

NSSF[®]

*The Firearm Industry
Trade Association*

Farewell Zero Tolerance – Now What?

ATTENTION FFLs:
The Rules Just Changed
– Are You Ready?



Additional NSSF Compliance Resources



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)



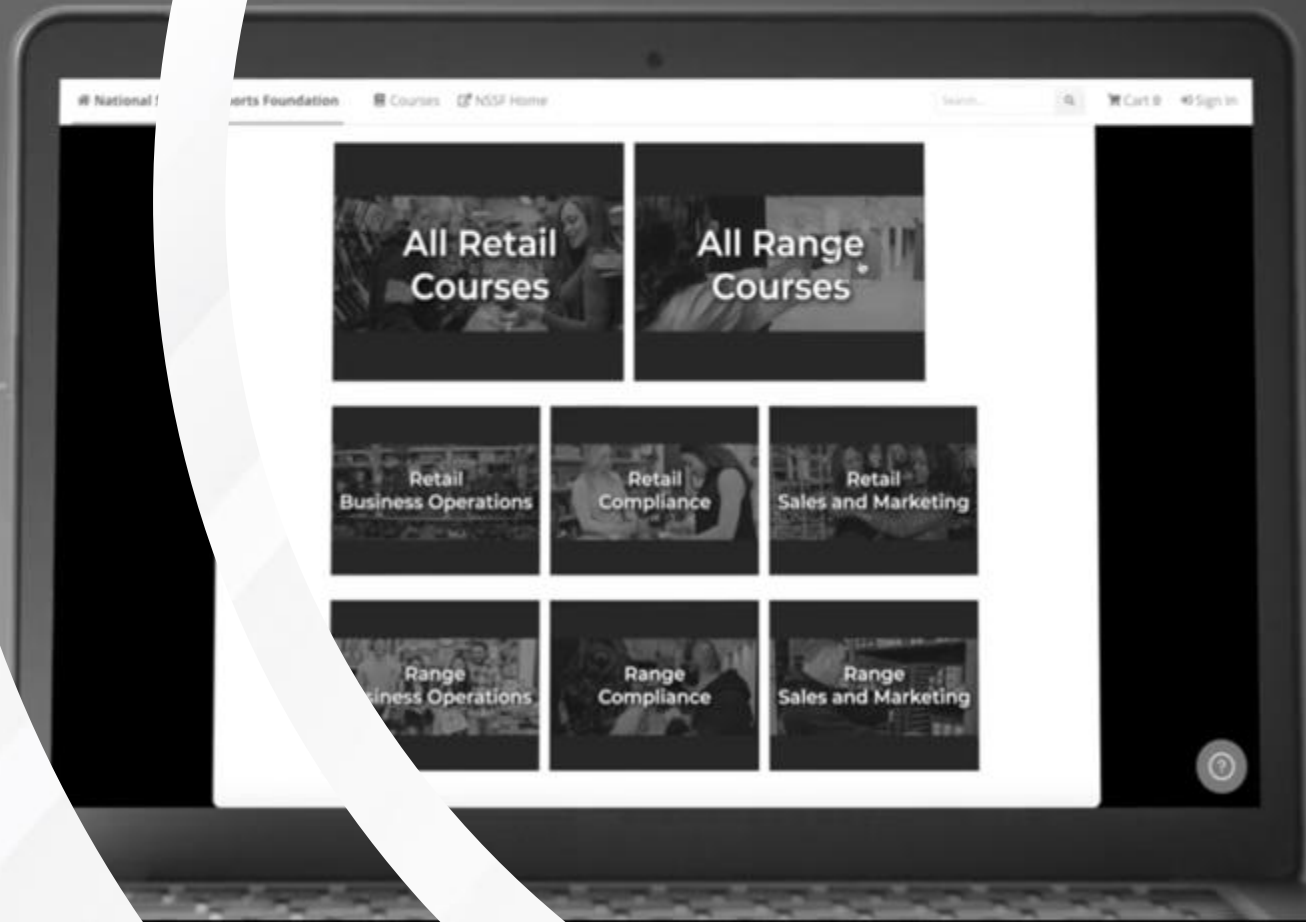
Additional NSSF Compliance Resources



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- Winning at ATF Inspections
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- Multiple Sales Report
- Store Security
- and more

