

JLS GROUP LLC's FCI
 FCI-26008
 09/09/2022 04:40 PM
 IO (b)(6) Phoenix III (IO) Field Office

LICENSEE INFORMATION

Licensee Name
 JLS GROUP LLC
 RDS Key
 9-86-09257
 License/Permit Number
 9-86-013-01-2K-09257
 License Type
 01 - Dealer License
 Business Type
 Limited Liability Company (LLC)
 Premises Ownership Type
 Leased/Rented
 Premises Location Type **Required**

Other

Other Required

Industrial

Premises Address
 1542 E Victory St, Unit N/A, Phoenix, Arizona 85040
 Address
 1542 E Victory St
 Unit N/A
 Phoenix, Arizona 85040
 Maricopa County
 United States
 Address
 1542 E Victory St
 Unit N/A
 Phoenix, Arizona 85040
 Maricopa County
 United States

Phone Type	Phone Number	Remarks
Business	+1 805-910-7433	
Email Address	Email Remarks	
(b)(6)		
Online Presence Type	Online Presence URL	Remarks
Website	www.lukearmory.com	For previous location. RP indicates it will change to match new location/trade name

RECOMMENDATIONS

Final Decision
 Revocation
 Date
 09/09/2022
 Details

Field inspection performed 05/24-09/28/21; a ROV was issued for six record keeping/reporting violations, a single conduct of business violation, a single administrative violation and a single unlawful act violation. The licensee's employ of a known prohibited person, failure to maintain required record keeping, failure to execute multiple ATF Forms 4473 and failure to conduct multiple NICS background checks merit Revocation by policy. It should be noted that a closing conference has not been held with the licensee after several unsuccessful attempts to make contact with the RP (b)(6) Submitted for concurrence of Revocation recommendation.

Out of Business Records and Inventory Management

Licensee Records

- ✔ The records are not available
 Records Unavailable Explanation
 Licensee has been unresponsive to all contact attempts made by IO.

Licensee Inventory

Deputy Assistant Director - Industry Operations Megan Bennett's Recommendation

Revocation
Details

ii concur with the recommendation of revocation.

Acting Special Agent in Charge (b)(6) Recommendation

I concur with the recommendation from both the DIO and Counsel of revocation.

Division Counsel (b)(6) Review
Details

I concur with the recommendation of the IOI, AS, and DIO: (b)(5) DPP
(b)(5) DPP

Director of Industry Operations Nichole Lee's Recommendation
Revocation
Details

Concur with the Administrative Action of Revocation. Licensee failed to conduct NICS background checks, employed a known prohibited person, failed to execute multiple ATF Forms 4473 and failed to maintain required records.

Area Supervisor (b)(6) Recommendation
Revocation
Details

Field inspection performed 05/24-09/28/21; a ROV was issued for six record keeping/reporting violations, a single conduct of business violation, a single administrative violation and a single unlawful act violation. The licensee's employ of a known prohibited person, failure to maintain required record keeping, failure to execute multiple ATF Forms 4473 and failure to conduct multiple NICS background checks merit Revocation by policy. It should be noted that a closing conference has not been held with the licensee after several unsuccessful attempts to make contact with the RP: (b)(6)
Submitted for concurrence of Revocation recommendation.

Industry Operations Investigator (b)(6) Recommendation
Revocation
Details

Revocation

Spartan's recorded date of interview (05/24/2021) denotes the date the field inspection resumed after February's Phoenix PD (TFO) activity concluded.

Inspection Findings

Records and Forms

1. Failure to timely and/or correctly maintain records of receipt, manufacture, importation or other acquisition on [redacted] percent or more of the licensee's total acquisitions during the inspection period, with a minimum of [redacted] instances.
2. Failure to timely and/or correctly maintain records of sales or other dispositions of [redacted] percent or more of the licensee's total dispositions during the inspection period, with a minimum of [redacted] instances.
9. Failure to execute a Form 4473 (Exception: Select findings 6, 7, and 8 above for consignment sales, transfers to law enforcement officers for personal use, and FFL responsible persons; if the transferee is NOT prohibited).
13. 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.

