

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Shark Coast Tactical, LLC 2819 Bee Ridge Road, Suite A Sarasota, FL 34239, Sarasota		2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 767035-2016-0282-B1B		
		3. PERMIT/LICENSE NUMBER 159115027B30742	4a. TARGET DATE	4b. TARGET HOURS
		5. REQUESTED BY (SIGNATURE, TITLE AND DATE) (b) (6), Area Supervisor, 01/26/2016		
6. ATF OFFICER(S) ASSIGNED (b) (6) - Assigned Investigator (b) (6) - Lead Investigator				
7. ASSIGNED BY (SIGNATURE, TITLE AND DATE) (b) (6), Area Supervisor, 04/26/2016				
8. PURPOSE/SPECIAL INSTRUCTIONS RECALL DE COMPLIANCE INSPECTION: Conduct recall inspection on or after 09/18/2015. Onsite end date of previous inspection: 09/17/14. Determine if Special Attention Flags may be removed. Watch for repeat violations. Determine if licensee deals in NFA, on the internet or at gun shows. Obtain GPS coordinates, photos and emergency contact information. Query NForce for any criminal enforcement (CE) investigations involving the applicant or FFL.				
9. INSPECTION RESULTS <input type="checkbox"/> CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC				
NO. OF VIOLATIONS	6	NO. OF REFERRALS		
NO. OF TECS CHECKS	138	NO. OF TECS HITS		
NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES	2111 - PER DIEM	
		\$ VALUE OF TAX DECREASES	2112 - P.O.A.	
NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS	2113 - COMM. AIR	
NO. OF CLAIMS		\$ VALUE OF CLAIMS	2114 - RENTAL CAR	
NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED	2115 - GPV EXPENSES	
			2116 - MISC.	
			TOTAL \$ FOR INSP.	
11. ATF OFFICER'S RECOMMENDATION Submitted by (b) (6) - Investigator Submitted on: 09/02/2016 Viols and Revocation / Denial of Renewal App				
12. TIME ACCOUNTING DATA				
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b) (6)				
FEB 2017 18.00				
ATF OFFICER'S SUBTOTAL		18.00	ATF OFFICER'S SIGNATURE	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS) (b) (6)				
MAY 2016 62.00				
JUN 2016 36.00				
JUL 2016 16.00				
AUG 2016 21.00				
SEP 2016 1.00				
ATF OFFICER'S SUBTOTAL		136.00	ATF OFFICER'S SIGNATURE	
TOTAL HOURS		154.00		

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Shark Coast Tactical, LLC 2819 Bee Ridge Road, Suite A Sarasota, FL 34239, Sarasota	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 767035-2016-0282-B1B		
	3. PERMIT/LICENSE NUMBER 159115027B30742	4a. TARGET DATE	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE) (b) (6), Area Supervisor, 01/26/2016		

13. REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

Concur with revocation of this license. Shark Coast Tactical, LLC and (b) (6) acted as a 'straw' applicant for Brandon Tactical, LLC in an attempt to obtain an FFL to expand the business operations of Shark Coast Tactical, LLC. By doing so, Shark Coast Tactical, LLC and (b) (6) knowingly made a false statement and/or representation by willfully withholding and/or misrepresented information on the ATF 7 in the name of Brandon Tactical, LLC that did not identify (b) (6) as a responsible person.

This recall inspection generated repeat violations of 478.126a, 478.125(e), 478.124(c)(3)(iv) and 478.129(b) from the previous inspection on September 17, 2014. IOI George Hancock asserts the violations that were cited in the current inspection are not, in fact, 'repeat violations' because the licensee did not receive an ATF F 5030.5 Report of Violations. The licensee did receive an ATF F 4500 (5300.4) Notice to Revoke or Suspend in Lieu of Revocation.

The fact that this licensee did not receive a Report of Violations does not preclude the violations that were cited in this inspection from being treated as repeat violations. It does appear that the licensee had knowledge of the violations cited in the 2014 inspection as the licensee did show improvement during this inspection in two of the violations previously cited which suggests that the licensee was made aware of the deficiencies in these areas.

Viols and Revocation / Denial of Renewal App

☒ REVIEWED

☒ CONCUR

☐ SEE COMMENTS

☐ FINAL DISPOSITION

SIGNATURE AND TITLE

(b) (6) - Area Supervisor

REVIEW DATE

08/18/2016

REVIEW COMMENTS AND RECOMMENDATION

Revocation is recommended based upon the licensee's falsification of a firearms application in order to receive a license through deception.

Update: Settlement reached.

Violations - Stipulated/Negotiated Settlement in Lieu of Revocation

☒ REVIEWED

☒ CONCUR

☒ SEE COMMENTS

☒ FINAL DISPOSITION

SIGNATURE AND TITLE

ARGERBER - DIO, Tampa Field Division

REVIEW DATE

08/31/2016

ROUTING SEQUENCE AND DATE

- ☐ 1. _____
- ☐ 2. _____
- ☐ 3. _____
- ☐ 4. _____

CONTROL FILE POSTED DATE _____

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor Shark Coast Tactical, LLC	Street Address 2819 Bee Ridge Road, Suite A	City Sarasota	State FL	Zip Code 34239-	County Sarasota	Page 1 of 7 Pages
License/Permit/Registry Number <i>(If any)</i> 159115027B30742	Expiration Date	Date(s) or Period of Inspection 05/09/2016 through 06/09/2016				

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Number: 1

Date Corrections to be Made: 06/30/2016

(If not corrected immediately)

Nature of Violation:

The licensee failed to retain in alphabetical (by name of purchaser), chronological (by date of disposition), or numerical (by transaction serial number) order, and as a part of the required records, each Form 4473 obtained in the course of transferring custody of a firearm(s).

Corrective Action to be Taken:

(If not corrected immediately)

IOI (b) (6) advised the licensee that the ATF Forms 4473 should be filed according to applicable laws and regulations by June 30, 2016.

On June 30, 2016, IOI (b) (6) verified that the ATF Forms 4473 had been filed according to applicable laws and regulations.

Citation: 27 CFR 478.124(b)

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor Shark Coast Tactical, LLC	Street Address 2819 Bee Ridge Road, Suite A	City Sarasota	State FL	Zip Code 34239-	County Sarasota	Page 2 of 7 Pages
License/Permit/Registry Number <i>(If any)</i> 159115027B30742		Expiration Date		Date(s) or Period of Inspection 05/09/2016 through 06/09/2016		

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Number: 2

Nature of Violation:

The licensee failed to correctly and/or completely record the Control Number provided by the Florida Department of Law Enforcement (FDLE) in (b) (3) - Public Law 112-55 (12) instances on (b) (3) - Public Law 112-55 (12) ATF Forms 4473 and duplicated a Control Number in (b) (3) - Public Law 112-55 (12) instances on (b) (3) - Public Law 112-55 (12) ATF Forms 4473 during the inspection period.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

IOI (b) (6) conducted a National Crime Information Center (NCIC) query of the (b) (3) - Public Law 112-55 (12) firearms identified on the ATF Forms 4473 which contained incorrect and/or incomplete Control Numbers resulting in zero (0) hits.

IOI (b) (6) queried the NICS for any prohibiting information about any transferee identified on an ATF Form 4473 where a firearm was transferred that also contained an incorrect and/or incomplete Control Number. The (b) (3) - Public Law 112-55 (12) NICS queries resulted in zero (0) hits.

IOI (b) (6) disclosed no information to indicate the licensee was falsifying Control Numbers or falsifying ATF Forms 4473. IOI (b) (6) was able to determine the correct Control Number for the (b) (3) - Public Law 112-55 (12) ATF Forms 4473 that contained a duplicated Control Number by taking the timestamp information provided by the FDLE for previously unverified Control Numbers and comparing the information to handwritten sales receipts for the date in question for the transferee named on the ATF Forms 4473 that contained a duplicated Control Number and through a program that the licensee utilizes to manage

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor Shark Coast Tactical, LLC	Street Address 2819 Bee Ridge Road, Suite A	City Sarasota	State FL	Zip Code 34239-	County Sarasota	Page 3 of 7 Pages
License/Permit/Registry Number (If any) 159115027B30742		Expiration Date		Date(s) or Period of Inspection 05/09/2016 through 06/09/2016		

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

payment information that also contained the named transferee and timestamp information.

IOI (b) (6) provided the correct Control Number to the licensee for the (b) (6) ATF Forms 4473 that contained a Control Number that was incorrect and/or incomplete (missing digit and/or transposed digits).

The licensee corrected the ATF Forms 4473 and, as detailed in the Licensee Response, implemented steps to prevent a reoccurrence.

Citation: 27 CFR 478.124(c)(3)(iv)

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Inspection Results

The licensee completed and submitted ATF Form 3310.4 for each unreported multiple sale or other disposition that was required but not completed or submitted.

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor Shark Coast Tactical, LLC	Street Address 2819 Bee Ridge Road, Suite A	City Sarasota	State FL	Zip Code 34239-	County Sarasota	Page 5 of 7 Pages
License/Permit/Registry Number <i>(If any)</i> 159115027B30742	Expiration Date	Date(s) or Period of Inspection 05/09/2016 through 06/09/2016				

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

April 9 Production

744

RIF

For Official Use Only

ATF E-Form 5030 5
Revised April 2005

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor Shark Coast Tactical, LLC	Street Address 2819 Bee Ridge Road, Suite A	City Sarasota	State FL	Zip Code 34239-	County Sarasota	Page 6 of 7 Pages
License/Permit/Registry Number <i>(If any)</i> 159115027B30742		Expiration Date		Date(s) or Period of Inspection 05/09/2016 through 06/09/2016		

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Number: 5

Nature of Violation:

The licensee failed to retain (b) (3) - Public Law 112-55 (12) ATF Forms 4473.

