

REAPER VALLEY TACTICAL LLC's FCI
FCI-29903
01/06/2023 10:33 AM
IOI (b)(6) Columbus III (IO) Field Office

LICENSEE INFORMATION

Licensee Name	RDS Key	License/Permit Number	License Type
REAPER VALLEY TACTICAL LLC	4-31-06442	4-31-089-01-1H-06442	01 - Dealer License
Business Type Limited Liability Company (LLC)			
Premises Ownership Type Leased/Rented		Premises Address	
Premises Location Type Required Store Front			

RECOMMENDATIONS

Final Decision
Warning Conference

Deputy Assistant Director Hans Hummel's Recommendation
Warning Conference

Details

This FCI was briefed to the Acting Director on 1/28/22. A DIO led WC in lieu of revocation is appropriate after consideration of the following extraordinary circumstances. Notably, as a result of the COVID pandemic, Ohio enacted legislation extending expiration dates on their Concealed Handgun Licenses. ATF informed FFLs that DLs that are deemed valid by the State continue as valid identification. However the same is not true for expired qualifying NICS alternative permits. This FFL accepted an expired Concealed Handgun License (CHL) in four instances. Additionally, this FFL received their license after a qualification conducted over the phone due to protocols in place due to the COVID pandemic.

Special Agent in Charge Roland Herndon's Recommendation
I concur with Warning Conference.

Division Counsel (b)(6) Review

Details

Reviewed.

Director Industry Operations Judyth Ledoux's Recommendation
Warning Conference

Details

The DIO concurs with IOI (b)(6) and AS (b)(6) recommendation to issue a Warning Letter in lieu of holding an AS Warning Conference as this was licensee's first inspection, no sales to prohibited persons, and licensee was cooperative and eager to correct violations. Following this inspection and review of regulations, licensee should ensure compliance or contact the Columbus III AO if he has questions.

Area Supervisor (b)(6) Recommendation
Warning Conference

Details

REAPER VALLEY TACTICAL LLC 4-31-06442

AS (b)(6) concurs with IOI (b)(6) recommendation of a Warning Letter and Recall Inspection as an alternate to a Warning Conference. On 8/4/2021, IOI (b)(6) issued the licensee a cease-and-desist letter, due to the fact the licensee moved and failed to notify ATF until they submitted their renewal application. IOI (b)(6) conducted a firearms compliance inspection with the amended application inspection for the change of address. This was the licensee's first compliance inspection. The licensee was cited for eleven (11) violations of the GCA, including accepting an expired Ohio concealed carry permit (CCW) from individuals in lieu of conducting a NICS check. Licensee assumed since the governor extended the expiration dates on the CCW due to COVID-19, they were still valid in lieu of a NICS check. IOI (b)(6) conducted background checks via NCIC, NLETS, OHLEG and NICS Indices with no results for prohibitions. Other than the violation listed above, there were no prohibited transactions, no illegal NICS violations and no public safety violations. A Warning Letter and Recall Inspection will help to ensure violations are not repeated and future compliance.

Onsite Work Summary:

Total # of ATF F 4473 Reviewed = []
Total # of Open Dispositions in A & D Record = []
Total # of Firearms in Inventory = 80
Total # of Firearms Missing after Reconciliation = 0
Total # of Acquisitions in the Last 12 Months = []
Total # of Dispositions in the Last 12 Months = (b)(4)
Industry Operations Investigator (b)(6) Recommendation
Warning Letter

Details

Licensee was cited for 11 violations of the Gun Control Act, including operating from an unlicensed premises and not conducting a NICS check when required in four (4) instances. Violations on transferee section of ATF Form 4473 were also at 5.6%.

