premises, which was been working better since the onsite inspection. Licensee is now also reviewing the forms at the time the firearm is logged out and the form is filed.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 09/29/2021</p>
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CLOSING CONFERENCE

(9/29/2021)
09/29/2021

Closing Conference Additional Notes
The licensee's last onsite inspection was held in 2010 with one violation cited and a ROV only, no further action recommendation made.

Attachment(s)

Attendee(s)

Sena Ann Parks

WARNING CONFERENCE

Scheduling Letter

Delivery Method
Email

Type	Email
Additional Email	(b)(6)

Conference Details

Warning Conference Lead
Benjamin Mendoza

Conference Date/Time
05/10/2022 11:00 AM

Conference Address
5815 Wise Rd, Lansing, Michigan 48911

Representing ATF	(b)(6)	Benjamin Mendoza and	(b)(6)
Responsible person(s) representing the licensee	Sena Ann Parks		
Non-Responsible person(s) representing the licensee	(b)(6)		

Follow-Up Letter Details
During the Warning Conference, you provided ATF with a written Warning Conference & Compliance Action Plan.

This Action Plan includes a three-tier filing system to help determine where an ATF Form 4473 is in the transaction process and ensure thorough review of the form prior to the transfer of the firearm. The form will be reviewed a minimum of three times prior to the actual transfer of the firearm, which includes a supervisory level staff member providing final approval before the transfer takes place. The supervisory level staff includes the President and the Administrative Assistant to the company President. A physical inventory verification of firearms will be conducted on a quarterly basis. Re-training of employees based on the violations cited by ATF has taken place with continuing training of employees quarterly.

In reference to the violations cited, you provided the following information:

Violation of 27 CFR 478.102(c): all employees have been re-trained on the requirements to conduct a new NICS background check for transactions over 30-days from the date a NICS check is initiated. You also established a three-tier filing system to identify where an ATF Form 4473 is in the transaction process in order to isolate and more accurately process forms documenting firearms transfers delayed by NICS.

Violation of 27 CFR 478.129(b): you stated you are still looking for the missing forms and surmised they were mistakenly attached to other documents on the business premises. Once found you will advise ATF of their recovery. In addition to training employees on ATF document retention requirements, you have established a policy to generate a NICS/POCS Daily Summary Report to verify that there is a 4473 form that corresponds to every NICS check performed during that day. This will help detect misplaced 4473 forms within the same business day and improve the timeliness of their recovery.

Violation of 27 CFR 478.125(e): all employees have been trained on the requirement to log transactions in the A&D record not later than 7 days following the transfer. You also established a policy to immediately record transfers to nonlicensees and record transfers to licensees by close of business on the day of transfer. The policy includes verification procedures for comparing transfers to the NICS/POCS Daily Summary Report (for non-licensee transfers) and a Detail Shipment Report (for licensee transfers). You attributed the vast majority your A&D record errors to transfers to police departments, other licensees, or the manufacturers of the firearms, none of which benefit from the additional documentation of a 4473 form.

Violation of 27 CFR 478.124(c)(1); .124(c)(3)(i); .21(a); .124(c)(5); .124(c)(3)(iv) (errors on the ATF Form 4473, Firearms Transaction Record): all employees have been trained on the proper completion of the ATF Form 4473 to include verifying the accuracy and validity of the identification document presented by transferees, recording accurate information, and signing and dating the form as required. NICS results are printed out, a photocopy of a transferee's ID is obtained, and both records are attached to the respective ATF Form 4473.

Follow-Up Letter

Recipient Name	Delivery Date
(b)(6)	05/11/2022 05:21 PM

EXHIBITS

Inspection

Category	Attachment Name
Correspondence	Spartan Notification RE: 4-38-22789 Inspection Results
WarningConferenceFollowUpLetter	Follow Up Letter.pdf
WarningConferenceScheduleReturnEmail	MPE WC Letter receipt confirmation.pdf
Correspondence	
Correspondence	Action required concerning your Federal Firearms License
WarningConferenceSchedulingLetter	Scheduling Letter.pdf
Correspondence	Spartan Notification RE: 4-38-22789 Monitored Case
Correspondence	Spartan Notification RE: 4-38-22789 Monitored Case
Correspondence	Spartan Notification RE: 4-38-22789 Monitored Case
UpdateLicensingCenter	8C Final Detroit FCI-16149.docx.pdf
Correspondence	Spartan Notification RE: 4-38-22789 Monitored Case
Correspondence	Spartan Notification RE: 4-38-22789 Monitored Case
Correspondence	Spartan Notification RE: 4-38-22789 Monitored Case
UpdateLicensingCenter	8C Initial Detroit FCI-16149.docx
Correspondence	Spartan Notification RE: 4-38-22789 Inspection Results
WarningLetterReturnEmail	Fwd_ [EXTERNAL] Re_ Action required concerning your Federal Firearms License.pdf
Correspondence	
Correspondence	Action required concerning your Federal Firearms License
WarningLetter	Warning Letter.pdf
OnSiteSummaryInformation	3310.11 Report 9-29-2011.pdf
Correspondence	Information Concerning Your Federal License/Permit
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	Action Required Concerning Your Federal Firearms Compliance Inspection
FirearmTheftLossList	Firearm Theft Loss List.pdf
PropertyOwnershipVerification	property verification.pdf
BusinessVerification	corporate verification.pdf



