

ADMINISTRATION HISTORY APPENDIX
CHAPTER FIVE: CREATING A SAFER AND MORE
SECURE SOCIETY

FIREARMS



93-128173

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

SECRETARY OF THE TREASURY

December 22, 1993

MEMORANDUM FOR THE PRESIDENT

FROM: Lloyd Bentsen

SUBJECT: Progress Report on Gun Dealer Licensing

This memorandum is in response to your directive addressing the subject of gun dealer licensing. Your memorandum directed the Department of the Treasury and the Bureau of Alcohol, Tobacco and Firearms (ATF) to take whatever steps necessary, to the extent permitted by law, to ensure compliance with the present licensing requirements of the Gun Control Act of 1968. Additionally, you directed me to report progress on the implementation of these initiatives within 90 days and annually thereafter.

Subsequent to my receipt of your memorandum, I directed ATF to develop a course of action addressing each of the strategies which you enumerated and to periodically report to me their progress. Attached is ATF's original proposal to implement your firearms initiatives, and the initial progress report on the implementation of their proposal.

These initiatives are already having a measurable impact on the Federal firearms licensing system. For the first time in years, the total population of Federal firearms licensees has actually decreased. While the numbers remain unacceptably high, we are confident that when all of these initiatives are implemented, we will continue to see a decrease in the Federal firearms licensee population. These initiatives will ensure that only those persons who have a reasonable expectation of engaging in a firearms business will be issued a Federal firearms license.

Attachments

TREASURY CLEARANCE SHEET

NO. 93-17
DATE: _____

MEMORANDUM FOR: SECRETARY DEPUTY SECRETARY EXECUTIVE SECRETARY
 ACTION BRIEFING INFORMATION LEGISLATION
 PRESS RELEASE PUBLICATION REGULATION SPEECH
 TESTIMONY OTHER _____

FROM: Ronald K. Noble, Asst. Sec'y (Enforcement)
 THROUGH:
 SUBJECT: Progress Report on Implementing the President's Directive on Gun Dealer Licensing

REVIEW OFFICES (Check when office clears)

- | | | |
|--|--|---|
| <input type="checkbox"/> Under Secretary for Finance | <input type="checkbox"/> Enforcement | <input type="checkbox"/> Policy Management |
| <input type="checkbox"/> Domestic Finance | <input type="checkbox"/> ATF | <input type="checkbox"/> Scheduling |
| <input type="checkbox"/> Economic Policy | <input type="checkbox"/> Customs | <input type="checkbox"/> Public Affairs/Liaison |
| <input type="checkbox"/> Fiscal | <input type="checkbox"/> FLETC | <input type="checkbox"/> Tax Policy |
| <input type="checkbox"/> FMS | <input type="checkbox"/> Secret Service | <input type="checkbox"/> Treasurer |
| <input type="checkbox"/> Public Debt | <input type="checkbox"/> General Counsel | <input type="checkbox"/> E & P |
| <input type="checkbox"/> Under Secretary for International Affairs | <input type="checkbox"/> Inspector General | <input type="checkbox"/> Mint |
| <input type="checkbox"/> International Affairs | <input type="checkbox"/> IRS | <input type="checkbox"/> Savings Bonds |
| | <input type="checkbox"/> Legislative Affairs | |
| | <input type="checkbox"/> Management | <input type="checkbox"/> Other _____ |
| | <input type="checkbox"/> OCC | |

NAME (Please Type)	INITIAL	DATE	OFFICE	TEL. NO.
INITIATOR(S)				
Director	/i/	11/10/93	ATF	927-8700
REVIEWERS				
Noble, R.	<i>RN</i>	12/01/93	Enforcement	622-0240
Simpson, J.	<i>JS</i>	11/21	Enforcement	622-0230
O'CONNELL, D.		11/18/93	"	
Alliston, J.		11/19/93	Gen Csl	622-1927
MCDONALD, R.	<i>RJ</i>			

SPECIAL INSTRUCTIONS

Review Officer Date Executive Secretary



DEPARTMENT OF THE TREASURY
WASHINGTON

ASSISTANT SECRETARY

DEC 17 1993

ACTION

MEMORANDUM FOR SECRETARY BENTSEN

FROM: Ronald Noble *RN*
Assistant Secretary (Enforcement)

SUBJECT: Progress Report On Implementing The President's
Directive On Gun Dealer Licensing

ACTION FORCING EVENT: The President issued a memorandum requesting you to direct the Bureau of Alcohol, Tobacco and Firearms (ATF) to take whatever steps are necessary, to the extent permitted by law, to ensure compliance with present Federal firearms licensing requirements. The memorandum listed a series of specific initiatives that should be addressed and directed you to report progress on the implementation of the initiatives within 90 days and annually thereafter.

RECOMMENDATION:

That you sign the attached memorandum to the President.

RN Agree _____ Disagree _____ Let's Discuss _____

BACKGROUND:

On September 7, 1993, ATF drafted a proposal containing specific strategies aimed at implementing the President's firearms initiatives. Accompanying the letter to the President and the progress report is a copy of ATF's proposal for your information.

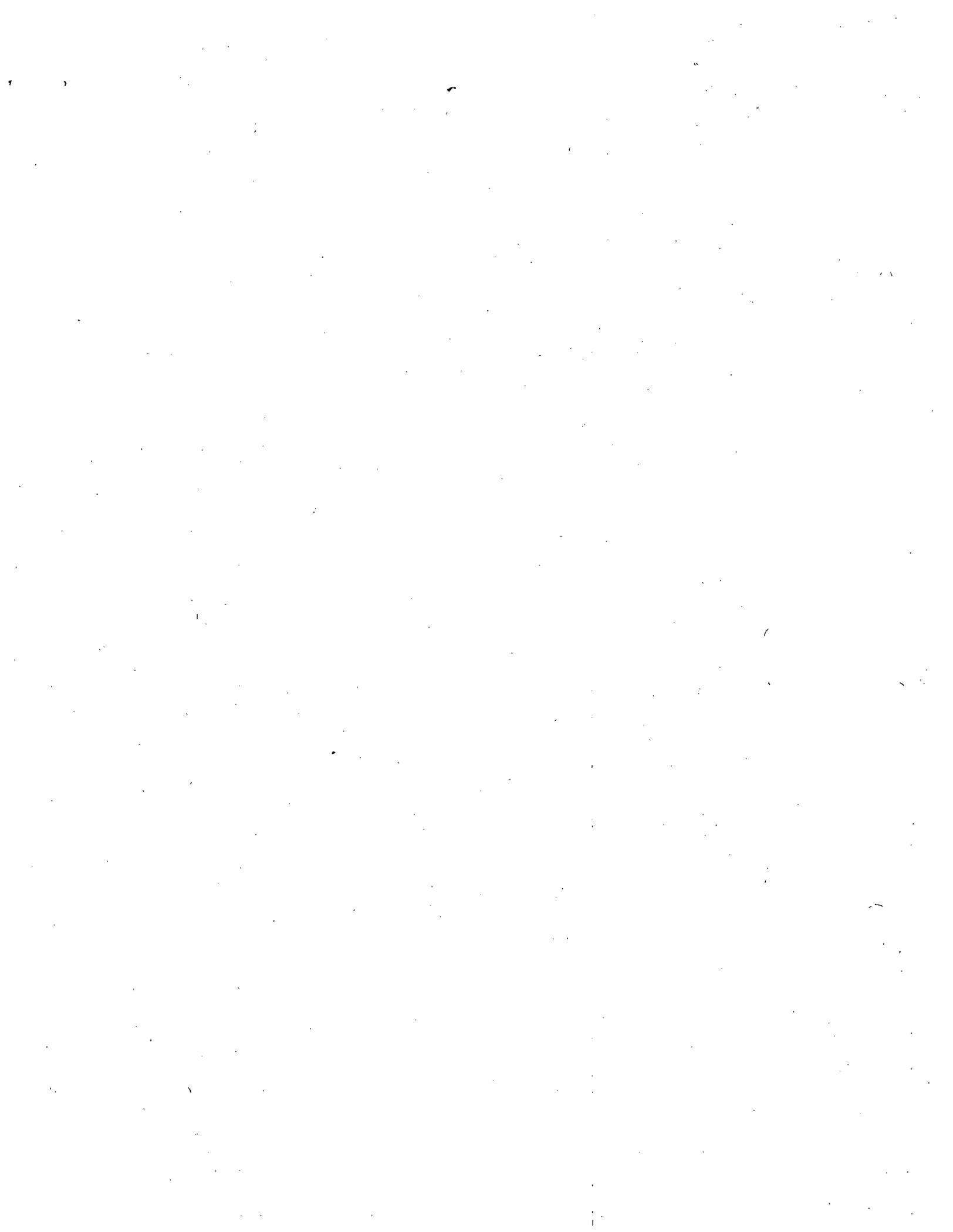
ATTACHMENT: Memorandum to the President, Progress Report, ATF Proposal to Implement the President's Firearms Initiatives.



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

**Proposal
to Implement
the President's
Firearms Initiatives**

September 7, 1993



PROPOSAL TO IMPLEMENT THE PRESIDENT'S FIREARMS INITIATIVES

BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

On August 11, 1993, the President of the United States issued two memorandums directed to the Secretary of the Treasury to undertake certain initiatives (Tabs 3 & 4) aimed at combatting the rising violence associated with the illegal sale and use of firearms.

The President's memorandum on "Gun Dealer Licensing" states that the Secretary of the Treasury will direct the Bureau of Alcohol, Tobacco & Firearms (ATF) to initiate action as soon as possible to implement the following directive:

**To take whatever steps are necessary,
to the extent permitted by law, to
ensure compliance with present
firearms licensing requirements.**

The President's memorandum further directed the Secretary to initiate action necessary to implement the above directive as soon as possible and report progress on the initiative within 90 days and annually thereafter.

The President's memorandum on "Importation of Assault Pistols" directed the Secretary of the Treasury to reassess ATF's present regulatory approach used to determine whether handguns are importable under the "sporting purposes" test of the Gun Control Act. The memorandum directed the Secretary to take the necessary steps to implement the following directive:

**To re-examine and/or modify the
factoring criteria used to determine
the sporting characteristics of certain
imported pistols not meeting the
modified criteria.**

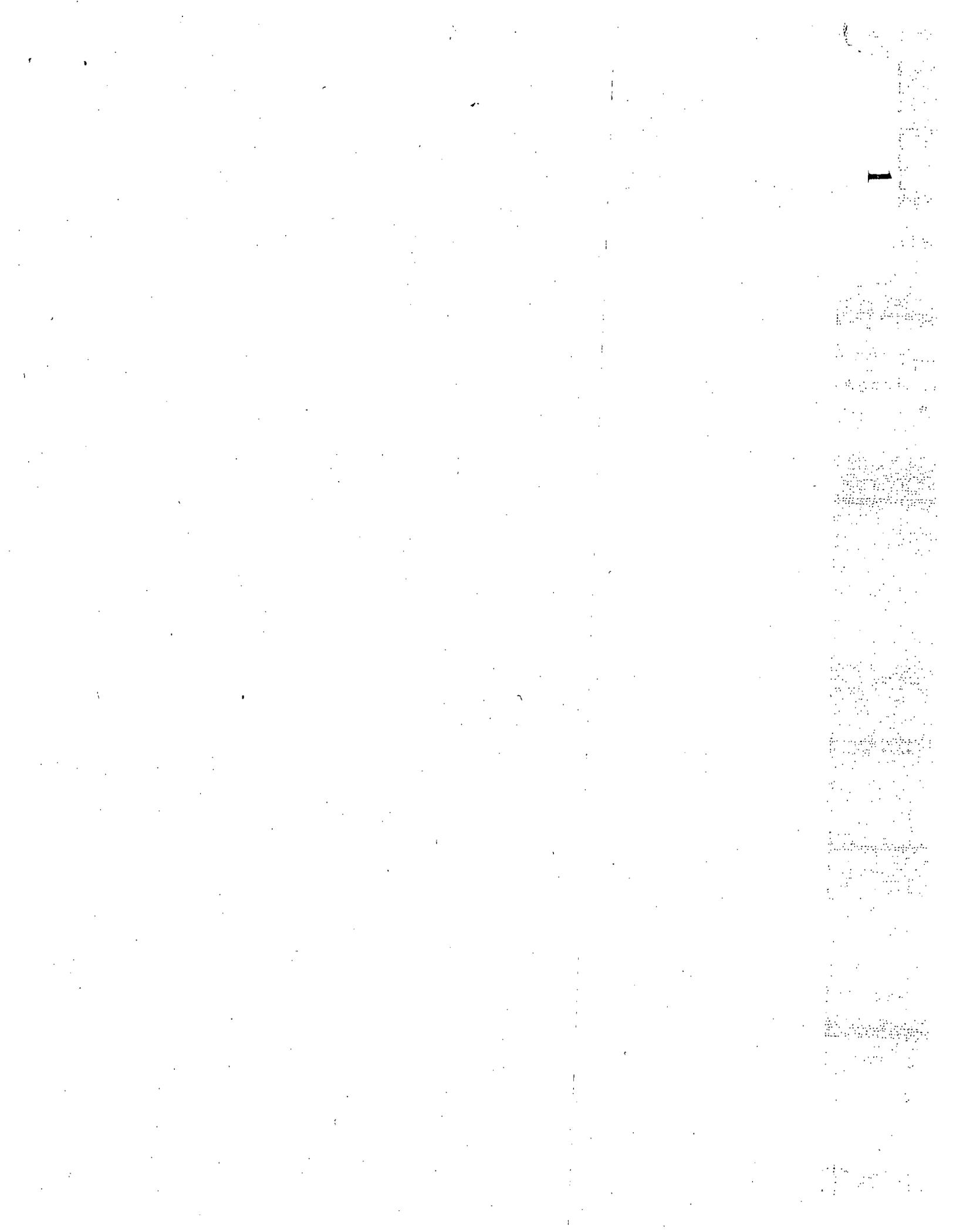
The President's memorandum further states that the Secretary has advised him that ATF will issue a notice of proposed rulemaking in the near future that will propose changes to the factoring criteria for imported handguns and that pending applications to import "assault pistols" will be suspended until final action on this issue is complete..

We propose to implement initiatives (A)-(H), found at Tab 1, in response to the President's memorandum on "Gun Dealer Licensing." We also propose to implement initiatives (A)-(B) at Tab 2 in response to the President's memorandum on "Importation of Assault Pistols." Detailed workplans on each of the directives are also attached.

Due to the overlapping nature of these initiatives, which are outlined in the accompanying workplans, they have been combined into common objectives. These objectives are as follows:

DEVELOP ADMINISTRATIVE SANCTIONS
ENHANCE PURCHASER IDENTIFICATION
ENHANCE COOPERATIVE AGREEMENTS
ENHANCE APPLICANT SCREENING
ENHANCE AUTOMATED SYSTEMS

The implementation of any initiatives that will alter the current operating procedures for Federal firearms licensees will be published in multiple media, such as various trade publications, the FFL Newsletter, etc..



GUN DEALER LICENSING

**TO TAKE WHATEVER STEPS ARE NECESSARY,
TO THE EXTENT PERMITTED BY LAW,
TO ENSURE COMPLIANCE WITH PRESENT
FIREARMS LICENSING REQUIREMENTS.**

INITIATIVES

INITIATIVE A:

IMPROVE THE THOROUGHNESS AND EFFECTIVENESS OF BACKGROUND CHECKS IN SCREENING APPLICANTS FOR A FEDERAL FIREARMS LICENSE (FFL).

STRATEGIES

- * Redesign the ATF Form 7 to require additional information to enable more thorough investigations. See initiative "B" for details.
(ENHANCE APPLICANT SCREENING)
- * Verify additional information proposed to be contained in the revised ATF Form 7. Additionally, conduct these checks on all renewal applications.
(ENHANCE APPLICANT SCREENING)
[Additional Resources Required, See Tab 5]
- * The Firearms and Explosives Licensing Center will conduct computer queries with the appropriate departments of motor vehicles to verify the drivers license numbers of the applicant.
(ENHANCE APPLICANT SCREENING)
- * To the extent resources permit, conduct full field investigations of all original applications for an FFL. Coordinate investigations with State and local agencies, where appropriate.
(ENHANCE INVESTIGATIVE ACTIVITIES)
[Additional Resources Required, See Tab 5]
- * Perform a cost benefit analysis for implementing an automated records check system through a link with the firearms licensee data base.
(ENHANCE AUTOMATED SYSTEMS)
[Additional Resources Required, See Tab 5]
- * Implement the use of an automated address verification system currently available within the Treasury Enforcement Communication System (TECS).
(ENHANCE APPLICANT SCREENING)

INITIATIVE B:

REVISE THE LICENSE APPLICATION PROCESS TO REQUIRE THE SUBMISSION OF ADDITIONAL INFORMATION, AND TO REQUIRE MORE RELIABLE FORMS OF IDENTIFICATION OF THE APPLICANT.