Due to violations, licensee should warrant revocation. IOI (b)(6) is recommending a warning letter and recall inspection due to the following factors:

- The operation from the unlicensed premises was due to responsible person Mark Jenkins being unaware of requirement to file an amended application with ATF prior to moving his license. Jenkins had filed his FFL renewal and disclosed his new address therein. IO (b)(6) served a cease and desist on August 4, 2021 as part of an amended application inspection (reference FCA-2364 for further information). At that time, Jenkins abided by the rule and conducted any/all transfers from his original location until the new FFL was issued. During inspection, Jenkins asked about what may qualify as an extension of his licensed premises, and disclosed multiple instances where he could operate at a qualifying event but did not due to "playing it safe."
- Regarding the NICS violations, licensee had simply accepted expired Ohio concealed carry permits from individuals in lieu of conducting a NICS check. This was due to confusion from the State as the governor had deemed all permits valid during the COVID-19 pandemic if not renewed timely. Licensee believed this extended to using in lieu of NICS and was mistaken.
- This is licensee's first compliance inspection. Other than the frequency of violations on the ATF Form 4473 transferee section, no other violations would rise to any administrative action.

Considering all these factors, IO (b)(6) believes future compliance will be achieved from licensee with a warning letter and recall inspection within 24 months.

Inspection Findings

License Type

- Conducting business at locations not authorized as an extension of the licensed business premises.

NICS

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

ELIGIBILITY VERIFICATION

Business Information Verification

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

Additional Findings
According to the Ohio Secretary of State, the LLC is registered and active.

Attachment(s):
Reaper Valley Tactical LLC business details.pdf

Property Ownership Verification

Premises Ownership Type	Premises Location Type	Has the property ownership been verified?
Leased/Rented	Store Front	Yes

Address
No data available

Additional Findings
According to the Licking County Auditor, the premises is owned by All Walls & Ceiling Systems LLC which does not appear to be a company associated with FFL or responsible person Mark Jenkins.

Attachment(s):
14 S Main St property card.pdf

Rental/Lease Verification

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

Additional Findings
Premises owned by All Walls & Ceiling Systems, LLC. IO (b)(6) called the company to ensure the business is authorized and left a voicemail.

An internet search disclosed the company is run by (b)(3) (112 Public Law 55 125 Stat 552), (b)(6) therefore indicating his knowledge of the business and no complaints.

Contact Information

Name: (b)(6) Date Contacted: 09/01/2021

Organization: All Walls & Ceiling Systems LLC

Job Title: Owner

Phone Type	Phone Number	Remarks
Business	+1 740-814-1191	

Attachment(s):

Zoning Information Verification

Is the proposed business activity in compliance with zoning?

Yes

Additional Findings

According to Utica Village Administrator (b)(6) the business is in compliance with all zoning ordinances.

Contact Information

Name: (b)(6) Date Contacted: 07/29/2021

Organization: Village of Utica

Job Title: Village Administrator

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

Attachment(s):

APPOINTMENT DETAILS

Interview Date

08/31/2021

Address:

Responsible Attendee(s)

MARK DUANE JENKINS

Non-Responsible Person(s)

(Deactivated)

(b)(6) (Deactivated)

RESPONSIBLE PERSON(S)

MARK DUANE JENKINS

Name	Gender	Race	Ethnicity
Mr. MARK DUANE JENKINS	Male	White	Not Hispanic or Not Latino

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

Physical Identifiers

Height	Weight	Hair Color	Eye Color
(b)(6)	(b)(6)	Brown	Brown

Place of Birth

Country	State	City
United States Of America	(b)(6)	Unknown

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)	

Criminal History Check

Date Criminal History Check Conducted
07/19/2021

Criminal History Check Comments

On July 19, 2021, IO [(b)(6)] determined no conflicts existed to conduct this inspection:
 - N-Force disclosed no active or pending ATF CE investigations into applicant;
 - Columbus I Field Office and Columbus II CGIC disclosed no potential ATF CE investigations into applicant;
 - NCIC and OHLEG queries of Mark Jenkins disclosed no prohibiting criteria;
 - FLS disclosed Jenkins also holds an active Type 06 FFL under the same LLC.

