

G7 WORLDWIDE INC's FCI
FCI-25423
12/15/2021 12:15 PM
IO (b)(6), Norfolk (IO) Satellite Office

LICENSEE INFORMATION

Licensee Name	RDS Key	License/Permit Number	License Type
G7 WORLDWIDE INC	1-54-24963	1-54-650-02-3F-24963	02 - Pawnbroker License

Business Type
Corporation

Premises Address

Mailing Address

Premises Ownership Type
Leased/Rented

Premises Location Type
Single Family Dwelling

RECOMMENDATIONS

Final Decision

Revocation

Date

12/03/2021

Details

RP Anthony Turner texted IO (b)(6) that he would not be requesting a hearing on 11/27/2021. On December 3, 2021, IO (b)(6) served RP Turner with the Final Notice of Revocation. RP Turner had transferred all firearms to his personal collection and was in the process of obtaining his full A&D records to submit to ATF OOBRC.

The fines have been waived as Mr. Turner did not request a hearing.

Out of Business Records and Inventory Management

Licensee Inventory

✔ Inventory transferred to self

Deputy Assistant Director Megan Bennett's Recommendation

Revocation

Details

I concur with the recommendation of revocation. The licensee sold firearms to prohibited persons, falsified ATF Forms 4473, and failed to respond to trace requests within 24 hours.

Special Agent in Charge Charlie Patterson's Recommendation

SAC Patterson concurs with the recommended administrative action of revocation proposed by the IOI, AS, and DIO. The IOI identified multiple violations that directly and adversely impact public safety, hinder firearms traceability, and merit revocation pursuant to ATF Order 5370.1D, Federal Firearms Administrative Action Policy and Procedures, including:

- instances of transferring firearms acquired under the license to personal inventory, and then transferring those firearms from personal inventory to nonlicensees without waiting 1 year (and at least of these transactions occurred the same day). This was knowingly and willfully to avoid conducting background checks and completing ATF Forms 4473, a of these firearms went to prohibited persons.
- firearms from the licensee's personal inventory were transferred to additional prohibited persons.
- handguns from the licensee's personal inventory were transferred to out-of-State residents.
- instances of failing to respond to firearm trace requests within 24 hours.
- instances of falsifying ATF Form 4473.

Attorney-Advisor (Litigation) (b)(6) Review

Details

Counsel concurs with the recommended administrative action of revocation proposed by the IOI, AS, and DIO. The IOI discovered multiple violations that directly and adversely impact public safety, hinder firearms traceability, and merit revocation pursuant to ATF Order 5370.1D, Federal Firearms Administrative Action Policy and Procedures, including:

- instances of transferring firearms acquired under the license to personal inventory, and then transferring those firearms from personal inventory to nonlicensees without waiting 1 year (and at least of these transactions occurred the same day). This was knowingly and willfully to avoid conducting background checks and completing ATF Forms 4473, a of these firearms went to prohibited persons.
- firearms from the licensee's personal inventory were transferred to additional prohibited persons.
- handguns from the licensee's personal inventory were transferred to out-of-State residents.
- instances of failing to respond to firearm trace requests within 24 hours.
- instances of falsifying ATF Form 4473.

person while knowing or having reasonable cause to believe that the transferee is a prohibited person. Moreover, revocation is strongly recommended when the FFL falsifies records, when the FFL fails to conduct a NICS check prior to transfer of a firearm and the purchaser is prohibited, and when the FFL fails to create or discontinues use of GCA records. In addition to the Administrative Action Policy, the July 14, 2021 Memorandum on Implementation of the Administration's Comprehensive Strategy to Prevent and Respond to Gun Crime and Ensure Public Safety is clear that absent extraordinary circumstances, an inspection that results in a finding that the FFL has willfully committed any of five enumerated violations shall result in a revocation. In this case, there are no extraordinary circumstances, and the licensee has willfully committed four of the five violations for which revocation must result. These are: 1) The transfer of a firearm to a prohibited person; 2) Failing to conduct a required background check; 3) Falsification of records; and 4) Failing to respond to an ATF tracing request.

The litigation risk associated with pursuing revocation is low. The element of willfulness can be established through introduction of statements made by the purchasers, several of whom have been interviewed by ATF Special Agents. These purchasers told ATF Special Agents that Mr. Turner knew they were prohibited and/or out-of-State residents and transferred firearms to them from his private inventory to avoid conducting a background check and completing ATF Forms 4473. These statements are clearly corroborated by Mr. Turner's actions of transferring firearms from his FFL inventory to his personal inventory, and then turning around and transferring the same firearms from his personal inventory to these prohibited and/or out-of-State purchasers.

As stated above, these violations have a direct and negative impact on public safety and obstruct firearms traceability such that revocation is clearly merited. ATF Analytics shows this FFL has [redacted] traces with an average time to crime of [redacted] (b)(3) (112 Public Law 55 125 Stat 552)

[redacted] (b)(3) (112 Public Law 55 125 Stat 552)

Director of Industry Operations Michael Fronczak's Recommendation
Revocation

Details

DIO concurs with the Lead IOI and Area Supervisors recommendation of revocation. Per the ATF Federal Firearms Administrative Action Policy and Procedures, the nature of the violations disclosed, the licensee's repeated violations from their previous inspection, and the overall increase in violations from their previous inspection. In addition, the licensee has clearly failed to properly complete and maintain records directly impacting the traceability of firearms. Furthermore, violations cited during the inspection have a clear nexus to persons prohibited from possessing firearms. The following violations made by the licensee are the justification for recommending that the FFL be revoked:

1. Licensee sold/dispensed of personal collection firearm(s) on [redacted] instances. Firearms acquired under the FFL were transferred to Responsible Persons (RP) on a 4473 and then transferred to non-licensees without any 4473/background check prior to one year from the transfer of the firearms to the RP under the FFL. The licensee/RP transferred these firearms to non-licensees shortly after acquiring these firearms with at least one Bill of Sale showing a same day transfer from the FFL to the RP to the non-licensee. [redacted] of the firearms involved were transferred to [redacted] prohibited persons. [redacted] firearms from the licensee's personal collection and not acquired as an FFL were transferred to [redacted] additional prohibited persons.
2. FFL failed to respond to firearm trace requests (within 24 hours) [redacted] instances. [redacted] (b)(3) (112 Public Law 55 125 Stat 552) IOI [redacted] (b)(6) successfully completed the trace requests on 12/30/20 and 1/4/21.
3. Licensee made false entry, omitting entry, or failed to properly maintain required recordkeeping on [redacted] instances.
4. FFL failed to execute an ATF F 4473, and complete an NICS/POC background check [redacted] instance).

In addition, the licensee had 5 repeat violations and failed to report the multiple sale of handguns on [redacted] instances.

Area Supervisor [redacted] (b)(6) Recommendation
Revocation

Details

AS concurs with IOI recommendation of Revocation.

IOIs identified that the licensee was transferring firearms into his personal collection with a 4473 and background check and subsequently selling, away from premises, to non-licensed individuals without a 4473 and background check on numerous occasions. Several sales were to prohibited individuals and handguns transferred to out-of-state residents.

