

RK HOLDINGS, LLP's FCI
FCL-32940
03/14/2022 12:58 PM
IO# (b)(6) Columbus III (IO) Field Office

LICENSEE INFORMATION

Licensee Name RK HOLDINGS, LLP	RDS Key 4-34-06926	License/Permit Number 4-34-059-01-4B-06926	License Type 01 - Dealer License
Business Type Limited Liability Partnership (LLP)			

Premises Address	Mailing Address
Premises Ownership Type Owned	Address 4216 DEWITT AVE Unit N/A MATTOON, Illinois 61938-6643 COLES United States
Premises Location Type Store Front	
Address 61750 SOUTHGATE PKWY Unit N/A CAMBRIDGE, Ohio 43725 GUERNSEY United States	

Phone Type	Phone Number	Remarks
Business	+1 740-781-0184	
Fax	+1 740-781-0185	

Email Address	Email Remarks
(b)(6)	

Online Presence Type	Online Presence URL	Remarks
Website	ruralking.com	

RECOMMENDATIONS

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

Details
This FCI was briefed to the Acting Director on 2/24/22. A DIO led WC in lieu of revocation is appropriate after consideration of the following extraordinary circumstances. Notably, the FFL proactively contacted ATF to self disclose a lower receiver that their self conducted audit identified as missing (and further investigation by the FFL disclosed had been sold without a 4473 or background). Their compliance program identified this missing receiver and the FFLs took steps to identify the purchaser and contacted ATF to best address the self identified problem. The FFL retrieved the receiver and disposed of properly with a background check. (purchaser was not prohibited).

Special Agent in Charge Roland Hernandez's Recommendation
I agree, alternate recommendation of DIO led Warning Conference in lieu of Revocation.

Division Count (b)(6) Review

Details
Reviewed.
Director Industry Operations Judyth Ledoux's Recommendation
Warning Conference

Details
The DIO concurs with alternate recommendation of DIO led Warning Conference in lieu of Revocation. The FFL self-reported the violation (478.102(a)) and conducted an internal investigation that led to the customer returning the firearm and the firearm properly transferred back to the customer. The details of this case are set forth in the MCP 8C which has been accepted in the Monitored Case Program. The MCP 8C has been forwarded for Counsel's review.

Area Supervisor (b)(6) Recommendation
Warning Conference

Details
On January 7, 2022, IO# (b)(6) completed an inspection at RK Holdings, LLP DBA Rural King. This was the licensee's first compliance inspection. The licensee was cited for two (2) violations of the Gun Control Act regarding a single instance: not conducting an ATF Form 4473 and not conducting a NICS check when required.

On December 21, 2021, licensee contacted ATF Columbus III Field Office to self-report the violation. Due to a miscommunication, a sales associate believed a form and NICS check were conducted on a receiver for a customer, and transferred the firearm. This inspection was already ready due to the license being issued via a telephone application inspection (per COVID-19 pandemic procedures). IO (b)(6) inspected the licensee and interviewed the store manager to determine the issue. No other violations were cited other than the two (2) that the licensee self-reported.

On January 13, 2022, the licensee contacted IO (b)(6) and disclosed they had identified the purchaser who had returned. The licensee was advised for the purchaser to return the firearm and log it back in, with a new form and NICS check conducted for traceability purposes. This was accomplished on January 14, 2022 with full cooperation of the customer. No prohibitions disclosed.

Acting AS (b)(6) recommends a DIO-Held Warning Conference in lieu of Revocation and Recall Inspection.
Industry Operations Investigator (b)(6) Recommendation
Warning Conference

Details

RK Holdings LLP d.b.a Rural King Type 01

Onsite Start: 01/04/2022

Onsite End: 01/07/2022

Alternate recommendation of DIO-held warning conference in lieu of revocation is recommended.