Date Corrections to be Made:

(If not corrected immediately)

Corrective Action to be Taken:

(If not corrected immediately)

IOI (b) (6) disclosed no information to indicate the licensee was falsifying Control Numbers or falsifying ATF Forms 4473. IOI (b) (6) determined that the (b) (3) - Public Law 112-55 (12) ATF Forms 4473 that were cited as missing were possibly thrown away by employees when a transfer was never completed or were possibly additional Control Numbers issued for the same transaction. IOI (b) (6) (b) (6) disclosed potential evidence of the trashing of ATF Forms 4473 where a transfer does not take place with the discovery in the file for ATF Forms 4473 where a transfer never took place of an ATF Form 4473 that appeared to have been crumpled and torn and then smoothed out and taped before filing. IOI (b) (6) was advised by the licensee that the ATF Form 4473 was discovered in the trash and was then properly filed. IOI (b) (6) disclosed potential evidence of additional background checks for the same transaction with the discovery of more than one Control Number recorded on multiple ATF Forms 4473 that contained notes in Item 30a explaining that the new Control Number was issued as a result of the employees resubmitting a background check after the discovery that the information initially provided for the transferee as part of the background check was misspelled or input incorrectly.

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor Shark Coast Tactical, LLC	Street Address 2819 Bee Ridge Road, Suite A	City Sarasota	State FL	Zip Code 34239-	County Sarasota	Page 7 of 7 Pages
License/Permit/Registry Number (If any) 159115027B30742		Expiration Date		Date(s) or Period of Inspection 05/09/2016 through 06/09/2016		

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

IOI (b) (6) advised the licensee to continue to look for any missing forms and to retain each ATF Form 4473 executed by the licensee in the course of conducting the business authorized by the license.

Citation: 27 CFR 478.129(b)

Number: 6

Nature of Violation:
18 U.S.C. 924(a)(1)(A) and 27 CFR 478.128(a)

The licensee knowingly made a false statement or representation with respect to the application for a license.

Shark Coast Tactical, LLC and (b) (6) knowingly made a false statement and/or representation with the willful withholding and/or misrepresented information provided in an attempt to obtain a FFL at 2553 SR 60 East, Valrico, FL 33594 after the attempted expansion of the current licensed business through the application for a FFL at 2553 SR 60 East, Valrico, FL 33594, which was withdrawn, by directing and funding the creation of a business at 2553 SR 60 East, Valrico, FL 33594 in the name of Brandon Tactical, LLC that did not identify William Crozier Meade IV and/or Shark Coast Tactical, LLC as the applicant.

Date Corrections to be Made:
(If not corrected immediately)

Corrective Action to be Taken:
(If not corrected immediately)

The violation was not discussed with the licensee as the information was not disclosed as part of the onsite inspection.

Citation: 27 CFR 478.128(a)

I Have Received a Copy of This Report of Violations (Proprietor's signature and title)

Signature and Title of ATF Officer

Date

Date

April 9 Production

746

RIP

For Official Use Only

ATF E-Form 5030 5
Revised April 2005

Notice to Revoke or Suspend License and/or Impose a Civil Fine

In the matter of License Number 1-59-115-02-7B-30742 and 1-59-115-07-7B-30785, as a/an

issued to:

Name and Address of Licensee (Show number, street, city, State and ZIP Code)

Shark Coast Tactical, LLC
2819 Bee Ridge Road #A
Sarasota, Florida 34239

Notice Is Hereby Given That:

Pursuant to the statutory provisions and reasons stated in the attached page(s), the Director or his/her designee, Bureau of Alcohol, Tobacco, Firearms and Explosives, intends to take action on the license described above.

☒ The above identified license may be revoked pursuant to 18 U.S.C. 923(c), 922(t)(5) or 924(p).

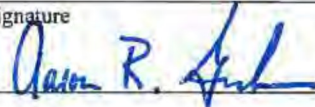
☐ The above identified license may be suspended pursuant to 18 U.S.C. 922(t)(5) or 924(p).

☐ The above identified licensee may be fined pursuant to 18 U.S.C. 922(t)(5) or 924(p).

Pursuant to U.S.C. 923(f)(2) and/or 922(t)(5), you may file a request with the Director of Industry Operations, Bureau of Alcohol, Tobacco, Firearms and Explosives, at 400 N. Tampa Street, Suite 2100, Tampa, Florida 33602, in duplicate, for a hearing to review the revocation, suspension and/or fine of your license. The request must be received at the above address within 15 days of your receipt of this notice. Where a timely request for a hearing is made, the license shall remain in effect pending the outcome of the hearing; and if the license is due to expire, the license will remain in effect provided a timely application for renewal is also filed. The hearing will be held as provided in 27 CFR Part 478.

If you do not request a hearing, or your request for a hearing is not received by ATF on time, a final notice of revocation, suspension, and/or imposition of civil fine (ATF Form 5300.13) shall be issued.

☒ Please see included brochure

Date 9/26/2016	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official Aaron R. Gerber, Director of Industry Operations	Signature 
-------------------	--	--

I certify that on the date shown below I served the above notice on the person identified below by:

☒ Certified mail to the address shown below.

Tracking Number: 70150640000240933093

Or

☐ Delivering a copy of the notice to
the address shown below.

Date Notice Served	Title of Person Serving Notice	Signature of Person Serving Notice

Print Name and Title of Person Served	Signature of Person Served (if applicable)

Address Where Notice Served

Shark Coast Tactical, LLC, c/o William Meade, 5346 Moeller Ave, Sarasota, Florida 34233

Shark Coast Tactical, LLC
2819 Bee Ridge Road #A
Sarasota, FL 34239

License Nos. 1-59-115-02-7B-30742
1-59-115-07-7B-30785

Under the provisions of 18 U.S.C. § 923(e) and 27 C.F.R. § 478.73, notice is hereby given of the revocation of the Federal firearms licenses specified above, in that the Director of Industry Operations, United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Tampa Field Division, has reason to believe that Shark Coast Tactical, LLC, 2819 Bee Ridge Rd #A, Sarasota, Florida 34239, a dealer, including pawnbroker, in firearms other than destructive devices and a manufacturer of firearms other than destructive devices, willfully violated the provisions of the Gun Control Act of 1968, as amended, 18 U.S.C. Chapter 44, and the regulations issued thereunder, 27 C.F.R. Part 478.

WILLFUL VIOLATIONS

The licensee knowingly and willfully made false statements as to a material fact in connection with an Application for Federal Firearms License, ATF Form 7, filed on or about November 17, 2015, by falsely listing Brandon Tactical, LLC as the applicant for such license when, in fact, the entity seeking the license was Shark Coast Tactical, LLC, in violation of 18 U.S.C. § 924(a)(1)(A) and 27 C.F.R. § 478.128(a).

Final Notice of Denial of Application, Revocation Suspension and/or Fine of Firearms License

In the matter of:

- ☐ The application for license as a/an _____, filed by:
or
- ☒ License Number s 1-59-115-02-7B-30742 and 1-59-115-07-7B-30785 as a/an
dealer, including pawnbroker, of firearms other than destructive devices and a manufacturer of firearms other than destructive devices, issued to:

Name and Address of Applicant or Licensee (Show number, street, city, state and ZIP Code)

Shark Coast Tactical, LLC
2819 Bee Ridge Road #A
Sarasota, Florida 34239

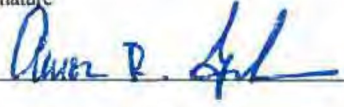
Notice is Hereby Given That:

- ☐ A request for hearing pursuant to 18 U.S.C. § 923(i)(2) and/or 922(i)(5) was not timely filed. Based on the findings set forth in the attached document, your
- ☐ license described above is revoked pursuant to 18 U.S.C. 923(e), 922(i)(2) or 924(p), effective:
- ☐ 15 calendar days after receipt of this notice, or ☐ _____.
- ☐ license is suspended for _____ calendar days, effective _____, pursuant to 18 U.S.C. § 922(i)(5) or 924(p).
- ☐ licensee is fined \$ _____, payment due: _____, pursuant to 18 U.S.C. § 922(i)(5) or 924(p).
- ☒ After due consideration following a hearing held pursuant to 18 U.S.C. § 923(i)(2) and/or 922(i)(5), and on the basis of findings set out in the attached copy of the findings and conclusions, the Director or his/her designee concludes that you:
- ☐ application for license described above is denied, pursuant to 18 U.S.C. 923(i).
- ☐ application for renewal of license described above is denied pursuant to 18 U.S.C. 923(d), effective:
- ☐ 15 calendar days after receipt of this notice, or ☐ _____.
- ☒ license described above is revoked pursuant to 18 U.S.C. 923(e), 922(i)(5) or 924(p), effective:
- ☒ 15 calendar days after receipt of this notice, or ☐ _____.
- ☐ license is suspended for _____ calendar days, effective _____, pursuant to 18 U.S.C. § 922(i)(5) or 924(p).
- ☐ licensee is fined \$ _____, payment due: _____, pursuant to 18 U.S.C. § 922(i)(5) or 924(p).

If, after the hearing and receipt of these findings, you are dissatisfied with this action you may, within 60 days after receipt of this notice, file a petition pursuant 18 U.S.C. § 923(j)(1), for judicial review with the U.S. District Court for the district in which you reside or have your principal place of business. If you intend to continue operations after the effective date of this action while you pursue filing for judicial review or otherwise, you must request a stay of the action from the Director of Industry Operations (DIO), Bureau of Alcohol, Tobacco, Firearms and Explosives, at 400 N Tampa St., Suite 2100, Tampa, FL 33602, prior to the effective date of the action set forth above. You may not continue licensed operations unless and until a stay is granted by the DIO.

Records prescribed under 27 CFR Part 478 for the license described above shall either be delivered to ATF within 30 days of the date the business is required to be discontinued or shall be documented to reflect delivery to a successor. See 18 U.S.C. 923(g)(4) and 27 CFR § 478.127.

After the effective date of a license denial or renewal, revocation, or suspension, you may not lawfully engage in the business of dealing in firearms. Any disposition of your firearms business inventory must comply with all applicable laws and regulations. Your local ATF office is able to assist you in understanding and implementing the options available to lawfully dispose of your firearms business inventory.

Date 05/22/2017	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official Aaron R. Gerber, Director of Industry Operations	Signature 
---------------------------	--	--

I certify that, on the date below, I served the above notice on the person identified below by:

☒ Certified mail to the address shown below.
Tracking Number: 70163010000092579680

Or

☐ Delivering a copy of the notice to
the address shown below.