NON-RESPONSIBLE PERSON(S)

Name	Date of Birth	Job Title
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BRIAN FINKES

Name	Date of Birth	Job Title
BRIAN FINKES		

INTERVIEW QUESTIONNAIRE

What is the proposed business activity?
 FFL operates primarily as a retail dealer of new and used handguns, long guns and receivers. Licensee conducts multiple gun raffles and fundraisers for the community as well; some qualifying events are conducted (Knox County Gun Bash, local hunting club). Some minor gunsmith and repairs are conducted.

Do they need an additional license or permit?
 No

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

Business Activities

Selected Operational Security Measures
 No items

- Retail
- Gunsmith
- Gun Show Participant

SECURITY WALKTHROUGH

Inspection Area Description
 Inspection area in main storefront. Records stored in a filing cabinet behind the desk. Firearms stored in gun safe, behind counter and in back room.

Primary Activity
 Retail

Selected Physical Security Measures

(b)(4)

GPS Coordinates

Latitude

Longitude

ONSITE SUMMARY

Total Number of ATF Form 4473s for Inspection Review Period

Total Number of ATF 4473 Reviewed
 []

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

Total Number of Firearms in Inventory
 80

Actual Number of Firearms Verified

Number of Firearms Missing Before Reconciliation

Total Number of Firearms Missing After Reconciliation
 0

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 These Traces That Were Unresolved

Inspection Period Start Date

Inspection Period End Date

Number Of Traces Resolved By IOI

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

Additional Comments

INTERNAL CONTROL EVALUATION

Inventories not conducted
Firearms logged into and out of A&D at the time of transaction
ATF Forms 4473 not reviewed
Multiple handgun sales detected via customer recognition
Youth Handgun Safety Act Poster and FFL posted
Youth Handgun Safety Act Pamphlets and gun locks on hand

STATISTICS

Traces: Zero since previous inspection through 8/25/2021
Thefts/Losses: Zero since previous inspection through 8/25/2021
Multiple Handgun Sales: Zero in past 12 months through 8/25/2021
NTNs reviewed: 18 (one denied, 17 proceed)

FFL was using Microsoft Excel as a computerized A&D record through February 2021. Currently FFL is using a bound book with no issues. IOI (b)(6) advised that Excel was not an appropriate database for computerized A&D records.

Number of Transferee Background Checks
3

Attachment(s)

Report of Violations.pdf

Report of Violations.pdf

Licensee Response to Violations Report.pdf

REPORT OF VIOLATIONS

Regulation	Corrective Actions	Instance Details
1 27 CFR 478.52(a): Failure to file application for an amended license Number of Instances: 1	If the licensee plans to move, ensure one completes and submits required ATF Form 5300.38 30 days prior to moving license.	FFL failed to notify ATF timely of his change of address; licensee notified ATF on FFL renewal several months after moving.
2 27 CFR 478.100(a)(1): Unlawful conduct of business away from licensed premises Number of Instances: 1	Only conduct licensed activities at the licensed premises; the sole exception to this is a gun show or qualifying event.	FFL has operated at new location from February 2021 through August 2021 while still licensed at former premises.
3 27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers ATF Forms 4473: [] Number of Instances: []	Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) by close of the same business day, for all applicable future multiple sales.	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
4 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.	(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 B items are completed/provided by the transferee/buyer on all future transactions.	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