This inspection was initiated as a result of the licensee failing to reply to trace requests within 24 hours. A special assignment to complete [redacted] outstanding trace requests was completed on 12/31/20 and the importance of completing trace requests was impressed upon the licensee who stated that he understood. The inspection of this licensee initiated on 1/5/21 and the licensee received [redacted] trace requests during the inspection [redacted] of which required two contact attempts by tracing center before the licensee completed the trace. The licensee was cited for this violation, indicating during the closing conference that he would be more attentive to trace requests, however the licensee having been advised of the requirement to comply with trace request within 24 hours on 12/31/2020 failed to comply for a trace initiated on [redacted]

Industry Operations Investigator [redacted] (b)(6) Recommendation
Revocation

Details

Investigator [redacted] (b)(6) recommends revocation of the licensee's federal firearms license (FFL). This recommendation is being made in accordance with guidance contained in the ATF Federal Firearms Administrative Action Policy and Procedures, the nature of the violations disclosed, the licensee's repeated violations from their previous inspection, and the overall increase in violations from their previous inspection. The following violations made by the licensee are the justification for recommending that the FFL be revoked:

27 CFR 478.125a: Failure to properly sell/dispense of personal collection firearm(s) [redacted] instances). The licensee transferred firearms acquired under their FFL to Responsible Persons (RP), and transferred those firearms to non-licensees prior to one year from the transfer of the firearms to the Responsible Persons under the FFL. The licensee transferred these firearms to non-licensees shortly after acquiring these firearms with at least one Bill of Sale showing the firearm transferred to the transferee on the same day RP Anthony Turner transferred the firearm from the FFL to himself. Of firearms from the FFL inventory transferred to non-licensees, at least [redacted] firearms were transferred to [redacted] prohibited persons. Other firearms from the licensee's personal collection were transferred to [redacted] additional prohibited persons. Some firearms may have been transferred in violation of Virginia state law which required all private party transfers of firearms be conducted through a FFL beginning 7/1/2020.

27 CFR 478.25a: Failure to respond to firearm trace requests (within 24 hours) [redacted] instances). On 12/23/2020, the ATF National Tracing Center (NTC) requested assistance from ATF Washington Field Division in completing [redacted] pending trace requests from the licensee after repeated attempts to contact the licensee were unsuccessful. ATF Norfolk SO IOI [redacted] was able to make contact with Responsible Person Anthony Turner on 12/23/2020 but attempts to receive required information for completion of the trace requests were unsuccessful. IOI [redacted] (b)(6) requested physical copies of the Forms 4473 for the associated trace requests be provided to him, and IOI [redacted] (b)(6) retrieved illegible copies of the associated Forms 4473 from the licensee's business premises, with the exception of one Form 4473 which the licensee did not provide, on 12/30/2020. IOI [redacted] (b)(6) returned to the licensee's business premises again on 12/31/2020 to make copies of the original forms to provide to NTC. NTC also provided IOI [redacted] (b)(6) with a document showing other trace requests where NTC had to make repeated attempts to contact the licensee. During the inspection period, the licensee had [redacted] trace requests.

27 CFR 478.121(c): Making false entry, omitting entry, or failing to properly maintain required recordkeeping [redacted] instances). In [redacted] instance, the licensee was to transfer

[redacted] (b)(3) (112 Pub. L. 55 125 Stat 552) - per ATF
[redacted] (b)(3) (112 Pub. L. 55 125 Stat 552) - per ATF

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

27 CFR 478.124(a): Failure to execute an ATF F 4473 [redacted] instance), 27 CFR 478.102(a): Failure to complete a NICS/POC background check [redacted] instance) [redacted] (112 Public Law 55 125 Stat 552) and ATF

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

Inspection Findings

Records and Forms

- Failure by the licensee to obtain complete and accurate information for any item(s) on Forms 4473, questions 11 & 12, or the buyer fails to sign and date the Form 4473 (to include failing to have the buyer recertify their answers if the transfer takes place on a different date than the original signature) in Section A on 5 percent or more of the Forms 4473 examined.
- Failure to execute a Form 4473 (Exception: Select finding [redacted] above for consignment sales, transfers to law enforcement officers for personal use, and FFL responsible persons; if the transferee is NOT prohibited).
- Falsify records required under the GCA or making a false or fictitious written statement in the FFL's required records or in applying for a firearms license.

Transfer of Firearm

- Transfer of any firearm (including lower receiver) other than Rifle / Shotgun to a resident of another State.
- Transfer of a firearm to a prohibited person while knowing or having reasonable cause to believe that the transferee is a prohibited person.

NICS

- Failure to conduct a NICS check or obtain an alternate permit (Exception: Select findings 1, 2, and 3 above for consignment sales, transfers to law enforcement officers for personal use, and FFL responsible persons if the transferee is NOT prohibited).

Failure to Report

- Failure to file Reports of Multiple Sale or Other Disposition of Pistols and Revolvers (F 3310.4) or Reports of Multiple Sales or Dispositions of Certain Rifles (F 3310.12) (Southwest Border states only) when legally required and with a minimum of [redacted] instances.

FFL History

- The current inspection reveals repeated similar violation(s) for which the FFL has been cited in a Report of Violations within the previous 5 years and there has been NO significant improvement.
- The current inspection reveals repeated similar violation(s) for which the FFL has previously been the subject of a Warning Letter or Warning Conference within the previous 5 years and there has been NO significant improvement.

Miscellaneous

- Any other GCA violation not specifically addressed in the Federal Firearms Administrative Action Policy and Procedures, ATF O 5370.1C, where revocation may be appropriate.

ELIGIBILITY VERIFICATION

Business Information Verification

Licensee Name	Business Type	Is the business valid?
G7 WORLDWIDE INC	Corporation	Yes

Additional Findings

Annual Registration Fee Past Due and/or Penalties Unpaid and Annual Report Past Due - Not in Good Standing per VSCC

Attachment(s):

G7 VSCC.pdf

Property Ownership Verification

Premises Ownership Type	Premises Location Type	Has the property ownership been verified?
Leased/Rented	Single Family Dwelling	Yes

Address
No data available

Attachment(s):
18 Pratt Property Information.pdf

Trade Name/DBA Verification

Trade Name/DBA Is the trade name/DBA registered?
G7 SUPPRESSORS SOLUTIONS FFL No

Additional Findings
Per business license obtained in 2019, trade name(s) associated with license are " G7 Suppression Solutions" and "G7 Secure Solutions".

Attachment(s):
G7 Business License 2019.pdf

Rental/Lease Verification

Is the proposed business activity permitted by the property owner?
Yes

Additional Findings
Per 2019 inspection, property is managed by Providence Realty, Inc. through which authorization to operate as a FFL was obtained by Providence Realty President (b)(6) resides (b)(6) (b)(6)

Attachment(s):
FCI-10512-G7WI-Authorization for FFL on Property 10-08-19.pdf

Zoning Information Verification

Is the proposed business activity in compliance with zoning?
No

Additional Findings
Per Table of Permitted Uses, general retail is not permitted in residential districts such as the licensee's zoned R-13 Residential.

Per Hampton Business license application effective 1/1/2011, "RESTRICTIONS FOR RESIDENTIAL BUSINESSES: TELEPHONE USE ONLY, NO CLIENTS OR EMPLOYEES MAY REPORT TO THE RESIDENCE & NO STORAGE OF MATERIALS WILL BE PERMITTED ON THE PREMISES. YOUR SIGNATURE BELOW CONFIRMS YOUR ADHERENCE TO THESE RESTRICTIONS."

However, in speaking with City of Hampton Zoning Office, as long as the business activity is an accessory use to the building, they do not intend to enforce this restriction.

Attachment(s):
Business-License-Application.pdf
Hampton Zoning Table of Permitted Uses.pdf

APPOINTMENT DETAILS

Interview Date
01/05/2021
Address

Responsible Attendee(s) Non-Responsible Person(s)

ANTHONY GALE TURNER Sr. No Items

RESPONSIBLE PERSON(S)

ANTHONY GALE TURNER Sr.