STRATEGIES

- * Redesign ATF Forms 7 & 8, Application for License and Application for Renewal, to require additional information concerning the applicant's eligibility for a license. The revisions will shift the burden to obtain information necessary to process the application from ATF to the applicant. Additional information being considered consists of, but is not limited to:

(ENHANCE APPLICANT SCREENING)

[Additional Resources Required, See Tab 5]

All places of residence within the past 10 years for the applicant.

All drivers license numbers (State ID card number if drivers license is not possessed) held by the applicant.

Fingerprint cards.

A current photograph of the applicant (within past six months).

A copy of the articles of incorporation/State registration by all corporate applicants. If applicant is a partnership, provide a copy of partnership agreement.

A copy of the birth certificate/naturalization papers of the applicant.

Copies of licenses/permits mandated by State/local authorities.

A diagram of business premises depicting specific areas where books, records, and inventory will be maintained and stored.

- * Submission of an ATF Form 7 for all FFL renewals until all licensees have provided ATF with the information required by the revised Form 7.

(ENHANCE APPLICANT SCREENING)

- * Develop ATF Form 7CR, Application for License for Collectors of Curios and Relics.
(ENHANCE APPLICANT SCREENING)
- * Develop and implement a Collector of Curios and Relics license that clearly differentiates the activities of the license holder from that of a dealer in firearms.
(ENHANCE APPLICANT SCREENING)

INITIATIVE C:

MAKE THE "PREMISES" REQUIREMENT OF THE STATUTE MORE MEANINGFUL BY INCREASING FIELD CHECKS AND THE USE OF OTHER PROCEDURES TO VERIFY COMPLIANCE.

STRATEGIES

- * To the extent resources permit, conduct full field investigations of all original applications for an FFL.
(ENHANCE INVESTIGATIVE ACTIVITIES)
[Additional Resources Required, See Tab 5]
- * To the extent resources permit, conduct full field investigations of all renewal applications for an FFL in identified high crime areas.
(ENHANCE INVESTIGATIVE ACTIVITIES)
[Additional Resources Required, See Tab 5]
- * Enlist the cooperation of State and local authorities, including departments of taxation, zoning boards, etc., to assist in the verification of premises.
(ENHANCE COOPERATIVE AGREEMENTS)
- * Redesign ATF Forms 7 & 8, Application for License and Application for Renewal, to require additional information concerning the applicant's control over the licensed premises, such as zoning restrictions, restrictive covenants, and leases.
(ENHANCE APPLICANT SCREENING)
- * Implement the use of an automated address verification system currently available within Treasury Enforcement Communication System (TECS).
(ENHANCE APPLICANT SCREENING)

INITIATIVE D:

INCREASE THE SCRUTINY OF LICENSEES' MULTIPLE HANDGUN SALES REPORTS AND PROVIDE AUTOMATED ACCESS TO REPORT INFORMATION BY FIREARM SERIAL NUMBER.

STRATEGIES

- * Amend 27 CFR 178.126a to require the licensee to maintain a copy of ATF F 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) on the licensed premises for review by any ATF officer.
(ENHANCE AUTOMATED SYSTEMS)
- * Revise ATF F 3310.4, to include the place of birth of the purchaser and the serial number of the firearms purchased.
(ENHANCE INVESTIGATIVE ACTIVITIES)
- * Enhance the current system of maintenance of the Form 3310.4, to allow for the recognition of common names and addresses during the data entry process.
(ENHANCE AUTOMATED SYSTEMS)
- * Consolidate all existing ATF firearms databases into a single system, the Firearms Information Networked Database (FIND) that can be accessed by the ATF Law enforcement community.
(ENHANCE AUTOMATED SYSTEMS)
[Additional Resources Required, See Tab 5]

INITIATIVE E:

REQUIRE DEALERS TO OBTAIN MORE RELIABLE IDENTIFICATION FROM PURCHASERS.

STRATEGIES

- * Amend the regulations to require non-licensed firearms purchasers to submit multiple forms of identification, of which at least 1 is a picture ID (drivers license).
(ENHANCE PURCHASER IDENTIFICATION)

- * Revise the ATF Form 4473, to amend the straw purchase information in the instruction section and remove the "is known to me" option in the identification section.

(ENHANCE PURCHASER IDENTIFICATION)

[Additional Resources Required, See Tab 5]

INITIATIVE F:

DETERMINE THE FEASIBILITY AND DESIRABILITY OF ADDING THE OPTION OF LICENSE SUSPENSION FOR VIOLATIONS OF THE GCA.

STRATEGIES

- * Conduct a review of current statutes, regulations, and policies to determine the feasibility and desirability of license suspensions.

(DEVELOP ADMINISTRATIVE SANCTIONS)

INITIATIVE G:

EXPAND THE USE OF COOPERATIVE AGREEMENTS WITH STATE AND LOCAL LAW ENFORCEMENT AGENCIES TO ADDRESS LICENSING AND TRAFFICKING PROBLEMS.

STRATEGIES

- * Develop additional partnerships with State and local authorities to reduce licensing and trafficking problems.
(ENHANCE COOPERATIVE AGREEMENTS)
[Additional Resources Required, See Tab 5]
- * Work with the International Association of Chiefs of Police to establish a model statewide enforcement program to curtail illegal firearms trafficking.
(ENHANCE COOPERATIVE AGREEMENTS)
- * Expand "Ceasefire," which utilizes new forensic technology to provide investigative support to State and local police departments in cities having gang and drug related shooting incidents. A computerized ballistic evidence data base will be maintained by these systems. One component, known as "Bulletproof," utilizes laser technology and ATF will be the first law enforcement agency in the United States to utilize this new technology. The data bases, in certain instances, may be used in conjunction with the National Tracing Center.
(ENHANCE INVESTIGATIVE ACTIVITIES)

- * As resources permit, provide firearms trafficking training for State/local agencies.
(ENHANCE INVESTIGATIVE ACTIVITIES)
- * Conduct a follow-up study to the 1991 "Protecting America," program. This study will research firearms trafficking patterns, methods of operation and profile individuals involved in firearms trafficking.
(ENHANCE INVESTIGATIVE ACTIVITIES)
- * Coordinate with Bureau of Justice Assistance to expand initiatives by identifying discretionary grant programs that are designed to target, investigate, and prosecute individuals and organizations involved in the unlawful use, sales or acquisition of firearms in violation of Federal and/or State laws; enhance the ability of State and local agencies to assist in more complete and comprehensive background investigations of applicants for new or renewed Federal firearms licenses; target a specific population (parolees) who are in possession of firearms illegally, and train enforcement officers regarding gun laws, and provide information and prevention messages on violence caused by illegal firearms.
(ENHANCE INVESTIGATIVE ACTIVITIES)

INITIATIVE H:

EXPAND ATF'S CAPABILITIES TO UTILIZE AUTOMATION AND OTHER TECHNOLOGY FOR THE OUT-OF-BUSINESS FIREARMS RECORDS FOR PURPOSES OF TRACING.

STRATEGIES

- * Implement Firearms Information Networked Data Base (FIND) to expedite the modernization and automation of the National Tracing Center to provide prompt tracing of firearms involved in criminal activities.
(ENHANCE AUTOMATED SYSTEMS)
[Additional Resources Required, See Tab 5]
- * Provide for automated firearms trace requests and responses between the National Tracing Center and State and local law enforcement agencies.
(ENHANCE AUTOMATED SYSTEMS)
- * Enhance the program to obtain the records of firearms licensees who have gone out of business and have not turned their records in to the Out-of-Business Records Center.
(ENHANCE AUTOMATED SYSTEMS)

- * Expand the firearms enforcement program "Ceasefire" utilizing new computerized imaging systems along with investigative support to improve the efficiency in the examination of ballistic evidence.
(ENHANCE INVESTIGATIVE ACTIVITIES)

- * Encourage licensed dealers to notify ATF of firearms thefts and/or losses via a 1-800 telephone number to the ATF National Command Center which is staffed 24 hours a day.
(ENHANCE INVESTIGATIVE ACTIVITIES)

**THE FOLLOWING WORKPLAN IS DESIGNED TO
IMPLEMENT STRATEGIES (A)-(H) OF THE
PRESIDENT'S INITIATIVES BY FOCUSING
ON THE COMPLETION OF EACH OBJECTIVE.**

FIREARMS LICENSING

OBJECTIVE	WORK STEPS	TARGET DATE
Enhance Applicant Screening <i>(Refer to Initiative(s): (a) (b) (c))</i>	Develop ATF Form 7CR.	10/1/93
	Develop unique Collector's License.	10/1/93
	Implement use of State DMV data bases.	10/15/93
	Implement use of an automated address verification system.	11/1/93
	Redesign ATF Form 8.	12/31/93
	Redesign ATF Form 7.	12/31/93
	Implement use of Collector's License.	1/3/94
	Require the submission of an ATF Form 7 for all FFL renewals until all licensees have provided ATF with the information required by the revised Form 7.	2/1/94
Increase number of criminal history checks.	3/1/94	

OBJECTIVE**WORK STEPS****TARGET DATE**

Enhance Investigative Activities
(Refer to Initiative(s): (a) (c) (d) (g) (h))

Enhance liaison with State/local authorities.

10/1/93

Encourage licensed dealers to notify ATF of firearms theft and/or losses via a 1-800 telephone number to the ATF National Command Center, which is staffed 24-hours a day.

1/1/94

Revise ATF Form 3310.4.

4/1/94

Expand BJA initiatives identifying discretionary grant programs that target, investigate, and prosecute individuals and organizations involved in the unlawful use, sales or acquisition of firearms in violation of Federal and/or State law.

7/1/94

Conduct a followup study to the 1991 "Protecting America," program. This study will research firearms trafficking patterns, methods of operation, and profile individuals involved in firearms trafficking.

7/1/94

Expand "Ceasefire," which utilizes new forensic technology to provide investigative support to cities having gang and drug-related shooting incidents.

10/1/94

Conduct full field investigations for all original applications for FFL. Coordinate with State/local agencies, where appropriate.

10/1/94

Provide firearms trafficking training to State/local law enforcement agencies.

10/1/94

Conduct full field investigations for renewal applications in identified high crime areas.

10/1/94

OBJECTIVE**WORK STEPS****TARGET DATE**

Enhance Cooperative Agreements
(Refer to Initiative(s): (c) (g) (h))

Enhance liaison with State/local authorities.

10/1/93

Work with the International Association of Chiefs of Police to establish model statewide enforcement program to curtail illegal firearms trafficking using among other investigative expertise, the improvement of the tracing capability to focus on the evidence of criminal possession, illicit sources, etc.

1/1/94

Develop additional partnerships with State and local authorities to reduce licensing and trafficking problems.

3/1/94

Coordinate with Bureau of Justice Assistance (BJA) to secure additional State/local grants.

7/1/94

OBJECTIVE	WORK STEPS	TARGET DATE
<p>Enhance Automated Systems <i>(Refer to Initiative(s): (a) (d) (g) (h))</i></p>	<p>Enhance the program to obtain the records of firearms licensees who have gone out of business and have not turned their records into the Out-of-Business Record Center.</p>	12/3/93
	<p>Perform a cost-benefit analysis for implementing an automated system for conducting automated records checks through a link with the firearms licensee data base.</p>	1/1/94
	<p>Publish NPRM proposing that licensees maintain copies of ATF Form 3310.4 on licensed premises for inspection by ATF.</p>	3/1/94
	<p>Publish final regulations requiring licensees to maintain copies of ATF Form 3310.4 on licensed premises for inspection by ATF.</p>	7/1/94
	<p>Consolidate all firearms data base into the Firearms Information Networked Data Base (FIND) which allows access by ATF law enforcement community.</p>	3/1/95
	<p>Expedite the modernization and automation of the National Tracing Center to provide prompt tracing of firearms involved in criminal activities.</p>	3/1/95
	<p>Provide for automated firearms trace requests and responses between the National Tracing Center and State and local law enforcement agencies.</p>	3/1/95

OBJECTIVE**WORK STEPS****TARGET DATE**

Enhance Automated Systems (cont'd.)

Enhance the system of maintenance of multiple sales forms to allow recognition of similar names/addresses during data entry.

3/1/95

Implement Firearms Information Networked Data Base (FIND) to expedite the modernization of automation of the National Tracing Center to provide prompt tracing of firearms involved in criminal activities.

3/1/95

OBJECTIVE**WORK STEPS****TARGET DATE**

Develop Administrative Sanctions
(Refer to Initiative(s): (f))

Review current statutes and policies to determine the feasibility and desirability of a system of FFL suspensions.

3/31/94

OBJECTIVE**WORK STEPS****TARGET DATE**

Enhance Purchaser Identification
(Refer to Initiative(s): (e))

Publish NPRM to require nonlicensed firearms purchasers to present multiple forms of I.D., including a driver's license or other picture I.D.

3/1/94

Revise ATF Form 4473 to amend the straw purchase information in the instruction section and remove the "is known to me" option in the identification section.

7/1/94

Publish final regulations to require non-licensed firearms purchasers to present multiple forms of I.D.

7/1/94

IMPORTATION OF ASSAULT PISTOLS

**TO REEXAMINE AND/OR MODIFY THE FACTORING
CRITERIA USED TO DETERMINE THE SPORTING
CHARACTERISTICS OF CERTAIN IMPORTED PISTOLS, AND
TO DENY THE IMPORTATION OF PISTOLS NOT MEETING
THE MODIFIED CRITERIA.**

INITIATIVES

INITIATIVE A:

REVIEW AND REVISE THE FACTORING CRITERIA FOR IMPORTED HANDGUNS TO ENSURE ONLY SPORTING HANDGUNS ARE GRANTED IMPORTATION STATUS.

STRATEGY

- * Prepare revised Factoring Criteria for internal review and identify those pistols affected by the revision.

INITIATIVE B:

FORMALIZE THE REVISED FACTORING CRITERIA THROUGH THE PUBLICATION OF A FINAL RULE IN THE FEDERAL REGISTER.

STRATEGIES

- * Publish a Notice of Proposed Rulemaking (NPRM) document providing a 90-day comment period for input from the public and other interested parties.
- * Publish a Final Rule formally adopting the Factoring Criteria.
- * Revise ATF Form 4590 to reflect revisions.

NONSPORTING HANDGUNS

OBJECTIVE	WORK STEPS	TARGET DATE
Review, modify and publicize Factoring Criteria for Handguns	Identify personnel in Chief Counsel, Compliance Operations, and Law Enforcement to work on factoring criteria and regulations.	8/11/93
	Review approved ATF Forms 6 for the past 3-5 years to determine whether non sporting handguns have been imported.	9/30/93
	Research legislative history of GCA's non sporting handgun terminology.	10/15/93
	Provide recommendations to the Director.	10/31/93
	Finalize NPRM and transmit to <u>Federal Register</u> .	1/15/94
	Publish final rule in <u>Federal Register</u> .	6/15/94
	Update text and reprint F 4590.	6/30/94

THE WHITE HOUSE

WASHINGTON

August 11, 1993

MEMORANDUM FOR THE SECRETARY OF THE TREASURY

SUBJECT: Gun Dealer Licensing

A major problem facing the Nation today is the ease with which criminals, the mentally deranged, and even children can acquire firearms. The gruesome consequences of this ready availability of guns is found in the senseless violence occurring throughout the country with numbing regularity. While there is not one solution to the plague of gun-related violence, there is more than sufficient evidence indicating that a major part of the problem involves the present system of gun dealer licensing, which encourages a flourishing criminal market in guns.

The Gun Control Act of 1968 established a licensing system for persons engaged in businesses of manufacturing, importing, and dealing in firearms. These licensees are allowed to ship firearms in interstate commerce among themselves, and are required to abide by State laws and local ordinances in their sale of firearms to non-licensees. They are also prohibited from selling firearms to felons, certain other classes of persons, and generally to out of state persons. This Act also established a comprehensive record-keeping system and authorized the Secretary to conduct inspections to ensure compliance with the Act. The statutory qualifications for a licensee are that the applicant is at least 21 years of age, is not a felon or other person prohibited from possessing firearms, has not willfully violated the Gun Control Act, and has premises from which he intends to conduct business. The license fee for a basic dealer's license is only \$10 a year.

The minimal qualification standards of the statute, coupled with policies of neglect and opposition to legitimate regulatory efforts by past Administrations, leave us with a situation where in some ways we have made it easier to get a license to sell guns than it is to get and keep a driver's license. Today there are in excess of 287,000 Federal firearms licensees, and a great number of these persons probably should not be licensed. The Bureau of Alcohol, Tobacco and Firearms (ATF) estimates that only about 30 percent of these are bona fide storefront gun dealers. ATF estimates that probably 40 percent of the

licensees conduct no business at all, and are simply persons who use the license to obtain the benefits of trading interstate and buying guns at wholesale. The remaining 30 percent of licensees engage in a limited level of business, typically out of private residences. While the Federal statute creates no minimum level of business activity to qualify for a license, many of the licensees in this category operate in violation of State and local licensing, taxing, and other business-related laws. Since the overall purpose of the Gun Control Act was to assist State and local gun control efforts, at the very least we need to coordinate the Federal licensing process with the appropriate State and local agencies.