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





JULY 16-17, 2025

WEST PALM BEACH, FL

NSSF® RANGE-RETAILER

BUSINESS EXPO™

RELOAD

THIS SUMMER



scan for more
information

NSSF's Range-Retailer Business Expo (RRBE) is designed to load retailers and range operators with the equipment, strategies and inspiration essential for success.

REGISTRATION IS OPEN!

RRBExpo.org

AN EVENT OF
NSSF
The Firearm Industry
Trade Association

Farewell Zero Tolerance – Now What?

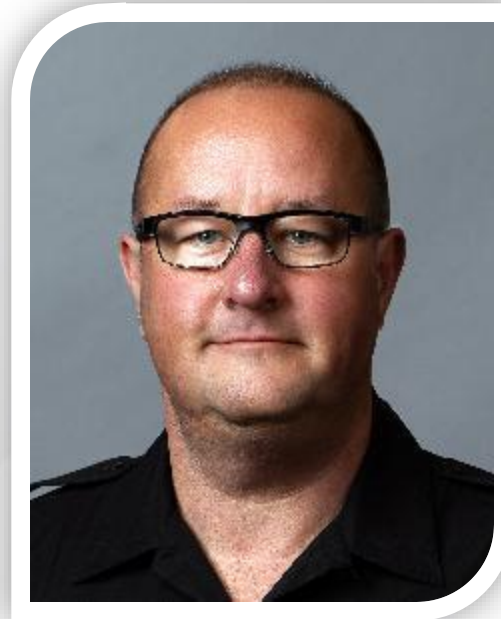
Understand ATF's new direction post-Zero Tolerance

Your Presenters



Andy Graham

NSSF Compliance Consultant
ATF Dep Asst Director (RET)



