

TIPS FOR CONSTRUCTING SAFE STORAGE PLAN

STRUCTURAL SECURITY OF RETAIL LOCATION AND ANY OFF-SITE STORAGE LOCATIONS:

- **Business location** – (i.e. High crime area) Do you need an external fence and/or lighting to secure your location?
- **Door and window locks, including window frames and doorjambs** – Does each external window and door have a lock? Are the locks being utilized? Do you need additional security features such as, but not limited to, bars on your external windows, reinforced door locks, shatter resistant glass coatings, etc.
- **Unsecured opening** – (i.e. air conditioning units in windows, holes in exterior walls, vents, chimneys, etc.) Do you have additional security features which hinder their exploitation to allow entry?
- **Walls and ceilings** – Are your walls and ceiling made of sturdy material? Is your safe room constructed in such a way as to significantly deter or delay entry by unauthorized persons (i.e. no windows, solid constructed walls, reinforced doors/door frames and locks?)
- **Exterior lighting and surrounding structures** – (i.e. shrubs, trees, ladders, dumpsters, etc.) Have you removed objects which criminals may use to their advantage to gain entry into your building?
- **Front windows and entrance** – Are you able to see customers approach your entrance? Can someone inside conceal themselves from public view so that a robbery would be undetected while it was being committed?
- **Alarm system** – Required for each licensee maintaining an inventory of firearms for sale or transfer. You should make sure your alarm system is always in proper working order.
- **Protect your alarm codes, safe combinations, and keys to the premises and firearm/ammunition cabinets.** It is highly recommended you change your alarm code(s) on a regular basis and reduce the number of keys copied. You may also find it useful to maintain a key log to sign them in and out.
- **Video surveillance system** – Required for each licensee operating a retail location.
The video surveillance system shall maintain video surveillance of critical areas of the business premises, including, but not limited to, all places where firearms in inventory are stored, handled, sold, or transferred and each entrance and exit. Best practice is to have a system which stores the video recordings off-site and regularly backs-up. If not feasible, it is recommended to place the video recording system in a locked room or in a locked cabinet to avoid theft of recordings. The ability to export still images (.jpg, .bmp or .gif) and video (industry standard format which can be played on a standard computer operating system) for law enforcement purposes is required. All

video surveillance records, along with any sound recordings obtained from them, shall be kept for a period of not less than 90 days.

INVENTORY SECURITY:

Inventory security is the way in which business merchandise and equipment is accounted for from the date it is received (acquired) by the business to the date of its disposition (sale, trade, etc.). At the core of inventory security is the practice of complete and consistent documentation. The following additional steps are recommended practices to help protect inventory:

- **Evaluate your business-hours store layout while you are open.** Are unsecured firearms displayed within reach of customers? Does your business have blind spots in which customers can access inventory? Are display cases kept locked unless an employee is showing an item from that case? Are all cases and firearms secured if an employee has to step away from the location firearms are being viewed by the customer (i.e. Has to go to the storage room in back).
- **Conduct periodic physical inventories and reconcile to book inventory.** Complete physical inventory counts and reconciliation to book inventory enable a Firearms licensee to know which firearms have been transferred legally and which firearms may have been lost or stolen. Without reliable records, it is impossible to determine if firearms have been transferred or are still in inventory. If this cannot be established and a crime occurs, the licensee will not be able to provide ATF and/or LPD with an accurate list of lost or stolen firearms. An inaccurate report could result in the arrest of an honest citizen or the inability to prosecute a criminal. Without reliable records, you may not even become aware that a crime has occurred. An inventory of firearms shall be completed at least annually. LPD recommends monthly to ensure the safeguard of your firearm inventory.
- Recommended you store your inventory logs in a fireproof, water-tight safe or backup your data off-site with a secure electronic storage system.
- It is highly recommended to only remove one firearm at a time while with a customer. If the customer wants to view another firearm, place original firearm back in the display case / storage area before removing another firearm.
- Display case construction should include (but not required) smash resistant or shatterproof glass, reinforced metal locking cabinets, or a combination of other security features.
- Recommended employee/customer ratio (1:1). Having one employee with a customer at a time allows for better observation and control of your inventory and safety.
- Highly recommended all dealers, at a minimum, check and verify the serial numbers of firearms received in shipping match the bill of lading from the shipping company or supplier.

AFTER HOUR STORAGE:

- Encouraged to conduct an overall count of firearms on hand at the close of business. This will help determine if anything is lost or has been stolen. If a firearm is determined to be lost or stolen, you must report it as instructed in letter (e) above on page 2 in the Safe Storage Plan Requirements.
- Ensure both video surveillance and alarm systems are functioning and activated before the last person leaves at the close of business.
- If you do not store your inventory at a retail location and utilize an off-site storage location such as your home; you may want to take extra precautions when loading firearms into the transportation vehicle. It is recommended, if feasible, to load the firearms within a fenced in area with a second person observing the surrounding area for anything out of the ordinary. It is suggested to take different routes to and from your retail location each day to avoid criminals learning your routine.
- By wiping down all countertops and door knobs each night you may help law enforcement apprehend criminals more quickly with the use of fingerprints left behind. It could be the difference between an unsolved crime and capturing the criminal(s).
- It is not recommended to leave personal messages on your answering machine which discloses your vacation plans or other significant amounts of time you may be away from your firearm inventory.

EMPLOYEE SCREENING:

The same care that is given to the safe handling and storage of firearms should be given to the selection of the people whom the licensee authorizes to do that work. Reluctance to embarrass or offend strangers or acquaintances must be set aside to ensure the security of the business. It is neither lawful nor in the licensee's interest to knowingly allow a prohibited person to possess firearms or engage in firearms sales. The importance of conscientiousness and trustworthiness is underscored by the high level of responsibility placed upon persons who are in a position to transfer firearms.

- **Institute an employee screening process.** LPD recommends conducting background checks on all employees and applicants (even relatives). Many private companies are available to perform these checks on a fee basis. Background checks should be repeated after an established period of time has elapsed. Applicants/employees should also provide references. These references should be contacted, interviewed, and asked to provide the names of other potential references, not listed by the applicant/employee.
- **Require proof of identity.** Require that each applicant/employee produce a government-issued identification card – a driver's license, for example – and a social security card.
- All employees who are a Colorado resident, are required to have a valid Colorado Driver's License or Identification card in accordance with State Law.

- Discuss questions with the local police or ATF. If it appears that an applicant or employee may not be eligible to possess or transfer firearms, the local police or local ATF office should be contacted

DISASTER PREPAREDNESS:

Every business should have a disaster plan. Federal firearms licensees have a double interest in having a plan in place because they need to safeguard their business to facilitate a quick recovery, and they need to protect the public from the risk of theft/loss of firearms and ammunition in the event of a disaster. The following suggestions can form a guide for developing a plan to follow in the event of impending disaster:

- Create and maintain a current set of records (and consider a second set maintained at an off-site location) that includes: insurance policies; supplier and contact list; computer records backup; and a second set of business records.
- Create a list of employee phone numbers and establish a plan under which, in the event of a disaster, they have a phone number to call to report that they are OK.
- Secure your inventory. Utilize safes, secure storage rooms, and other theft prevention devices such as cable locks that can retain and protect inventory.
- Perform a full inventory and take Acquisition and Disposition records to a safe location until the threat has passed.
- Make your disaster plan “multi-hazard” by taking into account each possibility: fire; tornado; flooding; civil unrest; etc.