Date Notice Served MAY 31 2017	Title of Person Serving Notice <i>Executive Assistant</i>	(b) (6)
Print Name and Title of Person Served		Signature of Person Served

Address Where Notice Served

Counsel Ryan Cleckner, FFLGuard, 244 Fifth Avenue, Suite 1960, New York, NY 10001

Note: Previous Edition is Obsolete

UNITED STATES OF AMERICA

DEPARTMENT OF JUSTICE

BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES

IN THE MATTER OF THE	:	TAMPA FIELD DIVISION
NOTICE TO DENY APPLICATION FOR	:	
LICENSE ISSUED TO:	:	
	:	
SHARK COAST TACTICAL, LLC	:	DEPARTMENT OF JUSTICE
2553 HIGHWAY 60 EAST	:	BUREAU OF ALCOHOL, TOBACCO,
VALRICO, FLORIDA 33594	:	FIRARMS AND EXPLOSIVES
	:	
AND	:	
	:	
IN THE MATTER OF THE NOTICE TO	:	
REVOKE THE LICENSES HELD BY:	:	
	:	
SHARK COAST TACTICAL, LLC	:	
2819 BEE RIDGE ROAD #A	:	
SARASOTA, FLORIDA 34239	:	

FINDINGS AND CONCLUSIONS

On September 26, 2016, the Director of Industry Operations, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Tampa Field Division, issued to Shark Coast Tactical, LLC, 2553 Highway 60 East, Valrico, Florida 33594, a Notice to Deny Application for License, ATF E-Form 5300.43(4498), with reasons therefor attached as page 2. On that same date, ATF issued to Shark Coast Tactical, LLC, 2819 Bee Ridge Road #A, Sarasota, Florida 34239, a Notice to Revoke or Suspend License and/or Impose a Civil Fine, ATF Form 4500(5300.4), notifying the licensee of the intent to revoke Federal firearms license numbers 1-59-115-02-7B-30742 and 1-59-115-07-7B-30785, with reasons therefor attached as page 2. By letter dated October 10, 2016, the Applicant/Licensee requested a hearing on the matter by and through its counsel (b) (6). A Notice of Hearing was issued to counsel for the Applicant/Licensee on December 29, 2016, and a hearing on the matter was held on February 7, 2017 in Tampa,

Florida. After considering all the relevant facts and circumstances presented at the hearing, I make the following findings and conclusions.

FINDINGS

1. Shark Coast Tactical, LLC, holds a Federal firearms license as a dealer, including pawnbroker, in firearms other than destructive devices, license number 1-59-115-02-7B-30742, and a Federal firearms license as a manufacturer of firearms other than destructive devices, license number 1-59-115-07-7B-30785.¹

2. Notices to Revoke or Suspend License and/or Impose a Civil Fine, ATF Form 4500(5300.4), were issued to Shark Coast Tactical, LLC, 2819 Bee Ridge Road #A, Sarasota, Florida 34239, on September 22, 2015 notifying the Licensee of ATF's intent to revoke license numbers 1-59-115-02-7B-30742 and 1-59-115-07-7B-30785, and impose a civil fine on license number 1-59-115-02-7 -30742. The notices asserted that Shark Coast Tactical, LLC, transferred a firearm to an unlicensed person on or about March 22, 2014 in violation of 18 U.S.C. § 922(d)(1) and 27 C.F.R. § 478.99(c)(1) knowing or having reason to believe such person was prohibited from receiving or possessing firearms, and without receiving prior to the transfer a unique background check identification number approving the transfer in violation of 18 U.S.C. § 922(t)(1) and 27 C.F.R. § 478.102(a); also with making a false statement in a record required to be kept by a licensee in violation of 18 U.S.C. §§ 922(m) and 924(a)(3), and 27 C.F.R. § 478.121(c) and 478.128(c), by stating that the transfer had been approved by the background check system when, in fact, the transfer had been denied. On that same date, September 22, 2015, ATF also issued a Notice to Deny Application for License, ATF Form

¹ Both licenses expired February 1, 2017. However, Shark Coast Tactical, LLC filed a timely application for renewal of both licenses with ATF. As provided in 27 C.F.R. § 478.78, where a notice of revocation has been served on the licensee and he has filed a timely request for hearing, the license in the possession of the licensee shall remain in effect even though the license has expired provided the licensee timely filed an application for renewal.

4498(5300.43), to Shark Coast Tactical, LLC at a proposed new location, 2553 SR 60 East, Valrico, Florida 33594, where it sought to expand its operations as a dealer, including pawnbroker, in firearms other than destructive devices. The denial asserted that Shark Coast Tactical, LLC was ineligible to receive a firearms license pursuant to 18 U.S.C. § 923(d)(1)(C), having willfully violated Title 18, United States Code, Chapter 44, relating to the transfer at issue in the revocation action.

3. On October 12, 2015, counsel for Shark Coast Tactical, LLC², expressed an interest in resolving the licensing matters, submitting a written offer of resolution by which Shark Coast Tactical, LLC would withdraw its pending application and not seek to open operations in Valrico; would serve a 10 day suspension of all licensed operations at the Sarasota location; and would pay the \$5,000.00 fine. In making the offer of resolution, counsel for Shark Coast Tactical, LLC expressed his belief that “Mr. Meade and his business [could] be rehabilitated” and that he expected “the DIO investigator who examines Shark Coast Tactical, LLC in November 2016 to be satisfied with what they find.” In the interest of providing Shark Coast Tactical, LLC an opportunity demonstrate it could be rehabilitated, ATF accepted the proposed resolution. On October 20, 2015 Shark Coast Tactical, LLC, by and through its counsel, withdrew the application for license at the Valrico, Florida location, waived the right to request a hearing, and accepted Amended and Final Notices suspending operations under license numbers 1-59-115-02-7B-30742 and 1-59-115-07-7 -30785 from October 26, 2015 through November 4,

² Shark Coast Tactical, LLC and William Meade were not represented by their current counsel in October 2015. ATF was notified that Shark Coast Tactical, LLC had changed its legal representative to FFLGuard via a Power of Attorney signed by William Meade dated May 9, 2016.

2015, and imposing a \$5,000.00 civil fine. The Licensee did suspend operations on the agreed upon dates, and the \$5,000.00 civil fine was paid by check dated January 11, [2016].³

4. On October 16, 2015, Brandon Tactical, LLC, filed Electronic Articles of Incorporation with the Florida Department of State, Division of Corporations. The filing listed Lorrie Vogel-Avendano, the wife of Shark Coast Tactical, LLC's responsible person William Meade, as Manager of Brandon Tactical, LLC, and a principal address of 2553 Highway 60 East, Valrico, Florida 33594. (b) (6) completed an Application for Federal Firearms License, ATF E-Form 7(5310.12), in the name of Brandon Tactical, LLC on November 5, 2015 seeking a license as a dealer in firearms other than destructive devices at 2553 Highway 60 East, Valrico, Florida 33594. (b) (6) indicated in response to item 24.D. on the application that she had been an employee of a Federal firearms licensee, but did not provide a separate sheet detailing the "yes" answer as instructed by the application. During the application inspection conducted January 5, 2016, (b) (6) provided a separate sheet detailing her "yes" answer stating "[i]n regards to item 24d, (b) (6) volunteered to assist my then boyfriend now husband with gunshows and sales at the shop (SHARKCOAST TACTICAL). Duties included completing 4473s, background checks from October 2013-present."

5. On or about April 7, 2016, Shark Coast Tactical, LLC posted a comment on its Facebook page which included the following:

SHARK COAST TACTICAL BRANDON/VALRICO WILL OPEN IN A MATTER OF DAYS. AT THIE [sic] TIME, WE HAVE NOT BEEN ABLE TO OBTAIN A FFL FOR THE BRANDON/VALRICO LOCATION. SO, WE ARE GONNA OPEN ANYWAY AND SELL EVERYTHING EXCEPT GUNS!! WE WILL HOPEFULLY

³ The check is actually dated January 11, 2015, however, the year is in error, as the notice imposing the fine was not issued until October 21, 2015, and the fine was not due until 90 days after such imposition.

BE GRANTED A LICENSE IN THE FUTURE. WE NEED TO GET OPENED, SO WE ARE OPENING.

6. On or about April 8, 2016, William Meade posted a video to Shark Coast Tactical, LLC's Facebook page announcing the opening of "Shark Coast Tactical Valrico/Brandon." The video states the location hasn't opened "because we've been having trouble getting the FFL up there." William Meade goes on in the video to say "hopefully before the election or something we'll get our FFL, but for now we need to open it up ... because we've been spending money on rent since September."

7. On or about April 9, 2016, Shark Coast Tactical, LLC posted a comment to its Facebook page which stated the following, and included a picture of a retail store:

Shark Coast Tactical Brandon is open! Shark [sic] Tactical Sarasota is Open! The Brandon store will not be selling guns for the time being but we will have everything else. Ammo, knives, bags, targets, cleaning supplies, uppers, parts, stocks, optics, ammo cans, free stickers, patches, tools, rails, etc. Hope to meet all the new folks in the Tampa Bay/Brandon/Valrico area. God bless and be safe. Shark Coast Tactical Brandon: 2553 Highway 60 East Valrico FL 941-228-9051

The photo of the retail store shows a large "SHARK COAST TACTICAL" sign with a logo associated with Shark Coast Tactical, LLC hanging on the wall.

8. On April 19, 2016, ATF issued a Notice to Deny Application for License, ATF Form 4498(5300.43), to Brandon Tactical, LLC, with reasons therefor attached as page 2. The grounds for denial were that the applicant willfully made a false statement of material fact by claiming to be the entity seeking the license when, in fact, the license was being sought for Shark Coast Tactical, LLC; and that the applicant had failed to disclose material information by failing to list William Meade as a responsible person of the business. *See* 18 U.S.C. § 923(d)(1)(C) and (D). That same day, (b) (6) withdrew Brandon Tactical, LLC's license application.

9. On or about May 9, 2016, Shark Coast Tactical, LLC submitted to ATF a Power of Attorney identifying its new counsel of record as FFLGuard, the same firm that represented Brandon Tactical, LLC.

10. On or about August 2, 2016, William Meade completed an Application for Federal Firearms License, ATF E-Form 7(5310.12), seeking a license as a dealer in firearms other than destructive devices on behalf of Shark Coast Tactical, LLC, E 2553 FL-60, Valrico, Florida 33594.⁴ The application lists William Meade as the sole responsible person of the business in item 22, and items 24.A through 24.C. are marked "yes" indicating the applicant, or William Meade, has held a Federal firearms license, been denied a Federal firearms license, and been an officer in a corporation holding a Federal firearms license. No separate sheet was included with the application detailing the "yes" answers contained in item 24.

