

Purpose –

The purpose of this document is to guide Cash Connection employees in the record keeping requirements when processing firearms transactions.

Being a licensed Federal Firearms Dealer (FFL), Cash Connection is required to follow the regulations, including firearms record keeping requirements, established by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). Cash Connection, as all other FFLs, plays a critical role in protecting America from violent firearms crime through responsible and lawful distribution of firearms and accurate record keeping which assists the ATF in tracing guns used to commit crimes.

System access to computerized A&D book –

Cash Connection utilizes an ATF approved computerized Acquisition and Disposition (A&D) book to permanently record the acquisition and disposition of each firearm that moves through our stores. This A&D book is a component of our pawn software system of record - Pawndex. System access to manually modify the A&D records is based on job responsibility, and as such is limited to management personnel only.

How to initiate a firearms record when a firearm enters the store –

When a firearm enters the store, either for a loan or purchase, the clerk will need to select "F" for Type and then the appropriate Category code when prompted to enter the customer's merchandise for the transaction. The following are the Category code options for a firearm:

- GUNH – Handguns; revolvers and pistols
- GUNL – Long guns; rifles
- GUNS - Shotguns

Next the clerk will be presented with the data entry fields required for a firearm transaction – type, action, caliber, finish, importer, make, model and serial number – and will automatically create a new gun log entry with all pertinent firearm and acquisition information in our computerized A&D book when the transaction is completed.

Although Cash Connection utilizes an ATF approved computerized A&D book as the official record for all firearms transactions, ***the information entered by our clerks during each transaction is critical to the accuracy of these records.*** It is important that each requested data field be completed accurately to help ensure accurate information is entered, both for the person and the firearm. Incomplete or inaccurate records are **NOT** an option.

How to close a firearms record when a firearm leaves the store –

When processing a transaction to transfer a firearm, either through a loan redemption or sale, the computerized A&D book will be automatically populated with the pertinent disposition information when the transaction has been completed. However, the following steps are required for every firearms transfer:

- Present the customer with ATF form 4473 and have them complete section A. Section A of this form should only be completed by the person whose name and picture are on the government issued photo ID.
- Once the customer has completed section A, review the form comparing the information submitted with their government issued photo ID and their answers for appropriateness.
- If at this point the form has been completed incorrectly, or the answers to one or more questions are not appropriate, a transfer is **NOT** be performed and the partially completed 4473 form is to be retained with all other non-transferred forms. Otherwise, obtain the customers fingerprints and complete section B & C.
- In order to complete section B & C, contact with Oregon State Police (OSP) for a background check is required. This can be done online or with a phone call. OSP will provide one of the following response:
 - **Approved** – the transfer of the respective firearm(s) can be completed.
 - **Delayed** – a decision to transfer the respective firearm(s) requires more time, and the transfer can **NOT** be completed until the decision has been made.
 - **Denied** – the transfer of the respective firearm(s) can **NOT** be completed.
- Only if the OSP response was Approved can the respective firearm(s) be physically transferred to individual. Be sure to accurately complete the 4473 form; including reference to the OSP approval number, attach the completed fingerprint card, and file the form for a later review.
- If the OSP response was Delayed or Denied, please see the appropriate section of this document for next steps.

OSP response to background check was Delayed –

If the OSP response to the background check was Delayed, inform the customer of the background decision, issue the customer a hand written receipt, provide them with OSP phone number for questions, and file the 4473 appropriately for a later OSP decision. Do **NOT** physically transfer the respective firearm(s) at this point.

As the firearm(s) has not physically left our store, the disposition information should not be entered into the computerized A&D book. Immediately notify the acting manager of the transaction status so they can confirm no disposition

information for this log entry exists. Additionally, the acting manager should add a note to the log entry stating the delayed status and that gun has not left store.

If the OSP decision at a later date is to Approve the transfer, the clerk will note that decision, the date of that decision, and the OSP approval number on the original 4473 form. The clerk will then contact the customer and inform them of the decision. Prior to the physical transfer of the respective firearm(s), the customer will need to recertify their answers to section A by completing questions 24 and 25 on the original 4473 form. If the recertification date is greater than 30 days from the original certification date, the customer will need to complete a new 4473 form and the background process will need to be completed again.

Only if the OSP response was Approved can the respective firearm(s) be physically transferred to individual. Be sure to accurately complete the 4473 form; including reference to the OSP approval number, attach the completed fingerprint card, and file the form for a later review. Once the physical transfer has taken place, the acting manager will need to manually complete all disposition information for this log entry.

OSP response to background check was Denied –

If the OSP response to the background check was Denied, inform the customer of the background decision, do **NOT** physically transfer the respective firearm(s), and explain the following options:

- For denied loan redemptions, the customer has an option to put the firearm(s) back into pawn until their situation is resolved OR the store can purchase the firearm from the customer.
- For denied sales, we should not have processed the sale through in Pawndex and can simply back out.

As the firearm(s) has not physically left our store, there is no disposition entered into the computerized A&D book. Immediately notify the acting manager of the transaction status so they can confirm A&D entries for this log entry and any subsequent log entries. Additionally, the acting manager should add a note to the log entry stating the denied status and what the resolution was.