March 28, 2022

WARNING CONFERENCE

MICHIGAN POLICE EQUIPMENT CO
6521 LANSING RD
CHARLOTTE, Michigan 48813-0000

Re: Federal Firearms License Number: 4-38-22789

MICHIGAN POLICE EQUIPMENT CO,

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 6521 LANSING RD, Unit N/A, CHARLOTTE, Michigan 48813-0000 on 2/3/2020 through 09/29/2021, 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 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 5815 Wise Rd, Lansing, Michigan 48911 on 04/14/2022 at 11:00 AM. 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 [REDACTED] (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,
Benjamin Mendoza
Director of Industry Operations
Detroit Field Division



April 11, 2022

WARNING CONFERENCE

MICHIGAN POLICE EQUIPMENT CO
6521 LANSING RD
CHARLOTTE, Michigan 48813-0000

Re: Federal Firearms License Number: 4-38-22789

MICHIGAN POLICE EQUIPMENT CO,

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 6521 LANSING RD, Unit N/A, CHARLOTTE, Michigan 48813-0000 on 2/3/2020 through 09/29/2021, 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 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 5815 Wise Rd, Lansing, Michigan 48911 on 05/10/2022 at 11:00 AM. 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 (b)(6) 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,
Benjamin Mendoza
Director of Industry Operations
Detroit Field Division



May 11, 2022

WARNING CONFERENCE FOLLOW UP

MICHIGAN POLICE EQUIPMENT CO

6521 LANSING RD
CHARLOTTE, Michigan 48813-0000

Re: Federal Firearms License Number: 4-38-22789

MICHIGAN POLICE EQUIPMENT CO,

This letter is a follow-up to the warning conference held with you on May 10, 2022 at 11:00 AM. During this conference, the violations cited during the inspection conducted on 2/3/2020 through 9/29/2021, and the necessary corrective action to prevent the violations from reoccurring were discussed. The following people were in attendance:

Representing the ATF Detroit Field Division Field Division: (b)(6) Benjamin Mendoza and (b)(6)
Responsible person(s) representing the licensee: Sena Ann Parks
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:

During the Warning Conference, you provided ATF with a written Warning Conference & Compliance Action Plan.

This Action Plan includes a three-tier filing system to help determine where an ATF Form 4473 is in the transaction process and ensure thorough review of the form prior to the transfer of the firearm. The form will be reviewed a minimum of three times prior to the actual transfer of the firearm, which includes a supervisory level staff member providing final approval before the transfer takes place. The supervisory level staff includes the President and the Administrative Assistant to the company President. A physical inventory verification of firearms will be conducted on a quarterly basis. Re-training of employees based on the violations cited by ATF has taken place with continuing training of employees quarterly.

In reference to the violations cited, you provided the following information:

Violation of 27 CFR 478.102(c): all employees have been re-trained on the requirements to conduct a new NICS background check for transactions over 30-days from the date a NICS check is initiated. You also established a three-tier filing system to identify where an ATF Form 4473 is in the transaction process in order to isolate and more accurately process forms documenting firearms transfers delayed by NICS.

Violation of 27 CFR 478.129(b): you stated you are still looking for the missing forms and surmised they were mistakenly attached to other documents on the business premises. Once found you will advise ATF of their recovery. In addition to training employees on ATF document retention requirements, you have established a policy to generate a NICS/POCS Daily Summary Report to verify that there is a 4473 form that corresponds to every NICS check performed during that day. This will help detect misplaced 4473 forms within the same business day and improve the timeliness of their recovery.

Violation of 27 CFR 478.125(e): all employees have been trained on the requirement to log transactions in the A&D record not later than 7 days following the transfer. You also established a policy to immediately record transfers to nonlicensees and record transfers to licensees by close of business on the day of transfer. The policy includes verification procedures for comparing transfers to the NICS/POCS Daily Summary Report (for non-licensee transfers) and a Detail Shipment Report (for licensee transfers). You attributed the vast majority your A&D record errors to transfers to police departments, other licensees, or the manufacturers of the firearms, none of which benefit from the additional documentation of a 4473 form.

Violation of 27 CFR 478.124(c)(1); .124(c)(3)(i); .21(a); .124(c)(5); .124(c)(3)(iv) (errors on the ATF Form 4473, Firearms Transaction Record): all employees have been trained on the proper completion of the ATF Form 4473 to include verifying the accuracy and validity of the identification document presented by transferees, recording accurate information, and signing and dating the form as required. NICS results are printed out, a photocopy of a transferee's ID is obtained, and both records are attached to the respective ATF Form 4473.

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,
Benjamin Mendoza
Director of Industry Operations
Detroit Field Division