



14 Ways You Can Get Your FFL Revoked in 2026

**Plus significant policy changes
under the Trump Administration
and 2025 ATF inspection results**



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



OBJECTIVES

- Overview of ATF Compliance Inspection Statistics over the past 5 years**
- Significant Changes by the Current Administration that have positively affected the firearms industry**
- ATF Policy Changes**
- The 14 “Willful” Violations that can result in a recommendation to revoke your license**
- Top 10 Violations cited by ATF and Best practices to avoid them**

FACTS: ATF STATISTICS

During the Biden-Harris administration, FFL revocations and surrender of licenses was at an all time high. From 2021-2024, ATF revoked 445 FFLs, and 1,661 surrendered their licenses.

FACTS: ATF STATISTICS

In 2025 ATF conducted 8,473 compliance inspections with the following results:

No Violations	4,604
Report of Violations	1,553
Warning Letters	667
Warning Conferences	547
License surrendered/out of business	912
Revocations	89
Other dispositions	91

ADMINISTRATION CHANGES

In 2025, under the Trump administration, there are many significant changes that have positively affected the firearms industry, ATF policies, and individual 2nd Amendment rights.

ADMINISTRATION CHANGES

- **February 6, 2025:** Trump EO “Unleashing Prosperity through Deregulation” (10 for 1 Rule), and 2017 EO “Enforcing the Regulatory Reform Agenda” reinstated.
- **February 7, 2025:** Trump EO “Protecting Second Amendment Rights” called for review of Biden’s Zero Tolerance Policy and ATF’s Enhanced Regulatory Enforcement Policy (EREP); review of ATF Ruling 2021R-08F, reclassifying pistols with stabilizing arm braces as SBRs, and ATF Ruling 2022R-17F amending definition of “engaged in the business.”
- **July 4, 2025 – H.R.1:** “One Big Beautiful Bill Act” proposed to eliminate \$200 transfer tax on silencers, short barreled rifles and shotguns, and Any Other Weapons.

ATF POLICY CHANGES

February 6, 2025: Executive Order “Enforcing the Regulatory Reform Agenda” reinstated.

- ATF named a POC to support and enhance ATF’s relationship with the industry, associations and their representatives by providing technical support and expertise, and to respond to inquiries on obscure issues. Send emails to industryliaison@atf.gov.

February 7, 2025 – Executive Order 14206 “Protecting Second Amendment Rights.”

- April 7, 2025, Biden’s 2021 “Zero Tolerance Policy” and ATF’s “Enhanced Regulatory Enforcement Policy” repealed.

ATF POLICY CHANGES

May 6, 2025: ATF Replaces their Administration Action Policy

PURPOSE: ATF Order that provides fair and consistent guidelines for administrative remedies for violations committed by FFLs.

BACKGROUND: The Order identifies baseline policy guidelines for administrative action.

ADMINISTRATIVE ACTION: Revocation, imposition of a civil fine, suspension or denial of a new or renewal application for a Federal Firearms License.

14 WAYS YOU CAN GET YOUR FFL REVOKED IN 2026

1. Transferring a firearm to a prohibited or underage person
2. Refusing to comply with background check provisions
3. Failure to create or discontinue to use required records
4. Falsifying records or make a fictitious or false written statement in required records
5. Transferring a firearm knowing that the transferee is not the actual buyer (i.e. a straw purchase)
6. Repeatedly failing to respond to trace requests

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7. Repeatedly refusing ATF right of entry and inspection during normal business hours
8. Allowing an employee who is prohibited to possess firearms while knowing or having reasonable cause to know the employee is prohibited
9. Failing to execute or use a 4473 for transfers to a non-licensee
10. Repeatedly failing to appropriately mark imported or manufactured firearms

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- 11. Possessing a firearm with an obliterated serial number**
- 12. Repeatedly conducting business at a location not authorized as an extension of the licensed business premises**
- 13. Failing to record the disposition of firearms in the A&D record (i.e. missing firearms after inventory reconciliation – no record of disposition, required or otherwise) and the violations are extensive and systemic**
- 14. Failing to timely report theft or loss of firearm(s) to ATF and local LE after being cited in a prior inspection**

ATF POLICY CHANGES

July 4, 2025 – H.R.1 – “One Big Beautiful Bill Act”

- On January 1, 2026, the \$200 tax stamp requirement is eliminated for silencers, SBRs, SBSs, and AOWs.
- Transfer tax remains in place for machine guns and DDs.
- Silencers, SBRs, SBSs, and AOWs are still regulated under the NFA and registration requirements stay the same.
- Form(s) still required for making or transferring.
- Must submit fingerprints, photo, and undergo background check.
- Wait for ATF approval/registration prior to transfer.