This Administration is committed to doing more to prevent this criminal market in illegal guns from continuing to flourish. Since all new firearms used in crime have at some point passed through the legitimate distribution system, Federal firearms licenses represent the first line of defense in our efforts to keep guns out of the hands of criminals.

Accordingly, you have informed me that you will direct the Department of the Treasury and ATF to take whatever steps are necessary, to the extent permitted by law, to ensure compliance with present licensing requirements, such as:

- (a) improving the thoroughness and effectiveness of background checks in screening dealer license applicants;
- (b) revising the application process to require the applicant to supply all information relevant to establishing qualification for a license, and to require more reliable forms of identification of the applicant, such as fingerprinting, to assist in identifying an applicant's criminal or other disqualifying history;
- (c) making the "premises" requirement of the statute more meaningful by increasing field checks and the use of other procedures to verify compliance;
- (d) increasing the scrutiny of licensees' multiple handgun sales reports and providing automated access to multiple sales report information by serial number for firearms trace purposes;
- (e) requiring dealers to obtain more reliable identification from purchasers;
- (f) reviewing sanctioning policies to determine the feasibility and desirability of adding the option of license suspension for certain violations;

(g) expanding the use of cooperative agreements with State and local law enforcement agencies to address licensing and trafficking problems;

(h) expanding ATF's capabilities to utilize effectively the firearms transaction records of out-of-business licensees for tracing purposes through the use of automation and other technology.

Acting pursuant to your statutory authority, you shall make such determinations and issue orders, regulations and rulings, as appropriate, to achieve the objectives stated in this memorandum.

I further direct that you initiate these actions as soon as possible and report your progress implementing these and other measures consistent with the foregoing to me within 90 days and annually thereafter.

All Executive agencies shall, to the extent permitted by law, cooperate with and assist you in carrying out the objectives of this memorandum. You shall consult with the Attorney General, the Director of National Drug Control Policy, and other Executive agencies as necessary to coordinate and implement the objective of this memorandum. To the maximum extent possible, the Attorney General, through the Office of Justice Programs, Bureau of Justice Assistance, will expand support to State and local agencies working with ATF on joint projects relating to licensing and trafficking in firearms. Nothing in this memorandum shall be construed to require actions contrary to applicable provisions of the law. You are hereby authorized and directed to publish this memorandum in the Federal Register.

William J. ...

THE WHITE HOUSE

WASHINGTON

August 11, 1993

MEMORANDUM FOR THE SECRETARY OF THE TREASURY

SUBJECT: Importation of Assault Pistols

A category of pistols commonly referred to as assault pistols has increasingly become the weapon of choice for drug dealers, street gang members, and other violent criminals. These pistols, generally characterized by their bulky military-style appearance and large magazine capacity, include domestically manufactured TEC-9's and MAC-10's, as well as imported models like the Uzi pistol and the H&K SP-89. Their popularity appears to stem from their intimidating appearance and their considerable firepower.

These weapons have been used to harm and terrorize many Americans, particularly our children, in recent years. As a result, it is no longer possible to stand by and witness the deadly proliferation of these weapons without acting to protect our communities.

Although addressing the domestic production of these weapons requires a change in the statute, which I support, existing law already bans the importation of firearms unless they are determined to be particularly suitable for or readily adaptable for sporting purposes. I am informed that shortly after enactment of the Gun Control Act of 1968, the Treasury Department adopted a factoring system to determine whether handguns were importable pursuant to this standard. The system entails the examination of the firearm against a set of criteria, with points being awarded for various features. A minimum score is required before importation is approved. The criteria and weighted point system were designed to address the crime gun of the day, the cheap, easily concealable "Saturday Night Special." Under this 25-year old system, small caliber, easily concealable handguns score few points and are banned from importation. However, assault-type pistols -- the new crime gun of the day -- because of their large size, weight, and caliber, easily score the necessary points to qualify for importation even though none of these pistols appears to have any legitimate sporting purpose. Accordingly, it is time to reassess how the present regulatory approach can be made more effective in achieving the legislative directive to preclude importation of firearms that are not particularly suitable for or readily adaptable for sporting purposes.

I hereby direct you to take the necessary steps to reexamine the current importation factoring system to determine whether the system should be modified to ensure that all nonsporting handguns are properly denied importation. You have advised me that the Bureau of Alcohol, Tobacco and Firearms (ATF) will issue a notice of proposed rulemaking in the near future that will propose changes to the factoring system to address the assault pistol problem. You have further advised me that effective immediately action on pending applications to import these weapons will be suspended, and that final action on any application will be delayed until this review process is completed.

Nothing herein shall be construed to require actions contrary to applicable provisions of law. You are hereby authorized and directed to publish this memorandum in the Federal Register.

William J. Bennett

BUDGETARY PROPOSAL FOR GUN DEALER

LICENSING INITIATIVES



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, D.C. 20226

AUG 16 1993

MEMORANDUM TO: Director, Office of Budget

FROM: Budget Officer

SUBJECT: Bureau Impact on Gun Dealer Licensing

Attached is the Bureau's response to the impact of the President's memorandum of August 11, 1993, which tightens enforcement of firearms dealers licenses. The budgetary implications range from 33 to 358 FTEs and \$9,505,000 to \$38,084,000. Program emphasis is as follows:

- o Improves background checks and the application process in screening of dealer license applicants.
- o Increases field checks and other procedures to verify compliance.
- o Increases scrutiny of licensees' multiple sales report information by serial number for trace purposes.
- o Reviews sanctioning policies.
- o Requires dealers to obtain more accurate information from firearms purchasers.
- o Expands the use of cooperative agreements with State and local law enforcement agencies to address licensing and trafficking problems.
- o Expands capabilities to effectively utilize transaction records of out-of-business licensees for tracing purposes through the use of automation and technology.

It should be noted that this proposal will have a major impact on illegal firearms trafficking; however, depending on the perspective of various segments of the public, it would be viewed as conflicting with Congressional appropriation language and may generate public criticism.


Marguerite R. Moccia

Attachments

BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
PRESIDENTIAL GUN DEALER LICENSING MEMORANDUM

- (A) Improve the thoroughness and effectiveness of background checks in screening dealer license applicants.

<u>Minimum</u>		<u>Proposed</u>		<u>Maximum</u>	
<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>
4	\$250	4	\$250	4	\$250

IMPACT - MINIMUM/PROPOSED/MAXIMUM:

The requirement of 4 FTE positions and \$250,000 will allow the Bureau to conduct increased criminal history queries (NLETS/TECS/NCIC), Department of Motor Vehicle queries and Postal CODE 1 queries using information provided by applicants and responsible persons. ATF will modify procedures to require applicants and each responsible person to submit all places of residence within the last 10 years.

This funding will also purchase additional software and hardware to achieve this objective.

- (B) Revise the application process to require the applicant to supply all information relevant to establishing qualification for a license, and to require more reliable forms of identification of the applicant, such as fingerprinting, to assist in identifying an applicant's criminal or other disqualifying history.

<u>Minimum</u>		<u>Proposed</u>		<u>Maximum</u>	
<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>
4	\$4,840	4	\$4,840	4	\$4,840

IMPACT - MINIMUM/PROPOSED/MAXIMUM:

The requirement of 4 FTE positions and \$4,840,000 will allow the Bureau to obtain more comprehensive applicant information. This will be achieved through revision of Form 7 (Application Form) and Form 8 (Renewal Application). The Bureau will also require submission of fingerprint cards and a current photograph (within the past 6 months) of the applicant and responsible person. (Responsible person is someone having say in business i.e., corporate officer, sole proprietor, partner. Assumes 3 people per application.)

- (C) Make the "premises" requirement of the statute more meaningful by increasing field checks and the use of other procedures to verify compliance.

<u>Minimum</u>		<u>Proposed</u>		<u>Maximum</u>	
<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>
25	\$1,750	100	\$7,000	225	\$15,750

IMPACT - MINIMUM:

A minimum requirement of 25 additional inspector and examiner FTE positions and \$1,750,000 is necessary for the Bureau to revise regulations to more clearly define premises eligible for licensing and conduct full field investigations of all original and renewal applications for a Federal Firearms License (FFL) within designated high crime areas.

IMPACT - PROPOSED:

A proposed requirement of 100 additional inspectors and examiner FTE positions and \$7,000,000 is necessary for the Bureau to revise regulations and conduct full field investigations of all renewals in designated high crime areas and of all original applications regardless of location.

IMPACT - MAXIMUM:

A maximum requirement of 225 additional inspectors FTE positions and \$15,750,000 is necessary to revise regulations and conduct full field investigations of all original and renewal applications for an FFL regardless of geographic location.

- (D) Increase the scrutiny of licensees' multiple handgun sales reports and provide automated access to multiple sales report information by serial number for firearms trace purposes.

- (G) Expand the use of cooperative agreements with State and local law enforcement agencies to address licensing and trafficking problems.

<u>Minimum</u>		<u>Proposed</u>		<u>Maximum</u>	
<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>
0	\$2,100	50	\$8251	125	\$15,692

IMPACT - MINIMUM: The minimum requirement of \$2,100,000 will enable ATF to consolidate existing firearms databases into a single Firearms Information Networked Database (FIND). This would enable access to the four major independent/stand-alone data bases in use by ATF.

The Office of Law Enforcement currently has several automated systems on various types of computers (e.g., mainframe, stand-alone PM, and multiuser) for the collection and analysis of firearms-related information. ATF supports State law enforcement personnel with work location, supplies, required equipment, and intelligence data required to facilitate investigations. Investigative activities have been enhanced by the firearms expertise of ATF special agents and the regional experience provided by local law enforcement.

[The Bureau believes that the proposal will have a major impact on illegal firearms trafficking; however, depending on the perspective of various segments of the public, it would be viewed as conflicting with appropriation language and may generate some criticism.] ATF has reviewed all requirements to comply with the Privacy Act while maintaining information on the multiple sale of handguns. The multiple sales form contains limited information on the purchaser, along with licensee information, and the number of handguns purchased. The licensee is required to report only purchases of more than two handguns by any one individual within a 5-day timeframe.

The systems cited are currently stand alone and do not have an interface that allows easy access. In many instances, these systems require duplicating data entry and queries because no direct link exists between them. This places a heavy burden on limited resources and impacts the Bureau's ability to provide current information to requesters.

IMPACT - PROPOSED: The proposed requirement of 50 FTE positions and \$8,251,000 will support the majority of law enforcement activities outlined in the President's policy

letter. It will provide the implementation of uniform firearms tracing by placing 24 special agents in ATF field divisions and two special agent positions in Headquarters. By instituting this program each field division will be able to identify the source states of firearms and determine the flow of firearms. In a few field divisions now utilizing a variety of such programs, trends and patterns of purchasing and distribution have become apparent.

Twenty-four special agents requested would be responsible for providing for additional law enforcement needs resulting from increased intelligence information and elevated compliance activities.

The Bureau will also amend the regulation in 27 CFR 178.126a to require the licensee to maintain a copy of ATF F 3310.4, (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) on the licensed premises for review by an ATF officer.

IMPACT - MAXIMUM: The maximum requirement of 125 FTE positions and \$15,692,000 to establish firearms trafficking intercept teams in each of the field divisions. These teams would consist of four special agents and one technical support position that would provide uniform firearms tracing activities and expand investigative efforts. By instituting this program each field division will be able to identify the source states of firearms and determine the flow of firearms. In a few field divisions now utilizing a variety of such program, trends and patterns of purchasing and distribution have become apparent. Advantages will also be realized in the timely identification of conspiracies, terrorist/radical groups, and drug cartels attempting to acquire and stockpile weapons.

The Bureau will also amend the regulation in 27 CFR 178.126a to require the licensee to maintain a copy of ATF F 3310.4, (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) on the licensed premises for review by an ATF officer.

- (E) Require dealers to obtain more reliable information from purchasers.

<u>Minimum</u>		<u>Proposed</u>		<u>Maximum</u>	
<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>
-	\$200	-	\$200	-	\$200

IMPACT - MINIMUM/PROPOSED/MAXIMUM:

This requirement of \$200,000 allows the Bureau to revise and obsolete existing ATF Form 4473, Firearms Transaction Record. With issuance of revised forms, the Bureau will require non-licensed firearms purchasers to submit multiple forms of identification, with at least one being a photo identification.

- (F) Review sanctioning policies to determine the feasibility and desirability of adding the option of license suspension for certain violations.

<u>Minimum</u>		<u>Proposed</u>		<u>Maximum</u>	
<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>
-	-	-	-	-	-

IMPACT - MINIMUM/PROPOSED/MAXIMUM:

The Bureau will conduct an in-depth review of current statutes, regulations and policies to determine the desirability of the development of a system of suspensions. ATF will absorb these functions into normal operations.

- (H) Expand ATF's capabilities to utilize effectively the firearms transaction records of out-of-business licensees for tracing purposes through the use of automation and other technology.

<u>Minimum</u>		<u>Proposed</u>		<u>Maximum</u>	
<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>	<u>FTE</u>	<u>(\$000)</u>
0	\$365	0	\$365	0	\$1,352

IMPACT - MINIMUM/PROPOSED: The Bureau requires \$365,000 to expedite the tracing of firearms that have been involved in criminal activities. This will be accomplished through the purchase of an automated microfilm system and to contract services with the mentally and physically handicapped to prepare documents for microfilming. The Bureau, according to statute, is the official repository for firearms records of Federal firearms licensees (FFLs) that have discontinued the firearms business. These firearms records, which must be searched in over 40 percent of all trace requests, need to be acted upon in a timely manner. Linking these 60 million out-of-business records by computer to the active tracing process will increase the overall efficiency of the

National Tracing Center (NTC) and allow traces to be retrieved more timely.

IMPACT - MAXIMUM: The NTC has a backlog of over 7,000 boxes of firearms records that have yet to be microfilmed. Computerization and indexing capability has allowed the NTC to query the system for firearm serial numbers being traced prior to contacting active firearms licensees. It has also allowed for rapid retrieval of information on used firearms. In order to fully automate the NTC, \$365,000 is required to microfilm records and an additional \$987,000 will allow for the computerizing and indexing of over 40 million documents. Also included is the computerized linkage to States that maintain a Firearms registration, such as California, Michigan and Maryland.

**BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
PRESIDENTIAL GUN DEALER LICENSING MEMORANDUM
SUMMARY OF BUDGETARY IMPACT**

	Minimum		Proposed		Maximum	
	FTE	(\$000)	FTE	(\$000)	FTE	(\$000)
Improving Background Checks (Additional queries \$200,000—GS 5/6 examiners; Software/Hardware, \$50,000)	4	250	4	250	4	250
Application Process Revision (Fingerprint checks @\$17 x 90,000 x 3*; Forms replacement, \$50,000; Additional personnel \$200,000)	4	4,840	4	4,840	4	4,840
Increasing Field Checks (Additional Inspectors)	25	1,750	100	7,000	225	15,750
Multiple handgun sales reports/traces; Expand cooperative agreements/ trafficking problems (Combine databases; establish trafficking teams)	0	2,100	50	8,251	125	15,692
Improve information provided to dealer from purchaser (Replacement of ATF Forms 4473**)	0	200	0	200	0	200
Review sanctioning policies (Absorbed through normal operations)	0	0	0	0	0	0
Expand use of out-of-business licensees for tracing purposes (Link records to tracing process)	0	365	0	365	0	1,352
TOTAL BUDGET IMPACT FY 1995	33	\$9,505	158	\$20,906	358	\$38,084

NOTE: Costs for 12 months with 1:1 FTE/Position ratio

* average of 3 responsible persons per application

Responsible person = corporate officers, partnership, sole proprietorship, etc.

** Form 4473 is Firearms Transaction Record

INTERNAL USE ONLY!

INTERNAL USE ONLY!