RK Holdings LLP was cited for two (2) violations, to include (b)(6) instance of 27 CFR 478.124(a): Failure to execute an ATF F 4473 and one (1) instance of 27 CFR 478.102(a): Failure to complete a NICS/POC background check.

On December 21, 2021, Mr. John Parker, Store Manager and Responsible Person, contacted ATF Columbus Industry Operations to self-report a firearm frame/receiver had been sold without an ATF F 4473 or background check completed. Mr. Parker explained that during a routine internal inventory they discovered an (b)(6) missing from inventory and initiated an internal investigation. They searched their computer system and were able to match the item number and serial number to a receipt showing it was purchased on (b)(3) (112 Public Law 55 125 Stat 552). Mr. Parker contacted Rural King IT department to see if they could obtain a name associated with the receipt as the firearm was purchased with a debit/credit card. He then contacted Card Services to try to identify the purchaser, although the only information shown was the last four digits of a dual use card, therefore no identifying information could be obtained. Mr. Parker obtained a security camera picture of the customer and showed it to all their employees. On 1/13/21, the customer returned to buy additional guns and was recognized by Assistant Manager (b)(6). (b)(6) contacted IO (b)(6) and asked what they should do. IO (b)(6) instructed they request customer (b)(6) to bring the receiver back to RK and it has now been properly logged back in and disposed to (b)(6) with a 4473 and background check. (b)(6) is not prohibited.

According to Mr. Parker, during interviews of the employees, it was discovered that on December 11, 2021, (b)(6) was looking at firearms at the gun counter and decided he wanted to purchase one. The sales associate called a manager who obtained a new in-the-box receiver from the vault because they do not sell the display models. Due to miscommunication between the manager and sales associate, the sales associate completed the sale thinking the manager had (b)(6) complete the ATF Form 4473 and background check. Mr. Parker stated that the sales associate did not follow store policy and was terminated. Mr. Parker stated that they have initiated new procedures and training to ensure this does not happen again.

Inspection Findings

Records and Forms

- 9. Failure to execute a Form 4473 (Exception: Select findings 6, 7, and 8 above for consignment sales, transfers to law enforcement officers for personal use, and FFL responsible persons; if the transferee is NOT prohibited).

NICS

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

ELIGIBILITY VERIFICATION

Business Information Verification

Licensee Name	Business Type	Is the business valid?
RK HOLDINGS, LLP	Limited Liability Partnership (LLP)	Yes

Additional Findings

IO (b)(6) verified the business is active and in good standing through the Ohio Secretary of State website.

Attachment(s):

OH SOS- Business_Details.pdf

Property Ownership Verification

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

Address

61750 SOUTHGATE PKWY
Unit N/A
CAMBRIDGE, Ohio 43725
GUERNSEY United States

Additional Findings

IO (b)(6) verified the property is owned by Rural King Realty LLC through the Guernsey County Auditor website.

Attachment(s):
Guemsey County Auditor.pdf

Trade Name/DBA Verification

Trade Name/DBA: RURAL KING
Is the trade name/DBA registered? Yes

Additional Findings
IO (b)(6) verified the trade name was registered through the Ohio Secretary of State website.

Attachment(s):
Trade Name.pdf

Zoning Information Verification

Is the proposed business activity in compliance with zoning?
Yes

Additional Findings
IO (b)(6) verified the property is zoned General Services Commercial and is compliant with zoning. IO (b)(6) spoke with (b)(6) Engineering Technician, who said the business is commercially zoned and compliant with the city of Cambridge.

Contact Information

Name: (b)(6)
Date Contacted: 01/06/2022
Organization: City of Cambridge
Job Title: Engineering Technician

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

Attachment(s):
Cambridge Zoning.pdf

APPOINTMENT DETAILS

Interview Date: 01/05/2022
Address: 61750 SOUTHGATE PKWY, Unit N/A, CAMBRIDGE, Ohio 43725
Remarks: Inspection began on 1/4/2022.