ATF POLICY CHANGES

- **October 1, 2025 – ATF Form 5320.20, Application to Transport Interstate or to Temporarily Export Certain NFA Firearms and, ATF Form 5630.7, Special Tax Registration and Return are now included in ATF's e-Form system and can be submitted electronically.**
- SOT will still be required from all FFLs.
- **October 25, 2025 – Proposed changes to Form 1, 4, and 5 to include, but not limited to:**
 - Allow option to attach passport style photo or copy of a photo ID document.
 - Allowing different types of electronic signatures
 - Removed CLEO notification requirement

ATF LEADERSHIP

On November 18, 2025, President Trump nominated Deputy Director Robert Cekada to serve as the next ATF Director. He is currently Acting ATF Director.

Cekada has served as ATF's Deputy Director since April 2025. He has over 30 years experience as a career professional in law enforcement, working in various positions within ATF and with major Police Departments prior to ATF.



TOP 10 VIOLATIONS CITED BY ATF IN 2025

27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearm	41,580
27 CFR 478.123(b): Failure to maintain an accurate/complete/timely licensee disposition record	7,028
27 CFR 478.123(a): Failure to maintain an accurate/complete/timely manufacture or acquisition record	5,719
27 CFR 478.21(a): Failure to complete forms as prescribed	31,037
27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473	23,433
27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473	14,796
27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473	10,371
27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473	7,184
27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers	6,659
27 CFR 478.124(c)(4): Failure to record firearm information on an ATF F 4473	5,647
Grand Total:	153,454

27 CFR 478.125(e)-dealers, 27 CFR 478.123(a)-importers and (b)-mfr's

- Failure to maintain an accurate/complete/timely acquisition and disposition record
 - Not recording the acquisition of a firearm by COB the next business day
 - Not recording the disposition of a firearm within seven days
 - Recording incorrect firearm description, e.g., transposing firearm SN
 - Not recording all required information
 - A&D record not in the correct format

27 CFR 478.21(a)

- Failure to complete forms as prescribed
 - Missing information
 - Leaving blocks blank when information or response required
 - Incorrect information
 - Using abbreviations that are not recognized by USPS
 - Not recording complete information

27 CFR 478.124(c)(1)

- Failure to obtain a completed ATF F 4473
 - Form is missing
 - You did not complete a form or run a background check when returning a consigned firearm to its owner, or a return to owner when facilitating a private party transfer

27 CFR 478.124(c)(3)(iv)

- Failure to record NICS contact information on an ATF F 4473
 - Record information immediately while on the phone or upon receipt of the NICS e-Check response
 - Good practice to print and retain NICS e-Check responses

27 CFR 478.124(c)(5)

- Failure by transferor to sign or date the ATF F 4473
 - Make sure to sign and date the form in Section E

27 CFR 478.124(c)(3)(i)

- Failure to verify or record Identification Document on an ATF F 4473
 - Valid Government issued photo ID
 - Supplemental documentation may be required if name or address on ID is not the same as recorded on the ATF F 4473

27 CFR 478.126a

- Failure to report the multiple sale or other disposition of pistols and revolvers
 - ATF F 3310.4
 - Two or more handguns purchased by the same individual within 5 consecutive business days-your business days
 - Submitted to ATF NTC and local LE
 - Not required for pawns or consignments

27 CFR 478.124(c)(4)

- Failure to record firearm Information on an ATF F 4473
 - Must be completed by FFL first
 - Essential to trace a firearm



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2026**

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- Strategies for Selling Your Business
- Marketing
- Media Relations
- Staff Training
- And More

Strengthen Your **Knowledge Base**
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NEW RESOURCE

EMPLOYEE TRAINING LOG

SHOT UNIVERSIT

For additional training and educational resources, please visit nssf.org/membership/nssfs-shot-university-online/

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/

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QUESTIONS?