FY 1995 IMPACT STATEMENT
LAW ENFORCEMENT/COMPLIANCE OPERATIONS BACKUP SUMMARY SHEET

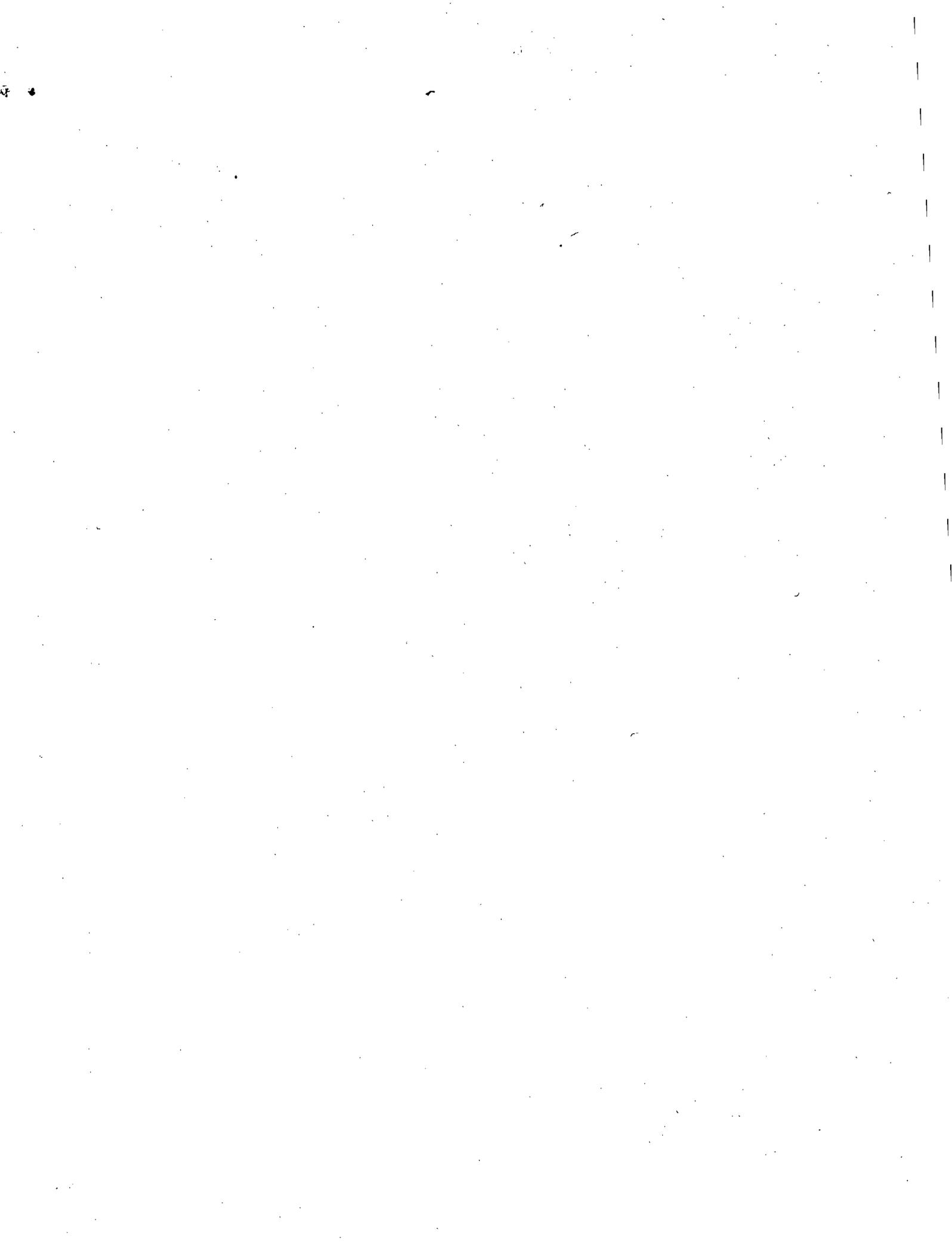
<i>FIREARMS INFORMATION NETWORKED DATA BASE</i>			
	MINIMUM	PROPOSED	MAXIMUM
	2,100,000	8,251,000	15,691,158
2513	395,000	394,200	395,000
2622	654,000	650,000	654,000
3152	845,000	834,000	845,000
3154	190,000	190,000	190,000
UNDEFINED	16,000	32,000	32,000
		123,016	123,016
		x	x
AGENT FTE		50	104
		<u>6,150,800</u>	<u>12,793,664</u>
			37,214
SUPPORT FTE			x
			<u>21</u>
			781,494

<i>NATIONAL TRACING CENTER</i>			
	MINIMUM	PROPOSED	MAXIMUM
	365,000	365,000	1,352,000
2513	0	0	700,000
2533	245,000	245,000	245,000
2622	45,000	45,000	45,000
3122	75,000	75,000	75,000
3152	0	0	287,000

COMPLIANCE OPERATIONS

PLEASE NOTE:

The average cost used for FTE position costs for Compliance Examiners (@\$50,000) and Inspectors (@\$70,000), are higher than the average cost models. This is attributed to greater start-up costs including: additional space requirements, additional supervisory personnel, and increased travel costs to insure 100% field coverage.



94-131745



DEPARTMENT OF THE TREASURY
WASHINGTON

11 /

ASSISTANT SECRETARY

March 10, 1994

MEMORANDUM FOR SECRETARY BENTSEN

FROM: Ronald K. Noble *RK for RN*
Assistant Secretary (Enforcement)

SUBJECT: Treasury's Federal Firearm Initiatives

Date / Time March 10, 1994, 5:45 P.M. (20 minutes with gun dealers and police)
limited time with press

Location Small conference room

AGENDA: Secretary Bentsen speaks from talking points (no press)
Gun dealers and law enforcement respond
Press enters -- Bill Bridgewater may leave
Secretary Bentsen announces signing of gun dealer and law
enforcement statement in support of Treasury Firearm Initiatives
(1-2 minute statement being prepared by Ilene separately)
Questions & Answers (if you wish to leave, you may turn questions
over to Ron and others)

PARTICIPANTS:

Treasury Secretary Bentsen
Assistant Secretary Noble
ATF Director John Magaw

Gun Dealers Jack Puglisi Chairman of the Dealer Task Force, Collectors
and Arms Dealers Association
Bill Bridgewater Executive Director, National Alliance of Stocking
Gun Dealers

Law Enforcement Federal Law Enforcement Officers Association (FLEOA)
National Association of Police Officers (NAPO)
International Brotherhood of Police (IBP)
National Sheriffs Association (NSA)

BRIEFING: Tab A Overview
Tab B Talking Points
Tab C Joint Statement in Support of Treasury Initiatives
Tab D Q's and A's
Tab E Letters of support from Puglisi and police groups
Letter of suggestions from Bridgewater

A

OVERVIEW
MEETING WITH GUN DEALERS AND POLICE GROUPS

March 10, 1994

PURPOSE:

You will be meeting with two important gun dealer groups and several police groups that support your firearms initiatives. A positive gathering of these organizations will show that your initiatives are broadly supported by the gun industry and the enforcers of the relevant laws.

The NRA has engaged in a full-fledged campaign to try to prove the opposite -- that Treasury has no support for its firearms proposals, in particular the \$600 FFL fee. This gathering of executives of large gun dealer and police organizations will help balance the sporadic criticisms made by a few individual gun dealers and the NRA.

During the meeting the gun dealers and the police representatives will sign and present a statement in support of Treasury's firearms initiatives. A blow-up of the new licensing form will be prominently displayed in the room.

BACKGROUND:

In your January 4, 1994 speech, you introduced Treasury's firearms initiatives and pledged \$81 million to these efforts -- \$71 from the Senate version of the crime bill and \$10 million from other sources. The most significant portions of that package were :

- o drafting of the Brady Bill regulations
- o raising the FFL fee to \$600
- o various legislative reforms to increase ATF's ability to regulate
 - o requiring FFLs to comply with State and local requirements
 - o revocation of licenses once convicted of a Gun Control Act violation
 - o permitting more than 1 compliance inspection per year
 - o giving ATF more time to make FFL decisions
- o tracking gun patterns in 10 counties
- o enhancing ATF's abilities to trace guns
- o expanding ATF firearms enforcement in areas such as Uptown (public housing enforcement) Achilles (armed career criminal targeting)

Recently, we received approval from the White House to try to convince the House to put your initiatives in its version of the crime bill. On March 9, you spoke with Chairman Brooks and received his commitment that he would "consider" adding Treasury's initiatives to the House crime bill. Per your direction, the FFL initiatives were delivered immediately to the Chairman's chief counsel along with letters of support from various law enforcement and gun dealer groups.

The press availability following your meeting and the subsequent reports of this strong and important constituent support may help convince Congressman Brooks and other members to do more than merely "consider" adding Treasury firearms initiatives to the crime bill.

B

**Talking Points for Meeting with
Gun Dealers and Police Organizations
on Federal Firearms Licensing (FFL) Reform**

Thursday, March 10, 1994, 5:45 p.m.

* I would like to welcome all of you to Treasury. I've heard a lot about the good work you all have been doing in an area of real importance to the nation.

* You may be wondering why we brought law enforcement representatives and gun dealers together in one meeting.

- Mr. Bridgewater (Bill) and Mr. Puglisi (Jack), you represent a lot of hard-working men and women engaged in the legal firearms trade -- a good, honest trade that is being threatened by an increasing number of firearms licensees who are operating in violation of the law, and who are undermining your legitimate businesses.

- Those of you from law enforcement may not have the same kind of economic interests in this issue, but you are the ones who come face

to face with the criminals who have been armed directly or indirectly through either illegal or irresponsible FFLs.

- And, of course, we at Treasury are trying to do the right thing by both of you and by the American people.

* I have to be candid with you. When I took over as Secretary of the Treasury and started to learn about the day to day activities of the various bureaus and agencies within the Department, I was shocked to learn how limited ATF's ability to regulate the firearms industry really was.

* As one recent study pointed out, teddy bear manufacturers and retailers are much more heavily regulated than are gun dealers and gun manufacturers.

* Now, I'm the last person to argue for heavy regulation -- I have always considered myself a friend of business -- but when there is an illicit market for a product, such as there is for firearms, the legitimate industry has certain responsibilities vis a vis the public, and the government has other responsibilities vis a vis the industry. And I honestly feel that what we are talking about is not heavy regulation, but responsible regulation.

Without the types of FFL reform that we are talking about, we are going to have too many licensees running amok, and we'll just make things more difficult and more dangerous for our friends in law enforcement who are here with us today.

* Believe me, I understand that, as gun dealers, you are walking a fine line between your own economic interests and concerns about public safety on the one hand, and the fact that many of your friends -- such as hunters, marksmen, and skeet shooters -- probably oppose this. I really appreciate your courage and personal strength in taking this position.

* I want you all to know that I, too, am an owner of a number of firearms. I thoroughly enjoy a good hunt and have always opposed any legislation or policy that would restrict my right to pursue this hobby.

* Mr. Bridgewater (Bill), you hit the nail right on the head in your recent letter to Ron -- "there is no question that the principal problem faced by the firearms industry is the simple fact that hiding among the legitimate businesses in the industry are those outlaws who divert the flow of firearms

from the legitimate trade into the more lucrative firearms black market."

- * We shared with ATF your descriptions of the three problem black marketeers -- the "Weekend Gun Show Cowboy;" the "Weekend Gun Runner;" and the "Local Street Vendor." Your graphic descriptions of these so-called business practices were enlightening to me.

- * Just so you know, our approach to this whole problem is not just the enactment of FFL reform, we are asking for additional funding for ATF enforcement in the crime bill. We are also trying to gather intelligence on the trafficking patterns and routes, in particular looking for loopholes we can plug in the gun laws and seeing where our resources can be most effective. We will review our findings to determine what possible additional legislation we may need.

- * Once we get this initiative passed, we are not going to close the door and walk away.

- * Mr. Bridgewater (Bill), I know that your membership has endorsed a fee in

the \$350-\$500 range. I realize that this puts you in a somewhat awkward position, inasmuch as our estimates for implementing the type of system we hope to have will cost closer to \$600, which is the fee that I have proposed. I appreciate your frankness on this point, and your continued willingness to support the thrust of our proposals. I want to ensure you that part of the improved regulatory program that we will institute with the fee will include targetting abuses of firearms licenses by illegal gun traffickers. As we progress in this area, we will continue to seek your counsel and expertise.

* Mr. Puglisi (Jack), your public statements of support have been extremely helpful. As you know, we are taking one small step at a time, and I appreciate your patience.

* To my friends in law enforcement, I want to thank you again for your unwavering support. We are very committed to an ongoing cooperative and supportive working relationship. I hope that you can take a few minutes to get to know our friends who are legal and responsible gun dealers. We all need to work together in tackling this serious problem.

- * I just want all of you to know that the door to Treasury is always open to people who take an honest, responsible approach to matters of importance to the Department and to the American people.

- * Thank you again for coming and for signing this joint statement endorsing FFL reform. I'm glad for all that you have done to be supportive. If we are united in this important mission, I strongly believe that we can prevail.

- * I am eager to hear from all of you any additional thoughts or comments on our reform package or other related items. If you have any questions, either I, Assistant Secretary Noble, or ATF Director Magaw will do our best to respond.

FOLLOWING THE DISCUSSION:

- [* I think there are a few people from the media who would like to take our pictures and ask us a few questions.]

C

DRAFT

JOINT STATEMENT

We recognize that there is a serious problem of crime, especially violent crime, in this nation. This problem is driven in part by the size, scope and availability of the illegal firearms market, which supplies criminals and juveniles with deadly weapons.

We strongly support the right of law-abiding American adults to bear arms, and our intention is not to undermine either their constitutional rights, or the legitimate commerce in firearms.

However, within the firearms industry are elements who divert the flow of firearms from the legitimate trade into the more lucrative firearms black market.

In addition to the tragedies and sorrows suffered by the victims of violent crime, we recognize the perils faced by state, local and federal law enforcement as they target gun traffickers and violent criminals.

We, further recognize that gun licensees, who through willful, negligent or irresponsible actions contribute to the illicit gun market, undermine those businesses which carefully adhere to the letter of the law.

At present, the Bureau of Alcohol, Tobacco and Firearms (ATF) has regulatory authority over the firearms industry, but its ability to ensure compliance with firearms laws is hampered by insufficient resources and inadequate statutory authority. The regulatory system with its present constraints is harmful to legitimate firearms businesses, to law enforcement and to the public.

We strongly support new legislation to reform the Federal Firearms Licensing (FFL) system, including the following initiatives:

- * requiring that FFLs be in compliance with state and local laws and ordinances;
- * requiring reports of losses or thefts from FFL firearms inventories;
- * removing the prohibition on more than one compliance visit per FFL per year;
- * increasing the penalty for willful falsification of records; and
- * extending ATF's period for a decision on firearms license applications from 45 to 90 days.

We further support any initiatives in the crime bill that would improve ATF's ability to enforce firearms violations, particularly addressing the illicit firearms market.

Finally, we believe that the firearms regulatory system should pay for itself, and we support an increase in the license fee commensurate with the cost of the program.

D

Question: Isn't the \$600 licensing fee simply an unfair tax increase for FFLs?

Answer: Absolutely not. For too long people have been buying licenses for ten bucks a year, when it costs sixty times that much to check an applicant to make sure they're not a criminal, supplying guns out of the back of their cars or kitchens, or simply buying guns cheaply from a wholesaler to turn around and deal them on the street to kids and criminals.

This is not a tax, it is an effort to make the licensing system pay for itself.

In legalese:

The licensing system must finance itself. For too long, the American taxpayer has subsidized the firearms licensing program - and the result has been minimal scrutiny of applicants for licenses.

The law provides that only regular firearms dealers qualify for licenses -- and that does not include people dealing guns from the back of their station wagon, or their kitchens -- and certainly should not include people buying guns cheap from a wholesaler and dealing them on the streets. Therefore, those people complaining that a \$600 cost is too much to impose on law-abiding gun collectors have no standing -- the collector (of any guns other than antiques) doesn't qualify for the license in the first place. But the system has been so overburdened that we haven't been able to exclude these people from dealers' licenses. Collectors don't need FFLs and don't qualify for them anyway.

Q: How does eliminating 80 percent of FFLs reduce crime?

A: First, what is important is which dealers go, and which remain in business. We seek to eliminate those that do not meet legal requirements for a license, and those that do not follow the rules when they sell guns.

Second, compare what we have now and what we will have when these reforms are implemented. Now we have a system where virtually anyone can get a license, where ATF cannot monitor FFLs activities, including whether they maintain proper records or sell guns off the books to kids and criminals. What we will establish is a self-financed and rigorously enforced licensing system, one that has the resources and the capability to enforce the laws.

Q: The NRA claims that the \$600 proposed fee is unjustifiable, constituting multiples of the actual cost of investigating an applicant.

A: ATF has researched this issue, and our studies indicate that it will cost \$580 to conduct the type of thorough investigation that we feel is necessary to ensure that licenses are held by the appropriate people. Once the fees are raised, the system will simply pay for itself -- and not be subsidized. That makes common sense when we are trying to cut the budget, no?

Q. Isn't it true that if you close off dealers, criminals will just get guns on the Black Market?

A: I love that argument. It never answers the question where the Black Market is supposed to get guns. The National Crime Information Center gets reports of approximately 200,000 stolen guns a year. That is a lot. There are an estimated 7.5 million guns a year sold at retail through licensees. That is alot more.

Only licensees have the ability to get guns shipped to them from manufacturers and wholesalers. This doesn't mean that dealers are bad. It means that criminal purchasers deceive them in order to get guns. Brady and reasonable oversight by ATF will clearly help curtail this.

Q: There is a long list of proposals in the Congress to curb firearms. The Clinton Administration seems to like all of them. Is the President going to get around to licensing gun owners? Is that where the Clinton Administration is headed?

A: We believe there are several practical, common-sense bills in the Congress which will reduce crime if enacted.

But registering gun owners should be the last thing we consider. First we ought to test measures that are less intrusive and less expensive.

The guns that make headlines and spread fear throughout America are those used in crimes. Then let's increase our ability to trace crime guns. An effective gun tracing system can work just as well as registration and be far less expensive.