Name	Gender	Race	Ethnicity
ANTHONY GALE TURNER Sr.	Male	Black	Not Hispanic or Not Latino
Date of Birth	SSN	Job Title	
(b)(6)	(b)(6)	PRESIDENT	

Physical Identifiers

Weight	Height	Hair Color	Eye Color
	(b)(6)	(b)(6)	(b)(6)

Place of Birth

Country	State	City
United States Of America	(b)(6)	(b)(6)

Home Address

(b)(6)

(b)(6)

Additional Names

Citizenship

United States

ID Type	Country	State	ID Number
Driver's License	United States	Virginia	(b)(6)

Phone Type	Phone Number	Remarks
Mobile	(b)(6)	

Email Address	Email Remarks
(b)(6)	work email
(b)(6)	

Online Presence Type	Online Presence URL	Remarks
Website	shop.g7worldwide.com	work website

Criminal History Check

Date Criminal History Check Conducted
01/04/2021

Criminal History Check Comments
(b)(6)

INTERVIEW QUESTIONNAIRE

What is the proposed business activity?
Promotion of ccw/self defense classes, clients purchase firearms used in classes from Mr. Turner, G7 security guards purchase their duty weapons and personal firearms from Mr. Turner's FFL, retail sales.

Do they need an additional license or permit?
No

Who are their primary suppliers?
(b)(4)

Other State or Local Permits

Type	Number	Expiration
State/Local Business License	128892	12/31/21

Business Activities

- (b)(3)(26 USC § 6103)
- Internet Sales/Transfers
- Retail
- Security Firm
- Law Enforcement Sales

Selected Operational Security Measures

- Current & Active Security Plan
- Designated Security Coordinator
- Formal Employee Training
- Suspicious persons/activities reporting protocols

Internet Sales/Transfers Website
shop.g7worldwide.com

SUPPLEMENTAL QUESTIONNAIRE

General Business Operations

If there is a security system, who has access to the security codes?
Mr. Anthony Turner & (b)(6)

Who has keys to the premises?
Mr. Anthony Turner & (b)(6)

Who has keys to locked inventory?
Mr. Anthony Turner & (b)(6)

Who is operating the business on a day-to-day basis?
Mr. Turner

Is financial backing provided by anyone that is not a responsible person on the license/permit?

None

Are any employees known to be prohibited?

No

Are any employees associated with a previously denied/revoked/surrendered license/permit?

No

PREMISES INFORMATION

Inspection Area Description
Home office in single family residence in Hampton, VA.

Primary Activity
Retail

Selected Physical Security Measures

Alarm Monitoring/Other Signage

Deadbolts

Floodlights

Local Audible Alarm

Motion Sensors

Safe(s)/Vault(s)

Security Cameras

Security Guard(s) / Loss Prevention Officer(s)

GPS Coordinates

Latitude

Longitude

ONSITE SUMMARY

Total # of ATF F 4473 Reviewed

[redacted]

Total # of Open Dispositions in A & D Record

[redacted]

Total # of Firearms in Inventory

28

Total # of Firearms Missing after Reconciliation

0

Total # of Acquisitions in the Last 12 Months

(b)(4)

Total # of Dispositions in the Last 12 Months

(b)(4)

NFA Documents Verified

Yes

Additional Comments

The Audit Review Period: From 1/5/2020 to 1/5/2021

FFL Iss: 7/15/2020 Exp: 6/1/2023

VSP DIN: (b)(6)

Number of traces [redacted] Unresolved: 0, Resolved by Investigator: [redacted]

On 12/23/2020 ATF NTC requested assistance from ATF FO in completing trace requests after the licensee did not respond to trace requests. IO (b)(6) made several attempts to contact the licensee before being able to complete these requests, as detailed in Spartan assignment A-26541

Number of VSP approval codes verified: 23

Closing Conference completed with licensee on 6/17/2021. ATF Norfolk IO (b)(6) was present during the closing conference and assisted IO (b)(6). During the closing conference, Anthony Turner stated that he had each individual purchaser to whom he sold a firearm to personally (i.e. firearms transferred from the FFL to Anthony or (b)(6) then transferred to a non-licensee without documenting the transfer on a 4473) return to the premises to complete an ATF Form 4473 and the required background check, with the exception of each individual who was found to be prohibited as documented in Spartan referrals R-1527, R-1528, R-1529, R-1530, R-1531, and R-1532. Mr. Turner stated that he had not been able to contact these individuals.

Attachment(s)

Report of Violations.pdf

Report of Violations.pdf

Report of Violations.pdf

Licensee Response to Violations Report.pdf

REPORT OF VIOLATIONS

Regulation	Corrective Actions	Instance Details
<p>27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearms</p> <p>Number of Instances: <input type="text"/></p>	<p>Accurately, completely & timely record all required future firearm acquisition information.</p> <p>Accurately, completely & timely record all required future firearm disposition information.</p> <p>Amend/Update A&D Record to accurately record all required firearm acquisition information.</p> <p>Amend/Update A&D Record to accurately record all required firearm disposition information.</p> <p>Resume proper maintenance of required acquisition and disposition record.</p> <p>Amend/Update electronic A&D record to conform with conditions set forth under ATF Ruling 2016-1.</p>	<p style="text-align: center;">(b)(3) (112 Public Law 55 125 Stat 552)</p>
<p>27 CFR 478.125a: Failure to properly sell/dispose of personal collection firearm(s)</p> <p>Number of Instances: <input type="text"/></p>	<p>Amend/Update A&D Record to accurately record all required firearm disposition information.</p> <p>Resume proper maintenance of required acquisition and disposition record.</p> <p>Accurately, completely & timely record all required future firearm acquisition information.</p>	<p style="text-align: center;">(b)(3) (112 Public Law 55 125 Stat 552)</p>
<p>27 CFR 478.125a(a)(4): Failure to properly record the sale/disposition of personal collection firearm(s)</p> <p>Number of Instances: <input type="text"/></p>	<p>Create A&D Record from all available sources of record (i.e. invoices, work/claim tags, receipts, etc).</p> <p>Resume proper maintenance of required acquisition and disposition record.</p> <p>Accurately, completely & timely record all required future firearm acquisition information.</p> <p>Accurately, completely & timely record all required future firearm disposition information.</p> <p>Amend/Update A&D Record to accurately record all required firearm acquisition information.</p> <p>Amend/Update A&D Record to accurately record all required firearm disposition information.</p>	<p style="text-align: center;">(b)(3) (112 Public Law 55 125 Stat 552)</p>

		(b)(3) (112 Public Law 55 125 Stat 552)
<p>27 CFR 478.25a: Failure to respond to firearm trace requests (within 24 hours)</p> <p>Number of Instances: []</p>	<p>Provide response to all future ATF trace requests within required 24 hours.</p>	(b)(3) (112 Public Law 55 125 Stat 552)
<p>27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473</p> <p>ATF Forms 4473: []</p> <p>Number of Instances: []</p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions. Ensure that the required transferor/seller signature and date of transfer is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D.</p>	<p>[(b)(6)/(b)(7)(C)]</p> <p>[(b)(6)/(b)(7)(C)]</p> <p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>27 CFR 478.121(c): Making false entry, omitting entry, or failing to properly maintain required recordkeeping</p> <p>ATF Forms 4473: []</p> <p>Number of Instances: []</p>	<p>Cease and desist from engaging in deceptive practices.</p>	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
<p>27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473</p> <p>ATF Forms 4473: []</p> <p>Number of Instances: []</p>	<p>Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions. Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified.</p> <p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

