

Business Practices To Be Implemented By World Pawn

1. **World Pawn will put the following statement concerning Safety First in Its Employee Training Manual.** "With rights, come responsibilities. In 2013, a woman named Kirsten Englund was killed with a gun transferred by World Pawn. World Pawn is instituting measures to do all it can to prevent tragedies like that from ever happening again. World Pawn recognizes that, as a federally-licensed firearms dealer, it has an important role to play in preventing dangerous people from obtaining firearms, and keeping its community safe. Part of that responsibility requires World Pawn, for every firearms transaction, to certify on the form 4473 that it has no reasonable cause to believe that the firearms purchase is prohibited. If a firearms seller has any doubt about whether to complete a transaction, it should always err on the side of public safety. If World Pawn has any doubt that a firearms purchaser is a straw purchaser, or is otherwise prohibited, it should not sell or transfer the gun."

2. **World Pawn will commit to preventing straw purchases, through specific Questioning of Transferees.** Before any sale or transfer of a firearm, World Pawn employees will ask questions of prospective purchasers/transferees to determine if they are buying for someone else, including asking about: their knowledge of firearms; their knowledge of the firearm they intend to buy; their intended use of the firearm they intend to buy; what is the role and relationship of any persons accompanying the prospective purchaser, or about whom there is any evidence suggesting they may have a role in the sale; whether they are buying for someone else. If World Pawn has doubt that the person to be transferred the gun is the person who ordered, selected, and paid for it, World Pawn will not transfer the gun. World Pawn will have each customer, separate from form 4473, answer the following written questions, which form will also be signed by World Pawn's employee handling the transaction:

1. Yes/No: I am buying this gun for myself.
2. Yes/No: I am buying this gun for or on behalf of someone else.
3. Yes/No: I am familiar with and experienced with the gun that I am purchasing.
4. Intended use of the gun: _____

World Pawn will maintain each such signed form with its other records related to the firearm sale for a period of at least 3 years.

3. **World Pawn employees will notify local and federal authorities of suspected straw purchasers.** World Pawn will notify law enforcement within 24 hours of a suspected straw sale or refusal to sell a firearm and provide all information that it believes would aid and/or was requested by law enforcement.

4. **World Pawn will undertake annual audits of the store's safety and compliance record.** For the purpose of considering any improvement to World Pawn's business practices to prevent firearms sales or transfers prohibited by state or federal law, World Pawn will conduct annual audits which will be done by World Pawn management, or a third party retained by World Pawn, at World Pawn's sole discretion, and may include reviewing the store's inventory, business practices, records of thefts or missing guns, if any, and records of any firearms that are traced by law enforcement, used in crime, and disclosed to World Pawn by law enforcement.

5. World Pawn will no longer transfer firearms that have been ordered from online sellers (not including World Pawn itself).

6. Persons involved in firearms sales will receive training sessions that cover these practices when they start and annually thereafter, as determined by World Pawn, designed to help them sell firearms safely and legally. These training sessions will include providing World Pawn's policies, and suggested questions and practices, in writing to employees, and reviewing them with staff.

7. World Pawn will publicly recommend that all gun dealers, including online sellers, go beyond the legal minimum to implement the safest business practices to prevent firearms from being obtained by criminals, straw purchasers, and other persons who pose a danger to themselves or others when in possession of a firearm. World Pawn will make the following public statement on its website and Facebook page:

World Pawn Exchange recognizes that with rights, come responsibilities. In 2013, a woman named Kirsten Englund was killed with a gun transferred by World Pawn. World Pawn is instituting measures to do all it can to prevent tragedies like that from ever happening again. World Pawn will no longer transfer firearms that have been ordered from online sellers. World Pawn recognizes that, as a federally-licensed firearms dealer, it has an important role to play in preventing dangerous people from obtaining firearms, and keeping its community safe. World Pawn recommends and encourages that all gun dealers, including online sellers, go beyond the legal minimum to implement the safest business practices to prevent firearms from being obtained by criminals, straw purchasers, and other persons who pose a danger to themselves or others when in possession of a firearm.

8. Every year for the next three (3) years, within 30 days following the end of each calendar year, World Pawn will send to counsel at the Brady Center to Prevent Gun Violence a letter that states that it has complied with the "best practices" terms agreed to in the settlement agreement.