3/10/94

Potential Press Questions

Issue: MAK 90 Rifles

1. How many of these illegal weapons have been imported from China? From other countries?

ATF has approved import permits for 1,928,000 MAK 90 rifles during the period of January 1, 1993 through January 31, 1994. We are currently compiling the records of actual imports to determine the exact number actually imported during that period. MAK 90 rifles have been imported since 1991.

We are working with importers to determine how many of the firearms that have come through were illegally configured. We expect it will be several thousand.

To a lesser extent than China, we are finding improperly configured rifles from Egypt.

2. How long have they been coming in illegally?

We became aware that some of the firearms coming in were improper in early January.

3. How did you discover that they had been imported?

A firearms distributor contacted ATF when he recognized that some of the firearms he received were improperly configured.

4. Why weren't they stopped before they entered the country and were sold?

This was not a case of every firearm in a shipment being illegal. ATF and Customs have stopped and examined all shipments that have arrived since the problem was discovered. However, it would just be impossible to examine every article arriving in the United States.

5. Are other illegal guns being imported now? Do you know?

We have stopped all shipments at Customs for examination and we have stopped granting import permits

until we can get to the bottom of the problem and ensure it doesn't happen in the future.

6. What will you do to prevent this from happening again?

We are in contact with the State Department and with the countries involved. We want to make sure that everyone understands the law and that systems are in place to ensure no repeat of this.

7. Why did the State Department decide in 1987 to allow Chinese arms imports? (and were they not allowed before 1987?) Will you ask State to reverse that decision now?

In a foreign policy decision, the State Department removed trade barriers for products from China, which included firearms. Currently, there are discussions between the State Department, Treasury Department and the White House to assess the situation and resolve these issues.

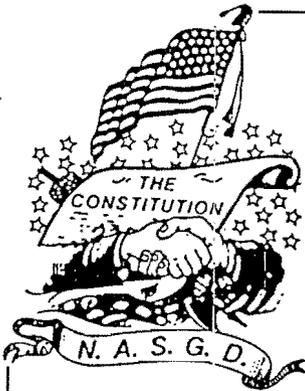
8. Do you anticipate prosecuting anyone for illegally importing these weapons?

At this point, we are not in the process of prosecuting anyone. However, if we find that anyone willfully imported these weapons in violation of law, we will recommend prosecution to the U.S. Attorney's office.

9. Why aren't all MAK-90 and other military-style weapons illegal to import? Will you take steps to make them illegal?

The Gun Control Act limits the importation of firearms to those that are suitable for sporting purposes. In 1989, ATF banned from import numerous rifles and shotguns that did not meet this criteria. Among those banned were AK-47 rifles. The MAK-90 rifle is a sporterized version of the AK-47 rifles, designed to meet the criteria of being suitable for sporting purposes. Therefore, we have no grounds under current law to ban them from import.

E



NATIONAL ALLIANCE OF STOCKING GUN DEALERS

26 January 1994

Mr Ronald Noble
Assistant Secretary for Law Enforcement
Department of the Treasury
1500 Pennsylvania Avenue NW
Room 4330
Washington, D.C. 20220

Dear Secretary Noble,

As we discussed during our first telephone conversation, the Alliance is not interested in just being another "nay-sayer" to every proposal originated by others.

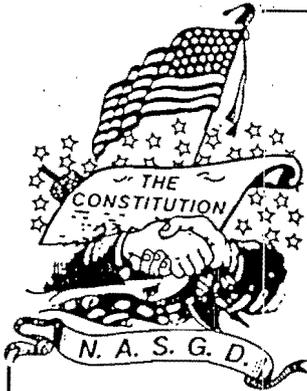
I believe that it is our obligation to contribute to the solutions to some of the problems that affect us all. In some ways we may have an even greater burden to contribute to the solutions to these problems since we make and sell products that can be misused in ways that are harmful to others.

There is no question that the principle problem faced by the firearms industry is the simple fact that hiding among the legitimate businesses in the industry are those outlaws who divert the flow of firearms from the legitimate trade into the more lucrative firearms black market.

This diversion occurs at the distributor/dealer level and is carried out by those who are licensed by the federal government as firearms dealers.

These black marketeers function in three major ways;

1. The first of these is the Weekend Gun Show Cowboy. Once or twice a month he will leave his regular job a little early on Friday night, swing by the local gun distributorship and load up his specially equipped van with 200-250 assorted firearms. The major part of his buy will be



NATIONAL ALLIANCE OF STOCKING GUN DEALERS

those commonly used in street crime, small caliber semi-autos and small frame revolvers with a sprinkling of the more expensive popular sporting handguns. Then he is on the road to the nearest large gun show, crossing state lines is inconsequential.

Upon arrival at the show, the Cowboy unloads his guns and sets up his tables for the show. He will normally portray himself as an individual gun owner and thus not subject to federal regulations while at the show.

He will sell the guns, "new in the box" for dealer cost plus 5-10%. He will net \$2-3000.00 clear profit, no taxes and play macho gun dealer all weekend. He will sell every gun he has to anyone with cash, local, state and federal laws be damned.

2. The second black marketeer is the Weekend Gun Runner. This individual will leave his job in Dayton, Ohio a little early on a Friday night and drive to the local distributor (or have already received the shipment at his house) where he will load his Bronco with 50 of the favorite street guns (small frame, small caliber semi-autos and small frame revolvers) and hit road to Washington, D.C.

Upon arrival in D.C. he will simply cruise the "bad streets" in town until he has disposed of his entire shipment. The small frame semi-autos that cost him \$49-59 will sell for \$250-400 on the streets of D.C. Deals are in cash only, to anyone with the cash.

He will gross \$10,000-15,000, with cost of the guns about \$2800-3000. His only other costs will be gas to D.C. and back, two nights in a cheap motel, and his triennial FFL fee. With two runs a month, this individual will make more in two months running guns than he does at his regular job. And it is all tax free.

3. The third black marketeer is the Local Street Vendor. This guy lives in or immediately adjacent to his market and he knows it very well. He will buy three or four street guns at a time that will be delivered to his home and



NATIONAL ALLIANCE OF STOCKING GUN DEALERS

peddle them on the "bad streets" for cash. He may even make "special orders" for his "clientele". Again, the small frame, small caliber semi-auto that he pays \$49-59 for will sell for \$250-400 on the streets. This individual has only the cost of his firearms and his triennial license fee as overhead. If he averages 3 gun sales a day, he will net approximately \$300,000 a year. It sure beats working for a living.

The first two of these black marketeers are fairly easy to detect, because they both buy in significant quantities at times that will allow delivery or pickup on Thursday or Friday evening.

Simply assign two inspectors to examine the shipping records of those distributors who are known to cater to the gun show crowd. Have them make copies of each shipment of 20 to 50 (or more) Davis/Jennings/Ravens and small frame .32's and .38's that are scheduled to arrive at the dealer's location on Wednesday through Friday.

Examine the invoices for repeat orders from the same individual and do a complete compliance audit on that individual dealer. If he is selling into the black market he doesn't dare log when and where and to whom he sold the gun, so he simply won't be able to account for dozens/hundreds of guns. GOTCHA!

The Local Street Vendor is harder to catch, since he doesn't buy in the quantities that are easy to spot, but he will buy the same thing consistently, the street guns. If your inspectors see the same name week after week ordering the same small quantities of street guns with only an occasional "special order" for some other firearm, you have just located the Street Vendor. Again an audit will catch him with firearms invoiced to him but not entered into his records.

When your agent is standing in front of these jerks with the invoices for shipments to them in his hand and they can't produce the firearms, it should be a fairly easy job for the prosecutor.



NATIONAL ALLIANCE OF STOCKING GUN DEALERS

Two well briefed auditors dedicated to rooting out the black marketeers will do more good in one year than all the rest of the auditors combined who are conducting audits of storefront operators.

I heartily recommend a frontal assault on the black marketeers who are the "source" of the firearms used by criminals. If you burn the "source", you will directly affect the flow of firearms into the criminal market.

Warm regards

Bill Bridgewater
Executive Director

DEALER TASK FORCE**CADA****COLLECTOR ARMS DEALER'S ASSOCIATION**

C/O JACK A. PUGLISI, CHAIRMAN
1336 COMMONWEALTH AVENUE
DULUTH, MN 55808
218-626-3618 • FAX 218-626-1904

March 4, 1994

Honorable Lloyd M. Bentsen
Secretary of the Treasury
Treasury Department
1500 Pennsylvania Avenue, N.W.
Washington, DC 20220

Dear Secretary Bentsen:

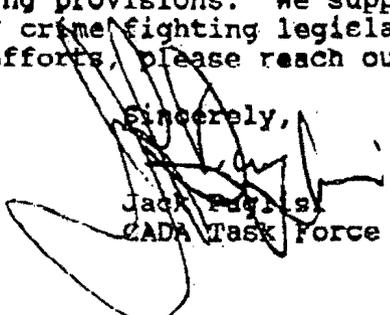
The Collectors and Arms Dealers Association (CADA), along with over 50,000 gun club members, have gone on record as supporting your anti-violence program, including the increase in the firearms licensing fee. We applaud your efforts to restore credibility to the legitimate firearms trade.

Although we also support the other initiatives of the program you recently introduced, we are particularly interested in, and supportive of, the firearms reform initiatives. CADA recognizes that an increase in the firearms dealer fee structure will provide adequate funding for ATF's background and compliance inspections of dealers, thereby eliminating those individuals who do not intend to engage in the legitimate firearms business.

Another part of your firearms licensing reform initiative includes requiring that all firearms dealers comply with State and local ordinances. We support this concept as indicative of the dealer's intent to conduct a legitimate firearms business.

We at CADA are encouraged that you have taken the position to reform firearms licensing provisions. We support your efforts to include them as part of crime fighting legislation. If we can be of assistance in your efforts, please reach out to us.

Sincerely,


Jack Puglisi
CADA Task Force Chairman



FEDERAL LAW ENFORCEMENT OFFICERS ASSOCIATION

"A Professional Association for Federal Law Enforcement Officers"

Representing Members of the:

Dept. of Agriculture - OIG - Special Agent
 US Forest Service - Special Agent
 Dept. of Commerce - Office of Drug Enforcement - SA
 Office of Inspector General - Special Agent
 National Marine & Fisheries Serv. - SA
 Dept. of Defense
 US Army - CID - Special Agent
 Defense Investigation Service - Special Agent
 Defense Criminal Investigative Service - SA
 Naval Investigative Service - Special Agent
 US Air Force - OSI - Special Agent
 Dept. of Education - Inspector - SA
 Dept. of Energy - OIG - Special Agent
 Dept. of Health & Human Services - SA
 Dept. of Housing & Urban Dev't - Inspr. - SA
 Dept. of Interior - OIG - Special Agent
 US Fish & Wildlife Services - Law Enforc. - SA
 Bureau of Indian Affairs - SA & Police
 US Park Police - Park Police Officers
 Bureau of Land Management - Special Agent & Ranger
 Dept. of Justice - US Attorney - CI & Attorney
 Drug Enforcement Administration - SA
 Federal Bureau of Investigation - SA
 DCI - Special Agent & Border Patrol
 US Marshall Service - Marshal & Dry-Marshal
 Parole & Prob. Service - Parole & Prob. Officers
 Dept. of Labor - OIG - Special Agent
 Office of Labor-Management - SA
 Dept. of State - Diplomatic Sec. Serv. - Special Agent
 Immigration - Special Agent
 State of Texas - Investigation - Special Agent
 US Coast Guard - Inspr. Officer - SA
 Federal Aviation Admin. (FAA) - Inspector
 Dept. of Treasury
 SA TFP - Special Agent
 US Customs Service - Office of Enforcement - Special Agent
 Customs Inspectors
 Internal Affairs - Special Agent
 National Revenue Service
 Criminal Investigation Division - SA
 Inspection Service - Inspr.
 US Secret Service - SA & Police
 Environmental Protection Agency
 Office of Criminal Investigation - Special Agent
 Office of Inspector General - Special Agent
 General Services Administration
 Office of Investigations - Special Agent
 National Archives - Criminal Inspectors
 Nuclear Regulatory Commission - Special Agent
 US Capitol Police - Police Officer
 US Postal Service - Inspector & Postal Police
 US Printing Office - Special Agent
 Veterans Administration - Inspectors - SA

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RICHARD GALLO
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ALLAN B. PAYNE
 General Counsel
KATHLEEN P. MAHON
 Legislative Consultant
JULES BERNSTEIN

March 4, 1994

Honorable Lloyd M. Bentsen
 Secretary of the Treasury
 Treasury Department
 1500 Pennsylvania Avenue, N.W.
 Washington, DC 20220

Dear Secretary Bentsen:

On behalf of the Federal Law Enforcement Officers Association (FLEOA), I want to take this opportunity to thank you for the attention you have placed on the necessity to address the surge in firearms violence in our country. We commend you for the vision you have shown through your anti-violence program.

Your program recognizes that the integral parts of fighting gun-related violence include expanding current law enforcement and prevention programs, as well as increasing intelligence capabilities and firearms licensing initiatives. You have included in your program a recommendation to increase the fee for federal firearms dealer licenses to \$600 annually.

We realize that these initiatives form a package that is the most important progress made in the firearms area since passage of the Gun Control Act in 1968. As such, your program will have its critics. However, we encourage you to maintain your strong stance on these areas by aggressively pursuing their implementation through legislation.



GRAND LODGE
FRATERNAL ORDER OF POLICE

520 SOUTH HIGH STREET, SUITE 205 • COLUMBUS, OHIO 43215-5885 • (614) 221-0180 • FAX (614) 221-0816

DEWEY R. STOKES
NATIONAL PRESIDENT

March 4, 1994

Honorable Lloyd M. Bentsen
Secretary of the Treasury
Treasury Department
1500 Pennsylvania Avenue, N.W.
Washington, DC 20220

Dear Secretary Bentsen:

Representing the law enforcement community, the Fraternal Order of Police (FOP) applauds the positive role you are advancing in the law enforcement arena. We are particularly encouraged by your initiatives to address the ever-increasing instances of firearms violence in our communities.

As Congress resumes the debate of the Crime Bill, the FOP is registering its support of the major provisions of the bill. We also recognize the importance of the initiatives that are part of your anti-violence package, and encourage you to seek their inclusion in the Crime Bill.

Our support for your initiatives extends to the increased fee for firearms licenses (to \$600 annually), enhancement of ATF's intelligence capabilities, expansion of various law enforcement programs, and the extension of prevention programs nationwide. We are also supportive of your position on tightening the system for purchasing explosives.

As you hear criticism for these initiatives by the public and by certain Congressional representatives, we encourage you not to be dissuaded from pursuing the inclusion of these initiatives in legislation. These are truly the most meaningful firearms initiatives since the 1968 passage of the Gun Control Act.

-2-

Secretary Bentsen

As always, the members of FLEOA appreciate the support you continue to demonstrate by introducing initiatives such as your anti-violence program. In turn, we extend our assistance in promoting this program.

Sincerely,

A handwritten signature in cursive script, appearing to read "John Pitta".

John Pitta
National Executive Vice President

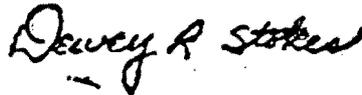
-2-

Secretary Bentsen

The membership of the FOP offers its strong support for the anti-violence program you have introduced. The law enforcement community appreciates the support you have demonstrated for our efforts and welcomes you to our ranks. We recognize that this program is primarily designed to protect our citizens from criminals who threaten their communities.

On behalf of the FOP, I fully endorse your anti-violence program and encourage you to pursue its inclusion in the Crime Bill.

Sincerely yours,

A handwritten signature in cursive script that reads "Dewey R. Stokes". The signature is written in black ink and is positioned above the typed name.

Dewey R. Stokes
National President



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

UNDER SECRETARY

JAN 29 1996

to: Ron Noble
From: Bob Rubin

CC: Summers
INFORMATION
Matthews

MEMORANDUM FOR SECRETARY RUBIN
DEPUTY SECRETARY SUMMERS

FROM: Ronald K. Noble *RKN*
Under Secretary (Enforcement)

SUBJECT: Youth Crime Gun Interdiction Initiative

This looks like
a good project and
ONE we could use
to help ATF re-
public image.

SUMMARY:

Youth crime is a major priority of this Administration. ATF and my office have developed, and I have approved, an initiative that uses ATF authority over the gun market to intervene in that market through law enforcement operations to reduce the availability of illegally supplied firearms to juveniles. Director Magaw has confirmed his strong support in writing (TAB A). This is a briefing memorandum to provide you with information about the initiative, which requires leadership and seed funding from Treasury.