CONCLUSIONS

11. As provided in 18 U.S.C. § 923(d)(1)(C) and 27 C.F.R. § 478.47(b)(3), the Attorney General shall approve an application for a Federal firearms license if, among other things, the applicant has not willfully violated any of the provisions of the Gun Control Act or any rules or regulations prescribed thereunder.

12. As provided in 18 U.S.C. § 923(e) and 27 C.F.R. § 478.73 and 478.74, after notice and opportunity for hearing, a Federal firearms license may be revoked if the holder of such license has willfully violated any provision of Title 18, United States Code, chapter 44 or any rule or regulation prescribed thereunder.

⁴ Although Mr. and Mrs. Meade used alternative street addresses on the Applications for Federal Firearms Licenses, whether listed as "SR 60 East", "Highway 60 East", or "E FL-60", the applications are all for the same physical location.

13. Based on the information presented at the hearing, I find Shark Coast Tactical, LLC willfully violated the provisions of the Gun Control Act and the regulations prescribed thereunder by willfully making false statements of a material fact in connection with the Application for Federal Firearms License, ATF E-Form 7(5310.12) completed November 5, 2015 and filed on November 17, 2015 by falsely listing Brandon Tactical, LLC as the applicant when, in fact, Shark Coast Tactical, LLC was the entity seeking the issuance of the license in violation of 18 U.S.C. § 924(a)(1)(A) and 27 C.F.R. § 478.128(a).

14. It is undisputed that Shark Coast Tactical, LLC, as part of an agreement *it* proposed to ATF to resolve violations that could have resulted in the absolute discontinuance of its business operations, withdrew its application filed July 28, 2015 for a firearms license at a new location in Valrico, Florida. As part of ATF accepting the proposed resolution, it was represented to the agency that despite “Shark Coast Tactical, LLC ha[ving] invested a substantial amount of capital and enter[ing] into a five year lease, in anticipation of the approval of the 2553 SR 60, Valrico, Florida location, ... it will not seek to open its operations there and w[ould] instead seek to sublease or assign the lease. ...” The clear import of this representation was that any business that might operate from 2553 SR 60, Valrico, Florida would be wholly unassociated with Shark Coast Tactical, LLC, as to do otherwise would make the statement regarding the capital investment by Shark Coast Tactical, LLC irrelevant, and make its statement that it would not seek to open operations specious. Shark Coast Tactical, LLC, had no intention, however, of abandoning operations at the Valrico location. Rather, in the midst of negotiations with ATF to preserve its existing licenses, Shark Coast Tactical, LLC, was devising an alternate route for obtaining a license at the Valrico location. That alternate route was having the wife of Shark Coast Tactical, LLC’s responsible person, William Meade, form Brandon Tactical, LLC,

complete an application for a firearms license at the same Valrico location Shark Coast Tactical, LLC had agreed to abandon, and omit William Meade from the list of responsible persons of that business. Upon consideration of all the presentations made at the hearing, I find that Brandon Tactical, LLC was a mere straw applicant for Shark Coast Tactical, LLC, the true applicant and intended recipient of the sought after license.

15. Counsel for the Applicant/Licensee appears to suggest that ATF cannot find Shark Coast Tactical, LLC to be the true applicant of Brandon Tactical, LLC's license application absent an admission by Lorrie Meade⁵ and/or William Meade that they falsified the application to secure a license for Shark Coast Tactical, LLC. However, the events surrounding the filing of the applications for license speak for themselves, and belie the self-serving statements made by Mr. and Mrs. Meade at the hearing.

16. Mr. and Mrs. Meade would have ATF believe the following events are unrelated, completely circumstantial, coincidental or without relevance:

- On October 16, 2015 Mrs. Meade files Articles of Incorporation for Brandon Tactical, LLC, just 4 days after Shark Coast Tactical, LLC makes an offer to resolve its licensing transgressions in part by withdrawing its own pending application at the same location.
- On November 5, 2015, the day after Shark Coast Tactical, LLC, completed its 10 day suspension, an Application for Federal Firearms License is completed for Brandon Tactical, LLC by Mrs. Meade, and Brandon Tactical, LLC signs a lease agreement essentially identical to that signed by Shark Coast Tactical, LLC for the same location. According to the lease agreement, Brandon Tactical, LLC was to begin paying rent December 1, 2015.
- On January 5, 2016, during an application inspection for the license application filed in the name of Brandon Tactical, LLC, Mrs. Meade, in response to questioning, states that she has an investor in the business that she will not identify, then adds that the investor is not her husband. The application

⁵ At the hearing, Lorrie Vogel-Avendano stated that she now uses the name Lorrie Meade following her marriage to William Meade. Both names as used in this document refer to the same person.

inspection also disclosed that the security deposit for the lease for Brandon Tactical, LLC was provided by Shark Coast Tactical, LLC.

- On April 7, 2016, while the only firearms license application pending with ATF for the Valrico location was in the name of Brandon Tactical, LLC, Shark Coast Tactical, LLC posted to its Facebook page that **"SHARK COAST TACTICAL BRANDON/VALRICO"** would open in a matter of days, going on to say **"WE WILL HOPEFULLY BE GRANTED A LICENSE IN THE FUTURE."**
- The following day, April 8, 2016, a video posted on Shark Coast Tactical, LLC's Facebook page announces the opening of **Shark Coast Tactical Valrico/Brandon**. In the video, William Meade laments the fact that **"we"** have had trouble getting the FFL at the location, and **"we"** have been spending money on rent since September.
- On April 9, 2016, Shark Coast Tactical posts on Facebook **"Shark Coast Tactical Brandon is open! Shark Tactical [sic] Sarasota is Open!"**. The post goes on to say **"the Brandon store will not be selling guns for the time being ..."**.
- On April 19, 2016, ATF issues a notice to deny the application filed in the name of Brandon Tactical, LLC. On that same date, Mrs. Meade withdraws the application she filed in the name of Brandon Tactical, LLC.
- The Application for Federal Firearms License completed July 21, 2015 seeking a firearms license in the name of Shark Coast Tactical, LLC at 2553 SR 60 East, Valrico, Florida lists William Crozier Meade, IV as the sole responsible person. The Application for Federal Firearms License completed November 5, 2015 seeking a license in the name of Brandon Tactical, LLC at the same location lists **(b) (6)** as the sole responsible person. The Application for Federal Firearms License completed August 2, 2016 seeking a license in the name of Shark Coast Tactical, LLC at the same location lists William Crozier Meade, IV as the sole responsible person.

17. This is a matter in which actions speak louder than words. Having secured leniency from ATF in the form of suspension of its licenses in lieu of revocation, in part by agreeing not to open operations at the proposed Valrico store location, the day after serving its suspension, Shark Coast Tactical, LLC, rather than legitimately subleasing or assigning the lease to another business, merely changed the name on the lease and license application, omitted William Meade as a responsible person, and filed an application for a firearms license in the name of Brandon Tactical, LLC in an effort to evade the consequences of its own negotiated settlement. It should

not go unnoticed that Brandon Tactical, LLC was created only *after* it became clear that Shark Coast Tactical, LLC's July 2015 license application would be denied or withdrawn. It should also be recognized that, having consented to the withdrawal of the application on behalf of Shark Coast Tactical, LLC, the Meades deliberately attempted to conceal William Meade's role in the creation and operation of the Valrico firearms business by listing only Mrs. Meade as a responsible person. The application, completed with the advice and guidance of FFLGuard and of which William Meade was aware, was calculated to give ATF the impression that a business independent of Shark Coast Tactical, LLC would be operating from that location. As Mr. Meade testified, it was his understanding from his former counsel that Shark Coast Tactical, LLC could not reapply for a license for a period of one year, or until undergoing a successful audit, making an application that did **not** list Shark Coast Tactical, LLC as the applicant the only perceived alternative for the Meades to take advantage of the retail space for which they were already paying rent.

18. The fact that Mr. and Mrs. Meade had already begun to make rent payments at the Valrico location, and had invested a substantial amount of money in the location to prepare it for retail firearms sales, provides a financial motivation for Mr. and Mrs. Meade to falsify the November 5, 2015 firearms license application in order to receive a license to sell firearms from that location. It likely did not matter to the Meades whether the license was issued in the name of Brandon Tactical, LLC or Shark Coast Tactical, LLC, as the sole objective was to obtain a firearms license to expand their business in Sarasota to the Valrico location. But while the Licensee/Applicant wants ATF to focus solely on the four corners of the application filed in the name of Brandon Tactical, LLC, the Meades, and their counsel, repeatedly prove that they themselves cannot delineate one business from the other.

19. The Facebook posts, Facebook video, and testimony introduced during the hearing show that there was never any true attempt by the Meades to distinguish between Brandon Tactical, LLC and Shark Coast Tactical, LLC, except as to the application to ATF for a license. The persistent references to “we” by the Meades, and “they” rather than “she” by the Meades’ counsel, demonstrate that the Meades worked in concert in an attempt to obtain a license for the Valrico store in an effort to expand Shark Coast Tactical, LLC’s business to its new desired location. Perhaps Mr. Meade said it best, and most truthfully, when he proposed an alternative version of the April 8, 2016 video:

I understand, like you, it does, you’re right, it looks like we we’re just tryin’ to. What ah, OK, then, what do you really want me to say on the video? ‘Hi. I’ve had problems with the ATF for four years, my wife just tried to get a license so we could use the space that we figured out. She can’t get it, I can’t get it, ATF hates me. We’re gonna open up and sell ammo.’

These statements and actions make it clear that the Brandon Tactical, LLC application was nothing more than an attempt to secure a firearms license for Shark Coast Tactical, LLC that it had agreed not to seek for itself. It is not reasonable to expect ATF to ignore the obvious and simply accept the Meades’ version of events. Even counsel for the Licensee/Applicant in addressing whether the Licensee/Applicant lied on the application appears conflicted: “I can see how it might be likely, I think reasonable people could maybe even agree on it could seem likely, but that’s not willfully knowingly lying, and even if it was, which it wasn’t, it’d be Lorrie, but she didn’t.” As both Mr. Meade and counsel for the Licensee/Applicant concede, the facts of this case lend themselves to the very reasonable conclusion that Shark Coast Tactical, LLC, by and through William and Lorrie Meade, falsified the November 2015 application for license by claiming the license was for Brandon Tactical, LLC when, in fact, the license was sought to expand the operations of Shark Coast Tactical, LLC to the Valrico location where it had agreed

not to open its operations. ATF need not abandon that reasonable conclusion based solely on the Meades' self-serving denials.