John 'JC' Clark

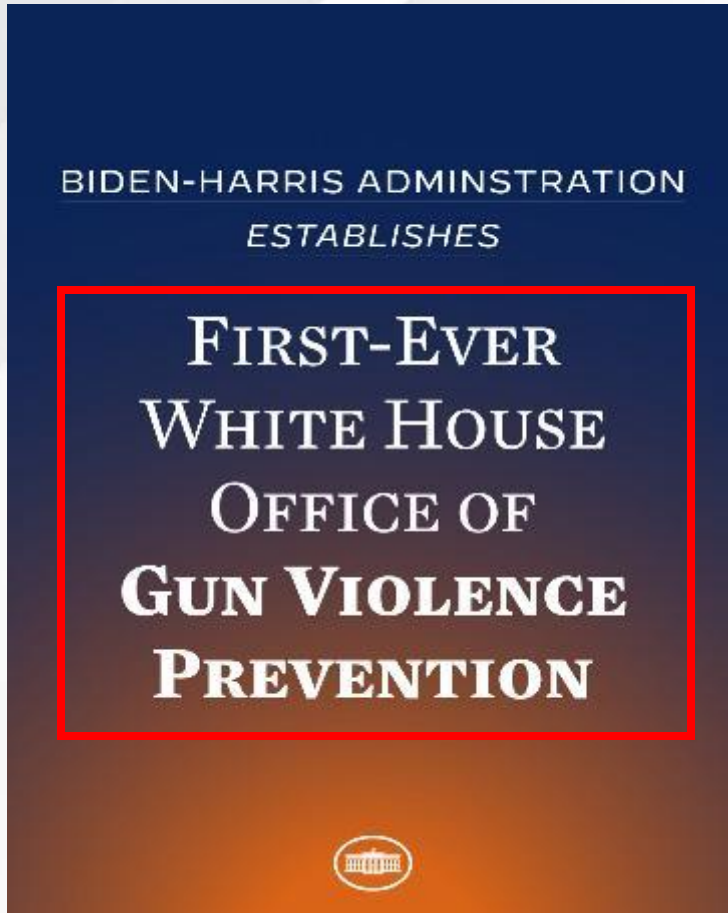
NSSF Compliance Consultant

NSSF MEMBER BENEFIT PROVIDERS



UPDATES

Office of Gun Violence Prevention



Office of Gun Violence Prevention



Office of Gun Violence Prevention



FBI-NICS UPDATES



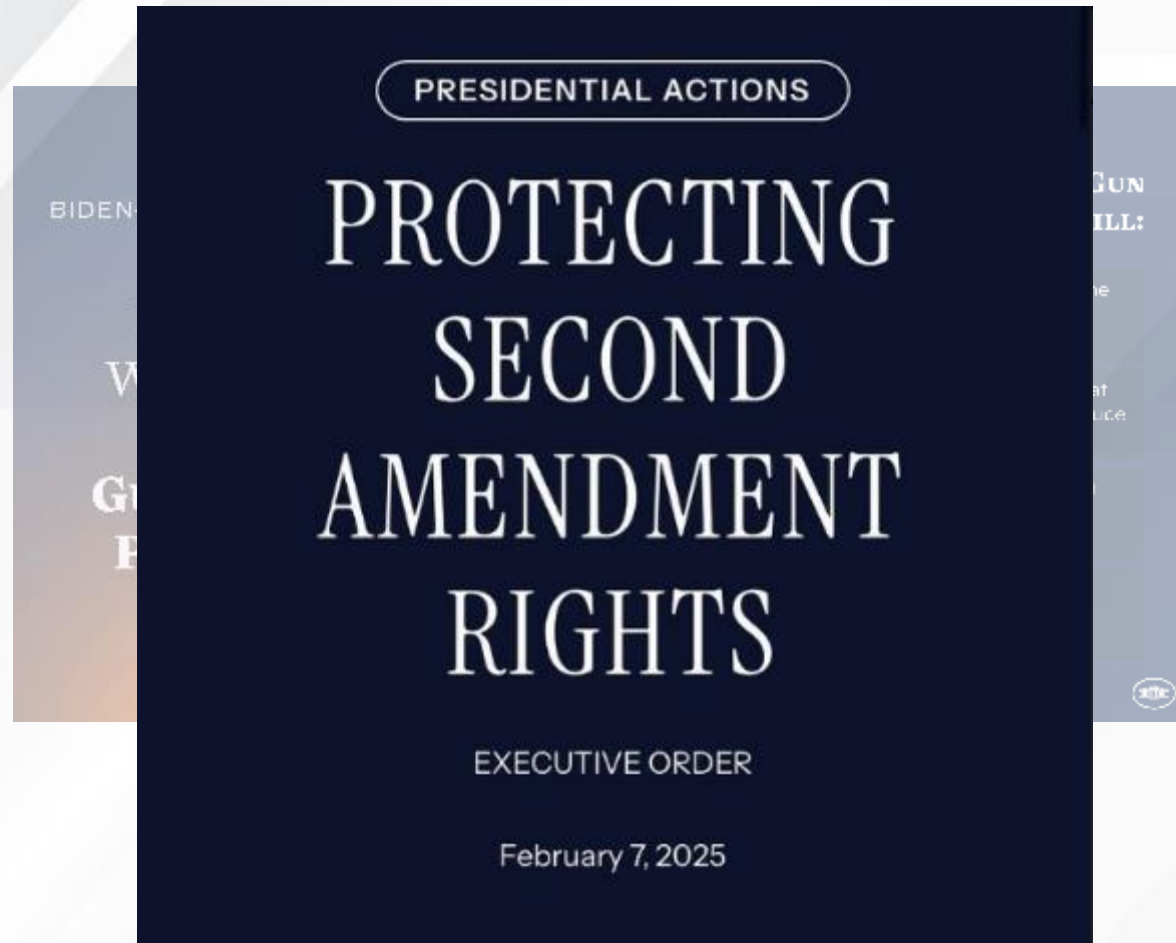
Expected July 2025

- “Stolen Firearm” Database Lookup for FFLs
- Firearm Handler Checks – FFL Employee Background Check

