

Exhibit 8C
INDUSTRY OPERATIONS MONITORED RISK ASSESSMENT CASE BRIEFING PAPER
SUBMISSION TYPE: Final

Monitored Case Summary – Jackie D Farris

DBA: Kwik Kash Pawn

License/Permit Number: 1-62-141-02-2M-38748

Address: 42 S CEDAR AVE, Unit N/A, COOKEVILLE, Tennessee 38501

Spartan Case ID: FCI-35373

Field Division: Nashville

Area Office: Nashville II (IO)

August 1, 2022

Judicial District: Middle District of Tennessee
US Attorney: (b)(6)/(b)(7)(C)
Congressional District: TN-6
Senators: Marsha Blackburn (R); Bill Hagerty (R)
Congressman: John Rose (R)
Represented by Attorney/Organization/Group: No
Name of Attorney/Organization/Group: [Click here to enter text.](#)

Type of Inspection: Firearms Dealer

Justification: Revocation

Stay of Revocation? Choose an item.

Effective Date: Date Granted. **Expires:** Expiration Date.

Inspection/Investigation Summary:

Include inspection details relevant to MCP (i.e., violations, inspection history, etc.) which support the justification. If discretionary or other provide description of reasons/findings and recommendation. For all alternate recommendations, DIO must indicate proposed alternate action and provide detailed justification for proposed alternate action.

The results of this investigation warrant a warning conference (WC) based on the repeated violations for failure to enter accurate information into the A&D record. However, an alternate recommendation of revocation is being offered for the following reasons. The FFL attended a warning conference for the same violation in 2021, 2019, 2009 (DIO (b)(6)/(b)(7)(C)), and 2008. And the FFL received a warning letter in 2011. The current inspection is a recall inspection in which the FFL's quantity of errors for A&D violations increased (9 to 19) representing an error rate of 2.3% to 3.0%. (b)(6)/(b)(7)(C) additional violation, not previously cited, indicate a WC per the adverse action policy – the sale of a handgun to an out of state resident. The FFL has processes in place and the ability to comply with the relevant laws and regulations but has been unable to prevent

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repeat violations without significant improvement from the warning conference in 2021. For over 10 years, the FFL has had multiple opportunities to improve processes, yet a failure to comply with the laws and regulations has continued.

Background/Compliance History:

Provide relevant background information related to the investigation, (date license/permit issued, inspection dates, outcome and date acknowledgment of regulations reviewed).

A review of Spartan and FLS indicates that Kwik Kash Pawn current Type 01 FFL was originally issued in November 1998 (1-62-38748). There are five (5) previous compliance inspections of the FFL under FFL number 1-62-38748 documented in Spartan. The 2008 inspection narrative shows one previous inspection completed on November 5, 1998, under a partnership with (b)(6)/(b)(7)(C). The partnership dissolved and Mr. Farris applied for an FFL, which he currently maintains.

FCI-15901 – The fifth inspection of this licensee was completed on March 25, 2021, with a warning conference completed on April 19, 2021. The inspection disclosed [redacted] violations:

(b)(3) (112 Public Law 55 125 Stat 552)

FCI-823 – The fourth inspection of this licensee was completed in 2019, disclosed [redacted] violations and resulted in an approved alternate result of warning conference completed on April 18, 2019; (b)(3) (112 Public Law 55 125 Stat 552)

(b)(3) (112 Public Law 55 125 Stat 552)

776055-2011-0249 - The third inspection of this licensee a recall inspection in 2011, disclosed [redacted] violations and resulted in Warning letter: (b)(3) (112 Public Law 55 125 Stat 552)

(b)(3) (112 Public Law 55 125 Stat 552)

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(b)(3) (112 Public Law 55 125 Stat 552)

776070-2010-0035 – The second inspection of this licensee a recall inspection in 2009 disclosed eight **(b)(3) (112 Public Law 55 125 Stat 552)** and resulted in a DIO-held Warning Conference: **(b)(3) (112 Public Law 55 125 Stat 552)**

(b)(3) (112 Public Law 55 125 Stat 552)

776070-2008-0135 – The first compliance inspection of the FFL in 2008 disclosed **(b)(3) (112 Public Law 55 125 Stat 552)** violations and resulted in a Warning Conference: **(b)(3) (112 Public Law 55 125 Stat 552)**

(b)(3) (112 Public Law 55 125 Stat 552)

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Business Description:

Provide a clear description of the business operations and complete the volume of activity, (Be sure to include information relevant to: Multiple Licenses involved, pawnshop, storefront, residence, gun show only, internet sales, etc.)

Kwik Kash Pawn is a traditional pawnshop in urban Cookeville, TN. The FFL primarily conducts firearms sales and pawn operations in addition to their other general sales to the general public. The FFL had 615 firearms in inventory and disposed of approximately [] firearm during the last 12 months. A review of ATF Analytics shows that the FFL was associated with [] completed traces and [] multiple sales involving [] firearms during the inspection period. No traces were unresolved nor were for violent crime, drugs or gang activity. (b)(3) (112 Public Law 55 125 Stat 552)

(b)(3) (112 Public Law 55 125 Stat 552)

(b)(3) (112 Public Law 55 125 Stat 552) The FFL emailed the MS forms and changed their process to emailing the form in the future.

Firearms Inspection Results:

Firearms in Inventory: 615

Firearms Dispositions: []

Firearms Missing After Reconciliation: 0

Firearms Missing query results:

None

Total # ATF 4473s for inspection review period: []

Total Reviewed: []

Trace Information During Inspection Period

(b)(3) (112 Public Law 55 125 Stat 552)

Were any traces tied to violent crime? Yes No

If yes provide details:

[]

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Explosives Inspection Results:

Explosives #'s inventoried: 000

Explosives Missing after reconciliation: 000

List Public Safety Violations:

Click here to enter text.

INSPECTION/INVESTIGATION DETAILS:

On Site Start Date:3/28/22

On Site End Date:4/21/22

Violations found:

Violations cited with brief summary and quantity relative to the monitored status, also notate if repeat violation and date previously cited.

(b)(3) (112 Public Law 55 125 Stat 552)

Law Enforcement:

Was a SAR or Referral generated? No

If ATF referral generated SAR#:

If SAR for transfer to prohibited person, status of retrieval:

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CE Investigative Activity:

Explanation of current or future CE activity:

Click here to enter text

Problems encountered or anticipated:

Provide details of current issue/problems

Click here to enter text

Investigator Name:

Telephone:

(b)(6)/(b)(7)(C)

Area Supervisor Name:

Telephone:

(b)(6)/(b)(7)(C)

DIO Name: Steven Kolb

Telephone:

(b)(6)/(b)(7)(C)

Division Counsel Reviewed (if alternate, denial or revocation)

Yes No

Click here to enter text

ACC Reviewed (if denial or revocation, NA for alternate)

Yes No NA

Click here to enter text

(b)(6)/(b)(7)(C)

Special Agent In Charge Signature

9/5/22

Date

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Concur **Non-concur** **NA**

**Note: Actionable Monitored Cases:* The initial Exhibit 8c, Industry Operations Monitored Case Briefing Paper is not signed by the SAC. In actionable Monitored Cases, the SACs signature is required for the final 8c submission only. *Situational Monitored Cases:* The initial Exhibit 8c, Industry Operations Monitored Case Briefing Paper must be signed by the SAC acknowledging awareness of the situation.