

NSSF[®]
The Firearm Industry
Trade Association

Bulletproof Compliance: Mastering ATF Compliance

**Actionable & Effective Quick Tips –
Help Ensure Your Compliance
Efforts Are Bulletproof**



Additional NSSF Compliance Resources

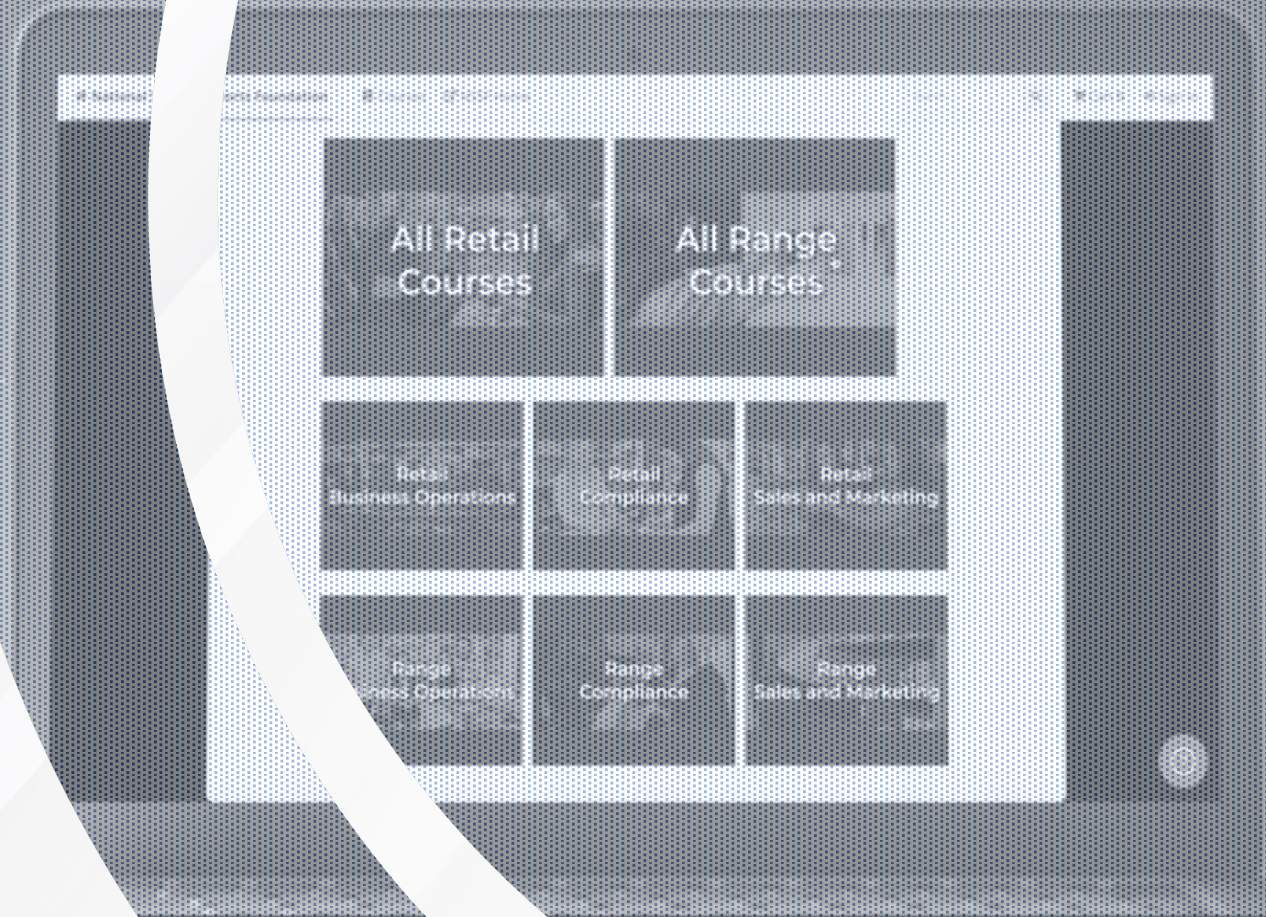
NSSF[®]
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Trade Association