Office of Gun Violence Prevention



Office of Gun Violence Prevention



DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
FIREARMS
EXPLOSIVES
PRO DOMINA JUSTITIA SEQUITUR
1 2

ZERO TOLERANCE

CANCELLED

The New ATF Enforcement Landscape

- New Administrative Order – “Similar” to ATF Order 5370.1D
- Focus on Voluntary Compliance and Risk to Public Safety
 - Willingness to Comply
 - Poses a Public Safety Threat
 - How are Traces Affected
 - Violations Linked to Criminal Activity
- **ATF Tools:** WL, WC, Revocation, Suspension, Civil Fines



BREAKING NEWS



Announcement – New Resources

- **Senior Industry Partnership Advisor**
 - ATF's Point-of-Contact for the Industry
 - Support & Enhance ATF Relationships
 - Develop & Maintain Sustainable Relationships
 - Aid in Clarifying Obscure Issues & Provide Expert Advisory + Counsel



LEADERSHIP



Krissy Carlson
Sr. Industry Advisor

- **NEW – Sr. Industry Partnership Advisor**
- Director Industry Operations – Dallas
- Division Chief
 - Firearms & Explosives Industry Division
- ATF Start – 2005
 - Industry Operations Investigator

Warning Letters & Conferences

– What Triggers Them?

- Error Rates on A&D, Recordkeeping, or 4473s
- NICS-Related Violations
- Missing Firearms or Improper Transfers

Revocation Still on the Table

- Straw Purchases, Diversion & Falsified Records
- Transfers to Prohibited Persons
- Willful, Repeat Violations Remain HIGH-RISK

Stabilizing Braces & “Engaged in the Business” Rules

- Review of Final Rule 2021R-08F: Stabilizing Braces
- Review of Final Rule 2022R-17F: Firearms Dealing Definition
- Stakeholder Engagement Expected

DOJ Second Amendment Task Force

- Led by AG Bondi
- Supports constitutional defense of 2A rights
- Potential influence on future ATF actions

What Should FFLs Do Now?

- **Be Responsive!**
- Document Everything – Records Matter!
- Cooperate During Inspections – Prepare & Inquire
 - Listen to what's being ASKED & SAID during!
 - Narrative – **SEEK SUPPORT!**
- Implement Internal Compliance Training & Audits

NSSF CONSULTANT TEAM

Real-World Application

- Case comparison: Pre- vs. Post-Policy Outcomes
- Revocation vs. WL/WC Based on Cooperation & Documentation
- Mitigating Factors **Expected** to Reduce Enforcement Severity

Questions to Ask **YOURSELF** Before the Next ATF Inspection

- Are A&D, Recordkeeping & 4473s Accurate and Timely?
- Can I Demonstrate Past Corrective Action?
- Do I have SOPs & Training Records on File?
- Have I had a Third-Party **Expert** Compliance Inspection?

ATF Enforcement – Final Thoughts

- This is a Policy Shift—**NOT a FREE PASS!**
- Know Your Compliance Risks
 - **Grade Your Risks!**
- Be Proactive, **DON'T BE REACTIVE!**

WHAT IF?

Revoked or Surrendered



1972



Can FFLs Revoked or Surrendered Re-Apply?

- Depending on the reasons, a "zero tolerance" revocation may have an opportunity to reapply.
- ATF will scrutinize reasons behind the original license revocation or surrender
- "Willful" violations, will likely create hurdles for re-applying.
- Ultimately, the ATF will retain significant discretion in granting or denying FFL applications.



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