DISCUSSION:

Treasury Enforcement's fall 1994 strategic plan made youth firearms violence the highest priority in the area of violent crime. It stated that Treasury will intervene in the illicit firearms market to juveniles. ATF's Youth Crime Gun Interdiction Initiative, a pilot program using minimal seed funding, is a first step toward fulfilling the commitment expressed in Treasury Enforcement's strategic plan. The initiative:

- (1) Establishes ATF-state/local law enforcement partnerships in approximately 16 pilot cities to target the illicit juvenile firearms market;
- (2) Uses the National Tracing Center (NTC) and Project LEAD, a NTC computer information system, to provide the ATF/state/local partnerships with investigative leads to develop cases against scofflaw firearms dealers and illicit firearms traffickers selling to juveniles;
- (3) Co-sponsors with the National Institute of Justice (NIJ) a study that will provide the ATF-local law enforcement partnership with operationally relevant information about the illegal juvenile gun market not available through Project LEAD, and will establish what additional information ought to be collected to support law enforcement operations against the illicit juvenile gun market;

EXECUTIVE SECRETARIAT

(4) By creating a partnership between federal and local law enforcement, provides a structure for the continued development by law enforcement of new strategies to attack the illicit gun market as it affects juveniles.

The initiative is supported by three working conferences, computers, and training, administrative, and operational funds.

Funding sources are Treasury, NIJ, and the Department of Justice Community Oriented Policing Services (COPS) Office. The funding is distributed as follows:

~~The Department of Justice and/or NIJ would contribute approximately half of the funding required to conduct a study of illicit juvenile gun markets (approximately \$300,000).~~

~~The COPS Office would fund three working conferences of participants, and computers for state/local law enforcement that will allow direct receipt of trace information (approximately \$250,000).~~

~~Treasury's proposed contribution would be \$1.175 million. This would cover: (1) software upgrade at the National Tracing Center, which allows for better information gathering on crime guns seized from juveniles and a geographic information system that provides investigative information on the specific sites; (2) pentium computers for the ATF field locations to run the program; (3) operational funds to support undercover and other law enforcement operations needed to make cases; (4) training and administrative support funds.~~

We are exploring funding options, including the possibility of funding the initiative from the Treasury Asset Forfeiture Fund, one goal of which is to launch new law enforcement activities.

Further discussion is provided at the attached tabs.

- | | |
|-------|---|
| TAB B | Treasury, ATF, Department of Justice, and Local Background
<i>Describes initiative's links to prior and current policy and activities at the federal and local levels.</i> |
| TAB C | Treasury Enforcement Strategic Plan
<i>Shows Enforcement priority placed on youth homicide and intervening in illicit gun markets.</i> |
| TAB D | Department of Justice Draft Juvenile Justice Action Plan
<i>Shows Justice focus on juvenile violence.</i> |

- TAB E The Pilot Program
 Describes the program.
- TAB F The 16 Cities
 Lists the currently contemplated program sites.
- TAB G Innovations and Goals
 *States what is new about the program, and lists
 the operational, policy, and institutional goals
 it serves.*



The Secretary of the Treasury

January 30, 1996

NOTE FOR RON NOBLE

FROM: BOB RUBIN

This looks like a good project, and one we could see to help ATF, re: public image.

Attachment

Copy to: Larry Summers
Sylvia Mathews

**YOUTH CRIME
GUN INTERDICTION
INITIATIVE**

TREASURY CLEARANCE SHEET

NO. _____

Date _____

MEMORANDUM FOR: SECRETARY DEPUTY SECRETARY EXECUTIVE SECRETARY
 ACTION BRIEFING INFORMATION LEGISLATION
 PRESS RELEASE PUBLICATION REGULATION SPEECH
 TESTIMONY OTHER _____

 FROM: Ronald K. Noble, Under Secretary for Enforcement

THROUGH: _____

 SUBJECT: Youth Crime Gun Interdiction Initiative
REVIEW OFFICES (Check when office clears)

- Under Secretary for Finance
 - Domestic Finance
 - Economic Policy
 - Fiscal
 - FMS
 - Public Debt

- Under Secretary for International Affairs
 - International Affairs

- Enforcement
 - ATF
 - Customs
 - FLETC
 - Secret Service
 - General Counsel
 - Inspector General
 - IRS
 - Legislative Affairs
 - Management
 - OCC

- Policy Management
 - Scheduling
 - Public Affairs/Liaison
 - Tax Policy
 - Treasurer
 - E & P
 - Mint
 - Savings Bonds

 Other _____

NAME (Please Type)	INITIAL	DATE	OFFICE	TEL. NO.
INITIATOR(S) Ginsburg, S.	<i>RG</i>	<i>1-27-96</i>	Enforcement	2-1496
REVIEWERS Medina, D.	<i>DM</i>	<i>1/29/96</i>	Enforcement	2-1483
Bresee, E.	<i>EAB</i>	<i>1/29/96</i>	Enforcement	2-0470
Wolin, N.	<i>WN</i>	<i>1/29/96</i>	Ex. Sec.	2-0283

SPECIAL INSTRUCTIONS
 Review Officer

Date

 Executive Secretary

Date

TAB A



DIRECTOR

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, D.C. 20226
DEC 27 1995

MEMORANDUM TO: Under Secretary
(Enforcement)

FROM: Director

SUBJECT: Youth Crime Gun Interdiction Initiative

In response to your recent correspondence regarding the above subject, I want to echo your sentiments and convey my whole-hearted support of this initiative. The time is right to proceed without haste to halt the supply of illegal firearms to our Nation's youth.

As you are aware, in October 1994, I sent an all stations message to every law enforcement agency in the United States committing the National Tracing Center to the task of tracing firearms recovered from juveniles. The data generated from this endeavor provided the first glimpse of the methods juveniles used to acquire firearms. I believe the proposed Youth Crime Gun Interdiction Initiative is the next logical step in a meaningful enforcement strategy.

You can be assured that I will commit the appropriate resources to this joint endeavor with local law enforcement. I am fully supportive of this initiative and look forward to taking a leadership role with you in making this project a success.

Please let me know if there is anything that ATF can do to expedite this process.

John W. Magaw
John W. Magaw

TAB B

Background:

Treasury, ATF, Department of Justice, and Local Law Enforcement.

The ATF Juvenile Tracing Initiative.

Over two years ago, in November 1993, I directed ATF Director Magaw to address the issue of juvenile gun crime. Director Magaw began the Juvenile Tracing Initiative in which ATF announced to all local police departments that it would provide trace information on any gun seized from a juvenile. Since the project started, over 5,000 juvenile guns have been reported to and traced by ATF. ATF has also compiled and analyzed the trace data to develop preliminary information about the sources of juvenile crime guns, the types of crime guns used by juveniles, and the crimes in which they are used. *ATF's analysis, combined with confirming analysis from other published and academic research, has provided information used in developing the proposed initiative, which combines further tracing and information analysis with law enforcement operations.*

Treasury Enforcement's Strategic Plan: Juvenile Homicide and Illicit Gun Markets.

Following the Waco Review, it was decided to focus ATF's resources more in the direction of trafficking cases, and away from involvement in law enforcement operations that could be conducted under local authority. Treasury Enforcement in fall 1994 adopted a strategic plan that identifies juvenile homicide as the single most important problem to address in the area of violent crime. The plan states:

Homicides committed by juveniles (often while they are under the influence of illegal drugs or alcohol) using firearms have increased significantly while violent crime in general continues at unacceptably high levels throughout the nation. . . We will . . . [e]nsure the integrity of the market in firearms and destructive devices by ensuring that businesses holding Federal firearms licenses are run responsibly, and by preventing the illegal acquisition, possession and trade of firearms by illegal gun traffickers, criminals and juveniles through a combination of regulatory and enforcement actions.

(TAB B). *The initiative fulfills Enforcement's commitment to address juvenile firearms homicides, by preventing the illegal acquisition, possession and trade of firearms by illegal gun traffickers and juveniles.*

ATF's Strategic Plan: The Trafficking Strategy.

In FY 1995, ATF proposed, Treasury supported, and OMB approved a restructuring of ATF field offices. The plan, called the Integrated Violence Impact Strategy ("IVIS"), establishes new Violence Reduction Alliances ("VRAs") and new Firearms Trafficking Task Forces ("FTTFs"). The VRAs will include ATF personnel and representatives of the U.S. Attorney, state prosecutors, and local law enforcement. By creating the VRAs, ATF is able to direct some armed career criminal and armed narcotics trafficker cases to local law enforcement when appropriate, while reserving for federal law enforcement those cases deemed appropriate for federal courts. At the same time, ATF field personnel are forming the new firearms trafficking groups, bringing ATF's unique expertise to bear on the illicit firearms markets. These firearms trafficking groups will be full-fledged task forces in some locations, in others, they will be groups, and in others there will be dedicated agents. As with the VRAs, ATF will seek participation by U.S. Attorneys, state and local prosecutors, and local police departments. *The firearms trafficking groups in approximately 16 of ATF's 200 field locations will participate in the juvenile initiative.*

Project LEAD.

In late 1995, ATF introduced Project LEAD to its 26 field division offices. Project LEAD is a state of the art computer software program that enables law enforcement to manage information in the database of the National Tracing Center. (By statute, out of business records of federal firearms licensees cannot be computerized.) Project LEAD software compiles data by linkanalysis, providing ATF regulatory inspectors and law enforcement investigators with information concerning potentially illegal firearms trafficking patterns, illegal purchasers, problem firearms dealers, and geographic sources of supply and sales. Project LEAD is enabling ATF to focus its resources and initiate many more regulatory and criminal investigations against illegal traffickers and their sources of supply. Since 1993, trafficking cases have risen from comprising 14.4% of ATF's firearms cases, to 21.5% in 1995. Further increases are projected. Piloted in 8 cities, including New York city, Project LEAD recently resulted in its first major case, the Traders Two case, in which the U.S. Attorney indicted several traffickers trafficking firearms from a FFL in Birmingham, Alabama to New York. U.S. Attorneys have been receptive to ATF's cases, and there will be more education and communication on the trafficking strategy this year. *The Youth Crime Gun Interdiction Initiative will tailor Project LEAD software to produce information specifically about traffickers to juveniles and juvenile firearms crimes in the participating jurisdictions, and place computers to run this software in cities participating in the initiative.*

Department of Justice COPS Youth Firearms Initiatives.

The Community Oriented Policing Services (COPS) office of the Department of Justice has granted \$1 million to 10 communities to establish innovative programs to increase and enhance proactive crime control and prevention programs in which juveniles, law enforcement, and others participate. For instance, in Birmingham, Alabama, police will work with school officials to conduct searches of lockers, vehicles, and students for illegal firearms. Birmingham police will also enforce curfews and step up their presence in high illicit activity sites in the city. Similarly, in Baltimore, Maryland, the police department is adding 24 officers to curfew teams and juvenile violent crime teams. The COPS Youth Firearms Initiative communities will participate in the Youth Crime Gun Interdiction Initiative, which will provide a federally backed firearms enforcement program to the participating police department, that includes gun traces, illicit market information, and law enforcement support.

Department of Justice NIJ Juvenile Gun Crime Research.

The National Institute of Justice (NIJ) has been sponsoring research on juvenile gun crime for several years, and is the source of most published research on juvenile firearms use. At present, NIJ research focuses on programs in four cities: Atlanta (cooperative community efforts, including public health resources); Boston (juvenile illicit firearms market research); Detroit (gun court); St. Louis (mentoring and consensual home searches). The Youth Crime Gun Interdiction initiative builds on previously published NIJ research, current NIJ research, especially in Boston, as well as on ATF analysis, and sponsors a study to better map illicit gun markets in the participating locations and, through aggregation of data, nationwide.

Department of Justice Policy Priority.

The Attorney General has repeatedly said that the reduction of youth firearms violence is a priority for her. The President announced during his State of the Union address that Attorney General will soon submit to Congress legislation that would facilitate the prosecution of juveniles as adults in federal court. The Justice Department's draft Juvenile Justice Action Plan includes as Objective 3 reducing youth involvement with guns, drugs, and gangs. (Selected pages of the draft Action Plan have been attached at TAB C.)

Local Police Department Initiatives and Successes.

Individual communities and police departments, sometimes working with U.S. Attorneys, have made firearms violence a priority. Gun buyback programs are one example of local initiatives. There is promising evidence, though not evidence dealing particularly with juveniles, from both New York City and Kansas City that measures aimed at detering gun carrying can result in significant decreases in violent crime. *The Youth Gun Crimes Interdiction Initiative provides a federal strategy and federal support aimed primarily at reducing the illegal supply of juvenile firearms, and generally disrupting local firearms markets, to complement and expand on local initiatives in the pilot cities.*

TAB C



DEPARTMENT OF THE TREASURY
Under Secretary for Enforcement

TREASURY ENFORCEMENT STRATEGY

STRATEGIC AGENDA

- ***Maintain Strong Treasury Law Enforcement***
- ***Ensure the Safety of the President and Other Protectees***
- ***Fight Financial Crimes:***
 - * ***Money Laundering***
 - * ***Counterfeit Currency and Credit/Access Card Fraud***
 - * ***Tax and Entitlement Fraud***
- ***Support U.S. Trade Objectives:***
 - * ***Promote Voluntary Trade Law Compliance***
 - * ***Deter Drug and Other Smuggling***
- ***Promote the Safety and Security of Americans by Reducing Gun Violence***
- ***Ensure Effective Economic Sanctions***
- ***Prepare the Enforcement Workforce for the 21st Century***

IMPLEMENTATION STRATEGY

The Department of the Treasury will employ an enforcement strategy that integrates prevention, detection, and enforcement. This strategy exploits Treasury's unique capabilities and missions, including its ability to use regulation and investigative law enforcement:

1. Focus on those areas in which Treasury has sole or primary enforcement responsibilities or where Treasury personnel have specialized skills.
2. Form public/private partnerships to enhance compliance with the law and reduce regulatory burdens.
3. Strengthen cooperation and coordination among federal, state, local, and international law enforcement agencies by serving as a catalyst among them.
4. Use our training capacity through the Federal Law Enforcement Training Center, as well as new technology, to identify vulnerabilities and new areas of criminal activity, so that we can better target our enforcement efforts.

TREASURY ENFORCEMENT'S STRATEGIC PRIORITIES

● **Maintain Strong Treasury Law Enforcement.** This nation is founded on the principles of freedom and democracy; the founders created a number of checks and balances to ensure that the people would be free. Central to this freedom is civilian law enforcement of the highest integrity. To ensure the integrity of Federal law enforcement we must maintain strong and balanced law enforcement functions in more than one cabinet department. As noted by Supreme Court Justice Robert H. Jackson, "I cannot say that our country could have no central police without becoming totalitarian, but I can say with great conviction that it cannot become totalitarian without a centralized national police." Treasury Enforcement provides an important balance for Federal law enforcement. We intend to maintain this important role, while coordinating and cooperating with other Federal, state and local law enforcement entities to improve our collective efficiency and effectiveness.

● **Ensure the Safety of the President and Other Protectees.** Recent incidents at the White House complex have elevated concerns for Presidential security. The Department of the Treasury, through the U.S. Secret Service, is responsible for protecting the safety of the President and Vice President of the United States, their families and other visiting heads of state. The safety of the President is the top enforcement priority of the Department of the Treasury. We will:

- * Implement the recommendations of the White House Security Review Task Force which, under an independent Advisory Committee, will complete its work early in 1995.
- * Develop a balance between security needs of the President and appropriate public access.

● **Fight Financial Crime.** The Department of the Treasury issues currency, regulates financial institutions and the financial marketplace, and collects, holds and disburses federal funds. Serious threats to these missions include:

A. **Money Laundering.** The need of drug traffickers, organized crime organizations and other criminals to transfer and to conceal the origins of the enormous profits of criminal activities creates a major vulnerability. Because of Treasury's oversight and regulation of the financial services sector we have a unique opportunity to attack criminal activities by focusing law enforcement and regulatory attention on the proceeds of those activities. Moreover, the laundering of billions of dollars in drug-related and other organized crime profits undermines legitimate banks and businesses and has a potential corrupting influence within the industry. We will:

- * Develop, implement and monitor regulations to protect the financial system from being used to commit or conceal crimes, through money laundering or other means, and conduct better focused financial investigations aided by new, sophisticated, computer intelligence at the Financial Crimes Enforcement Network and the Treasury Enforcement bureaus.
- * Address international financial crimes through improved international law enforcement cooperation, training, and education to encourage international adoption of preventive regulatory measures, specialized financial enforcement authorities, and information exchanges.
- * Seize assets derived from criminal activities.

B. Counterfeit Currency, Fraudulent Electronic Payments, and Financial Institution Fraud. Sophisticated technology is being criminally misused to counterfeit U.S. currency and to use credit card and smart card privileges fraudulently. We will:

- * Ensure the integrity of U.S. currency, both domestically and internationally, through law enforcement suppression of counterfeiting as well as the development of new currency notes.
- * Develop new strategies utilizing the most current technologies to police the increased use and criminal misuse of non-currency means of commerce, such as access cards, credit cards, and "smart" cards. Continue efforts to detect, prevent and suppress financial institution fraud.

C. Fraud against Federal Government's Collection of Revenue and Disbursement of Payments. The enormous amounts of money collected and disbursed by Treasury create a significant potential for fraud. A pilot Secret Service project demonstrated alarming potential for fraudulent receipt of Treasury disbursements, i.e. Welfare, Social Security and other entitlements. Schemes to defraud the government of tax revenues, in particular the recent abuses of electronic income tax filing, have become more technologically sophisticated and complex. We will:

- * Protect against tax evasion, utilizing IRS' new artificial intelligence system to enhance traditional tax law enforcement.
- * Expand work with other agencies to halt improper Treasury payments.