SHOT
UNIVERSITY[™]
NSSF[®] online

Industry Compliance courses:

- “Zero Tolerance” Policy
- Winning at ATF Inspections
- Completing the Form 4473
- Multiple Sales Report
- and more

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





NSSF RANGE-RETAILER

BUSINESS EXPO™

TIME TO **RELOAD**

JULY 10-11, 2024

AN OFFICIAL EVENT OF:

NSSF
The Firearm Industry
Trade Association

WEST PALM BEACH, FL

NSSF's Range-Retailer Business Expo is designed to load retailers and range operators with the equipment, strategies and inspiration essential for success. Held in July, it's the perfect time to reconsider sales strategies, reload inventories and meet with leading manufacturers to have big conversations in a small setting.

REGISTER AT RRBExpo.org

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WHAT'S NEW?

REVISED 4473

REQUIRED: February 1, 2024

“REVISED AUGUST 2023”

STATE LAW UPDATES

- ⊕ Michigan
- ⊕ Washington
- ⊕ Oregon
- ⊕ Illinois
- ⊕ Colorado

The screenshot displays the NSSF website. At the top left is the NSSF logo with the text "The Firearm Industry Trade Association". To the right is the SHOT SHOW logo, a green target with "SHOT SHOW" written across it, and "AN NSSF EVENT" below. A navigation bar contains links for "Retailers", "Ranges", "Manufacturers", and "Media". The main content area features a background image of the U.S. Capitol building with the text "GOVERNMENT RELATIONS" overlaid. At the bottom is a footer with links for "Home", "Legislative Action Center", "Fact Sheets & Backgrounders", and "Economic Impact Data".

THE ATF
DEADLY SINS !

ATF **9** **DEADLY** **SINS**

- 1. Transferring A Firearm To A Prohibited Person**
- 2. Failing To Conduct A Required Background Check**
- 3. Falsifying Records, Such As A Firearms Transaction Form**
- 4. Failing To Respond To A Trace Request**
- 5. Refusing To Permit ATF To Conduct An Inspection**
- 6. Failure To Account For Firearms**
- 7. Failure To Verify And Document Buyer Eligibility**
- 8. Failure To Maintain Records Needed For Successful Firearms Tracing**
- 9. Failure To Report Multiple Sales Of Handguns (or Long Guns in Border States)**

REMEMBER !

ADMINISTRATIVE ACTION

**REPEAT VIOLATIONS
ARE WILLFUL !**

ADMINISTRATIVE ACTION

RECALL INSPECTION

ATF F 4473

QUICK TIPS!

**DON'T DISCOUNT
DOUBLE CHECK !**

BEFORE THE TRANSFER !

WHAT

RIGHT

TO DO

NOW!

HIGHLIGHT IT or CALL IT OUT!

Section B - Must Be Completed Personally By Transferee/Buyer

9. Transferee's/Buyer's Full Name (If legal name contains an initial only, record the initial followed by "IO" in quotes. If no middle initial or name, record "NMN".)

Last Name (including suffix, e.g., Jr, Sr, II, III)

First Name

Middle Name

10. Current State of Residence and Address (U.S. postal abbreviations are acceptable. Cannot be a post office box.)

Number and Street Address

City

Reside in City Limits?

Yes No Unknown

State

ZIP Code

County/Parish/Borough

11. Place of Birth

U.S. City and State

-OR-

Foreign Country

12. Height

Ft. _____

In. _____

13. Weight

(lbs.)

14. Sex

Male

Female

Non-Binary

15. Birth Date

Month

Day

Year

16. Social Security Number (optional, but will help prevent misidentification)

17. Unique Personal Identification Number (UPIN) or Appeals Management Database Identification (AMD ID) (if applicable)

18.a. Ethnicity

Hispanic or Latino

Not Hispanic or Latino

18.b. Race (Select one or more race in 18.b. Both 18.a. and 18.b. must be answered.)