Responsible Attendee(s) Non-Responsible Person(s)

JOHN PAUL PARKER (b)(6) (Deactivated)

RESPONSIBLE PERSON(S)

JOHN PAUL PARKER

Name: JOHN PAUL PARKER	Gender: Male	Race: White	Ethnicity: Not Hispanic or Not Latino
Date of Birth: (b)(6)	SSN: (b)(6)	Job Title: STORE MANAGER	

Physical Identifiers

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

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

Criminal History Check

Date Criminal History Check Conducted:
12/28/2021

Criminal History Check Comments:
IOI (b)(6) conducted an NCIC criminal history query (JWIN) with no prohibiting information discovered.

NON-RESPONSIBLE PERSON(S)

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

INTERVIEW QUESTIONNAIRE

What is the proposed business activity?

Rural King operates as a farm supply chain store which offers an assortment of goods to include, farming supplies, clothing, tools, firearms, and household goods. Rural King sells 100 percent new firearms including handguns and long guns. The majority of firearms are obtained from Rural King Distribution Center. Occasionally they will obtain firearms directly from the manufacturer.

Rural King transfers firearms to other licensees and follows the proper protocol of acquiring a certified copy of the FFL prior to the transfer. They also advertise and sell firearms on their website, www.rkguns.com. Purchases made from the website are shipped to the Rural King closest to the purchaser. When the licensee transfers firearms to other licensees, they obtain a certified copy of licenses and maintains copies of these licenses on file.

The ATF Form 4473s are reviewed daily, weekly and monthly by members of management for accuracy. A physical serial number inventory is conducted weekly as well as on a monthly basis. The licensee does not engage in manufacturing, importing or exporting of firearms or ammunition. In addition, they do not sell firearms at gun shows, do not sell firearms to wholesalers, do not deal in black powder, and they do not sell NFA firearms.

Do they need an additional license or permit?
No

Who are their primary suppliers?
Rural King Distribution Center

Business Activities

Internet Sales/Transfers

Retail

Internet Sales/Transfers Website

www.dkguns.com

Selected Operational Security Measures

Controlled Access to ATF Recordkeeping

Controlled Access to Keys

Current & Active Security Plan

Designated Security Coordinator

Formal Employee Training

Suspicious persons/activities reporting protocols

PREMISES INFORMATION

Inspection Area Description

RK Holdings LLP d.b.a Rural King operates from an urban commercial location in Cambridge, OH. All firearms on display are locked in glass cases or with cable locks secured on the wall at the gun counter. All other firearms are stored inside a walk in vault behind the gun counter. All ATF Forms 4473 are stored in the administrative office area which is locked to the general public.

Primary Activity
Retail

GPS Coordinates

Latitude
39.99668

Longitude
-81.57562

Selected Physical Security Measures

(b)(4)

ONSITE SUMMARY

Total Number of ATF Form 4473s for Inspection Review Period

Total Number of ATF F 4473 Reviewed

Total Number of Open Dispositions in A & D Record

Total Number of Firearms in Inventory

842

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:

IOI (b)(6) reviewed ATF Forms 4473 on file for the inspection period and discovered no discrepancies. There were 348 NTN's from the NICS Audit Log were reviewed with corresponding ATF Forms 4473 with no discrepancies. There were 13 NICS denial ATF Forms 4473 with no discrepancies. There were reported multiple sales an no unreported multiple sales for the inspection period.

There were successful trace requests for the inspection period. None of the purchasers had any other trace requests.

There were 842 firearms in inventory and open entries in the acquisition and disposition books.

IOI (b)(6) compare disposition entries with the corresponding ATF Forms 4473 with no discrepancies.

The licensee utilizes electronic ATF Forms 4473 and electronic A&D books.

RK Holdings LLP was cited for two (2) violations, to include instance of 27 CFR 478.124(a): Failure to execute an ATF F 4473 and one (1) instance of 27 CFR 478.102(a): Failure to complete a NICS/POC background check.

