

**NSSF**<sup>®</sup>  
The Firearm Industry  
Trade Association

# MAXIMIZING COMPLIANCE – KEY INSIGHTS FROM NSSF CONSULTANT SITE VISITS

**2026 Firearm Industry  
Compliance Series**



# Additional Educational Resources



Industry Compliance Courses & More!

- Firearm E-Commerce Blueprint
- Unlocking Success in the NFA Space
- Winning at ATF Inspections
- Completing the Form 4473
- Multiple Sales Report

[NSSF.org/Education](https://www.nssf.org/education)



# NSSF Premium Retail Membership

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- Top Tier Membership for Firearm Retailers available to any qualifying NSSF retailer member with an FFL who is not under ATF administrative actions.
- Cost \$750 annually for unparalleled protection and benefits.
- **FFL Compliance Consultant Visit and on-going support.**
- Legal Defense Fund: Maximum \$25,000 lifetime benefit should ATF take administrative action against your FFL.

# NSSF Site Visit-What We Cover

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## Mock ATF Audit Review

- Qualifying Documents
- ATF Inspection History
- Premise Security
- Firearm Thefts and Losses
- Employee Hiring and Training
- Internal Controls
- General Retail Operations: Range, Retailer, Gunsmith, Auctioneer, etc.
- Gun Shows and Qualifying Events
- FFL Transfers
- Government & Law Enforcement Sales
- A&D Records
- Inventory Verification
- ATF Form 4473s
- Multiple Handgun/Rifle Reports
- Firearm Trace Requests
- NFA Operations
- Conduct of Business Requirements

# NSSF Site Visit-What We Cover

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- ✓ **Qualifying Documents**
  - Ensure FFL and any State or local licenses to conduct business are posted.
  - Determine if there have been changes requiring an amended or new FFL.
  - Determine if there are new responsible persons who need to be added to your FFL and reported to ATF.
- ✓ **ATF Inspection History**
  - Review Inspection History and ATF's Administrative Action Policy.
- ✓ **Premise Security**
  - Discuss security measures and NSSF Operation Secure Store checklist and training video.

# NSSF Site Visit-What We Cover

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- ✓ **Firearm Thefts and Losses**
  - Cover reporting requirements for thefts and losses –
  - Call ATF's Stolen Firearms Program Manager toll free at [1-888-930-9275](tel:1-888-930-9275).
  - ATF Form 3310.11. Email: [StolenFirearms@atf.gov](mailto:StolenFirearms@atf.gov) or Fax: [\(304\) 260-3671](tel:(304)260-3671)
- ✓ **Employee Hiring and Training**
  - Discuss hiring and training protocols.
- ✓ **Internal Controls**
  - Assessment of internal control strengths & weaknesses.
  - Standard Operating Procedures.

# NSSF Site Visit-What We Cover

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- ✓ **General Retail Operations**
  - **Conduct of Business.** Is license proper for operations conducted?
- ✓ **Gun Shows and Qualifying Events**
  - **Extension of business premises/Participation.**
- ✓ **FFL Transfers**
  - **Verification of FFL, ATF FFL EZ-Check, Shipping & Receiving.**
- ✓ **NFA Operations**
  - **Review with SOT payers.**

# NSSF Site Visit-What We Cover

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- ✓ **Government & Law Enforcement Sales**
  - Procedures on how to conduct.
- ✓ **Firearm Trace Requests**
  - Requirements to respond to firearm traces.
- ✓ **Multiple Sales of Pistols and Revolvers and Certain Rifles**
  - Requirement to submit ATF Forms 3310.4 and 3310.12.
- ✓ **Mock Inspection/Audit**
  - A&D Records Review.
  - Firearms Inventory Verification.
  - ATF Forms 4473s Review.

# NSSF Site Visit-What We Find

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## A&D Records:

- Failure to record both the foreign manufacturer and U.S. Importer's name for imported firearms (applies to ATF Form 4473 as well).
- Record not compliant with ATF Final Ruling 2021R-05F effective August 24, 2022 – does not include “Privately Made Firearm” or “PMF.”
- Incorrectly recording the “type,” “model,” or “serial number” of the firearm.
- Failure to record the disposition of a firearm.
- Maintaining a paper Gunsmithing record when FFL has a digital program for all other firearms.
- Not segregating firearms by activity, e.g., retail sales, gunsmithing, manufacturing, NFA, etc.

# NSSF Site Visit-What We Find

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## ATF Forms 4473:

- Printed Forms stapled where the responses to question 21 on the 2<sup>nd</sup> page cannot be seen.
- 4473 hole punched to place in a 3-ring binder.
- Forms not filed in chronological, numerical or alphabetical order.
- Failure to upload corrected Forms 4473 page(s) when storing forms digitally.
- Failure to upload Forms 4473 continuation sheet and multiple handgun/certain rifles reports (Forms 3310.4 and 3310.12).
- Untimely resolution of errors on the Form. What if the customer will not come back?