American Indian or Alaska Native

Asian

Black or African American

Native Hawaiian or Other Pacific Islander

White

19. Country of Citizenship: (Check/List more than one, if applicable. Nationals of the United States may check U.S.A.)

United States of America (U.S.A.)

Other Country/Countries (Specify):

20. If you are an alien, record your U.S.-issued alien or admission number (AR#, USCIS#, or I94#):

ONLY EXCEPTION!

Section B - Must Be Completed Personally By Transferee/Buyer

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Number and Street Address

City

Reside in City Limits?

Yes No Unknown

State

ZIP Code

County/Parish/Borough

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U.S. City and State

-OR-

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Not Hispanic or Latino

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American Indian or Alaska Native

Black or African American

White

Asian

Native Hawaiian or Other Pacific Islander

19. Country of Citizenship: (Check/List more than one, if applicable. Nationals of the United States may check U.S.A.)

United States of America (U.S.A.)

Other Country/Countries (Specify):

20. If you are an alien, record your U.S.-issued alien or admission number (AR#, USCIS#, or I94#):

HIGHLIGHT IT or CALL IT OUT!

I certify that my answers in Section B are true, correct, and complete. I have read and understand the Notices, Instructions, and Definitions on ATF Form 4473. I understand that answering “yes” to question 21.a. if I am not the actual transferee/buyer is a crime punishable as a felony under Federal law, and may also violate State and/or local law. I understand that a person who answers “yes” to any of the questions 21.b. through 21.l. as well as 21.n. is prohibited from receiving, possessing, or purchasing a firearm. I understand that a person who answers “yes” to question 21.m.1. is prohibited from receiving or possessing a firearm, unless the person answers “yes” to question 21.m.2. and provides the documentation required in 26.d. I also understand that making any false oral or written statement, or exhibiting any false or misrepresented identification with respect to this transaction, is a crime punishable as a felony under Federal law, and may also violate State and/or local law. I further understand that the repetitive purchase of firearms for the purpose of resale to predominantly earn a profit without a Federal firearms license is a violation of Federal law.

22. Transferee's/Buyer's Signature

23. Certification Date

Month

Day

Year

NOT YOUR BIRTH DATE!

MOST COMMON PITFALLS!

ONLY WHAT'S REQUIRED!

26.a. Identification (e.g., Virginia driver's license (VA DL) or other valid government-issued photo identification including military ID.)

Issuing Authority and Type of Identification	Number on Identification	Expiration Date of Identification (if any)		
		Month	Day	Year

26.b. Supplemental Government Issued Documentation (if identification document does not show current residence address or legal name)

ISSUING AUTHORITY AND WHAT IT WAS!	NO EXPIRATION DATES NO CONTROL NUMBERS
------------------------------------	--

26.c. Official Military Orders Establishing Permanent Change of Station (PCS):

PCS Base, City and State:	PCS Effective Date:	PCS Order Number (if any):

26.d. Exception to the Nonimmigrant Alien Prohibition: If the transferee/buyer answered "yes" to 21.m.2. record the type of documentation showing the exception to the prohibition and attach a copy to this ATF Form 4473:

--

MILITARY MEMBER PCS ORDERS

26.a. Identification (e.g., Virginia driver's license (VA DL) or other valid government-issued photo identification including military ID.)

Issuing Authority and Type of Identification	Number on Identification	Expiration Date of Identification (if any)		
		Month	Day	Year

26.b. Supplemental Government Issued Documentation (if identification document does not show current residence address or legal name)

--

26.c. Official Military Orders Establishing Permanent Change of Station (PCS):

PCS Base, City and State:	PCS Effective Date:	PCS Order Number (if any):

MILITARY ID MUST BE USED!