On December 21, 2021, Mr. John Parker, Store Manager and Responsible Person, contacted ATF Columbus Industry Operations to self-report a firearm frame/receiver had been sold without an ATF F 4473 or background check completed. Mr. Parker explained that during a routine internal inventory they discovered an (b)(6) missing from inventory and initiated an internal investigation. They searched their computer system and were able to match the item number and serial number to a receipt showing it was purchased of (b)(6) (12 PUBLIC LAW 96-128 STAT 852). Mr. Parker contacted Rural King IT department to see if they could obtain a name associated with the receipt as the firearm was purchased with a debit/credit card. He then contacted Card Services to try to identify the purchaser, although the only information shown was the last four digits of a dual use card, therefore no identifying information could be obtained. Mr. Parker obtained a security camera picture of the customer and showed it to all their employees. On 1/13/21, the customer returned to buy additional guns and was recognized by Assistant Manager (b)(6) contacted IOI (b)(6) and asked what they should do. IOI (b)(6) instructed they request customer (b)(6) to bring the receiver back to RK and it has now been properly logged back in and disposed of (b)(6) with a 4473 and background check. Mr. (b)(6) not prohibited.

According to Mr. Parker, during interviews of the employees, it was discovered that on December 11, 2021 (b)(6) was looking at firearms at the gun counter and decided he wanted to purchase one. The sales associate called a manager who obtained a new in-the-box receiver from the vault because they do not sell the display models. Due to miscommunication between the manager and sales associate, the sales associate completed the sale thinking the manager had (b)(6) complete the ATF Form 4473 and background check. Mr. Parker stated that the sales associate did not follow store policy and was terminated. Mr. Parker stated that they have initiated new procedures and training to ensure this does not happen again.

FFL has reported the firearm transferred as missing inventory to ATF Stolen Firearms Branch, who has issued a theft/loss number. The licensee was directed to do so by their corporate office in order to log the firearm out of their A&D system. RK contacted the ATF Stolen Firearms Branch and informed them they have recovered the firearm and it was removed.

Inspection History: January 8, 2021- Telephonic Application Inspection

Attachment(s)

Report of Violations.pdf

Licensee Response to Violations Report.pdf

REPORT OF VIOLATIONS

Regulation	Corrective Actions	Instance Details
1 27 CFR 478.124(a): Failure to execute an ATF F 4473 ATF Forms 4473: [redacted] Number of Instances: [redacted]	Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.	(b)(3) (112 Public Law 55 125 Stat 552)
2 27 CFR 478.102(a): Failure to complete a NICS/POC background check ATF Forms 4473: 1 Number of Instances: 1	Execute a required NICS/POC background check for all future over-the-counter firearm transactions.	NICS Violation, Unknown, 12/11/2021

LICENSEE RESPONSE REPORT

Regulation	Corrective Actions	Licensee Response	Status Details
1 27 CFR 478.124(a): Failure to execute an ATF F 4473 ATF Forms 4473: [redacted] Number of Instances: [redacted]	Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.	Mr. Parker stated that the sales associate believed the form had already been completed. Mr. Parker stated that they discovered the missing item during a weekly audit and immediately notified the ATF Columbus office. Mr. Parker stated that they attempted to identify the customer but were unsuccessful. Mr. Parker stated that have initiated new procedures to identify all customers on their receipts.	Status Licensee Notified Verified Method In Person Date Licensee Notified 01/07/2022
2 27 CFR 478.102(a): Failure to complete a NICS/POC background check ATF Forms 4473: 1 Number of Instances: 1	Execute a required NICS/POC background check for all future over-the-counter firearm transactions.	Mr. Parker stated that the sales associate believed the form had already been completed. Mr. Parker stated that they discovered the missing item during a weekly audit and immediately notified the ATF Columbus office. Mr. Parker stated that they attempted to identify the customer but were unsuccessful. Mr. Parker stated that have initiated new procedures to identify all customers on their receipts.	Status Licensee Notified Verified Method In Person Date Licensee Notified 01/07/2022