20. The filing of the applications by Shark Coast Tactical, LLC and William Meade, then Brandon Tactical, LLC and Lorrie Meade, followed again by Shark Coast Tactical, LLC and William Meade, underscore the Meade's true business intentions. As explained by Mr. Meade, when Shark Coast Tactical, LLC withdrew its initial application "[Brandon Tactical, LLC] ... tried to get a license so **we** could use the space that **we** figured out. ..." however Mr. Meade was not listed as a responsible person on that application; thus there was no "we" just Mrs. Meade. However, when Brandon Tactical, LLC withdrew its application, and a subsequent application for license was filed by Shark Coast Tactical, LLC, only William Meade was listed as the sole responsible person, essentially a reversion to the "true" original applicant for the license.

21. Counsel for the Licensee/Applicant argues that the opening of the accessories business in Valrico on or about April 9, 2016 as "Shark Coast Tactical" is irrelevant, as Mrs. Meade had already decided to withdraw the application of Brandon Tactical, LLC, and no license is required to sell firearms accessories and ammunition. That argument, however, begs the question as to why Mrs. Meade, who claimed to want to run her own business, did not open Brandon Tactical, LLC as a firearms accessory and ammunition store, either prior to withdrawal of the application, or after the decision to withdraw the application. The only reasonable conclusion to be drawn is that once the Meades became aware that ATF did not intend to issue a license to Brandon Tactical, LLC, the purpose for which that LLC had been created was moot, and the Meades reverted to their true intention, operating their business as Shark Coast Tactical.

22. In addition to the reasonable conclusions drawn from the facts, I find the Applicant/Licensee's reputation for truthfulness when completing government documents to be

lacking. As noted in paragraph 2, the revocation action initiated against Shark Coast Tactical, LLC in September 2015 alleged that Shark Coast Tactical, LLC falsified an ATF Form 4473 in relation to the transfer of a firearm to a person who was prohibited from receiving or possessing firearms by noting on the record that the background check system had approved the transfer of the firearms when, in fact, the system had denied the transfer. I find it reasonable to conclude that the Licensee/Applicant, having completed a Form 4473 in a manner so as to conceal the true nature of a firearms transaction, would similarly complete an Application for Federal Firearms License in a manner so as to conceal the true applicant.

23. ATF may look past the formal corporate structure of an applicant or licensee, especially when that structure is used to circumvent statutory requirements. ATF may, therefore, look past the facade of the application filed in the name of Brandon Tactical, LLC, as Brandon Tactical, LLC's application was occasioned solely as a result of the withdrawal, in lieu of denial for willful violations, of the application filed by Shark Coast Tactical, LLC at the same location. By filing an application to extend the licensed operations of Shark Coast Tactical, LLC to the Valrico location by claiming to be Brandon Tactical, LLC, Shark Coast Tactical, LLC, by and through William and Lorrie Meade, made a false statement in applying for a firearms license in violation of 18 U.S.C. § 924(a)(1)(A), and 27 C.F.R. § 478.128(a).


24. A "willful" violation for purposes of the regulatory provisions of the Gun Control Act means a purposeful disregard of or plain indifference to the firearms laws and regulations. I find that Shark Coast Tactical, LLC, by and through William and Lorrie Meade, willfully violated 18 U.S.C. § 924(a)(1)(A), and 27 C.F.R. § 478.128(a) by filing an application in the name of Brandon Tactical, LLC with full knowledge that the license was actually being sought to expand the business operations of Shark Coast Tactical, LLC.

DECISION

On consideration of all relevant facts and circumstances presented in this matter, I find that Shark Coast Tactical, LLC, is not qualified to receive a Federal firearms license under the provisions of 18 U.S.C § 923(d)(1)(C), and 27 C.F.R. § 478.47(b)(3), as Shark Coast Tactical, LLC, by and through William and Lorrie Meade, willfully violated Title 18, United States Code, Chapter 44, and its implementing regulations, specifically 18 U.S.C. § 924(a)(1)(A) and 27 C.F.R. § 478.128(a). Thus, the Application for Federal Firearms License seeking a license at 2553 Highway 60 East, Valrico, Florida 33594, is hereby denied.

On consideration of all relevant facts and circumstances presented in this matter, I find that the firearms licenses issued to Shark Coast Tactical, LLC, license numbers 1-59-115-02 7B 30742 and 1-59-115-07-7B-30785, are subject to revocation pursuant to 18 U.S.C. § 923(e) as Shark Coast Tactical, LLC, by and through William and Lorrie Meade, willfully violated a provision of Title 18, United States Code, Chapter 44, and its implementing regulations, specifically 18 U.S.C. § 924(a)(1)(A) and 27 C.F.R. § 478.128(a). Thus, Federal firearms license numbers 1-59-115-02-7B 30742 and 1 59-115-07-7B-30785, are hereby revoked.

Signed this 22ND day of May, 2017.



AARON R. GERBER
Director of Industry Operations
Bureau of Alcohol, Tobacco, Firearms and Explosives
Tampa Field Division

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

Address: 2819 Bee Ridge Road, Suite A
Sarasota, FL 34239

1 - Introduction

Inspection Profile:

On May 9, 2016 Industry Operations Investigator (IOI) (b)(6) initiated a Firearms Inspection (Pawnbroker, Recall DE) on Shark Coast Tactical, LLC at the licensed premises. A Recall requires the inspection period to begin on the date after the previous inspection ended, therefore, the inspection period was the activity authorized by the Federal Firearms License (FFL) from September 18, 2014 to May 8, 2016. IOI (b)(6) interviewed William Crozier Meade IV, Responsible Person and Manager of Shark Coast Tactical, LLC.

Business Profile:

Shark Coast Tactical, LLC was engaged in a business activity requiring a license as a Dealer, Including Pawnbroker, in Firearms. The premises was an urban commercial location. The licensee acquired approximately (b)(4) (b)(4)) firearms and disposed of approximately (b)(4) (b)(4)) firearms during the inspection period and acquired approximately (b)(4) (b)(4) and disposed of approximately (b)(4) (b)(4) during the last twelve (12) months. The licensed business consisted of approximately (b)(4) (%) retail sales with (b)(4) (b)(4) new firearms. The licensee identified (b)(4)

(b)(4)) as primary suppliers of firearms. IOI (b)(6) identified no other business on the premises or other business also conducted by the licensee. IOI (b)(6) identified no compliance issues with State/Local licensing or zoning. This license was first issued in 2014 according to the Federal Licensing System (FLS).

- William Crozier Meade IV stated that licensed business was conducted at gun shows.
- William Crozier Meade IV stated that firearms were sold via the internet.
- The licensee also held a Type 07 FFL issued by the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF); 1-59-07-30785.

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

Ownership and Control:

The licensee was Shark Coast Tactical, LLC as an Other-Limited Liability Corporation (LLC). A review of the FLS and the Florida Department of State Division of Corporations (Sunbiz) confirmed the business structure and identified William Crozier Meade IV as the sole Responsible Person on the license and Manager of Shark Coast Tactical, LLC.

IOI (b)(6) conducted a query of the National Instant Criminal Background Check System (NICS) and N-Force for any relevant information about William Crozier Meade IV disclosing no information relevant to the status of William Crozier Meade IV as a Responsible Person.

Variance:

The licensee held no approved variances.

2 - Recommendation

Viols and Revocation / Denial of Renewal App

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

3 - Inspection History

Date of Inspection: September 17, 2014
Type of Inspection: Firearms Inspection
(Pawnbroker, DE)
UI#: 767035-2014-0518, B1B
Inspection Results: Violations – Stipulated/Negotiated Settlement in Lieu of Revocation
Cited Violations: The following were presented to the licensee on ATF Form 4500 (5300.4), Notice to Revoke or Suspend License and/or Impose a Civil Fine:
18 U.S.C. § 922(t)(1) and 27 CFR § 478.102(a)
18 U.S.C. 922(t)(5)
18 U.S.C. § 922(d)(1) and 27 CFR § 489.99(c)(1) [sic]
18 U.S.C. § 922(m), 18 U.S.C. § 924(a)(3),
27 CFR § 478.121(c), and 27 CFR § 478.128(c)

SIOI (b)(6) noted the following additional violations in the narrative and N-Spect, however, the licensee was never presented an ATF Form 5030.5, Report of Violations for the noted violations.:

27 CFR 478.21(a) – (b)(3) - 112 Public Law 55 125 Stat 552) Instances
27 CFR 478.102(a) – (b)(3) - 112 Public Law 55 125 Stat 552) Instances
27 CFR 478.102(a)(2)(i) – (b)(3) - 112 Public Law 55 125 Stat 552) Instance
27 CFR 478.103(d) – (b)(3) - 112 Public Law 55 125 Stat 552) Instance
27 CFR 478.124(b) – (b)(3) - 112 Public Law 55 125 Stat 552) Instance
27 CFR 478.124(c)(1) – (b)(3) - 112 Public Law 55 125 Stat 552) Instances
27 CFR 478.124(c)(3)(i) – (b)(3) - 112 Public Law 55 125 Stat 552) Instances
27 CFR 478.124(c)(3)(iv) – (b)(3) - 112 Public Law 55 125 Stat 552) Instances
27 CFR 478.124(c)(4) – (b)(3) - 112 Public Law 55 125 Stat 552) Instances
27 CFR 478.124(c)(5) – (b)(3) - 112 Public Law 55 125 Stat 552) Instances
27 CFR 478.125(e) – (b)(3) - 112 Public Law 55 125 Stat 552) Instances
27 CFR 478.121(c) – (b)(3) - 112 Public Law 55 125 Stat 552) Instance
27 CFR 478.124(a) – (b)(3) - 112 Public Law 55 125 Stat 552) Instances
27 CFR 478.126a – (b)(3) - 112 Public Law 55 125 Stat 552) Instances
27 CFR 478.129(b) – (b)(3) - 112 Public Law 55 125 Stat 552) Instances