NON-IMMIGRANT ALIEN

26.d. Exception to the Nonimmigrant Alien Prohibition: If the transferee/buyer answered “yes” to 21.m.2. record the type of documentation showing the exception to the prohibition and attach a copy to this ATF Form 4473:

MOST COMMON EXCEPTION IS A VALID HUNTING LICENSE A PHOTOCOPY IS REQUIRED TO BE ATTACHED

ATTACH A PHOTOCOPY OF THE EXCEPTION

NICS EXEMPTION – LTC/CCW MUST BE VALID (5 YRS)!

29. No NICS check is required because the transferee/buyer has a valid permit from the State where the transfer is to take place, which qualifies as an exemption to NICS.

Issuing State and Permit Type

Date of Issuance (if any)

Expiration Date (if any)

Permit Number (if any)

**NO OUT-OF-STATE RESIDENTS!
POLICE CREDENTIALS DO NOT QUALIFY!**

BACKGROUND CHECK

27.a. Date the transferee's/buyer's identifying information in Section B was transmitted to NICS or the appropriate State agency:

Month

Day

Year

27.b. The NICS or State transaction number (if provided) was:

VS.

CONCEALED CARRY PERMIT | LTC/CCW

29. No NICS check is required because the transferee/buyer has a valid permit from the State where the transfer is to take place, which qualifies as an exemption to NICS.

Issuing State and Permit Type

Date of Issuance (if any)

Expiration Date (if any)

Permit Number (if any)

BACKGROUND CHECK

27.a. Date the transferee's/buyer's identifying information in Section B was transmitted to NICS or the appropriate State agency:

Month | Day | Year

27.b. The NICS or State transaction number (if provided) was:

NO!

NO!

NO!

CONCEALED CARRY PERMIT | LTC/CCW

29. No NICS check is required because the transferee/buyer has a valid permit from the State where the transfer is to take place, which qualifies as an exemption to NICS.

Issuing State and Permit Type

Date of Issuance (if any)

Expiration Date (if any)

Permit Number (if any)

OUT OF STATE RESIDENTS RULES OF BOTH APPLY !

- ⊕ **LICENSE/PERMIT TO PURCHASE OR FOID CARD**
- ⊕ **FIREARM TYPE RESTRICTIONS**
- ⊕ **FIREARM PURCHASE AGE RESTRICTIONS**
- ⊕ **STATE WAIT PERIODS**
- ⊕ **FIREARM SAFETY CERTIFICATION VERIFICATION**

DELAYED

TRANSACTIONS

30 DAYS !

HIGHLIGHT IT or CALL IT OUT!

I certify that all of my responses in Section B of this form are still true, correct, and complete.

30. Transferee's/Buyer's Signature

31. Recertification Date

Month	Day	Year
_____	_____	_____

AVOID EXPIRED NICS/POC!

#32 = STORY BOX

HIGHLIGHT IT OR CALL IT OUT!

Section E - Must Be Completed By Transferor/Seller

32. For Use by Licensee

NICS | POC TRANSACTION EXPIRATION DATE: XX/XX/XXXX

33. Trade/corporate name and address of transferor/seller and Federal Firearm License Number (must contain at least first three and last five digits X-XX-XXXXX; hand stamp may be used)

NICS | POC EXPIRATION DATE

TRANSACTION WATCHTOWER

KEEPING AN EYE ON DELAYS

- ⊕ **Day 1 Starts on Day 0 = 1 Day Grace Period**
- ⊕ **Paper Forms = 3 Tier Filing System**
- ⊕ **Opening Manager – Review Report Daily**
- ⊕ **Delayed Transaction Log**
- ⊕ **Require Manager Approval To Transfer**
- ⊕ **DO ANYTHING TO STOP AN EXPIRED DELAY!**

**ATF FORM 4473
REQUIRED ATTACHMENTS**

WHAT'S REQUIRED?

