



Firearms Inventory Procedures for FFLs

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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 violations: failure to
timely record disposition information

For Fiscal Year 2010

2,533 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 premise and all open entries in the acquisition and disposition record.



To conduct a successful inventory:

- Take a physical count of firearms on the business premise.
 - 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))

Type	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 Number	Date of 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))

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

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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

[ATF Ruling 2011-1](#) *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



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 notices and instructions on reverse carefully before completing this form.

Section A - Federal Firearms Licensee Information

Federal Firearms License Number 9-88-123-08-3B-90123	Federal Firearms Licensee Telephone Number <i>(Include area code)</i> (702) 555-1234	
Trade/Corporate Name Boomsticks, Inc.		
Street Address of Federal Firearms Licensee 1234 Main Street	City Las Vegas	State Nevada
	Zip Code 89109	Telephone Number <i>(with area code)</i> (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 <i>(with area code)</i> (702) 555-1234

Section B - Theft/Loss Information

	Date	Time	Description of Incident
Date of Theft/Loss Discovered	01/10/2011	11:00AM	<input type="checkbox"/> Burglary <input checked="" type="checkbox"/> Robbery <input type="checkbox"/> Larceny <input type="checkbox"/> Missing Inventory
Police Notification	01/10/2011	11:30AM	ATF Issued Incident Number F20111234567
ATF Notification	01/10/2011	11:15AM	
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	



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
3141 Sunrise Avenue

Theft Location if Different from FFL Premises

City Las Vegas	State Nevada	Zip Code 89101	City	State	Zip Code
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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.

Section C - Description of Firearms

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

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
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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** if:

- in cases where there is no indication of a crime (reconciliation of inventory)

A firearm would be reported **stolen** if:

- 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 acquisition and disposition (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



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