5		(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: 7 Number of Instances: <input type="text"/></p>	<p>Ensure that all required ATF Form 4473 Section B items are completed/provided by the transferee/buyer on all future transactions. Complete all forms as prescribed. Correct/Update photocopies of all specified ATF Form 4473 discrepancies, in accordance with form headings and instructions.</p> <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
7	<p>27 CFR 478.131(a)(2): Failure to record on an ATF Form 4473 (or affix a copy of) NICS alternative permit info</p> <p>ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/></p>	<p>Ensure that a qualifying NICS alternative permit is properly obtained, validated, verified, and documented for all applicable future over-the-counter firearm transactions.</p> <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
8	<p>27 CFR 478.102(a): Failure to complete a NICS/POC background check</p> <p>ATF Forms 4473: 4 Number of Instances: 4</p>	<p>If accepting a permit in lieu of a NICS check, only accept valid, current Ohio CCW permits.</p> <p>Queries of NCIC, NLETS, OHLEG and NICS Indices conducted; no individuals were prohibited. Execute a required NICS/POC background check for all future over-the-counter firearm transactions.</p> <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
9	<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="text"/> Number of Instances: <input type="text"/></p>	<p>Ensure that all required transferee/buyer identification information is obtained and accurately recorded on all future ATF Forms 4473, Section C. All identification documents should contain a photograph, full name, current address and date of birth.</p> <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
10	<p>27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473</p> <p>ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/></p>	<p>Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section C.</p> <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
11	<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="text"/> Number of Instances: <input type="text"/></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 E.</p> <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>

Regulation	Corrective Actions	Licensee Response	Status Details
<p>27 CFR 478.52(a): Failure to file application for an amended license</p> <p>Number of Instances: 1</p>	<p>If the licensee plans to move, ensure one completes and submits required ATF Form 5300.38 30 days prior to moving license.</p>	<p>Jenkins disclosed he was unaware of requirement to notify ATF of moving his FFL.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 08/04/2021</p>
<p>27 CFR 478.100(a)(1): Unlawful conduct of business away from licensed premises</p> <p>Number of Instances: 1</p>	<p>Only conduct licensed activities at the licensed premises; the sole exception to this is a gun show or qualifying event.</p>	<p>Jenkins disclosed he was unaware of requirement to notify ATF of moving his FFL.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 08/04/2021</p>
<p>27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers</p> <p>ATF Forms 4473 <input type="checkbox"/></p> <p>Number of Instances: <input type="checkbox"/></p>	<p>Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) by close of the same business day, for all applicable future multiple sales.</p>	<p>Jenkins disclosed he thought the requirement was for three or more. He has since filed all his multiple sale reports and acknowledges the violation.</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 09/03/2021</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="checkbox"/></p>	<p>Accurately, completely & timely record all required future firearm acquisition information. Accurately, completely & timely record all required future firearm disposition information.</p>	<p>Jenkins believed he had logged the firearms into the book. He acknowledged the violation and had no questions.</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 08/31/2021</p>
<p>27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473</p> <p>ATF Forms 4473 <input type="checkbox"/></p> <p>Number of Instances: <input type="checkbox"/></p>	<p>Ensure that all required ATF Form 4473 Section B items are completed/provided by the transferee/buyer on all future transactions.</p>	<p>Jenkins acknowledged the violation and had no questions.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 09/03/2021</p>
<p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473 <input type="checkbox"/></p> <p>Number of Instances: <input type="checkbox"/></p>	<p>Ensure that all required ATF Form 4473 Section B items are completed/provided by the transferee/buyer on all future transactions. Complete all forms as prescribed. Correct/Update photocopies of all specified ATF Form 4473 discrepancies, in accordance with form headings and instructions.</p>	<p>Jenkins acknowledged the violation and had no questions.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 09/03/2021</p>
<p>27 CFR 478.131(a)(2): Failure to</p>		<p>Jenkins acknowledged the violation and</p>	<p>Status</p>