		<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473</p> <p>ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/></p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions. Ensure that all required transferee/buyer identification information is obtained, validated and accurately recorded on all future ATF Forms 4473, Section B.</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473</p> <p>ATF Forms 4473: <input type="text"/> Number of Instances: <input type="text"/></p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions. Ensure that all required NICS/POC background check information is obtained, validated and accurately recorded on all future ATF Forms 4473, Section B.</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers</p>	<p>Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) for all non-reported multiple sales identified as a result of this inspection.</p>	<p>(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>

8

9

ATF Forms 4473
Number of Instances:

Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) by close of the same business day, for all applicable future multiple sales.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

10

27 CFR 478.124(c)(4): Failure to record firearm information on an ATF F 4473

ATF Forms 4473
Number of Instances:

Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions. Ensure that all required firearm identification information is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

11

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

MI

27 CFR 478.21(a): Failure to complete forms as prescribed

ATF Forms 4473
Number of Instances:

Complete all forms as prescribed.
Correct/Update photocopies of all specified ATF Form 4473 discrepancies, in accordance with form headings and instructions.
Ensure that all ATF Form 4473 items, as required by form headings and instructions, are accurately completed on all future transactions.
Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions.
Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified.
Ensure that the required transferor/seller printed name and title is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D.
Ensure that the most up-to-date version of the ATF Form 4473 is used for all future over-the-counter transactions.
Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

27 CFR 478.99(b)(2): Unlawful sale or delivery of a firearm in violation of State Law or published local ordinance

ATF Forms 4473
Number of Instances:

Cease and desist transfer of firearms in violation of State law or published local ordinance.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

27 CFR 478.124(a): Failure to execute an ATF F 4473

ATF Forms 4473
Number of Instances:

Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

<p>27 CFR 478.102(a): Failure to complete a NICS/POC background check</p> <p>ATF Forms 4473: 1 Number of Instances: 1</p>	<p>Execute a required NICS/POC background check for all future over-the-counter firearm transactions.</p> <p>Retrieve and accurately record (on an ATF Form 4473) a required final NICS/POC background check response prior to all future over-the-counter firearm transactions.</p>	<p>NICS Violation, NO SALE (b)(6)</p>
---	--	---------------------------------------

LICENSEE RESPONSE REPORT

Regulation	Corrective Actions	Licensee Response	Status Details
<p>27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearms</p> <p>Number of Instances: []</p>	<p>Accurately, completely & timely record all required future firearm acquisition information.</p> <p>Accurately, completely & timely record all required future firearm disposition information.</p> <p>Amend/Update A&D Record to accurately record all required firearm acquisition information.</p> <p>Amend/Update A&D Record to accurately record all required firearm disposition information.</p> <p>Resume proper maintenance of required acquisition and disposition record.</p> <p>Amend/Update electronic A&D record to conform with conditions set forth under ATF Ruling 2016-1.</p>	<p>Licensee stated: "I'm going to get part time help to go over everything that is entered into the A&D record and to complete all required information. I think getting confused with what is mandatory information and taking short cuts in completing information in AD record are what contributed to these errors."</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>
<p>27 CFR 478.125a: Failure to properly sell/dispose of personal collection firearm(s)</p> <p>Number of Instances: []</p>	<p>Amend/Update A&D Record to accurately record all required firearm disposition information.</p> <p>Resume proper maintenance of required acquisition and disposition record.</p> <p>Accurately, completely & timely record all required future firearm acquisition information.</p>	<p>Licensee stated: "I had been ordering firearms to sell and others to use as range guns to instruct with that were transferred to myself, and didn't know that I had to not transfer those firearms to myself and keep possession of those for a time. I will no longer transfer firearms to myself to be transferred to individuals. Individuals were contacted to return to complete ATF forms 4473 with the exception of individuals who were unavailable and have been contacted and I'm still trying to get them to come and complete a 4473"</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>
<p>27 CFR 478.125a(a)(4): Failure to properly record the sale/disposition of personal collection firearm(s)</p> <p>Number of Instances: []</p>	<p>Create A&D Record from all available sources of record (i.e. invoices, work/claim tags, receipts, etc).</p> <p>Resume proper maintenance of required acquisition and disposition record.</p> <p>Accurately, completely & timely record all required future firearm acquisition information.</p> <p>Accurately, completely & timely record all required future firearm disposition information.</p> <p>Amend/Update A&D Record to accurately record all required firearm acquisition information.</p> <p>Amend/Update A&D Record to accurately record all required firearm disposition information.</p>	<p>Licensee stated: "I will no longer transfer firearms to myself and I will not have to maintain this record in the future because of that. All future sales will be done on the book. I was not aware off the the requirement to maintain the record. I will create a new bound book for personal sales I have already completed."</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>
<p>27 CFR 478.25a: Failure to respond to firearm trace requests (within 24 hours)</p> <p>Number of Instances: []</p>	<p>Provide response to all future ATF trace requests within required 24 hours.</p>	<p>Licensee stated: "I'm going to make sure that traces are a priority and keep my laptop with me to ensure that information is given within 24 hours. I think that it was multiple things like receiving emails and running out of space on my email drive. I wasn't paying attention to requests as closely as I should have. I was getting behind with work.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>
<p>27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473</p> <p>ATF Forms 4473: [] Number of Instances: []</p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p> <p>Ensure that the required transferor/seller signature and date of transfer is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D.</p>	<p>Licensee stated: "I will make sure that 'don't purchase' and denials are given same attention and ensure that forms are completed before being filed. I was not aware of requirement to complete forms that were denied or canceled."</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>

6	<p>27 CFR 478.121(c): Making false entry, omitting entry, or failing to properly maintain required recordkeeping</p> <p>ATF Forms 4473 (b)(6) Number of Instances: (b)(6)</p>	<p>Cease and desist from engaging in deceptive practices.</p>	<p>Licensee stated: "We'll make sure that the person purchasing the firearm is the person filling the 4473 out and if that person changes their mind regarding a firearm they want transferred, that they will complete a new 4473. I think that (b)(6) wanted to save some time and someone else filled out the form. I vaguely remember the transfer happening. I don't know who completed the form.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>
7	<p>27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473</p> <p>ATF Forms 4473 (b)(6) Number of Instances: (b)(6)</p>	<p>Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions.</p> <p>Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified.</p> <p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>Licensee stated: "One of the things is that I intend to do is highlight numbers and ensuring all items are complete. I wasn't looking at forms close enough and my QA (quality assurance) process was failing."</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>
8	<p>27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473</p> <p>ATF Forms 4473 (b)(6) Number of Instances: (b)(6)</p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p> <p>Ensure that all required transferee/buyer identification information is obtained, validated and accurately recorded on all future ATF Forms 4473, Section B.</p>	<p>Licensee stated: "We'll make sure that we pay extra attention to all identification information and it is 100% within standards. I think I overlooked a lot of items that I should have focused on."</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>
9	<p>27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473</p> <p>ATF Forms 4473 (b)(6) Number of Instances: (b)(6)</p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p> <p>Ensure that all required NICS/POC background check information is obtained, validated and accurately recorded on all future ATF Forms 4473, Section B.</p>	<p>Licensee stated: "We're going to pay extra attention to all line items and step up the QA process to ensure all items are complete before filing forms."</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>
10	<p>27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers</p> <p>ATF Forms 4473 (b)(6) Number of Instances: (b)(6)</p>	<p>Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) for all non-reported multiple sales identified as a result of this inspection.</p> <p>Complete and submit ATF Form 3310.4 (Report of Multiple Sale or Other Disposition of Pistols and Revolvers) by close of the same business day, for all applicable future multiple sales.</p>	<p>Licensee stated: "In the past I had left a lot of work for someone else to do that wasn't getting done. I will file all multiple sale forms immediately after completion of the transaction."</p>	<p>Status Correction Verified</p> <p>Verified Method In Person</p> <p>Date Correction Verified 01/12/2021</p>
11	<p>27 CFR 478.124(c)(4): Failure to record firearm information on an ATF F 4473</p> <p>ATF Forms 4473 (b)(6) Number of Instances: (b)(6)</p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p> <p>Ensure that all required firearm identification information is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D.</p>	<p>Licensee stated: "For denied and canceled transfers we will pay extra attention to all line items to make sure they are complete regardless of sale. It was a combination of not knowing the requirement to complete items for denied or canceled transactions and not paying close enough attention to completeness of the forms.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>
	<p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473 (b)(6) Number of Instances: (b)(6)</p>	<p>Complete all forms as prescribed.</p> <p>Correct/Update photocopies of all specified ATF Form 4473 discrepancies, in accordance with form headings and instructions.</p> <p>Ensure that all ATF Form 4473 items, as required by form headings and instructions, are accurately completed on all future transactions.</p> <p>Ensure that all required ATF Form 4473 Section A items are</p>	<p>Licensee stated: "I ensured that all old 4473s are not in the office, and I'm providing extra training to ensure that all items are complete to include using highlighting and having multiple people check the forms. I think items were just being overlooked and weren't having enough attention paid to the items to be</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>