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

Date of Inspection: December 17, 2013
Type of Inspection: Firearms Inspection
(Pawnbroker, Qualification New Onsite)
UI#: 767035-2014-0139, B1B
Inspection Results: Application Approved
Cited Violations: No Violations Cited

4 - Acquisition & Disposition (A&D) Record - Inventory

The A&D Record was in the proper format, however, required information was not accurate and entries were not timely made. IOI (b)(6) conducted a complete inventory. The licensee had eight hundred fourteen (814) firearms in inventory, including two hundred twenty (220) weapons under the purveyance of the National Firearms Act (NFA). The licensee had (b)(3) - 112 Public Law 55 125 Stat 552 open dispositions in the A&D Record, including (b)(3) - 112 Public Law 55 125 Stat 552 open dispositions in a separate A&D Record for the NFA weapons. IOI (b)(6) cited the licensee for the following violation(s):

The licensee failed to record (b)(3) - 112 Public Law 55 125 Stat 552 firearm acquisition during the inspection period in the Acquisition and Disposition (A&D) Record.
[Report of Violations (ROV) #3, Inventory and A&D Review Worksheet, Exhibit 01]

The licensee recorded the disposition of (b)(3) - 112 Public Law 55 125 Stat 552 firearms that were in inventory.
[ROV #3, Inventory and A&D Review Worksheet, Exhibit 01]

The licensee failed to record (b)(3) - 112 Public Law 55 125 Stat 552 firearm dispositions during the inspection period in the A&D Record.
[ROV #3, Inventory and A&D Review Worksheet, Exhibit 01 (Representative Sample)]

(b)(3) - 112 Public Law 55 125 Stat 552 additional open disposition was not reconciled and the firearm was reported on ATF Form 3310.11, Federal Firearms Licensee Firearms Inventory Theft/Loss Report (ATF Issued Incident Number (b)(3) - 112 Public Law 55 125 Stat 552)
[ROV #3, Inventory and A&D Review Worksheet]

The licensee submitted (b)(3) - 112 Public Law 55 125 Stat 552 theft or loss report during the inspection period (b)(3) - 112 Public Law 55 125 Stat 552 and (b)(3) - 112 Public Law 55 125 Stat 552 theft or loss report as a result of this inspection (b)(3) - 112 Public Law 55 125 Stat 552. IOI (b)(6) traced ten (10) firearms through the required records from acquisition to disposition disclosing no additional discrepancies.

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

IOI (b)(6) conducted a secondary market analysis of twelve (12) firearms representing approximately fourteen percent (14%) of the used firearms in inventory resulting in zero (0) hits.

IOI (b)(6) discussed standard operating procedures relevant to the A&D record and inventory with the licensee. William Crozier Meade IV stated that a full inventory was conducted regularly. William Crozier Meade IV acknowledged and accepted responsibility for accounting for inventory, safeguarding inventory from theft and/or loss, and accurately and timely making entries in the required records. William Crozier Meade IV stated intent to follow procedures for conducting inventories and making entries in the required records as prescribed by the law, regulation, rulings, and other information provided by the ATF.

5 - ATF Forms 4473 – NICS & Other Dispositions

The licensee had (b)(3) - 112 Public Law 55 125 Stat 552 executed ATF Forms 4473 on file for the inspection period and (b)(3) - 112 Public Law 55 125 Stat 552 one (b)(3) - 112 Public Law 55 125 Stat 552 executed ATF Forms 4473 during the last twelve (12) months. IOI (b)(6) Hancock reviewed (b)(3) - 112 Public Law 55 125 Stat 552 ATF Forms 4473. IOI (b)(6) cited the licensee for the following violation(s):

The licensee failed to retain in alphabetical (by name of purchaser), chronological (by date of disposition), or numerical (by transaction serial number) order, and as a part of the required records, each Form 4473 obtained in the course of transferring custody of a firearm(s).

[ROV #1]

A query of the Florida Department of Law Enforcement (FDLE) disclosed seven thousand five hundred nine (7509) background checks represented by Control Numbers initiated by the licensee in the inspection period. IOI (b)(6) verified (b)(3) - 112 Public Law 55 125 Stat 552 FDLE Control Numbers from the licensee queries to an ATF Form 4473 on file with the licensee for the same period. IOI (b)(6) cited the licensee for the following violation(s):

The licensee failed to correctly and/or completely record the Control Number provided by the Florida Department of Law Enforcement (FDLE) in (b)(3) - 112 Public Law 55 125 Stat 552 instances on (b)(3) - 112 Public Law 55 125 Stat 552 ATF Forms 4473 and duplicated a Control Number in (b)(3) - 112 Public Law 55 125 Stat 552 instances on (b)(3) - 112 Public Law 55 125 Stat 552 ATF Forms 4473 during the inspection period.

[ROV #2, ATF Form 4473 (2012 Edition) Review Worksheet, Exhibit 02 (Representative Sample)]

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

The licensee failed to retain (b)(3) - 112 Public Law 55 125 Stat 552 ATF Forms 4473.
[ROV #5, ATF Form 4473 (2012 Edition) Review Worksheet]

IOI (b)(6) conducted a National Crime Information Center (NCIC) query of the (b)(3) - 112 Public Law 55 125 Stat 552 firearms identified on the ATF Forms 4473 which contained incorrect and/or incomplete Control Numbers resulting in zero (0) hits.

IOI (b)(6) queried the NICS for any prohibiting information about any transferee identified on an ATF Form 4473 where a firearm was transferred that also contained an incorrect and/or incomplete Control Number. The fifty nine (59) NICS queries resulted in zero (0) hits.

IOI (b)(6) disclosed no information to indicate the licensee was falsifying Control Numbers or falsifying ATF Forms 4473. IOI (b)(6) was able to determine the correct Control Number for the (b)(3) - 112 Public Law 55 125 Stat 552 ATF Forms 4473 that contained a duplicated Control Number by taking the timestamp information provided by the FDLE for previously unverified Control Numbers and comparing the information to handwritten sales receipts for the date in question for the transferee named on the ATF Forms 4473 that contained a duplicated Control Number and through a program that the licensee utilizes to manage payment information that also contained the named transferee and timestamp information.

IOI (b)(6) provided the correct Control Number to the licensee for the (b)(3) - 112 Public Law 55 125 Stat 552 ATF Forms 4473 that contained a Control Number that was incorrect and/or incomplete (missing digit and/or transposed digits).

IOI (b)(6) disclosed no information to indicate the licensee was falsifying Control Numbers or falsifying ATF Forms 4473. IOI (b)(6) determined that the (b)(3) - 112 Public Law 55 125 Stat 552 ATF Forms 4473 that were cited as missing were possibly thrown away by employees when a transfer was never completed or were possibly additional Control Numbers issued for the same transaction. IOI (b)(6) disclosed potential evidence of the trashing of ATF Forms 4473 where a transfer does not take place with the discovery in the file for ATF Forms 4473 where a transfer never took place of an ATF Form 4473 that appeared to have been crumpled and torn and then smoothed out and taped before filing. IOI (b)(6) was advised by the licensee that the ATF Form 4473 was discovered in the trash and was then properly filed. IOI (b)(6) disclosed potential evidence of additional background checks for the same transaction with the discovery of more than one Control Number recorded on multiple ATF Forms 4473 that contained notes in Item 30a explaining that the new Control Number was issued as a result of the employees resubmitting a background check after the discovery that the information initially provided for the transferee as part of the background check was misspelled or input incorrectly.

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

IOI (b)(6) discussed standard operating procedures relevant to ATF Form 4473 completion and other dispositions with the licensee. William Crozier Meade IV acknowledged and accepted responsibility for accurately and timely making entries in the required records and ensuring the transfer of firearms only to persons not prohibited by law from receiving or possessing firearms. William Crozier Meade IV stated intent to follow procedures for making entries in the required records and transferring firearms as prescribed by the law, regulation, headings on required forms and the instructions on or pertaining to required forms, rulings, and other information provided by the ATF.

6 - Multiple Sales

Firearm Trace History acquired from the Violent Crime Analysis Branch (VCAB) disclosed that the licensee was associated with (b)(3) - 112 Public Law 55 125 Stat 552 multiple sales or other dispositions where the licensee sold or otherwise disposed of, at one time or during any five (5) consecutive business days, two (2) or more pistols, or revolvers, or any combination of pistols and revolvers during the inspection period.

IOI (b)(6) identified unreported multiple sales or other dispositions of, at one time or during any five (5) consecutive business days, two (2) or more pistols, or revolvers, or any combination of pistols and revolvers totaling two (2) or more to a nonlicensee during the inspection period. IOI (b)(6) cited the licensee for the following violation:

The licensee failed to prepare a report of multiple sales or other disposition when the licensee sold or otherwise disposed of, at one time or during any five consecutive business days, two or more pistols, or revolvers, or any combination of pistols and revolvers totaling two or more, to an unlicensed person in (b)(3) - 112 Public Law 55 125 Stat 552 instances involving (b)(3) - 112 Public Law 55 125 Stat 552 firearms.

[ROV #4, ATF Form 4473 (2012 Edition) Review Worksheet, Exhibit 04]

7 - Suspicious/Prohibited Purchasers

IOI (b)(6) identified no suspicious or prohibited persons.

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

8 - Trace Activity

Firearm Trace History acquired from the VCAB disclosed that the licensee was associated with (b)(3) - 112 Public Law 55 125 Stat 552) successful trace requests during the inspection period. Firearm Trace History acquired from the VCAB disclosed that the licensee was associated with zero (0) unsuccessful trace requests during the inspection period.

IOI (b)(6) conducted a secondary market analysis of twelve (12) firearms representing approximately fourteen percent (14%) of the used firearms in inventory resulting in zero (0) hits. The licensee acquired approximately (b)(4) (b)(4) used firearms and disposed of (b)(4)) used firearms during the inspection period.

9 - NFA/Importer/Collector/Manufacturer

The licensee did not engage in the business as an Importer, a Collector, or a Manufacturer.

The licensee was a dealer in items under the purveyance of the NFA and possessed an appropriate and valid Special Tax Stamp. The licensee recorded the NFA items in a separate A&D Record. The record for the NFA items contained all of the required information, was accurate, and timely recorded.

IOI (b)(6) conducted a complete inventory disclosing no discrepancies. The licensee had two hundred twenty (220) NFA items in inventory and (b)(3) - 112 Public Law 55 125 Stat 552 (b)(3) - 112 Pu open dispositions in the A&D Record that corresponded to the NFA items. IOI (b)(6) reviewed the corresponding records for the NFA items disclosing no discrepancies.