7	record on an ATF Form 4473 (or affix a copy of) NICS alternative permit info ATF Forms 4473: [] Number of Instances: []	Ensure that a qualifying NICS alternative permit is properly obtained, validated, verified, and documented for all applicable future over-the-counter firearm transactions.	had no questions.	Licensee Notified Verified Method In Person Date Licensee Notified 09/03/2021
8	27 CFR 478.102(a): Failure to complete a NICS/POC background check ATF Forms 4473: 4 Number of Instances: 4	If accepting a permit in lieu of a NICS check, only accept valid, current Ohio CCW permits. Queries of NCIC, NLETS, OHLEG and NICS Indices conducted; no individuals were prohibited. Execute a required NICS/POC background check for all future over-the-counter firearm transactions.	Jenkins acknowledged the violation and had no questions. He stated he believed the CCW permits were still valid for NICS exception due to the COVID-19 State protocol.	Status Licensee Notified Verified Method In Person Date Licensee Notified 08/31/2021
9	27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473 ATF Forms 4473: [] Number of Instances: []	Ensure that all required transferee/buyer identification information is obtained and accurately recorded on all future ATF Forms 4473, Section C. All identification documents should contain a photograph, full name, current address and date of birth.	Jenkins acknowledged the violation and had no questions.	Status Licensee Notified Verified Method In Person Date Licensee Notified 09/03/2021
10	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 C.	Jenkins acknowledged the violation and had no questions.	Status Licensee Notified Verified Method In Person Date Licensee Notified 09/03/2021
11	27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473 ATF Forms 4473: [] Number of Instances: []	Ensure that the required transferor/seller signature and date of transfer is obtained, validated and accurately recorded on all future ATF Forms 4473, Section E.	Jenkins acknowledged the violation and had no questions.	Status Licensee Notified Verified Method In Person Date Licensee Notified 09/03/2021

CLOSING CONFERENCE

Review Regulations conducted offline

(9/3/2021)

09/03/2021

Closing Conference Additional Notes:

Closing conference held offline due to connectivity issues.

Attachment(s)

Attendee(s)

MARK DUANE JENKINS

WARNING CONFERENCE

Scheduling Letter

Assigned To

(b)(6)

Delivery Method

Certified Mail

Certified Mail Return Slip**Attachment****Date/Time**

Receipt of Warning Conference Letter.pdf

02/07/2022 01:29 PM

Conference Details

Warning Conference Lead

Judyth Ledoux

Representing ATF

(b)(6)

and Judyth Ledoux

Conference Date/Time

02/22/2022 01:00 PM

Responsible person(s) representing the licensee

MARK DUANE JENKINS

Conference Address

230 West St, Columbus, Ohio 43215

Non-Responsible person(s) representing the licensee

(b)(6)

Follow-Up Letter Details

VIOLATIONS PERTAINING TO NOT NOTIFYING ATF OF MOVING THE FFL

1. 27 CFR 478.52(a): Failure to file application for an amended license. Number of Instances: 1
2. 27 CFR 478.100(a)(1): Unlawful conduct of business away from licensed premises. Number of Instances: 1

In response to this violation, you disclosed you were unaware of the reporting requirement. You stated you now know whenever you move you need to file for an amended license. However, you also disclosed you had no intention to move in the near future.

VIOLATION PERTAINING TO MULTIPLE HANDGUN SALES

3. 27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers. ATF Forms 4473: [] Number of Instances: []

In response to this violation, you disclosed the violation was "on me." You disclosed you thought the multiple handgun sale reporting requirement was for more than two firearms instead of more than one. You stated that now all multiple handgun sales are being reported to ATF as well as your local law enforcement.

VIOLATION PERTAINING TO ACQUISITION AND DISPOSITION RECORD

4. 27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearms. Number of Instances: []

In response to this violation, you disclosed that you had not had these [] firearms logged in and that now all three full and part time employees are ensuring all firearms are logged in immediately upon arrival and logged out immediately upon completion of an ATF Form 4473. Further, you stated that you are conducting monthly inventories now.

VIOLATIONS PERTAINING TO ATF FORM 4473 COMPLETION

5. 27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473. ATF Forms 4473: [] Number of Instance: []
6. 27 CFR 478.21(a): Failure to complete forms as prescribed. ATF Forms 4473: [] Number of Instances: []
7. 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: []
9. 27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473. ATF Forms 4473: [] Number of Instances: []
10. 27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473. ATF Forms 4473: [] Number of Instances: []
11. 27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473. ATF Forms 4473: [], Number of Instances: []

In response to these violations, you disclosed that the forms are now going through at least a three-step process of review. The forms are being reviewed by the original transferor prior to the firearm being logged out and then again twice by the other two employees. You also clarified the entries on how to enter NICS information.