12		<p>completed/provided by the transferee/buyer on all future transactions.</p> <p>Ensure that the transferee/buyer provides required signature and date, on ATF Form 4473 Section C, for all transactions taking place on a date different from when Section A was certified.</p> <p>Ensure that the required transferor/seller printed name and title is obtained, validated and accurately recorded on all future ATF Forms 4473, Section D.</p> <p>Ensure that the most up-to-date version of the ATF Form 4473 is used for all future over-the-counter transactions.</p> <p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	completed."	
13	<p>27 CFR 478.99(b)(2): Unlawful sale or delivery of a firearm in violation of State Law or published local ordinance</p> <p>ATF Forms 4473 Number of Instances: 1</p>	<p>Cease and desist transfer of firearms in violation of State law or published local ordinance.</p>	<p>Licensee stated : "I didn't know that this was an issue of policy. Going forward every transfer will be what is recorded on the form 4473 and if any firearms are to be changed or added, a new form 4473 will be completed along with applicable state forms."</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>
14	<p>27 CFR 478.124(a): Failure to execute an ATF F 4473</p> <p>ATF Forms 4473 Number of Instances: 1</p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>Licensee stated: "I was selling her a new gun on a 4473 and i sold her a used gun instead and i won't conduct anymore private sales. I will make sure that all transfers like this are notated, but i will not transfer firearms on bills of sale moving forward."</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>
15	<p>27 CFR 478.102(a): Failure to complete a NICS/POC background check</p> <p>ATF Forms 4473: 1 Number of Instances: 1</p>	<p>Execute a required NICS/POC background check for all future over-the-counter firearm transactions.</p> <p>Retrieve and accurately record (on an ATF Form 4473) a required final NICS/POC background check response prior to all future over-the-counter firearm transactions.</p>	<p>Licensee stated: "I was selling her a new gun on a 4473 and i sold her a used gun instead and i won't conduct anymore private sales. I will make sure that all transfers like this are notated, but i will not transfer firearms on bills of sale moving forward."</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 06/17/2021</p>

CLOSING CONFERENCE

(6/17/2021)

06/17/2021

Attachment(s)

Attendee(s)

ANTHONY GALE TURNER Sr.

EXHIBITS

Inspection

Category	Attachment Name
Correspondence	Spartan Notification RE: 1-54-24963 Inspection Results
Correspondence	Spartan Notification RE: 1-54-24963 Monitored Case
Correspondence	Spartan Notification RE: 1-54-24963 Monitored Case
Correspondence	Spartan Notification RE: 1-54-24963 Monitored Case
Correspondence	Spartan Notification RE: 1-54-24963 Monitored Case
Correspondence	Spartan Notification RE: 1-54-24963 Monitored Case
Correspondence	Spartan Notification RE: 1-54-24963 Monitored Case
Correspondence	Spartan Notification RE: 1-54-24963 Monitored Case
Correspondence	Spartan Notification RE: 1-54-24963 Monitored Case
Correspondence	Spartan Notification RE: 1-54-24963 Monitored Case
Correspondence	Spartan Notification RE: 1-54-24963 Monitored Case
Correspondence	Spartan Notification RE: 1-54-24963 Monitored Case

Correspondence	
Correspondence	DIO Michael Fronczak Returned Inspection FCI-25423
Correspondence	Spartan Notification RE: 1-54-24963 Monitored Case
Correspondence	Spartan Notification RE: 1-54-24963 Monitored Case
LicenseeResponseToViolationsPDF	Licensee Response to Violations Report.pdf
ClosingConferenceSummary	Acknowledgment of Regulations.pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit
ViolationsPDF	Report of Violations.pdf
ViolationsPDF	Report of Violations.pdf
ViolationsPDF	Report of Violations.pdf
ZoningVerification	Business-License-Application.pdf
ZoningVerification	Hampton Zoning Table of Permitted Uses.pdf
RentalLeaseVerification	FCI-10512-G7WI-Authorization for FFL on Property 10-08-19.pdf
TradeNameVerification	G7 Businesws License 2019.pdf
PropertyOwnershipVerification	18 Pratt Property Information.pdf
BusinessVerification	G7 VSCC.pdf

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

In the matter of License Number 1-54-650-02-3F-24963, as a/an

Pawnbroker in Firearms Other than Destructive Devices issued to:

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

G7 Worldwide, Inc.
d/b/a - G7 Suppressors Solutions FFL
18 Pratt St.
Hampton, VA 23669

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(e), 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 michael.fronczak (b)(6), 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	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official	Signature
11/10/2021	Michael F. Fronczak - Director, Industry Operations	MICHAEL FRONCZAK <small>Digitally signed by MICHAEL FRONCZAK Date: 2021.11.10 08:46:55 -0500</small>

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: _____

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
12 Nov 2021	Industry Operations Investigator	(b)(6)
Print Name and Title of Person Served Anthony Turner - President		(b)(6) (able)
Address Where Notice Served 18 Pratt St., Hampton, VA 23669		

G7 Worldwide, Inc.
d/b/a G7 Suppressors Solutions FFL
18 Pratt St.
Hampton, VA 23669

1-54-650-02-3F-24963

Under the provisions of 18 U.S.C. § 923(e) and 27 C.F.R. § 478.73(a), the Attorney General may, after notice and opportunity for hearing, revoke a license issued under 18 U.S.C. § 923 if the holder of the license has willfully violated any provision of the Gun Control Act (GCA) or regulations issued under the authority of the GCA. The license as a pawnbroker in firearms other than destructive devices under Title 18, United States Code, Chapter 44, Firearms, held by G7 Worldwide, Inc. d/b/a G7 Suppressors Solutions FFL is subject to revocation. This Notice explains the basis for the revocation.