10 - Referrals

IOI (b)(6) generated no referrals as a result of this inspection.

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

11 - Other

The licensee had displayed a Youth Handgun Safety Act (YHSA) poster and the licensee affirmed compliance regarding the distribution of the YHSA notices. The licensee had secure gun storage or safety devices available and William Crozier Meade IV affirmed compliance regarding the distribution of secure gun storage or a safety device.

IOI (b)(6) queried N-Force to verify that the FFL and any Responsible Person was not under investigation for the purpose of safety, collaboration and coordination.

IOI (b)(6) conducted sixty (60) queries of the NICS for any relevant information about:

- William Crozier Meade IV
- (b)(6) Transferees Identified on an ATF Form 4473 where a Firearm was Transferred That Also Contained an Incorrect and/or Incomplete Control Number

IOI (b)(6) conducted a NCIC query of seventy eight (78) firearms.

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

IOI (b)(6) was provided additional relevant information for attachment to this inspection from AS (b)(6) and SIOI (b)(6) regarding the licensee; based on the additional information discovered and reported on in a prior inspection (767035-2016-0122) and activity conducted by the licensee immediately prior to this inspection a recommendation of revocation was made for this inspection. The additional information received was, as follows:

For historical purposes, both licenses held by Shark Coast Tactical, LLC (Type 02: 1-59-30742 and Type 07: 1-59-30785) were previously recommended for revocation for willfully violating the Gun Control Act. The Notice of Revocation, which was sent on 9/22/15, also included the denial of a pending application that Shark Coast Tactical, LLC filed with a location of 2553 Highway 60 East Valrico, Florida 33594. The basis for denial of the Type 02 application (1-59-32683) was for a willful violation of the Gun Control Act under Title 18 U.S.C. 923(d)(1)(C) disclosed during compliance inspections of Mr. Meade's FFLs 1-59-30742 and 1-59-30785. The licenses for Shark Coast Tactical, LLC (Type 02: 1-59-30742 and Type 07: 1-59-30785) were not revoked as an settlement was reached in which Shark Coast Tactical, LLC's licenses (1-59-30742 and 1-59-30785) were suspended from October 26, 2015 through November 4, 2015 and paid a civil fine of \$5,000.00 for a violation of 18 U.S.C 922(t)(5). In addition to the suspension and the fine, the Type 02 application submitted for Shark Coast Tactical, LLC was withdrawn on 10/20/2015. For reference purposes, the Type 07 (FFL: 1-59-32684) application was withdrawn due to zoning restrictions.

Information collected in a denial action sought by ATF against the application for a Federal firearms license submitted by Brandon Tactical, LLC (see UI # 767035-2016-0122) indicates Shark Coast Tactical LLC was directly involved in the falsification of a Federal firearms application. ATF pursued denial based upon its documented contention that Brandon Tactical, LLC was a "straw" applicant for Shark Coast Tactical, LLC to receive a license through deceit. Evidence for this included:

(b)(5), (b)(6)

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

(b)(5), (b)(6)

(b)(5)

Subsequent to this action, SIOI (b)(6) received a tip from an industry member that further supports ATF's claim against Shark Coast Tactical, LLC. This includes:

- On April 8, 2016, information was received by Senior IOI (SIOI) (b)(6), from a Federal firearms licensee (FFL) regarding Shark Coast Tactical, LLC. The FFL stated to SIOI (b)(6) that he had seen Facebook posts made by FFL Shark Coast Tactical, LLC regarding his new location in Brandon, Florida. SIOI (b)(6) immediately notified Area Supervisor (b)(6) and Director, Industry Operations, Aaron Gerber, who notified Tampa IV, Intel who began investigating the nature of the information as stated by the FFL.
- On April 25, 2016, this same FFL sent SIOI (b)(6) a text message of a snap shot of Southwest Florida Guns and Ammo Facebook's page. According to the FFL, Southwest Florida Guns and Ammo is a private group. The FFL stated that individuals have posted that Brandon Tactical LLC is selling firearms; however, these posts were deleted almost immediately. In addition to the posts, the FFL stated one of his customers told him that he purchased a firearm from Shark Coast Tactical LLC in Sarasota, Florida however; the customer stated he picked up the firearm at Brandon Tactical, LLC, in Tampa, Florida. The FFL would not provide the name of the customer at the customer's request.

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

The following Facebook posts from Shark Coast Tactical's page:

- On September 16, 2015, a post was made on tampajobsources.com Facebook page requesting a GUN SMITH GUN SHOP SHOP MANAGER FOR SHARK COAST TACTICAL (BRANDON).
- On April 7, 2016, a post was made regarding a "ONE DAY GIVE AWAY!! SHARK COAST TACTICAL BRANDON/VALRICO WILL OPEN IN A MATTER OF DAYS. AT THE TIME, WE HAVE NOT BEEN ABLE TO OBTAIN A FFL FOR THE BRANDON/VALRICO LOCATION. SO, WE ARE GONNA OPEN ANYWAY AND SELL EVERYTHING EXCEPT GUNS!!"
- On April 9, 2016 a post was made to Tampa Backwoods Camping and Outdoors Facebook page stating, "Shark Coast Tactical Brandon is open! The Brandon store will not be selling guns for the time being"...The post goes on to state, "Hope to meet all the new folks in the Tampa Bay/Brandon/Valrico area. God bless and be safe. Shark Coast Tactical Brandon: 2553 Highway 60 East Valrico, Florida 941-228-9051".
- On April 12, 2016, a post was made stating: "Shark Coast Tactical Brandon is OPEN!! Some people have a salad bar, we have an AMMO bar!!! Shark Coast Tactical Sarasota is OPEN!! Scorpions and FiveseveNs inbound! Glock 43s in stock!"
- A photo was also downloaded from Facebook in which a Shark Coast Tactical sign is hanging on the wall of the location located at 2553 Highway 60 East Valrico, Florida 33594.
- Additional videos were also preserved and saved in low resolution.

From the above additional information received from AS (b)(6) and SIOI (b)(6), the following timeline was established:

On July 28, 2015, the Federal Firearms Licensing Center (FFLC) date stamped an application for a FFL at 2553 SR 60 East, Valrico, FL 33594 in the name of Shark Coast Tactical, LLC with William Crozier Meade IV listed as the only Responsible Person and Manager of Shark Coast Tactical, LLC.

[ROV #6, Exhibit 05]

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

On September 16, 2015, a job posting was made on tampajobsources.com seeking a Shop Manager, Gun Smith, Sales Person, Shop Help, Internet Sales...for Shark Coast Tactical (Brandon).

[ROV #6, Exhibit 06]

On October 16, 2015, Brandon Tactical, LLC was created according to information disclosed by IOI (b)(6) during the course of the application inspection (767035-2016-0122) for a FFL by Brandon Tactical, LLC at 2553 SR 60 East, Valrico, FL 33594.

[ROV #6, Exhibit 07]

On October 20, 2015, Shark Coast Tactical, LLC as part of a Stipulated/Negotiated Settlement in Lieu of Revocation, withdrew the application for a FFL at 2553 SR 60 East, Valrico, FL 33594.

[ROV #6, Exhibit 08]

On November 17, 2015, the FFLC date stamped an application for a FFL at 2553 SR 60 East, Valrico, FL 33594 in the name of Brandon Tactical, LLC with (b)(6) - (b)(6) listed as the only Responsible Person and Manager. (b)(6)

[ROV #6, Exhibit 09]

On January 22, 2016, IOI (b)(6), as a result of the application inspection for a FFL by Brandon Tactical, LLC at 2553 SR 60 East, Valrico, FL 33594, concluded that (b)(6) willfully failed to disclose material information in connection with the submitted application for a FFL and that William Crozier Meade IV and Shark Coast Tactical, LLC actually attempted to acquire the FFL using (b)(6) and Brandon Tactical, LLC to disguise the actual control of the licensed business at 2553 SR 60 East, Valrico, FL 33594. IOI (b)(6) recommended that the application be denied.

[ROV #6, Exhibit 10]

On April 7-12, 2016, Shark Coast Tactical and Shark Coast Tactical Brandon posted to respective facebook.com pages notifications and photos about the expansion of the licensed business in Sarasota to Shark Coast Tactical Brandon/Valrico and Shark Coast Tactical Brandon. Shark Coast Tactical Brandon linked to the website sharkcoasttactical.com in the About section on the facebook.com page, and merchandise/branding for Shark Coast Tactical was prominently displayed.

[ROV #6, Exhibit 11]

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

On April 19, 2016, a Notice to Deny Application for License was signed by Director of Industry Operations (DIO) Aaron Gerber and sent via Certified Mail to Brandon Tactical, LLC.

[ROV #6, Exhibit 12]

On April 19, 2016, (b)(6) drafted a letter to DIO Aaron Gerber requesting the withdrawal of the application for a FFL by Brandon Tactical, LLC.

[ROV #6, Exhibit 13]

Shark Coast Tactical, LLC advertised for employees and announced an expansion of business operations to 2553 SR 60 East, Valrico, FL 33594, despite the withdrawal of the application for a FFL at 2553 SR 60 East, Valrico, FL 33594 by Shark Coast Tactical, LLC, which was a part of a Stipulated/Negotiated Settlement in Lieu of Revocation. This advertisement and announcement of an expansion of business operations to 2553 SR 60 East, Valrico, FL 33594 coincided with a pending application for a FFL at 2553 SR 60 East, Valrico, FL 33594 by Brandon Tactical, LLC, whose sole Manager and Responsible Person was (b)(6)

(b)(6)

Shark Coast Tactical, LLC and William Crozier Meade IV knowingly made a false statement and/or representation with the willful withholding and/or misrepresented information provided in an attempt to obtain a FFL at 2553 SR 60 East, Valrico, FL 33594 after the attempted expansion of the current licensed business through the application for a FFL at 2553 SR 60 East, Valrico, FL 33594, which was withdrawn, by directing and funding the creation of a business at 2553 SR 60 East, Valrico, FL 33594 in the name of Brandon Tactical, LLC that did not identify William Crozier Meade IV and/or Shark Coast Tactical, LLC as the applicant based on the information presented above from AS (b)(6), SIOI (b)(6), and IOI (b)(6).