Police confiscations –

Occasionally, merchandise will be confiscated by the local law enforcement agencies. When a law enforcement officer presents themselves in our stores it is critical that the acting store manager be the person who interfaces with the officer. Confiscating a firearm is no different than any other piece of merchandise in the store. The officer must complete a property seizure form, and provide the store with a copy for our permanent records. The property seizure form should clearly

describe the merchandise being removed, the officer's contact information, and the respective case number. Additionally, the acting store manager should attach the officer's business card with the officer's email address to the store's copy of the property seizure form.

To properly document a police confiscation for a firearm, the acting store manager will need to use our computerized record keeping system to either confiscate the loan or sales merchandise. During this process the name and badge number of the law enforcement officer who physically confiscated the merchandise and the case number provided must be entered to accurately complete the firearm disposition record.

Firearm repairs –

Cash Connection will send both customer guns and store inventory out for repair as needed. As a rule, Cash Connection will only allow gunsmiths with a current FFL to repair firearms. This eliminates the need for a completed 4473 form and associated OSP background check.

When transferring a firearm to a gunsmith for repairs, it is important to accurately document the transfer of the firearm(s) in the computerized A&D book. The acting manager should conduct these transfers to ensure records are accurate and complete.

When the firearm belongs to the customer, the firearm should be received into the computerized A&D book only. To transfer a customer firearm to the gunsmith for repair the inventory number should be manually disposed out to the gunsmith's FFL in the computerized A&D book. When receiving repaired customer firearms back in from the gunsmith, the firearm should again be received into the computerized A&D record only. To return the firearm to the original customer who brought the firearm in for repair the firearm should be manually disposed out to the original customer only. The acting manager should conduct these transfers to ensure records are accurate and complete.

Customer firearm repairs do not require a completed 4473 form and associated OSP background check if being returned to the individual who originally brought the firearm in for repair. If a different individual is picking up the repaired firearm a 4473 form and associated OSP background check must be conducted prior to physically transferring the respective firearm(s).

When the firearm is store inventory, the firearm has already been received into the computerized A&D book. To transfer a store inventory firearm to the gunsmith for repair the inventory number should be sold out to the gunsmith's FFL at \$0.00 for transfer. This sale will automatically populate the computerized A&D book with the appropriate disposition information. When receiving repaired store inventory firearms back in from the gunsmith, the firearm should be received via sales return,

which will automatically populate the computerized A&D book and assign and inventory new inventory number with the original cost and asking price associated to the firearm prior to transferring it out to gunsmith. The firearm should then be placed out for sale. The acting manager should conduct these transfers to ensure records are accurate and complete.

Pawn loans redeemed by person other than name on contract -

As of March 1, 2015 this is no longer an option. Only the person whose name is on the pawn ticket can redeem a firearm from loan.

Completing and submitting multiple handgun forms -

ATF form 3310.4 Report of Multiple Sales or Other Disposition of Pistols and Revolvers is to be used to report all transactions in which an unlicensed person has acquired two or more pistols and/or revolvers at one time or during five consecutive business days.

When two or more hand guns have been transferred via sale to the same unlicensed person within a period of five consecutive days this form must be accurately completed and submitted according to the instructions found on the bottom of the form. Copy 3, which is to be retained for the Cash Connection official records should be attached to the completed 4473 form.

Timely reporting of missing firearms -

Within 48 hours of discovering a missing firearm, Cash Connection is required to notify the ATF of the loss. Upon the discovery of a missing firearm, the Cash Connection General Manager should be contacted.

Incomplete 4473 forms -

Although the goal is to not have incomplete 4473 forms prior to physically transferring the firearm(s), the reality is being human we will at some point make a mistake. In the event that we do have an incomplete form, the acting store manager should be immediately notified.

First, the customer should be contacted and instructed come back in to add the missing information to the 4473 form. Prior to the customer adding any information to the 4473 form, a photocopy of the original form should be made. The customer should then make their additions to the photocopy only and attach the photocopy to the originally completed form. ***The originally completed 4473 form should not be altered after the physical transfer of a firearm has been conducted.***

Internal controls for accurate and complete firearm records -

To ensure Cash Connection is continually in compliance with the ATF record keeping requirements, the following procedures have been implemented:

- *Prior to customer leaving the store* – each Cash Connection employee will be responsible for obtaining a secondary review on the 4473 form **prior** to allowing the customer to leave the store with any firearm(s). This secondary review is to be performed by another employee who is properly trained in the completion of a 4473 form. The employee who performs the secondary review will inspect the form for completeness and must denote completion by initialing the top of page 1 on the 4473 form.
- *Weekly* – each Cash Connection Store Manager will be responsible for running the Guns Leaving Shop Report and reconciling against the 4473 forms for that week to determine the information in our computerized A&D book matches the information on the respective 4473 form(s). The Store Manager will denote completion of this weekly reconciliation by initialing an accurate version of the Guns Leaving Shop Report and filing the report and associated 4473 form(s).
- *Monthly* – each Cash Connection Store Manger will be responsible for running a Guns In Shop Report and reconciling against each and every firearm in their store. The Store Manager will denote completion of this monthly reconciliation by initialing an accurate version of the Guns In Shop Report and filing the report.