Under the provisions of 18 U.S.C. § 922(t)(5) and 27 C.F.R. § 478.73(a), the Attorney General may, after notice and opportunity for a hearing, suspend for not more than six months or revoke any license issued to the licensee under 18 U.S.C. § 923, and may impose on the licensee a fine of not more than \$5,000.00,¹ if 1) the licensee knowingly transferred a firearm to an unlicensed person and knowingly failed to comply with the requirements of 18 U.S.C. § 922(t) with respect to the transfer and 2) at the time the transferee proposed the transfer, the national instant criminal background check system was operating and information was available to the system demonstrating that the transferee's receipt of a firearm would violate 18 U.S.C. § 922(g) or § 922(n) or State law. G7 Worldwide, Inc.'s license as a pawnbroker of firearms other than destructive devices under Title 18, United States Code, Chapter 44, Firearms, is subject to revocation, and G7 Worldwide, Inc. is subject to pay a fine of \$35,324.00 on this basis. This Notice explains the basis for the revocation and fine.

Legal Authorization for Revocation and Fine

18 U.S.C. § 923(e) provides in applicable part:

The Attorney General may, after notice and opportunity for hearing, revoke any license issued under this section if the holder of such license has willfully violated any provision of this chapter or any rule or regulation prescribed by the Attorney General under this chapter...

18 U.S.C. § 922(t)(5) provides:

If the licensee knowingly transfers a firearm to such other person and knowingly fails to comply with paragraph (1) of this subsection [the instant check procedures] with respect to the transfer and, at the time such other person most

¹ Title 28 C.F.R. § 85.5, Adjustments to penalties for violations occurring after November 2, 2015, provides: For civil penalties assessed after June 19, 2020, whose associated violations occurred after November 2, 2015, the civil monetary penalty provided by 18 U.S.C. § 922(t)(5) is \$8,831.00.

recently proposed the transfer, the national instant criminal background check system was operating and information was available to the system demonstrating that receipt of a firearm by such other person would violate subsection (g) or (n) of this section or State law, the Attorney General may, after notice and opportunity for a hearing, suspend for not more than 6 months or revoke any license issued to the licensee under section 923, and may impose on the licensee a civil fine of not more than \$5,000.

Compliance History/Current Inspection

- (1) ATF issued Federal firearms license (FFL) #1-54-24017 (Type 01 - Dealer in Firearms Other Than Destructive Devices) to the licensee on May 25, 2017, following a qualification inspection.
- (2) In 2019, the licensee was subject to a compliance inspection by ATF Industry Operations Investigators. At the conclusion of the inspection, the licensee was cited for, among other things:
 - a. Violation of 27 C.F.R. § 478.125(e) for failure to maintain an accurate/complete/timely acquisition and disposition record of firearms (b)(3) (112 Public Law 55 125 Stat 552) instances).
 - b. Violation of 27 C.F.R. § 478.124(c)(1) for failure to obtain a completed ATF Form 4473 (b)(3) (112 Public Law 55 125 Stat 552) instances).
 - c. Violation of 27 C.F.R. § 478.21(a) for failure to complete forms as prescribed (b)(3) (112 Public Law 55 125 Stat 552) instances).
 - d. Violation of 27 C.F.R. § 478.124(c)(3)(i) for failure to verify or record identification document on ATF Form 4473 (b)(3) (112 Public Law 55 125 Stat 552) instances).
 - e. Violation of 27 C.F.R. § 478.124(c)(4) for failure to record firearm information on an ATF Form 4473 (b)(3) (112 Public Law 55 125 Stat 552) instances).
- (3) Following the compliance inspection, G7 Worldwide, Inc. was provided with a copy of the Report of Violations (ROV) detailing the problems ATF found during the inspection. Mr. Anthony Gale Turner, Sr., on behalf of G7 Worldwide, Inc., signed the ROV, acknowledging that he had received the ROV and that the ATF investigator had discussed the violations with him.
- (4) The ATF investigator then reviewed federal firearms regulations and recordkeeping requirements with Mr. Anthony Gale Turner, Sr., on behalf of G7 Worldwide, Inc., and provided him with the Federal Firearms Regulations Reference Guide and a package of ATF Forms. Mr. Anthony Gale Turner, Sr., on behalf of G7 Worldwide, Inc., stated he understood the regulations and signed the Acknowledgement of Federal Firearms Regulations. The ATF investigator provided a copy of the signed Acknowledgement to Mr. Anthony Gale Turner, Sr., on behalf of G7 Worldwide, Inc.
- (5) The licensee received a warning letter on or around October 8, 2019, which again detailed the violations discovered during the inspection. The letter also reminded the licensee that future

violations may be considered willful and could result in the revocation of its federal firearms license.

- (6) On or about November 14, 2019, G7 Worldwide, Inc. applied for and was issued by ATF FFL #1-54-650-02-3F-24963 (Type 02, Pawnbroker in Firearms Other Than Destructive Devices).
- (7) On January 5, 2021, ATF Industry Operations Investigator (IOI) (b)(6) conducted a compliance inspection of the licensee's premises that covered the period January 5, 2020, through January 5, 2021. This compliance inspection was initiated after the ATF National Tracing Center (NTC) requested assistance, on December 23, 2020, from ATF Washington Field Division in completing (b)(3) (112 Public Law 55 125 Stat 552) pending trace requests from the licensee after repeated attempts to contact the licensee were unsuccessful. The inspection revealed the following willful violations of the GCA and its regulations.

Legal and Factual Ground for Revocation and Fine

- i. You violated 18 U.S.C. § 923(g)(7) and 27 C.F.R. § 478.25a on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions, by failing to respond within the required 24-hour period to firearm trace requests received from the ATF National Tracing Center. See Appendix A, ¶ 6.i.
- ii. You violated 18 U.S.C. § 923(c) and 27 C.F.R. § 478.125a on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions, by failing to properly sell/transfer personal collection firearms. The firearms were acquired under your license, transferred to the personal collection of Mr. Anthony Turner, Sr., a Responsible Person, and, in turn, sold to unlicensed persons prior to maintaining the firearms in the personal collection for the required one year from the date the firearm was transferred from the business inventory. See Appendix A, ¶ 6.ii.
- iii. You violated 18 U.S.C. §§ 922(d), 922(t)(1) and (5), and 27 C.F.R. §§ 478.99(c) and 478.102(a)(2), on (b)(3) (112 Public Law 55 125 Stat 552) separate occasions, by knowingly transferring (b)(3) (112 Public Law 55 125 Stat 552) firearms to (b)(3) (112 Public Law 55 125 Stat 552) unlicensed persons, all of whom were prohibited from receiving a firearm under Federal and/or State law, without acquiring a unique identification number from the NICS/VFTP system. At the time of the transfer, NICS/VFTP was operating, and information was available to the system demonstrating that receipt of the firearms by the unlicensed persons would violate 18 U.S.C. § 922(g) or State law. Therefore, as provided in 18 U.S.C. § 922(t)(5), the Director, Industry Operations, has determined that you are subject to a fine of \$35,324.00. See Appendix A, ¶ 6.iii.
- iv. You violated 18 U.S.C. § 922(t)(1) and 27 C.F.R. §§ 478.102(a)(2) and 478.124(a), on (b)(3) (112 Public Law 55 125 Stat 552) occasions, by knowingly transferring a firearm to an unlicensed purchaser, without having him/her complete and sign an ATF Form 4473 prior to transferring said firearm, and without contacting NICS/VFTP and waiting for the NICS/VFTP system to provide you with a unique identification number. See Appendix A, ¶ 6.iv.
- v. You violated 18 U.S.C. §§ 922(m) and 923(g)(1)(A), and 27 C.F.R. §§ 478.121(c) and 478.128(c), on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions, by knowingly making a false entry,

omitting entry, and/or failing to properly maintain required transaction records. *See* Appendix A, ¶ 6.v.