- ⊕ ATF FORM 3310.4 – MULTIPLE HANDGUN SALE
- ⊕ *ATF FORM 3310.12 – MULTIPLE LONG GUN (*BORDER STATES)*
- ⊕ ATF FORM 4473 CONTINUATION SHEET
- ⊕ OVERTURN LETTER DOJ | POC (AMDID)
- ⊕ NON-IMMIGRANT ALIEN EXEMPTION – HUNTING LICENSE
- ⊕ PERJURY STATEMENT – PURCHASING FOR ENTITY/ASSOC
- ⊕ CORRECTIONS **POST**-TRANSFER

**ATF FORM 4473
NOT REQUIRED**

WHAT'S NOT REQUIRED?

- ⊕ DRIVERS LICENSE OR IDENTIFICATION
- ⊕ CONCEALED CARRY PERMIT
- ⊕ SUPPLEMENTAL DOCUMENT – VERIFY ADDRESS/IDENTITY
- ⊕ PCS ORDERS – MILITARY MEMBER
- ⊕ NICS | POC BACKGROUND CHECK RESPONSE
- ⊕ POINT OF SALE RECEIPTS
- ⊕ ATF FORM 3 & 4 – NFA FIREARMS TRANSFER

KEEP THAT “BUDDY FILE”!

WHY IS THIS IMPORTANT?

15 SECONDS!



ATF FIREARMS COMPLIANCE INSPECTION

- ⊕ We want the ATF Form 4473 to be NAKED!
- ⊕ **REMOVE ANYTHING THAT IS NOT REQUIRED!**
- ⊕ IOI should be able to Review 1 Form Every 00:00:15-ish
+ **00:00:15 = 240 Forms per Hour**
- ⊕ **EX: 5000 Forms / 240 = 20.83 Hours (Roughly 3-4 Days!)**

TRXN's / 240 = # of Hours

**ADD'L RECOMMENDED
STRATEGIES**

ADD'L STRATEGIES...

- ⊕ TRAINING & COMMUNICATIONS LOG
- ⊕ DENIED TRANSACTION PROGRAM – STRAW PREVENTION
- ⊕ A&D RECORD ANALYSIS – DIVERSION IDENTIFICATION
- ⊕ TRACE REQUEST LOG + ANALYSIS
- ⊕ NICS PRINT DETAIL & SEARCH HISTORY
- ⊕ POC STATE SUMMARY REPORTS
- ⊕ IN NOTHING ELSE... CREATE A BACKGROUND CHECK LOG

ATF COMPLIANCE INSPECTION

WHAT TO EXPECT...

- ⊕ **100% Inventory Verification – Open Dispositions**
- ⊕ **A&D Record Review – Properly Completed**
- ⊕ **A&D Record vs ATF F 4473 – Comparison**
- ⊕ **NICS/POC Summary Report – ATF F 4473 Comparison**
 - + **60 Days of NICS/POC Transactions - MINIMUM**
 - + **Verification of ATF F 4473**
- ⊕ **ATF Form 4473 Review**
 - + **Transferred & Denied Firearms Transactions**
 - + **Accurate & Complete**
 - + **Straw Purchase & Diversion Analysis**

ATF ARRIVAL + OPENING/CLOSING CONFERENCES

★ DON'T REFUSE ENTRY – BE WELCOMING!

- Set them up in a Comfortable Spot – Off the Sales Floor!
- **Be Prepared – Be Organized! – Records & Inventory**

★ The ASK...

- Ask if ATF would “Flag & Notate” any violations identified (ATF F 4473)
 - You're asking because... **You want the ability to ensure you can “Train Staff”!**
- Ask if they would review each day's findings prior to leaving.

★ End of Inspection

- Ask if they would provide a “DRAFT” Copy of Report of Violations
 - We want it **PRIOR** to the **INSPECTION CLOSING CONFERENCE**
 - You want to formulate your **LICENSEE RESPONSES!**

★ REMEMBER – IT AIN'T OVER, UNTIL IT'S OVER!

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THANKS!