VIOLATION PERTAINING TO NICS CHECKS

8. 27 CFR 478.102(a): Failure to complete a NICS/POC background check. ATF Forms 4473: 4, Number of Instances: 4

In response to this violation, you disclosed that this violation was incurred due to believing the concealed carry permits were still valid due to the COVID-19 extension by Governor DeWine. You even pointed out, which was noted by IOI (b)(6), that you indicated such over a few of the forms on which these expired Ohio permits were accepted. You disclosed you still take permits now but are putting more scrutiny into which permits are valid (i.e. issued by Ohio only, current and not expired).

Follow-Up Letter

Delivery Method

Certified Mail

Tracking Number

(b)(6)

Date Sent

02/22/2022

Date Delivered

02/23/2022

Certified Mail Return Slip**Attachment****Date/Time**

Receipt of Warning Conference Follow Up Letter.pdf

02/23/2022 01:20 PM

Category	Attachment Name
Correspondence	Spartan Notification RE: 4-31-06442 Inspection Results
WarningConferenceFollowUpLetterReturnSlip	Receipt of Warning Conference Follow Up Letter.pdf
WarningConferenceFollowUpLetter	Follow Up Letter.pdf
WarningConferenceLetterReturnSlip	Receipt of Warning Conference Letter.pdf
Correspondence	Spartan Notification RE: 4-31-06442 Monitored Case
WarningConferenceSchedulingLetter	Scheduling Letter.pdf
Correspondence	Spartan Notification RE: 4-31-06442 Monitored Case
Correspondence	Spartan Notification RE: 4-31-06442 Monitored Case
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Correspondence	Spartan Notification RE: 4-31-06442 Monitored Case
Correspondence	Spartan Notification RE: 4-31-06442 Monitored Case
Correspondence	Spartan Notification RE: 4-31-06442 Inspection Results
Correspondence	Spartan Notification RE: 4-31-06442 Inspection Results
WarningLetterReturnEmail	Reaper Re_ Please respond concerning your Federal Firearms License.pdf
WarningLetterReturnEmail	Reaper Re_ Please respond concerning your Federal Firearms License.pdf
WarningLetterReturnEmail	Reaper Re_ Please respond concerning your Federal Firearms License.pdf
Correspondence	
Correspondence	Action required concerning your Federal Firearms License
WarningLetter	Warning Letter.pdf
ReturnedSignedROV	Report of Violations, Reaper Valley Tactical LLC Revised.pdf
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
ViolationsPDF	Report of Violations.pdf
Correspondence	Spartan Notification RE: 4-31-06442 Inspection Results
LicenseeResponseToViolationsPDF	Licensee Response to Violations Report.pdf
ViolationsPDF	Report of Violations.pdf
BusinessVerification	Reaper Valley Tactical LLC business details.pdf
PropertyOwnershipVerification	14 S Main St property card.pdf



January 31, 2022

WARNING CONFERENCE

REAPER VALLEY TACTICAL LLC

Re: Federal Firearms License Number: 4-31-06442

REAPER VALLEY TACTICAL 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 8/31/2021 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 230 West St, Columbus, Ohio 43215 on 02/22/2022 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,
Judyth Ledoux
Director Industry Operations
Columbus Field Division



February 22, 2022

WARNING CONFERENCE FOLLOW UP

REAPER VALLEY TACTICAL LLC

Re: Federal Firearms License Number: 4-31-06442

REAPER VALLEY TACTICAL LLC,

This letter is a follow-up to the warning conference held with you on February 22, 2022 at 1:00 PM. During this conference, the violations cited during the inspection conducted on 8/31/2021 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 Columbus Field Division Field Division (b)(6) and Judyth Ledoux
Responsible person(s) representing the licensee: MARK DUANE JENKINS
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:

VIOLATIONS PERTAINING TO NOT NOTIFYING ATF OF MOVING THE FFL

1. 27 CFR 478.52(a): Failure to file application for an amended license. Number of Instances: 1
2. 27 CFR 478.100(a)(1): Unlawful conduct of business away from licensed premises. Number of Instances: 1

In response to this violation, you disclosed you were unaware of the reporting requirement. You stated you now know whenever you move you need to file for an amended license. However, you also disclosed you had no intention to move in the near future.