● **Support U.S. Trade Objectives.** The Department of the Treasury, through the U.S. Customs Service, collects tariffs and enforces over 500 trade laws and numerous agreements, including the recently enacted NAFTA and GATT agreements. As international trade expands, opportunities for evading trade regulations and trafficking in illicit goods may also increase. To support this nation's trade objectives, Treasury's strategy will take a two-pronged approach:

A. Promote Voluntary Compliance with Trade Laws. Although access to the U.S. market is becoming more liberal and free, the regulations and laws implementing the new trade agreements are complex and confusing, requiring a sophisticated level of understanding in order to comply. We will:

- * Promote informed voluntary compliance with trade laws by working with the private sector to clarify rules and by working with the trade community to reduce paperwork and costs while ensuring that prospective transactions are in compliance with the law.
- * Harmonize and simplify customs procedures internationally, assist in developing customs unions, reduce standards-related barriers to U.S. exports, and U.S. exporters to protect the commercial identity of their products.
- * Identify and target for investigation the most likely violators of trade laws through improved computer technology, such as automated risk analysis of shipments and goods entering the U.S.

B. Investigate and Deter the Illegal Importation of Drugs and Other Smuggled Merchandise. Through a variety of intelligence, interdiction and investigative programs, Customs is responsible for both the regulation of legitimate trade and enforcing the laws which prohibit the entry of illicit goods, such as drugs, copyright violations, and forced labor products. We will:

- * Improve technology and data bases to detect drug smuggling shipments of goods that violate U.S. laws.
- * Improve intelligence collection, analysis and coordination.
- * Prevent the illegal importation and exportation of counterfeit currency, drugs, criminal profits, other illegal goods, and dangerous products through more aggressive and better coordinated law enforcement at ports of entries and on our borders.

● **Ensure Effective Economic Sanctions.** Because international trade and the movement of currency have become so important, U.S. Administrations have frequently turned to trade embargoes and other economic sanctions as non-military means of projecting foreign policy. Although these sanctions must be applied uniformly by the entire international community, imposition of sanctions by the U.S. alone can substantially disadvantage a hostile government. U.S. sanctions are administered by Enforcement's Office of Foreign Assets Control. We will:

- * Improve domestic compliance with economic sanctions through a combination of education and enforcement efforts.
- * Ensure consistency within the international community for economic sanctions.

● **Promote the Safety and Security of Americans by Reducing Gun**

Violence. Homicides committed by juveniles (often while under the influence of illegal drugs or alcohol) using firearms have increased significantly while violent crime in general continues at alarmingly high levels throughout the nation. Treasury taxes and regulates the production, manufacture, and sale of potentially harmful or dangerous products, such as explosives, firearms, tobacco, and alcohol. The Bureau of Alcohol, Tobacco, and Firearms has long-developed expertise in these and the related law enforcement areas and maintains invaluable, close working relationships with state and local law enforcement agencies and the affected industries. We will:

- * Utilize Treasury's financial crimes jurisdiction to attack criminal organizations, that sponsor violent crime and drug trafficking by removing their primary incentive -- profits -- through money laundering investigations and asset seizures.
- * Focus on armed career criminals who operate across local and state lines, and improve intelligence and technology available to Federal, state and local enforcement that target violent offenders and their firearms and explosives.
- * Ensure the integrity of the market in firearms and destructive devices by ensuring that businesses holding Federal firearms licenses are run responsibly, and by preventing the illegal acquisition, possession and trade of firearms by illegal gun traffickers, criminals and juveniles through a combination of regulatory and enforcement actions.
- * Work in partnership with other government entities and the industry to reduce illegal possession and use of alcohol by minors.
- * Encourage agents and other Enforcement personnel to volunteer in the community as tutors, mentors and role models for at risk youth through Treasury's Project Outreach.

● **Prepare the Workforce for the 21st Century.** Changing technology, increasingly sophisticated criminal enterprises, and shrinking government resources are some of the serious challenges to the Treasury Enforcement workforce as we approach the new millennium. We will:

- * Create a workforce with integrity, operational excellence, and diversity, within a professional environment that respects equal opportunity and recognizes the importance of family and civic or individual priorities.
- * Provide excellence in law enforcement training through the assets available at the Federal Law Enforcement Training Center, utilizing a variety of innovative and proven teaching methods and sophisticated technology.

TAB D

National Juvenile Justice Action Plan Federal Activities

Objective 1: Provide Immediate Intervention and Appropriate Sanctions and Treatment for Delinquent Juveniles

Assist in the development of model state and local programs through training and technical assistance:

OJJDP will provide TTA on balanced and restorative justice.

OVC and NIJ will emphasize community restitution programs, including tribal justice systems.

Provide Communities with guidance for implementing a comprehensive strategy that reflects delinquency prevention and effective graduated sanctions:

OJJDP will disseminate the Guide for Implementing the Comprehensive Strategy.

OJJDP will provide a range of TTA through regional seminars.

OJJDP will provide TTA through satellite telconferences.

OJJDP will provide TTA through a CD-Rom package.

OJJDP will provide TTA through focus groups.

Provide model protocols for intake, assessment, and aftercare:

OJJDP will support programming to improve intake and assessment.

OJJDP will disseminate model protocols through the Guide.

OJJDP will continue to support training in Serious Habitual Offender Comprehensive Action Program (SHOCAP) and Police Operations Leading to Improved Children and Youth Services (POLICY).

Provide research on alternatives to incarceration, such as boot camp:

NIJ, OJP Corrections and BJA will fund evaluation of bootcamps.

Objective 3: Reduce youth involvement with guns, drugs, and gangs

Enhance law enforcement capacity to respond to juvenile crime and drug trafficking:

OJJDP will provide TTA to help law enforcement agencies respond to serious juvenile crime.

HUD will support efforts to combat drug trafficking in public and Native American housing developments.

ATF's Project Uptown will address the problem of armed gangs and narcotics trafficking in public housing.

ATF and HUD will disseminate a strategy and guidebook entitled "Addressing Violent Crime in Public Housing Developments."

NIJ will fund research on the magnitude of youth gang involvement in drug trafficking.

Support interagency gun and drug interdiction and suppression strategies:

CC will support ONDCP in implementing its "National Drug Control Strategy."

BJA will support the 14-State Interstate Firearms Trafficking Compact.

DOJ will support comprehensive, community-based gun interdiction strategies.

ATF will implement Violence Reduction Alliance (VRA), a nationwide strategy to coordinate law enforcement resources to combat and prosecute violent criminals, including illegal firearms dealers.

ATF will provide support to investigative efforts with "Project Lead," the illegal firearms trafficking database, and ATF's National Firearms Tracing Center.

BJA will document promising illegal gun suppression and interdiction strategies.

BJA and OJJDP will provide funds to assist States and local jurisdictions to implement strategies to prevent illegal possession and use of firearms by youth.

Get guns out of schools:

ED will provide guidance to schools and law enforcement on implementing the Gun-Free Schools Act of 1994.

ED and OJJDP will support alternative education programs to keep youth off the streets.

ATF will continue to trace all firearms recovered from juveniles.

ATF will recommend to the U.S. Attorney's office juvenile prosecution when warranted.

ATF will analyze the juvenile firearms trace data to determine trends in armed juvenile crime and sources of firearms for juveniles.

Support U.S. Attorneys efforts to advance local anticrime initiatives:

U.S. Attorneys will work with Federal, State and local law enforcement to identify, target and investigate individuals who engage in illegal trafficking, sales, possession, or use of firearms.

U.S. Attorneys will enforce laws and prosecute violators in order to disrupt illegal gun trade.

U.S. Attorneys will work with State and local officials to enhance enforcement of laws concerning illegal trade in firearms and the use of guns to commit crimes.

U.S. Attorneys will provide encouragement to State and local agencies to trace guns seized from juveniles.

U.S. Attorneys will launch targeted enforcement efforts related to juveniles involvement in firearms trafficking, sales, possession, or use.

U.S. Attorneys will actively participate in delinquency prevention efforts through Operation Weed and Seed and other community-based initiatives.

U.S. Attorneys will use public outreach to promote increased personal responsibility among youth concerning the use of guns.

Target youth gangs:

Federal agencies will cooperate in their gang reduction activities.

DOJ will provide leadership in implementing gang suppression and intervention strategies.

HHS will focus on community-based gang prevention efforts.

U.S. Attorneys will work with law enforcement through task forces to identify, apprehend, and prosecute certain gang-involved juvenile offenders.

NIJ will fund research on the criminal behavior of gang members.

NIJ will conduct research on the effectiveness of antigang legislation and gang prosecution units.

BJA, OJJDP and HHS will coordinate, evaluate and enhance their gang prevention, intervention, and suppression activities.

BJA will continue to support the Comprehensive Gang Initiative in eight local jurisdictions.

OJJDP will continue to fund a national evaluation to assess gang prevention and intervention models.

OJJDP will provide TTA on gang prevention and intervention.

OJJDP's Juvenile Justice Clearinghouse will continue to disseminate gang prevention and intervention materials for community programs.

OJJDP's National Youth Gang Center will assist State and local jurisdictions in collecting, analyzing, and exchanging information on gang-related issues.

OJJDP will continue to support five demonstration gang prevention, intervention, and suppression sites.

OJJDP will continue to fund an empirical study of communities implementing a comprehensive gang plan.

OJJDP will continue to support communities through the gang and drug policy intensive team-oriented approach.

HHS's Family and Youth Services Bureau will award five to seven grants to implement Youth Gang Drug Prevention.

HHS will continue to support 21 grants under the Youth Gang Drug Prevention Program.

ATF will continue to support the Gang Resistance Education and Training Program.

Advance Youth-Focused Community-Oriented Policing:

COPS, CRS, and OJJDP will develop a Youth-Focused Community Policing Initiative in 14 communities.

COPS, CRS, and OJJDP will develop a youth-focused community policing TTA package.

Provide Information on curfew programs for juveniles:

OJJDP will publish a document on curfew laws and ordinances, with resource information.

Disseminate information on model youth handgun legislation and strategies for reducing youth gun violence:

DOJ will fund the National Criminal Justice Association to develop a model juvenile handgun law.

OJJDP will disseminate a directory of research, programs, and organizations for reducing youth gun violence.

OJJDP will develop and disseminate a guide to promising strategies for reducing youth gun violence.

NCJRS will provide information on youth violence and guns to agencies, organizations, and individuals.

Promote the development of juvenile drug courts:

OJP's Drug Court Office will provide grants to establish and operate drug court programs.

NIJ will continue to fund research to evaluate drug court programs.

Support community efforts to prevent substance abuse and help resist pressure to use drugs:

CSAP's Community Partnership Program will provide federal leadership in promoting comprehensive, long range programs to address alcohol and other drug use.

CSAP will support the High Risk Youth Demonstration Program to prevent alcohol, tobacco, or illegal drug use by children at risk.

CSAP will disseminate a directory of Federal grant programs for drug-abuse prevention and intervention activities.

CSAP will continue to support High-Intensity Drug Trafficking Area (HIDTA) program coordinators and State points of contact for drug-related programs.

ONDCP will promote Federal agency partnerships with State, National, and local substance abuse prevention organizations to establish a united front against drug abuse.

Advance technological interventions to reduce gun violence:

→ ATF
NIJ will identify technologies to aid law enforcement in preventing the illegal acquisition and use of firearms.

NIJ will continue to fund projects to assist in designing guns that are harder to conceal and have trigger safeties, fingerprint identification, and loading indicators.

ATF will explore and expand the investigative application of canines in firearms detection.

NIJ will support the publication of "Smart Gun technology requirements: A Preliminary Report."

NIJ will sponsor technology to create a concealed weapon detection system.

ATF -

TAB E

The Pilot Program

- A. Purposes and Assumptions
- B. Program Elements
- C. Participants and Their Roles

Purposes and Assumptions

The Youth Crime Gun Interdiction Initiative is a pilot program. Its purposes are to:

Create a community oriented law enforcement structure for mobilizing local police departments, with federal backing, to disrupt the illegal firearms market, especially the juvenile illegal firearms market and its adult suppliers.

Implement an ATF-state-local strategy to interdict illegally supplied firearms, particularly to juveniles by adults, thereby reducing illegal juvenile access to firearms, and reducing juvenile firearms violence, death, and injury.

Investigate and prosecute scofflaw federally licensed firearms dealers and illegal firearms traffickers and pushers to juveniles.

Provide results that will permit development of a nationwide federal-state-local partnership to disrupt illegal firearms markets, especially juvenile illegal firearms markets.

The basic facts and ideas behind the pilot program are:

Because most guns used by juveniles in crimes are obtained illegally, disrupting the illicit gun market will result in less juvenile violence;

Because surveys have consistently revealed that kids acquire weapons mostly out of fear and for self-defense, primarily fear of other kids with guns, making it harder to get guns will break the current cycle of fear leading to gun acquisition leading to more fear and more gun acquisition;

Because juvenile gun acquisition also may be particularly tied to illicit drug market and gang activity, it is necessary to develop community oriented policing partnerships that can jointly address all aspects of the juvenile firearms violence, including fear, illicit drugs, and gangs.

The pilot program is intended to be flexible, permitting the dropping or adding of sites, with the expectation that there will be a variation in the levels of enforcement activity and research occurring in the different sites. The pilot is expected to produce information about enforcement strategies and the illicit gun market that will benefit local jurisdictions specifically and law enforcement and policy makers generally.

By fall 1996, the juvenile initiative is expected to generate sufficient results to permit ATF, Treasury, and OMB to decide whether its approach, in whole or in part, should be replicated.

Program Elements

SUMMARY

Federal-local Partnership. The pilot project creates a federal-state structure to attack illicit firearms markets. At least one crime analyst from each participating police departments will join an ATF firearms trafficking group.

Partnership Mission. The mission of the partnerships is to disrupt the juvenile illicit firearms market.

Partnership Strategy. The initial strategy will be to identify and build cases against illegal adult gun traffickers to juveniles, straw purchasers, and street level sellers to juveniles.

Partnership Roles. The partnership provides benefits to both sides.

The federal government will supply (1) equipment, (2) training, (3) operational information, and (4) law enforcement support, as well as (5) make federal trafficking cases against locally active adult traffickers to juveniles, (6) conduct a study of the local and national juvenile illicit gun markets, and (7) enter into a dialogues with local police departments about appropriate federal and state and local law enforcement strategies to attack the illicit gun market as it affects juveniles.

The local police department will (1) supply a local partner for the ATF firearms trafficking group, who will (2) ensure that all crime guns seized in the jurisdiction are traced, (3) refer non-federal trafficking leads derived from ATF's Project LEAD to state and local authorities, (4) assist in joint federal-state-local trafficking cases, (5) facilitate the federal study of the juvenile illicit gun markets, (6) continue to work with ATF in developing new law enforcement strategies against the illicit gun markets.

PROGRAM ELEMENTS

ATF's Overall Trafficking Strategy. The Youth Crime Gun Interdiction Initiative builds on and is a component of ATF's overall trafficking strategy, which seeks to cut off the illicit supply of firearms by building cases against the sources of crime guns. The trafficking strategy has the following elements:

NTC traces. ATF traces any crime gun submitted by any federal, state, or local law enforcement agency at its National Tracing Center. The agency submits basic information about the crime gun to the NTC through a computer phone line or by fax. NTC responded to 89,726 trace requests in FY '95.

Traces that solve firearms crimes. The NTC trace identifies the federal firearms licensee (FFL) that sold the crime weapon and the initial purchaser of that weapon. NTC returns this information to the submitting agency within approximately 11 days. Trace information can be useful in any case involving a firearm, by providing leads to, or evidence of, the link between the perpetrator and the weapon. Though prosecutors may successfully make cases without this information, an NTC trace can only serve to strengthen the evidence against a defendant.

Traces that identify illegal traffickers. NTC trace information can lead to the building of an additional case, against a gun dealer, trafficker or street level pusher that illegally sold, transported and/or transferred the crime gun. Arresting a scofflaw FFL or illicit trafficker disrupts the illegal supply of firearms to felons, juveniles, and other prohibited persons.

Supply disruption that aims at preventing firearms crime. The systematic use of trace information by ATF to attack illegal firearms dealers supplying prohibited persons with weapons represents an entirely new, violence prevention law enforcement strategy for ATF and all of federal law enforcement. ATF and state law enforcement agencies, using a variety of "three strikes" type statutes, will continue to arrest the most violent criminals who use firearms, but will now also take action against illegal firearms suppliers, with the goal of depriving prohibited persons of illegal firearms, thus reducing overall levels of violence.

Use of Project LEAD at the NTC to support the strategy.