- vi. You violated 18 U.S.C. §§ 922(m) and 923(g)(1)(A), and 27 C.F.R. § 478.21(a), on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473), by failing to obtain/execute a current ATF Form 4473 as indicated by the headings on the form and the instructions on or pertaining to the form (such as questions 10.a, 11.a, 16, 29, 33, 34, and 36). This is a repeat violation. The licensee was previously cited for other violations of 27 C.F.R. § 478.21(a) during the 2019 compliance inspection. *See* Appendix A, ¶ 6.vi.
- vii. You violated 18 U.S.C. § 922(b)(2) and 27 C.F.R. § 478.99(b)(2), on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions, by failing to record the accurate number of firearms by category intended to be sold, in violation of Va. Code Ann. § 18.2-308.2:2(R). *See* Appendix A, ¶ 6.vii.
- viii. You violated 18 U.S.C. §§ 922(m) and 923(g)(1)(A), and 27 C.F.R. § 478.124(c)(1), on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473), by failing to obtain and record all required information on the ATF Form 4473. This is a repeat violation. The licensee was previously cited for other violations of 27 C.F.R. § 478.124(c)(1) during the 2019 compliance inspection. *See* Appendix A, ¶ 6.viii.
- ix. You violated 18 U.S.C. §§ 922(m), 922(t)(1)(C), and 923(g)(1)(A), and 27 C.F.R. § 478.124(c)(3)(i), on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasion (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473), by failing to provide a complete response to question 18.a/18.b/26.a, which requires that the licensee verify and properly record the identity of the transferee by examining a valid government-issued identification document (as defined in 27 C.F.R. § 478.11). This is a repeat violation. The licensee was previously cited for other violations of 27 C.F.R. § 478.124(c)(3)(i) during the 2019 compliance inspection. *See* Appendix A, ¶ 6.ix.
- x. You violated 18 U.S.C. §§ 922(m), 922(t)(4), and 923(g)(1)(A), and 27 C.F.R. § 478.124(c)(3)(iv) on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473) for failing to record background check information on ATF Form 4473 prior to the transfer of a firearm. *See* Appendix A, ¶ 6.x.
- xi. You violated 18 U.S.C. §§ 922(m) and 923(g)(1)(A), and 27 C.F.R. § 478.124(c)(4), on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473), by failing to record certain information about the firearm to be transferred on the ATF Form 4473 prior to transfer of the firearm. This is a repeat violation. The licensee was previously cited for other violations of 27 C.F.R. § 478.124(c)(4) during the 2019 compliance inspection. *See* Appendix A, ¶ 6.xi.
- xii. You violated 18 U.S.C. §§ 922(m), 923(g)(1)(A), and 27 C.F.R. § 478.124(c)(5), on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473), by failing to properly sign and/or record the correct date of transfer of a firearm on ATF Form 4473. *See* Appendix A, ¶ 6.xii.

- xiii. You violated 18 U.S.C. §§ 922(m) and 923(g)(1)(A), and 27 C.F.R. § 478.125(e), on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions, by failing to completely, accurately, and/or timely record information into the Acquisition and Disposition record. This is a repeat violation. The licensee was previously cited for other violations of 27 C.F.R. § 478.125(e) during the 2019 compliance inspection. *See* Appendix A, ¶ 6.xiii.
- xiv. You violated 18 U.S.C. § 923(g)(3) and 27 C.F.R. § 478.126a, on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions, by failing to timely and accurately report the sale of two (2) or more pistols and/or revolvers to an unlicensed person on the same day or within five (5) consecutive business days. *See* Appendix A, ¶ 6.xiv.

Appendix A

Paragraph 6.i:

Date Entered Trace Request

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

Paragraph 6.ii:

Transferee Acquisition Date Bill of Sale Date Firearm

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 6.iii:

Transferee Acq Date Disp Date Sale Date Firearm

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

¹ Transferee/Buyer prohibited pursuant to 18 U.S.C. § 922(g)(1).

² See fn 1.

³ Transferee/Buyer prohibited pursuant to 18 U.S.C. § 922(g)(9).

⁴ Transferee/Buyer prohibited pursuant to VA Code § 18.2-308.2.2(B).

Paragraph 6.iv:

Transferee Acquisition Date Bill of Sale Date Firearm

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 6.v:

Transferee Date Discrepancy

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 6.vi:

Transferee Date Discrepancy

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 6.vii:

Transferee Date Discrepancy

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 6.viii:

Transferee Date Discrepancy

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 6.ix:

Transferee Date Discrepancy

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 6.x:

Transferee Date Discrepancy

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 6.xi:

Transferee Date Discrepancy

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 6.xii:

Transferee Date Discrepancy

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 6.xiii:

Acquisition and Disposition Errors

Firearm Description

Disposition Discrepancy

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 6.xiv:

Transferee Date(s) Firearms

(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

**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 1-54-650-02-3F-24963 as a/an
Pawnbroker in Firearms Other than Destructive Devices, issued to:

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

G7 Worldwide, Inc.
d/b/a G7 Suppressors Solutions FFL
18 Pratt St.
Hampton, VA 23669

Notice is Hereby Given That:

- A request for hearing pursuant to 18 U.S.C. § 923(f)(2) and/or 922(t)(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(t)(5) or 924(p), effective:
 15 calendar days after receipt of this notice, or December 3, 2021
 license is suspended for _____ calendar days, effective _____, pursuant to 18 U.S.C. § 922(t)(5) or 924(p).
 licensee is fined \$ _____, payment due: _____, pursuant to 18 U.S.C. § 922(t)(5) or 924(p).
- After due consideration following a hearing held pursuant to 18 U.S.C. § 923(f)(2) and/or 922(t)(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 your
 application for license described above is denied, pursuant to 18 U.S.C., 923(d).
 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(t)(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(t)(5) or 924(p).
 licensee is fined \$ _____, payment due: _____, pursuant to 18 U.S.C. § 922(t)(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(f)(3), 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 _____

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 of 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 11/30/2021	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official Michael F. Fronczak - Director, Industry Operations	Signature MICHAEL FRONCZAK <small>Digitally signed by MICHAEL FRONCZAK Date: 2021.11.30 14:42:52 -0500</small>
--------------------	---	---

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: _____

Or

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

Date Notice Served	Title of Person Serving Notice Industry Operations Investigator	Signature of Person Serving Notice
Print Name and Title of Person Served		Signature of Person Served
Address Where Notice Served 18 Pratt Street, Hampton, VA 23669		
Note: Previous Edition is Obsolete		

G7 Worldwide, Inc.
d/b/a G7 Suppressors Solutions FFL
18 Pratt St.
Hampton, VA 23669

1-54-650-02-3F-24963

Findings of Fact and Conclusions of Law

Background and Procedural History

On or about November 10, 2021, the Director of Industry Operations, Washington Field Division, Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) issued a Notice of Revocation of License and/or Civil Fine, ATF Form 4500, (“the Notice”) to G7 Worldwide, Inc. d/b/a G7 Suppressors Solutions FFL. The Notice was served on Mr. Anthony Gale Turner, Sr., President of G7 Worldwide, Inc., by Industry Operations Investigator (b)(6) via personal delivery in accordance with 27 C.F.R. § 478.75 on November 12, 2021. The Notice informed G7 Worldwide, Inc. d/b/a G7 Suppressors Solutions FFL that ATF intended to revoke its Federal license as a pawnbroker in firearms other than destructive devices because the licensee willfully violated the Gun Control Act (GCA) and its implementing regulations. The Notice also advised G7 Worldwide, Inc. d/b/a G7 Suppressors Solutions FFL that ATF intended to impose a civil fine of \$35,324.00 because 1) the licensee knowingly transferred firearms to unlicensed persons and knowingly failed to comply with the requirements of 18 U.S.C. § 922(t) with respect to the transfers, and 2) at the time the transferee proposed the transfers, the national instant criminal background check system was operating and information was available to the system demonstrating that the transferees’ receipt of firearms would violate 18 U.S.C. § 922(g) or § 922(n) or State law. Finally, the Notice advised G7 Worldwide, Inc. d/b/a G7 Suppressors Solutions FFL that it could file a request for a hearing to review the revocation of its license within 15 days after receipt of the Notice.