12 - Closing Actions

IOI (b)(6) reviewed and discussed each applicable point of the Acknowledgement of Federal Firearms Regulations, including secure gun storage and safety devices, and the ATF Important Notice – Selling Firearms AFTER Revocation, Expiration, or Surrender of an FFL with William Crozier Meade IV on June 9, 2016.

IOI (b)(6) obtained a signed Acknowledgement of Federal Firearms Regulations from William Crozier Meade IV.

[Exhibit 03]

The final record review was completed on June 9, 2016.

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

13 – Violations

IOI (b)(6) cited five (5) violations as a result of this inspection.

1. 27 CFR 478.124(b)

Nature of Violation:

The licensee failed to retain in alphabetical (by name of purchaser), chronological (by date of disposition), or numerical (by transaction serial number) order, and as a part of the required records, each Form 4473 obtained in the course of transferring custody of a firearm(s).

Licensee Response:

William Crozier Meade IV stated that they had already begun organizing the ATF Forms and will continue to maintain the ATF Forms by date of disposition.

Corrective Action:

IOI (b)(6) advised the licensee that the ATF Forms 4473 should be filed according to applicable laws and regulations by June 30, 2016.

On June 30, 2016, IOI (b)(6) verified that the ATF Forms 4473 had been filed according to applicable laws and regulations.

[ATF Form 4473 (2012 Edition) Review Worksheet]

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

2. 27 CFR 478.124(c)(3)(iv)

Nature of Violation:

The licensee failed to correctly and/or completely record the Control Number provided by the Florida Department of Law Enforcement (FDLE) in (b)(3) - 112 Public Law 55 125 Stat 552 instances on (b)(3) - 112 Public Law 55 125 Stat 552 ATF Forms 4473 and duplicated a Control Number in (b)(3) - 112 Public Law 55 125 Stat 552 instances on (b)(3) - 112 Public Law 55 125 Stat 552 ATF Forms 4473 during the inspection period.

Licensee Response:

William Crozier Meade IV stated that they switched to online checks in order to eliminate any confusion about the response provided by the FDLE, however, this switch coincided with a huge increase in the amount of business and they didn't have an adjustment period giving them time to familiarize themselves with the online system. Most of the mistakes were transposed numbers or numbers left out; others were duplicated because people were looking at the wrong line. William Crozier Meade IV stated that they have started requiring employees to type in the name of the buyer in the search bar so that only the associated number shows up. They also take screen shots of the results and put them in a spreadsheet and record the number on the customer ticket so that if this issue does occur again it can be easily rectified by one of the spreadsheet or the ticket.

Corrective Action:

IOI (b)(6) conducted a National Crime Information Center (NCIC) query of the sixty six (66) firearms identified on the ATF Forms 4473 which contained incorrect and/or incomplete Control Numbers resulting in zero (0) hits.

IOI (b)(6) queried the NICS for any prohibiting information about any transferee identified on an ATF Form 4473 where a firearm was transferred that also contained an incorrect and/or incomplete Control Number. The fifty nine (59) NICS queries resulted in zero (0) hits.

IOI (b)(6) disclosed no information to indicate the licensee was falsifying Control Numbers or falsifying ATF Forms 4473. IOI (b)(6) was able to determine the correct Control Number for the (b)(3) - 112 Public Law 55 125 Stat 552 ATF Forms 4473 that contained a duplicated Control Number by taking the timestamp information provided by the FDLE for previously unverified Control Numbers and comparing the information to handwritten sales receipts for the date in question for the transferee named on the ATF Forms 4473 that contained a duplicated Control Number and through a program that the licensee utilizes to manage payment information that also contained the named transferee and timestamp information.

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

IOI(b)(6) provided the correct Control Number to the licensee for the ATF Forms 4473 that contained a Control Number that was incorrect and/or incomplete (missing digit and/or transposed digits).

The licensee corrected the ATF Forms 4473 and, as detailed in the Licensee Response, implemented steps to prevent a reoccurrence.

[ATF Form 4473 (2012 Edition) Review Worksheet, Exhibit 02 (Representative Sample)]

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

3. 27 CFR 478.125(e)

Nature of Violation:

The licensee failed to record (b)(3) - 112 Public L firearm acquisition during the inspection period in the Acquisition and Disposition (A&D) Record.

The licensee recorded the disposition of (b)(3) - 112 Public Law 5 firearms that were in inventory.

The licensee failed to record (b)(3) - 112 Public Law 55 125 Stat 552) firearm dispositions during the inspection period in the A&D Record.

(b)(3) - 112 Public) additional open disposition was not reconciled and the firearm was reported on ATF Form 3310.11, Federal Firearms Licensee Firearms Inventory Theft/Loss Report (ATF Issued Incident Number (b)(3) - 112 Public Law 55 125 Stat 552).

Licensee Response:

William Crozier Meade IV stated that this was just an oversight and the result of human error.

Corrective Action:

The licensee recorded the acquisition of the (b)(3) - 112 Public L firearm that was not recorded in the A&D Record, corrected the (b)(3) - 112 Public Law erroneous dispositions that were recorded in the A&D Record as disposed but were found in inventory, and located ATF Forms 4473 reconciling the disposition of (b)(3) - 112 Public Law 55 125 Stat 552) firearms that the A&D Record showed to be in inventory but were not found in inventory. The licensee submitted (b)(3) - 112 Public L theft or loss report as a result of this inspection (b)(3) - 112 Public Law 55 125 Stat 552).

[Inventory and A&D Review Worksheet, Exhibit 01 (Representative Sample)]

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

4. **27 CFR 478.126a**

Nature of Violation:

The licensee failed to prepare a report of multiple sales or other disposition when the licensee sold or otherwise disposed of, at one time or during any five consecutive business days, two or more pistols, or revolvers, or any combination of pistols and revolvers totaling two or more, to an unlicensed person in [REDACTED] instances involving [REDACTED] firearms.

Licensee Response:

William Crozier Meade IV stated that this was just an oversight and the result of human error.

Corrective Action:

The licensee completed and submitted ATF Form 3310.4 for each unreported multiple sale or other disposition that was required but not completed or submitted.

[ATF Form 4473 (2012 Edition) Review Worksheet, Exhibit 04]

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

5. **27 CFR 478.129(b)**

Nature of Violation:

The licensee failed to retain (b)(3) - 112 Public Law 85 125 Stat 552 ATF Forms 4473.

Licensee Response:

William Crozier Meade IV stated that this was a result of switching over to calling in and doing online background checks; sometimes they initiated a new check if they discovered that a mistake was made when the buyer information was input incorrectly and the new number issued was not recorded on the form, other times employees may have thrown away a form if the buyer changed their mind but a check had already been done. William Crozier Meade IV stated that due to the disorganization of the forms, that the forms with the missing numbers may be in the files somewhere but they just couldn't find them before the closing.

Corrective Action:

IOI (b)(6) disclosed no information to indicate the licensee was falsifying Control Numbers or falsifying ATF Forms 4473. IOI (b)(6) determined that the (b)(6) ATF Forms 4473 that were cited as missing were possibly thrown away by employees when a transfer was never completed or were possibly additional Control Numbers issued for the same transaction. IOI (b)(6) disclosed potential evidence of the trashing of ATF Forms 4473 where a transfer does not take place with the discovery in the file for ATF Forms 4473 where a transfer never took place of an ATF Form 4473 that appeared to have been crumpled and torn and then smoothed out and taped before filing. IOI (b)(6) was advised by the licensee that the ATF Form 4473 was discovered in the trash and was then properly filed. IOI (b)(6) disclosed potential evidence of additional background checks for the same transaction with the discovery of more than one Control Number recorded on multiple ATF Forms 4473 that contained notes in Item 30a explaining that the new Control Number was issued as a result of the employees resubmitting a background check after the discovery that the information initially provided for the transferee as part of the background check was misspelled or input incorrectly.

IOI (b)(6) advised the licensee to continue to look for any missing forms and to retain each ATF Form 4473 executed by the licensee in the course of conducting the business authorized by the license.

[ATF Form 4473 (2012 Edition) Review Worksheet]

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

6. **18 U.S.C. 924(a)(1)(A) and 27 CFR 478.128(a)**

Nature of Violation:

The licensee knowingly made a false statement or representation with respect to the application for a license.

Shark Coast Tactical, LLC and William Crozier Meade IV knowingly made a false statement and/or representation with the willful withholding and/or misrepresented information provided in an attempt to obtain a FFL at 2553 SR 60 East, Valrico, FL 33594 after the attempted expansion of the current licensed business through the application for a FFL at 2553 SR 60 East, Valrico, FL 33594, which was withdrawn, by directing and funding the creation of a business at 2553 SR 60 East, Valrico, FL 33594 in the name of Brandon Tactical, LLC that did not identify William Crozier Meade IV and/or Shark Coast Tactical, LLC as the applicant.

Licensee Response:

The violation was not discussed with the licensee.

Corrective Action:

The violation was not discussed with the licensee.

[Exhibits 05-13]

FIREARMS INSPECTION REPORT

Name: Shark Coast Tactical, LLC
Trade Name:

UI#: 767035-2016-0282, B1B
FFL#: 1-59-115-02-7B-30742

X

Industry Operations Investigator

Index of Worksheets and Exhibits

Informational Page

Inventory and A&D Review Worksheet

ATF Form 4473 (September 2008 Edition) Review Worksheet

ATF Form 4473 (September 2012 Edition) Review Worksheet

Other Statistics

Exhibit 01 – A&D Record Violation

Exhibit 02 – ATF Form 4473 FDLE Control Number Violation

Exhibit 03 – Signed Acknowledgement of Federal Firearms Regulations

Exhibit 04 – Failure to Report Multiple Sale Violation

Exhibit 05 – Shark Coast Tactical, LLC Application for FFL

Exhibit 06 – facebook.com Post

Exhibit 07 – Brandon Tactical, LLC Articles of Organization

Exhibit 08 – Shark Coast Tactical, LLC Withdrawal and Application Denial

Exhibit 09 – Brandon Tactical, LLC Application for FFL

Exhibit 10 – IOI (b)(6) Narrative

Exhibit 11 – facebook.com Posts

Exhibit 12 – Notice to Deny Application

Exhibit 13 – Brandon Tactical, LLC Withdrawal