VIOLATION PERTAINING TO MULTIPLE HANDGUN SALES

3. 27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers. ATF Forms 4473: [] Number of Instances: []

In response to this violation, you disclosed the violation was "on me." You disclosed you thought the multiple handgun sale reporting requirement was for more than two firearms instead of more than one. You stated that now all multiple handgun sales are being reported to ATF as well as your local law enforcement.

VIOLATION PERTAINING TO ACQUISITION AND DISPOSITION RECORD

4. 27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearms. Number of Instances: []

In response to this violation, you disclosed that you had not had these [] firearms logged in and that now all three full and part time employees are ensuring all firearms are logged in immediately upon arrival and logged out immediately upon completion of an ATF Form 4473. Further, you stated that you are conducting monthly inventories now.

VIOLATIONS PERTAINING TO ATF FORM 4473 COMPLETION

5. 27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473. ATF Forms 4473: [] Number of Instances: []
6. 27 CFR 478.21(a): Failure to complete forms as prescribed. ATF Forms 4473: [] Number of Instances: []
7. 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: []
9. 27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473. ATF Forms 4473: [] Number of Instances: []
10. 27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473. ATF Forms 4473: [] Number of Instances: []
11. 27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473. ATF Forms 4473: [] Number of Instances: []

In response to these violations, you disclosed that the forms are now going through at least a three-step process of review. The forms are being reviewed by the original transferor prior to the firearm being logged out and then again twice by the other two employees. You also clarified the entries on how to enter NICS information.

VIOLATION PERTAINING TO NICS CHECKS

8. 27 CFR 478.102(a): Failure to complete a NICS/POC background check. ATF Forms 4473: 4, Number of Instances: 4

In response to this violation, you disclosed that this violation was incurred due to believing the concealed carry permits were still valid due to the COVID-19 extension by Governor DeWine. You even pointed out, which was noted by IC (b)(6), that you indicated such over a few of the forms on which these expired Ohio permits were accepted. You disclosed you still take permits now but are putting more scrutiny into which permits are valid (i.e. issued by Ohio only, current and not expired).

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,
Judyth Ledoux
Director Industry Operations
Columbus Field Division



September 8, 2021

WARNING LETTER

REAPER VALLEY TACTICAL LLC

PO Box 892
Utica, Ohio 43080

Re: Federal Firearms License Number: 4-31-06442.

REAPER VALLEY TACTICAL 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 14 S Main St, Unit N/A, Utica, Ohio 43080 on 8/31/2021 through 9/3/2021, 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.

All violations were fully explained to you by ATF Industry Operations Investigator (b)(6). You indicated that you understood the requirements of the firearms laws and regulations as a licensee. You further indicated that corrective actions would be taken to eliminate future violations.

The records you are required to maintain and the business operations you conduct are important to law enforcement in our continuing efforts 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. ATF appreciates the efforts you and other industry members make in this area, and we look forward to continuing to work with you in that regard.

You are reminded that retention of your Federal Firearms License is conditional upon compliance with Federal laws and regulations. Because the violations cited in this most recent inspection were fully explained to you and you stated you understood your compliance responsibilities as a licensee, any future violations, either repeat or otherwise, could be viewed as willful and may result in the revocation of your license. Please ensure that future compliance is achieved.

Should you have any questions regarding this matter, please contact Industry Operations Investigator (b)(6) at (b)(6).

Sincerely,

(b)(6)

Area Supervisor

Columbus III (IO) Field Office