

Firearms Inventory Procedures for FFLs

Adam P. Rogers Chief, Firearms Industry Programs Branch



Topics Covered

- ➤ Why Conduct an Inventory?
- ➤ How To Conduct an Inventory
- > Theft / Loss Reporting



Why conduct an inventory?

Lost firearms = Lost \$\$\$



ATF Reasons

Most commonly found violation: failure to timely record disposition information

For Fiscal Year 2010, 2,533 theft/loss reports totaling 26,095 firearms



An inventory ensures that:

- ☐ All firearms on the premises are properly recorded in the acquisition & disposition (A&D) records
- ☐ All open disposition entries found in the A&D record have a corresponding firearm found on the premises
 - •All dispositions have been properly recorded.

Account for all firearms on the business premises and all open entries in the A&D record.



To conduct a successful inventory:

- □ Take a physical count of firearms on the business premises.
 - Record information from the firearms on inventory sheet

Firearm to A&D Record

- ☐ Identify all open disposition entries in the A&D record.
 - Entries that do not have disposition information

A&D Record to Firearm

□ RECONCILE:

- Compare the inventory sheet to open dispositions, then reconcile the discrepancies.
 - All firearms listed on your physical inventory sheet(s) not found in the A&D record will have to be recorded as a receipt.
 - •Any open disposition entries in the A&D record, which do not have a corresponding firearm in inventory, must be recorded as a disposition if an ATF Form 4473 is found reflecting the transfer or if an invoice reflecting the transfer to another FFL is found. If not, the firearm must be reported lost/stolen.



Firearm to A&D Record



Firearm Information (478.122(a))						
Туре	Model	Caliber or Gauge	Manufacturer	Country of Manufacturer	Serial Number	
Rifle	SAIGA	7.62 x 39	IZHMASH	Russia	H04100582	













Firearm Information (478.122 (b))

Quantity	Type	Manufacturer	Country of Manufacturer	Caliber or Gauge	Model	Serial Number
1	Rifle	IZHMASH	Russia	7.62 x 39	SAIGA	H04100582

DISPOSITION TO LICENSEE

Name	License	Date of
	Number	transaction

DISPOSITION TO NONLICENSEE

Date	Name	Address or license No. if licensee, or Form 4473 Serial No. if Forms 4473 filed numerically



A&D Record to Firearm

Firearm Information (478.122(a))

Туре	Model	Caliber or Gauge	Manufacturer	Country of Manufacturer	Serial Number
Rifle	SAIGA	7.62 x 39	IZHMASH	Russia	H04100582

DISPOSITION TO NONLICENSEE				
Date	Name	Address or license No. if licensee, or Form 4473 Serial No. if Forms 4473 filed numerically		

DISPOSITION TO LICENSEE

Name License Number Date of transaction













U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Office of the Director

Washington, DC 20226

18 U.S.C. 923(g)(1)(A): RECORDS REQUIRED

27 CFR 478.22: ALTERNATE METHODS OR PROCEDURES

27 CFR 478.121: RECORDS REQUIRED

27 CFR 478.122: RECORDS MAINTAINED BY IMPORTERS

27 CFR 478.125: RECORDS OF FIREARMS RECEIPT AND DISPOSITION

27 CFR 478.129: RECORD RETENTION

ATF authorizes an alternate method or procedure from the firearms acquisition and disposition recordkeeping requirements of 27 CFR 478.122. Specifically, ATF authorizes licensed importers to consolidate their records of importation or other acquisition of firearms and their separate firearms disposition records, provided all of the requirements stated in this ruling are met.

ATF Rul. 2011-1

The Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) has received requests

<u>ATF Ruling 2011-1</u> authorizes licensed importers to consolidate their records of importation or other acquisition of firearms and their separate firearms disposition records, provided all of the requirements stated in this ruling are met.



What happens when a firearm ends up unaccounted for?

- 1. Call your local law enforcement agency to report the theft or loss. If the firearms are unaccounted for during inventory, you should make it clear to the authorities that there is no evidence of a crime and that the disposition of these firearms is unknown and may stem from a record keeping error.
- 2. Contact the ATF's Stolen Firearms Program Manager toll free at 1-888-930-9275. They can also assist in the preparation of the Theft / Loss Report for submission.
 - a. They will issue an ATF Incident Number.
- 3. Complete the **Federal Firearms Licensee Inventory Theft/Loss Report, ATF F 3310.11**, attach any continuation sheets (ATF F 3310.11a) necessary and mail it to ATF's National Tracing Center. Be sure to submit the original form(s) to ATF and retain copies for your records



OMB No. 1140-0039 (07/31/2012)

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Federal Firearms Licensee Firearms Inventory Theft/Loss Report