RECORD(S) OF CONVERSATION

Name	When Contacted	Method of Contact
	01/05/2022	In-Person
Phone	Location Contacted	
	61750 Southgate PKWY, Cambridge, Ohio 43725	
Investigative Participant(s)	Narrative	
No items	<p>Responsible Person and Store Manager John Parker stated that on December 1, 2021, an unknown customer purchased an [redacted] (b)(6) [redacted] and did not fill out an ATF Form 4473 or have a background check. Mr. Parker stated that the customer was looking at firearms at the gun counter and decided he wanted to purchase one. The sales associate called a manager to obtain a new in the box receiver from the vault because they don't sell the display models. The manger placed the receiver on the sales counter and left the area. The unknown customer picked up the receiver and went to the cash registered with ammunition firearms accessories and the receiver. The sales associate thought the manager completed the ATF F 4473. The sales associate rang up all the items and completed the sale with no ATF Form 4473 or background check and the customer left the store.</p> <p>On December 21, 2021, during a routine inventory they discovered the missing receiver. Going through their computer system they were able to match the item number and serial number to the receipt showing it was purchased on [redacted] (b)(6) [redacted] Mr. Parker contacted ATF Columbus Industry Operations to self-report the violation on December 21, 2021. Mr. Parker then contacted Rural King IT department to see if they could obtain a name because the unknown customer made the purchase with a card. Mr. Parker then contacted Card Services to try to identify the customer. Mr. Parker was told the only thing the card shows is the last four digits of a dual use card and there is no identifying information. Mr. Parker has a security camera picture of the customer and has shown it to all employee's, but nobody has been able to identify him.</p>	

CLOSING CONFERENCE

Attendee(s)

JOHN PAUL PARKER

WARNING CONFERENCE
Scheduling Letter

Assigned To

(b)(6)

Delivery Method
Certified Mail

Tracking Number
(b)(6)

Date Sent
03/04/2022

Date Delivered
03/04/2022

Certified Mail Return Slip

Attachment	Date/Time
[EXTERNAL] Re_ Please Respond Concerning your Federal Firearms License - WC Scheduling Letter_ RK HOLDINGS, LLP 4-34-06926.pdf	03/04/2022 10:34 AM

Conference Details

Warning Conference Lead
Judyth Ledoux

Conference Date/Time
03/10/2022 01:00 PM

Conference Address
230 West St, Unit Ste. 400, Columbus, Ohio 43215

Representing ATF
Judyth Ledoux (b)(6)

Responsible person(s) representing the licensee
JOHN PAUL PARKER

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

Follow-Up Letter Details

1. Violation of 27 CFR 478.124(a): Failure to execute an ATF F 4473
2. Violation of 27 CFR 478.102(a): Failure to complete a NICS/POC background check.

In response to the above violations, the sales associate broke the Standard Operating Procedures and was terminated. The licensee has initiated more training to associates to ensure ATF Forms 4473 and NICS background checks are conducted for each transaction. They have placed placards on the receivers on display and tags on the receivers in inventory identifying them as firearms. They have altered their SOP to ensure managers are present and observe the customers when they begin completing the ATF Form 4473. Licensee will continue with their self-audit program that caught this violation initially to identify any future problems. Licensee believes these changes and training will prevent this from happening in the future.

DIO LeDoux thanked the licensee for self-reporting the violations. DIO LeDoux discussed the seriousness of not conducting a NICS background check or completing an ATF Form 4473. DIO LeDoux advised the licensee that if such violations were to occur again, they could be subject to revocation of the license.