# NSSF Site Visit-What We Find

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## **ATF Forms 4473 (Buyer/Transferee's Responsibility):**

### **Section B:**

- **Reverses first and last name or does not record "IO" or "NMN" for middle initial only or no middle name.**
- **Misspellings or abbreviations not accepted by USPS (POB, County, etc.).**
- **Indicates they are prohibited or straw purchaser by answers to questions 21a-n.**
- **Not recording AR#, USCIS # or 194# when not a U.S. Citizen.**
- **Certification date is incorrect.**

### **Section D:**

- **Recertifies when not required.**
- **Fails to recertify when required.**

# NSSF Site Visit-What We Find

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## ATF Forms 4473 (Seller/Transferor's Responsibility):

### Section A:

- Incorrectly recording the description of the firearm.
- Not recording the total number of firearms transferred.

### Section C:

- ID expiration date is incorrect.
- Failure to record supplement government issued documentation when required or recording information incorrectly.
- NICS information incorrect, e.g., no date of contact, no NTN, no initial response, no response received within 3 or 10 business days when firearm(s) transferred.
- Failure to record the response provided by NICS.

### Section E:

- Failure to complete or incorrectly completed.
- Failure to properly sign digital Form 4473.

# NSSF Site Visit-What We Find

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## Multiple Sale or Other Disposition of Pistols and Revolvers or Certain Rifles for SWB States:

- **Untimely Submission.**
- **Failure to Report.**
- **Not attaching to or uploading with the ATF Form 4473.**

## Inventory Verification:

- **Failing to conduct firearm inventory audits.**

## NICS:

- **Accepting a CCW or Concealed Carry Permit after NICS has been contacted and provided a delayed response.**

# NSSF Site Visit-What We Find

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## FFL Transfers:

- Firearm shipped to FFL with no Identification of purchaser or FFL who shipped it.
- FFL shipping firearm to other FFLs without first obtaining a copy of the receiving FFLs license.
- NFA firearm shipped with no registration paperwork.
- Placing unobstructed copies of FFL in shipping container.

## Conduct of Business:

- No SOPs or Training Protocols.
- Failure to ensure employees are not prohibited from possessing/handling firearms.
- Failing to mitigate violations cited in previous ATF inspections.
- No YHSA ([ATF I 5300.1](#)) poster in store and/or no YHSA tri-folds ([ATF I 5300.2](#)) that need to be provided to handgun purchasers.

# NSSF Site Visit-What We Find

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## FFL Firing Ranges:

- Failure to ensure rental firearm returned is same firearm that was rented.
- Failing to conduct the OSHA lead dust and noise exposure monitoring withing employee's breathing and hearing zones.

# NSSF Premium Retail Membership

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- ❖ FFL Compliance Hotline 855-FFL-NSSF (855-335-6773) or via email [fflhotline@nssf.org](mailto:fflhotline@nssf.org)
- ❖ Acquisition and Disposition Record Books
- ❖ Industry Research
- ❖ SHOT Show Benefits
- ❖ Discounts to retailer seminars and SHOT University
- ❖ Discounts on:
  - ❖ POS software,
  - ❖ Website / e-commerce
  - ❖ property and casualty insurance,
  - ❖ employee background checks,
  - ❖ credit-card processing,
  - ❖ security systems and display cases
- ❖ Toolkits
  - ❖ Don't Lie for the Other Guy
  - ❖ Operation Secure Store – Security Risk Self-Assessment
  - ❖ Suicide Prevention

## NSSF Member Benefits for Retailers

- Compliance Hotline
- SHOT University Online
- Discounts to Live Events including SHOT Show (first buyer badge is free - additional registrations discounted)
- Member Benefit Provider Discounts
- Access to Programs Such as First Shots

[nssf.org/membership/join/](https://nssf.org/membership/join/)

## NSSF Compliance Consultant Team

### ATF Consultants



**Judy Bender**  
judybender73@gmail.com  
630-418-0141



**Harry McCabe**  
harry@mccabeconsultingllc.com  
931-505-3638



**Andrew Graham**  
andy@grahamia.com  
720-670-0096



**Bill Napier**  
lpcbill@gmail.com  
308-249-0131



**Wally Nelson**  
nels4947@outlook.com  
703-505-2617



**Judyth Ledoux**  
ledoux.judyth@gmail.com  
202-528-9465

### CA DOJ Consultant



**Renee Lewis**  
rlewis.consultant@gmail.com  
916-717-5304

### OSHA Consultant



**Dale Krupinski**  
oshacoach@ontargetsafetyacademy.com  
303-351-7915

### Federal Excise Tax Consultant



**Richard M. Weimer**  
akrich246@yahoo.com  
704-641-0531

[Meet The Team](#)