All entries must be in ink. Please read n	notices and instructions on	reverse carefully befor	re completing this form.		
Section A - Federal Firearms Licensed		, c. c. se ca. cjany ceja	e compressing maryer m		
Federal Firearms License Number 9-88-123-08-3B-90123		Federal Firearms (702) 555-1234	Federal Firearms Licensee Telephone Number (Include area code) (702) 555-1234		
Trade/Corporate Name Boomsticks, Inc.		18			
Street Address of Federal Firearms Licen 1234 Main Street	see	City Las Vegas	State Nevada		
		Zip Code 89109	Telephone Number (with area code) (705) 555-1234		
Full Name of Person Making Report Robert Smith			*		
Street Address of Person Making Report 1234 Main Street		City Las Vegas	State Nevada		
		Zip Code 89109	Telephone Number (with area code) (702) 555-1234		
Section B - Theft/Loss Information		1			
	Date	Time	Description of Incident		
Date of Theft/Loss Discovered	01/10/2011	11:00AM	Burglary		
Police Notification 01/10/2011		11:30AM	Larceny Missing Inventory ATF Issued Incident Number		
ATF Notification 01/10/2011		11:15AM	F20111234567		
Name of Local Authority to Whom Repo Las Vegas Metropolitan Police Departmen		or robbery, include the	police report number and officer/ detective name).		
Street Address of Local Authority		Theft Location if I	Theft Location if Different from FFL Premises		



Name of Local Authority to Whom Reported (For burglary, larceny or robbery, include the police report number and officer/detective name). Las Vegas Metropolitan Police Department Street Address of Local Authority Theft Location if Different from FFL Premises 3141 Sunrise Avenue City Zip Code Zip Code State City State Las Vegas 89101 Nevada Name and Telephone Number of the ATF Representative Notified (If this report is the result of an ATF compliance inspection, provide the name and telephone number of the ATF Inspector.) Industry Operations Investigator Adam Rogers, (702) 347-5930

Brief Description of Incident (e.g., How firearms were stolen, etc.):

Firearms discovered lost during a routine inventory.

Acquisition Date	Type	ms Manufacturer	Model	Caliber/ Gauge	Serial Number
12/01/2009	Rifle	Colt Industries	AR-15 SP1	.223	X25337
		4			4

Certification

I hereby certify that the information contained in this report is true and correct. I also understand that failure to report the theft or loss of a firearm from my inventory or collection within 48 hours of the discovery of the theft/loss is a violation of 18 U.S.C. § 923(g)(6) punishable as a felony.

Signature of Licensee	Date
	01/10/2011



U.S, Department of J Bureau of Alcohol, Te	Iustice obacco, Firearms ar	nd Explosives		al Firearms Lice tory Theft/Loss (omb No. 1140-0039 (07/31/201 nsee Firearms Continuation Sheet
Acquisition Date	Туре	Manufacturer	Model	Caliber/Gauge	Serial Number
	5,00				
	7				
	18		3		
		ion is true and correct. I also			eft or loss of a firearm from my
uthorized Signature				enemente en 1962 - Esperiorio de proposicio de 1965 de	Date
Note: Forward origina	ıl to ATF, and keep	a copy for your permanent r	ecords.		ATF E-Form 3310.11 Revised June 2003



Submit forms to:

Bureau of Alcohol, Tobacco, Firearms and Explosives National Tracing Center

Attn: ATF Stolen Firearms Program

244 Needy Road

Martinsburg, West Virginia 25405 USA

Voice (888) 930-9275



Reporting firearms lost or stolen:

A firearm would be considered **lost** in cases where there is no indication of a crime (reconciliation of inventory)

A firearm would be reported **stolen** in cases involving evidence of a crime (burglary, larceny, robbery).

Each licensee shall report the theft or loss of a firearm from their inventory within 48 hours after the theft or loss is discovered. The clock begins to tick when you are reasonably certain that the firearm is missing.



Reporting continued:

Licensees must make a corresponding entry in the A&D records whenever a theft/loss report is made.

Enter "stolen" or "missing" as appropriate, the date of theft or loss, and the ATF Incident Report number in the disposition column of the A&D record.

Retain Form 3310.11 and 3310.11a for 5 years from the date the theft or loss is reported to ATF.

Licensees reporting theft/loss of firearms registered under the National Firearms Act (NFA) must provide written notification to the NFA Branch.



Review

Inventory

Comparison of:

inventory to records (Firearm to A&D Record)

records to inventory (A&D Record to Firearm)

Reconcile

For unaccounted for firearms:

File Theft/Loss Report

- -48 hours upon discovery
 - -Call ATF, incident number
 - -Call local police, report number
- -Enter in to A&D record as missing or stolen



Adam P. Rogers Chief, Firearms Industry Programs Branch

Bureau of Alcohol, Tobacco, Firearms and Explosives 99 New York Avenue, NE Mailstop 6.N-672 Washington, DC 20226

Phone: (202) 648-7190