When a number of traces of crime guns are aggregated and analyzed, the trace information supplies information concerning patterns of illegal trafficking. The more guns traced, the more patterns are visible. With the support of Northeastern University, ATF has developed the Project LEAD computer software, an automated link analysis information system that aggregates and analyzes trace data. Project LEAD identifies firearms purchasers and FFLs who repeatedly have crime-related firearms traced back to them. The information is contained in a Windows environment, easily usable by law enforcement investigators. The identifications provide leads that ATF may follow up in regulatory inspections or criminal investigations.

Limited local use of Project LEAD. Individual NTC traces are provided directly to the submitting law enforcement entity. However, at present, the NTC provides Project LEAD software only to ATF's 26 field divisions. While the Firearms Trafficking Task Forces will invite local police department participation, ATF's overall firearms trafficking strategy is primarily federally focused, using Project LEAD data to build multi-defendant, interstate gun trafficking cases.

Pilot success with Project LEAD. An early example of success with Project LEAD is from New York City, where the software has been piloted. Crime guns seized in NYC were traced to a former Birmingham, Alabama FFL called Traders Two. The Birmingham U.S. Attorney on December 29 announced the indictments of a firearms dealer and six other persons on charges including conspiracy, illegal possession of firearms, and making false statements on firearms records.

Increasing crime gun tracing. The more guns that are traced, the more data there is for Project LEAD to analyze, and the more information will be available to all of law enforcement about illegal gun pushers. At the federal level, law enforcement agencies are only now committing to gun tracing; U.S. Attorneys, with a few notable exceptions, have yet to make the illicit gun markets a priority. At the local level, police departments, with a few notable exceptions, are unfamiliar with the benefits of tracing and with the concept of disrupting firearms markets through a trafficking strategy. Few of the nation's 17,000 police departments trace crime guns. For there to be successful nationwide disruption of the illicit firearms markets, all crime guns must be traced. Over the long run, ATF must develop ways to make Project LEAD information available not only to all ATF offices, but also to local law enforcement, as is being done in this initiative.

The Youth Crime Gun Interdiction Initiative. The Youth Crime Gun initiative both extends and develops ATF's trafficking strategy, gun tracing, and Project LEAD infrastructure, while specially targeting adult gun pushers who supply juveniles. The initiative will work as follows:

Local partners. In approximately 16 pilot jurisdictions, local police chiefs will designate a staff person to join ATF's firearms trafficking groups and be the local partner for federal law enforcement. The local partner will concentrate on trafficking cases involving youth crime guns.

Crime gun tracing. Upon joining the initiative, the local police department will commit to submitting all crime guns seized in the jurisdiction for NTC tracing. NTC trace information will be provided to the jurisdiction through the local partner. The tracing and LEAD analysis of all crime guns, and not only all juvenile crime guns, is a benefit of this project, that will both assist local law enforcement in criminal investigations, and provide the firearms trafficking groups with a broader picture of the local illicit gun market. In sites where record keeping and resources permit, traces will be conducted on a sample of or all juvenile crime guns for the preceding five years, and a sample of adult crime guns for comparison purposes.

Site and juvenile specific Project LEAD analysis. NTC will upgrade Project LEAD software (1) to create a geographic information system that provides trace analysis and investigative leads specific to the 16 jurisdictions, and (2) to provide information that further describes the illicit juvenile market, for instance whether the crime gun was seized at school. Project LEAD updates will be provided at least every 30 days to the Task Forces, permitting the continuous evaluation of new investigative leads. This Youth Crime Gun Interdiction Initiative will be ATF's first use of a local and group specific application for Project LEAD.

Project LEAD computers and training. The initiative includes computers for the specially designed software. The Justice Department's COPS Office will provide computers for using Project LEAD to the participating sites. These computers will belong to the local police departments. Treasury will fund 16 computers for the participating ATF field offices. ATF will train the local partners in the use of Project LEAD data.

Trafficking inspections and investigations. Using Project LEAD information developed from local crime gun traces, ATF will conduct FFL inspections and ATF and local police departments will conduct criminal investigations and make trafficking cases against scofflaw FFLs, gun traffickers, straw purchasers, distributors, and pushers supplying local juveniles.

Limitations of Project LEAD. Because Project LEAD cases will only reach a segment of the illicit firearms market affecting juveniles, the initiative takes additional steps to attempt to address the entire illicit firearms market.

The problem. NTC tracing identifies only the FFL seller and the first purchaser; it does not provide information about subsequent purchasers or transferrers of the crime gun to the person from whom the weapon has been confiscated. When the time elapsed from purchase to confiscation by law enforcement (for criminal possession or activity) is short - - under two years -- Project LEAD is most effective in linking crime guns with illicit traffickers. (Guns may be called "crime guns" both if they are illegally possessed or because they have been used in another crime.) The longer a crime gun has been in circulation before its confiscation and submission for tracing, the more likely it is to have had multiple owners, and to require active investigation by ATF in order to determine its chain of transfer from the legal to the illegal market. So-called short time-to-crime guns constitute only a part of the supply of guns illicitly available to juveniles. Interdicting them and arresting their traffickers is therefore only a partial strategy to reduce the illicit availability of guns to juveniles.

The additional steps: targeting the entire illicit youth firearms market. Very little is known about the characteristics of the illicit juvenile market not supplied by easily traceable, short time-to-crime guns. Yet ATF and researchers believe this may be as much as half or more of the illegal firearms supply. For instance, in Boston 70% of the juvenile crime guns are more than two years old, and only 50% of the guns are semi-automatic pistols, which are generally new guns, while revolvers (30%) and long guns (20%) are generally older. In order to target the entire illicit juvenile firearms market about which little is known, Treasury and NIJ will jointly sponsor a study to provide ATF and local police departments more information about the local patterns of illicit gun supply. The new information will be used to develop additional law enforcement strategies.

Differences between the youth and adult illicit markets
Little is known about the differences between how kids and adults obtain firearms illegally. Existing indications are that juveniles may: use straw purchasers to obtain guns from firearms dealers, since FFLs cannot sell to juveniles; prefer new, semi-automatic pistols to older guns; use fewer guns obtained in burglaries. This data is from limited research and may not be representative of the picture nationwide. The lack of illicit market information useful to law enforcement is the principal reason for the study. ATF's Juvenile Tracing Initiative, for example, compiles data from trace requests from any police department that submits them; ATF's compiled analysis is therefore suggestive but not a valid national sample. Existing survey research on both juveniles and adult felons is that roughly 1/3 say they can obtain a gun with difficulty, and 1/3 not at all, suggesting that tightening the market is a reasonable approach to decreasing firearms violence.

Treasury/NIJ Funded Joint Study. Researchers will:

Report on analysis of LEAD data -- analyze LEAD data every 30 days, by site, aggregated and cross-site, and report any useful findings to ATF and the local partner.

Collect additional available data -- with local partner assistance, collect additional available data associated with the juvenile traces and a comparison sample of adult felon traces, such as crime report information, firearm value information, and criminal history and associations of the juvenile; analyze this data by site, aggregated and cross-site, and report any useful findings to ATF to be shared with the local partner.

Conduct selected interviews -- where possible, conduct selected interviews to obtain qualitative information that will verify and supplement information derived from available data -- with special agents, gang officers, probation officers, juveniles, and others. At the same time, Treasury and ATF will engage in discussions with the Justice Department and U.S. Attorneys about debriefing arrestees in illegal possession of firearms about sources of the firearms, and transmitting that intelligence to ATF and local investigators, as is done by the D.C. U.S. Attorney.

Design protocols for sample investigative traces -- with ATF, design protocols and samples to support limited investigative or end-to-end traces by ATF of youth crime guns, and a comparison sample of crime guns used by felons - - investigative traces follow crime guns through the complex channels that deliver them from the point of sale to the street.

Report on city specific and cross-site analysis of all data -- available data, interview reports; and investigative trace results -- to provide such information as: what type of firearms are preferred by type of juvenile and type of crime, source of firearms by nature of offense, firearms acquisition by gang affiliation, time-to-crime for particular group of offenders, concentration of FFL and straw purchasers for particular groups of offenders, and the structure of illicit firearms markets.

Report regularly to ATF. The NIJ researchers will provide analysis and information to ATF on a periodic basis as it is developed, so that it is immediately available for law enforcement purpose, as well as formal final reports.

Improvements in Law Enforcement Information Collection.

Researchers and ATF will determine what information ought to be collected on a long term basis and/or added to the LEAD system, based on the pilot project information's utility to law enforcement at each site. The initiative's upgrades of Project LEAD will be evaluated, as well as the use of available data, interviews, and investigative traces. Tailoring federal law enforcement data for local application and making it available to local law enforcement is a major benefit of the Youth Crime Gun Interdiction Initiative.

Community Policing/Problem Solving. ATF and local law enforcement will work together to use the additional information to develop locally relevant approaches to disrupting the illicit firearms market. The information also may be useful in developing new policy approaches, or in pinpointing the need for legislation.

Participants and Their Roles

Treasury will:

Provide seed funding and oversight;

Speak publicly about the role of illicit firearms markets in contributing to violent crime, ATF's intervention in those markets through its trafficking strategy, the need to enlist the nation's 17,000 police departments in that strategy, the national problem of juvenile firearms violence (especially in urban areas), and ATF's juvenile initiative.

Ensure a high level of coordination with the Department of Justice.

ATF headquarters will:

Speak publicly about the strategy;

Direct and supervise the program;

Work with the field and local partners in developing new enforcement interventions at the pilot sites;

Produce reporting on the law enforcement operations associated with the initiative.

ATF's participating field offices will:

Conduct the program's federal law enforcement operations.

An ATF coordinator (probably an ASAIC, or a RAIC in non-division offices) will:

Ensure tracing of the local crime guns by the NTC, working with the local partner/crime analyst;

Receive and analyze Project LEAD information;

Supply law enforcement leads to the appropriate group of special agents and police officers working the area;

Develop trafficking cases against traffickers of firearms to juveniles;

Design and support law other law enforcement operations aimed at disrupting the illegal availability of firearms to juveniles;

Be responsible for all necessary statistical and

administrative information;

Receive the research results on a periodic basis from the NIJ/Treasury research project, and develop any new law enforcement interventions in conjunction with ATF headquarters and the local partner;

Participate in the three COPS funded planning/working meetings.

ATF's National Tracing Center will:

Upgrade its Project LEAD software to provide for geographic information systems;

Trace all crime guns submitted by the sites;

Provide Project LEAD information to the sites at regular intervals.

The chiefs of police will:

Attend an initial working meeting in Washington, D.C., in late February;

Endorse the program;

Designate at least one crime analyst/investigator to be ATF and NIJ's local partner;

Authorize their departments to provide information as required by ATF and NIJ and generally facilitate the project;

Become spokespersons for ATF's market disruption mission, and its trafficking strategy and NTC tracing system.

The local partner, a crime analyst/investigator, who may be sworn or unsworn, will:

Submit traces to the NTC;

Receive the trace data from ATF and provide it to the police department;

Work with the gun trafficking group in referring Project LEAD leads to ATF and/or local law enforcement;

Facilitate/assist the collection of available data by NIJ researchers;

In some sites, assist ATF in the jurisdiction in conducting

end-to-end or investigative traces of selected crime guns;

Participate with ATF in law enforcement strategy development and problem solving aimed at the local illicit gun traffic.

NIJ will administer and co-fund with Treasury research to better describe the local and national illicit markets in firearms, with a special emphasis on the illicit juvenile market.

The COPS Office will:

Sponsor an initial working meeting with the pilot program police chiefs, ATF SAICS, U.S. Attorneys, state prosecutors/district attorneys;

Purchase pentium computers for the participating local police departments;

Fund two user conferences during the project, so that the local partners, researchers, and ATF coordinators can share information and address problems.

The ATF tracing and operations may become a component of the COPS Youth Firearms Initiatives for purposes of NIJ's evaluation of those initiatives.

U.S. Attorneys will:

Attend an initial working meeting to learn about and contribute to finalizing the plans for the initiative;

Prosecute good cases developed by ATF against scofflaw FFLs, and gun traffickers, straw purchasers, distributors, and pushers, according to criteria that they develop;

Educate the public about the role of gun pushers in juvenile crime through speaking engagements and major case announcements.

The Department of Justice's role will become clearer after briefings of the staff of the Attorney General, Deputy Attorney General, and Associate Attorney General, likely to occur this week.

TAB F

The Pilot Cities

16 police departments of various sizes and geographic locations were chosen for the pilot program. All of ATF's field locations are included in the trafficking strategy and the development of firearms trafficking groups, therefore, all locations sufficiently near to ATF offices were possible sites. The 16 sites were chosen because in each, local law enforcement authorities have made a significant commitment to working with the federal government to reduce youth firearms crime. Because the goal was to begin the pilot project as quickly as possible, the well-known, pre-existing local commitment was considered a major advantage to the initiative.

Local Police Department

ATF Support Office

(1) Atlanta, GA**^	Atlanta Field Division
(2) Baltimore, MD*^	Baltimore Field Division
(3) Birmingham, AL*	Birmingham Field Division
(4) Boston, MA**^	Boston Field Division
(5) Bridgeport, CT*	Hartford Field Office
(6) Cleveland, OH*^	Cleveland Field Division
(7) Inglewood, CA*	Los Angeles^ Field Division
(8) Jersey City, NJ***	New York Field Division/Newark Field Office
(9) Milwaukee, WI*	Milwaukee Field Office
(10) New York City, NY***^	New York Field Division
(11) Richmond, VA*	Washington Field Division/Richmond Field Office
(12) St. Louis, MO**	St. Louis Field Division
(13) Salinas, CA*	San Francisco Field Division/San Jose Field Office
(14) San Antonio, TX*	Houston Field Division/San Antonio Field Office
(15) Seattle, WA*	Seattle Field Division
(16) Washington, DC***	Washington Field Division

*COPS Office Youth Firearms Initiative grant site.

**NIJ juvenile firearms research site.

***Additional sites where U.S. Attorneys and chiefs of police have made firearms trafficking and/or juvenile firearms crime a major priority.

^ Enterprise Community/Empowerment Zone

TAB C

Innovations and Goals

- A. Innovations
- B. Operational Goals
- C. Policy Goals
- D. Institutional Goals

Innovations of the Juvenile Crime Gun Interdiction Initiative

ATF's trafficking strategy is based on Project LEAD and is aimed primarily at multi-defendant, interstate trafficking cases, although investigative leads will also point to intrastate supply from FFLs. The juvenile initiative adds the following innovations:

It establishes a new form of ATF-state/local partnership;

It seeks to obtain a more complete description of the local illicit firearms supply, by supplementing Project LEAD information with available local law enforcement data collected by researchers, and by information from investigative traces conducted by ATF;

The federal-local partnerships will use the new information about the illicit firearms market to develop community based and/or nationally applicable law enforcement solutions.

It will demonstrate what data need to be collected on a long term basis in some or all jurisdictions to support law enforcement aimed at disrupting the illicit firearms system.

Operational Goals

(1) By increasing crime gun related arrests and prosecutions of adult traffickers to juveniles, disrupt local supplies of illegal firearms, reduce youth access to firearms, reduce youth firearms violence, decrease juvenile firearms related arrests, and reduce community fear in high juvenile crime communities;

(2) By ensuring that all crime guns are traced at the sites, increase ATF's Project LEAD database, generate more investigative leads, and penalize and arrest more scofflaw FFLs and illegal gun traffickers;

(3) By combining federal and local resources in partnerships, provide operational and research support for ATF, and educate and provide operational support to local law enforcement;

(4) By providing new information about how illicit firearms markets work, position law enforcement to respond to previously unidentified criminal patterns;

(5) By establishing an federal-local partnership, provide a structure for developing and implementing new kinds of federally supported local law enforcement operations.

(6) By developing new information about illicit markets, provide a basis for recommendations for operationally useful federal and local data collection.

Policy Goals

(1) Prevent juvenile gun violence by interrupting the illegal flow of firearms to kids;

(2) Counter the cycle of violence, fear, and decline in the nation's inner cities caused partly by gun violence;

(3) Use ATF's information systems and expertise to assist police departments in community problem-solving;

(4) By focusing on a limited number of pilot sites, provide replicable models for developing the trafficking strategy, ATF's use of geographic information systems, and federal-local operational problem solving.

Institutional Goals

- (1) Enlist the nation's 17,000 police departments in operations that interdict guns going to prohibited persons - - 1,500 ATF agents devoted to firearms cannot handle the national illegal firearms trafficking problem;
- (2) Strengthen ATF's record and reputation for innovative, effective law enforcement, and for strong support of state and local law enforcement;
- (3) Continue Treasury Enforcement's role as a leading voice in the continuing national debate about firearms markets and federal policy relating to them;
- (4) Support Treasury's comprehensive approach to addressing urban problems, by developing law enforcement strategies that complement economic strategies.
- (5) Support the Attorney General's focus on juveniles, specifically the COPS Youth Firearms Initiative programs and the Juvenile Justice Action Plan.
- (6) Support the President's focus on juvenile crime by complementing the approach he announced in the State of the Union -- legislation to facilitate the prosecution of juveniles as adults -- by providing an initiative that holds adults accountable, to the extent provided for by law, for illegally providing firearms to juveniles.