On November 22, 2021, Mr. Anthony Gale Turner, Sr., President of G7 Worldwide, Inc. sent a text message to Industry Operations Investigator Arndt indicating that G7 Worldwide, Inc. d/b/a G7 Suppressors Solutions FFL was not contesting this matter. Moreover, G7 Worldwide, Inc. d/b/a G7 Suppressors Solutions FFL failed to make a timely request for a hearing within 15 days after receipt of the Notice. Accordingly, I am issuing this Final Notice of Revocation with Findings and Conclusions as prescribed by 27 C.F.R. § 478.73(b).

Findings and Conclusions

In the absence of any evidence to the contrary, I find that the violations alleged in the Notice took place as stated therein. Specifically, I find that the licensee was an experienced Federal Firearms licensee who knew and understood its obligations under the Gun Control Act and Gun Control Act regulations, but nevertheless displayed plain indifference and purposeful disregard to these violations. As such, in the aforementioned instances the licensee willfully violated the Gun Control Act. *American Arms Int'l v. Herbert*, 563 F. 3d 78, 83 (4th Cir. 2009); *RSM v. Herbert*, 466 F. 3d 316, 321 (4th Cir. 2006).

Current Inspection

On January 5, 2021, ATF Industry Operations Investigator (IOI) (b)(6) conducted a compliance inspection of the licensee's premises that covered the period January 5, 2020, through January 5, 2021. This compliance inspection was initiated after the ATF National Tracing Center (NTC) requested assistance, on December 23, 2020, from ATF Washington Field Division in completing (b)(6) pending trace requests from the licensee after repeated attempts to contact the licensee were unsuccessful. The inspection revealed the following willful violations of the GCA and its regulations.

Legal and Factual Ground for Revocation

1. You violated 18 U.S.C. § 923(g)(7) and 27 C.F.R. § 478.25a on approximately [REDACTED] occasions, by failing to respond within the required 24-hour period to firearm trace requests received from the ATF National Tracing Center.
2. You violated 18 U.S.C. § 923(c) and 27 C.F.R. § 478.125a on approximately [REDACTED] occasions, by failing to properly sell/transfer personal collection firearms. The firearms were acquired under your license, transferred to the personal collection of Mr. Anthony Turner, Sr., a Responsible Person, and, in turn, sold to unlicensed persons prior to maintaining the firearms in the personal collection for the required one year from the date the firearm was transferred from the business inventory.
3. You violated 18 U.S.C. §§ 922(d), 922(t)(1) and (5), and 27 C.F.R. §§ 478.99(c) and 478.102(a)(2), on [REDACTED] separate occasions, by knowingly transferring [REDACTED] firearms to [REDACTED] unlicensed persons, all of whom were prohibited from receiving a firearm under Federal and/or State law, without acquiring a unique identification number from the NICS/VFTP system. At the time of the transfer, NICS/VFTP was operating, and information was available to the system demonstrating that receipt of the firearms by the unlicensed persons would violate 18 U.S.C. § 922(g) or State law. Therefore, as provided in 18 U.S.C. § 922(t)(5), you are subject to a fine of \$35,324.00.
4. You violated 18 U.S.C. § 922(t)(1) and 27 C.F.R. §§ 478.102(a)(2) and 478.124(a), on [REDACTED] occasions, by knowingly transferring a firearm to an unlicensed purchaser, without having him/her complete and sign an ATF Form 4473 prior to transferring said firearm, and without contacting NICS/VFTP and waiting for the NICS/VFTP system to provide you with a unique identification number.
5. You violated 18 U.S.C. §§ 922(m) and 923(g)(1)(A), and 27 C.F.R. §§ 478.121(c) and 478.128(c), on approximately [REDACTED] occasions, by knowingly making a false entry, omitting entry, and/or failing to properly maintain required transaction records.
6. You violated 18 U.S.C. §§ 922(m) and 923(g)(1)(A), and 27 C.F.R. § 478.21(a), on approximately [REDACTED] occasions [REDACTED] ATF Forms 4473), by failing to obtain/execute a current ATF Form 4473 as indicated by the headings on the form and the instructions on or pertaining to the form (such as questions 10.a, 11.a, 16, 29, 33, 34, and 36).
7. You violated 18 U.S.C. § 922(b)(2) and 27 C.F.R. § 478.99(b)(2), on approximately [REDACTED] occasions, by failing to record the accurate number of firearms by category intended to be sold, in violation of Va. Code Ann. § 18.2-308.2:2(R).
8. You violated 18 U.S.C. §§ 922(m) and 923(g)(1)(A), and 27 C.F.R. § 478.124(c)(1), on approximately [REDACTED] occasions [REDACTED] ATF Forms 4473), by failing to obtain and record all required information on the ATF Form 4473.

9. You violated 18 U.S.C. §§ 922(m), 922(t)(1)(C), and 923(g)(1)(A), and 27 C.F.R. § 478.124(c)(3)(i), on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasion (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473), by failing to provide a complete response to question 18.a/18.b/26.a, which requires that the licensee verify and properly record the identity of the transferee by examining a valid government-issued identification document (as defined in 27 C.F.R. § 478.11).
10. You violated 18 U.S.C. §§ 922(m), 922(t)(4), and 923(g)(1)(A), and 27 C.F.R. § 478.124(c)(3)(iv) on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473) for failing to record background check information on ATF Form 4473 prior to the transfer of a firearm.
11. You violated 18 U.S.C. §§ 922(m) and 923(g)(1)(A), and 27 C.F.R. § 478.124(c)(4), on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473), by failing to record certain information about the firearm to be transferred on the ATF Form 4473 prior to transfer of the firearm.
12. You violated 18 U.S.C. §§ 922(m), 923(g)(1)(A), and 27 C.F.R. § 478.124(c)(5), on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions (b)(3) (112 Public Law 55 125 Stat 552) ATF Forms 4473), by failing to properly sign and/or record the correct date of transfer of a firearm on ATF Form 4473.
13. You violated 18 U.S.C. §§ 922(m) and 923(g)(1)(A), and 27 C.F.R. § 478.125(e), on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions, by failing to completely, accurately, and/or timely record information into the Acquisition and Disposition record.
14. You violated 18 U.S.C. § 923(g)(3) and 27 C.F.R. § 478.126a, on approximately (b)(3) (112 Public Law 55 125 Stat 552) occasions, by failing to timely and accurately report the sale of two (2) or more pistols and/or revolvers to an unlicensed person on the same day or within five (5) consecutive business days.

Revocation

Accordingly, the Federal firearms license held by G7 Worldwide, Inc. d/b/a G7 Suppressors Solutions FFL, shall be revoked at close of business on the date stated on the first page of this Final Notice of Revocation. The civil fine shall not be imposed given G7 Worldwide, Inc. d/b/a G7 Suppressors Solutions FFL's cooperation in surrendering the Federal firearms license and GCA records.

November 30, 2021

Date

Michael F. Fronczak
Director, Industry Operations
Washington Field Division