Follow-Up Letter

Delivery Method
Email

Type	Email
Business Email	(b)(6)
Additional Email	

Delivery Method

EXHIBITS
Inspection

Category	Attachment Name
Correspondence	Spartan Notification RE: 4-34-06926 Inspection Results
WarningConferenceFollowUpEmailConfirmation	EMAIL CONFIRMING RECEIPT OF DIO WC FOLLOW UP LETTER.pdf
Correspondence	
Correspondence	Action required concerning your Federal Firearms License
Correspondence	Action required concerning your Federal Firearms License
Correspondence	
WarningConferenceFollowUpLetter	Follow Up Letter.pdf
WarningConferenceLetterReturnSlip	[EXTERNAL] Re_ Please Respond Concerning your Federal Firearms License - WC Scheduling Letter_ RK HOLDINGS, LLP 4-34-06926.pdf
WarningConferenceSchedulingLetter	Scheduling Letter.pdf
Correspondence	Spartan Notification RE: 4-34-06926 Monitored Case
Correspondence	Spartan Notification RE: 4-34-06926 Monitored Case
Correspondence	Spartan Notification RE: 4-34-06926 Monitored Case
Correspondence	Spartan Notification RE: 4-34-06926 Monitored Case

Correspondence	Spartan Notification RE: 4-34-06926 Monitored Case
Correspondence	Spartan Notification RE: 4-34-06926 Monitored Case
OnSiteSummaryInformation	RK ATF F 4473-Mclear, Mark.pdf
Correspondence	Information Concerning Your Federal License/Permit
ClosingConferenceSummary	Acknowledgment of Regulations.pdf
LicenseeResponseToViolationsPDF	Licensee Response to Violations Report.pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
ZoningVerification	Cambridge Zoning.pdf
TradeNameVerification	Trade Name.pdf
PropertyOwnershipVerification	Guernsey County Auditor.pdf
BusinessVerification	OH SOS- Business_Details.pdf



March 1, 2022

WARNING CONFERENCE

RK HOLDINGS, LLP
RURAL KING
4216 DEWITT AVE
MATTOON, Illinois 61938-6643

Re: Federal Firearms License Number: 4-34-06926

RK HOLDINGS, LLP,

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 61750 SOUTHGATE PKWY, Unit N/A, CAMBRIDGE, Ohio 43725 on 1/5/2022 through 01/07/2022, 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 230 West St, Ste 400, Columbus, Ohio 43215 on 03/10/2022 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 [REDACTED] or me at [REDACTED] 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



March 10, 2022

WARNING CONFERENCE FOLLOW UP

RK HOLDINGS, LLP
RURAL KING
4216 DEWITT AVE
MATTOON, Illinois 61938-6643

Re: Federal Firearms License Number: 4-34-06926

RK HOLDINGS, LLP,

This letter is a follow-up to the warning conference held with you on March 10, 2022 at 1:00 PM. During this conference, the violations cited during the inspection conducted on 1/5/2022 through 1/7/2022, 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: Judyth Ledoux (b)(6)
Responsible person(s) representing the licensee: JOHN PAUL PARKER
Non-Responsible person(s) representing the licensee (b)(6)

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

1. Violation of 27 CFR 478.124(a): Failure to execute an ATF F 4473
2. Violation of 27 CFR 478.102(a): Failure to complete a NICS/POC background check.

In response to the above violations, the sales associate broke the Standard Operating Procedures and was terminated. The licensee has initiated more training to associates to ensure ATF Forms 4473 and NICS background checks are conducted for each transaction. They have placed placards on the display receivers identifying them as firearms. They have also attached tags to the receivers identifying them as firearms. They have altered their SOP to ensure managers are present and observe the customers when they begin completing the ATF Form 4473. Licensee will continue with their self-audit program that caught this violation initially to identify any future problems. Licensee believes these changes and training will prevent this from happening in the future.

DIO LeDoux thanked the licensee for self-reporting the violations. DIO LeDoux discussed the seriousness of not conducting a NICS background check or completing an ATF Form 4473. DIO LeDoux advised the licensee that if such violations were to occur again, they could be subject to revocation of the license.

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