Firearms

1. Missing firearms after inventory reconciliation (e.g., no records of disposition, required or otherwise).

Miscellaneous

5. Allow an employee who is prohibited to have actual or constructive possession of a firearm while knowing or having reasonable cause to believe that the employee is a prohibited person.

ELIGIBILITY VERIFICATION

Business Information Verification

Licensee Name
JLS GROUP LLC
Business Type
Limited Liability Company (LLC)
Is the business valid?
Yes
Additional Findings
Valid ACC record attached

Attachment(s):
ACC Record - JLS.pdf

Property Ownership Verification

Premises Ownership Type

Leased/Rented
Premises Location Type
Industrial
Has the property ownership been verified?
Yes
Address
1542 E Victory St
Unit N/A
Phoenix, Arizona 85040
Maricopa County
United States
Additional Findings
Valid MCA record attached

Attachment(s):
Maricopa County Assessors Office - 1542 E. Victory Street Phoenix AZ 85040.pdf
Trade Name/DBA Verification

Trade Name/DBA
VICTORY TACTICAL
Is the trade name/DBA registered?
No
Additional Findings
The State of Arizona does not require the registration of trade names

Attachment(s):
Registering Trade Name not Required.pdf
Rental/Lease Verification

Is the proposed business activity permitted by the property owner?
No
Additional Findings
Request was made of Responsible Person (RP) for Lease validation with firearm's activity. RP failed to respond. Unable to locate owner, city confirmed no record as well.

Attachment(s):
[EXTERNAL] RE_ 1542 E Victory Street, Phoenix, AZ 85040.pdf
Zoning Information Verification

Is the proposed business activity in compliance with zoning?
Yes
Additional Findings
Zoned A-2. Activity permitted.

Attachment(s):
Phoenix Zoning District A2 Section 628 Industrial.pdf

APPOINTMENT DETAILS

Interview Date
05/24/2021
Address
1542 E Victory St, Unit N/A, Phoenix, Arizona 85040

Responsible Attendee(s)

JERRY LUKE SIMSON

Non-Responsible Person(s)

(Deactivated)

RESPONSIBLE PERSON(S)

JERRY LUKE SIMSON

Name
JERRY LUKE SIMSON
Gender
Male
Race
Asian or Pacific Islander
Ethnicity
Not Hispanic or Not Latino
Date of Birth
(b)(6)
SSN
(b)(6)
Job Title
SOLE/MANAGING MEMBER

Physical Identifiers

(b)(6)

(b)(6)

Place of Birth

(b)(6)

Home Address

(b)(6)

United States

Additional Names

Citizenship

United States

ID Type	Country	State	ID Number
Driver's License	United States	Arizona	(b)(6)
Phone Type	Phone Number	Remarks	
Mobile	(b)(6)		
Email Address	Email Remarks		
(b)(6)			

Criminal History Check

Date Criminal History Check Conducted

02/04/2021

Criminal History Check Comments

(b)(6)

NON-RESPONSIBLE PERSON(S)

Name

Date of Birth

Job Title

Associate

INTERVIEW QUESTIONNAIRE

What is the proposed business activity?

Internet transfers. No retail sales at the current time beyond special orders.

Do they need an additional license or permit?

No

Who are their primary suppliers?

(b)(4)

Business Activities

Internet Sales/Transfers

Retail

Internet Sales/Transfers Website

Enter to sort

www.gunbroker.com

Selected Operational Security Measures

No items

SECURITY WALKTHROUGH

Inspection Area Description

Industrial bay in industrial strip area. Back area is auto workshop and front section is office.

Primary Activity

Retail

GPS Coordinates

Latitude
 33.41654
 Longitude
 -112.04777
 Selected Physical Security Measures
 Alarm Monitoring/Other Signage
 Security Cameras

ONSITE SUMMARY

Total Number of ATF Form 4473s for Inspection Review Period

Total Number of ATF F 4473 Reviewed

Total Number of Open Dispositions in A & D Record

Total Number of Firearms in Inventory

Actual Number of Firearms Verified

Number of Firearms Missing Before Reconciliation

Total Number of Firearms Missing After Reconciliation

Total Number of Acquisitions in the Last 12 Months

Total Number of Dispositions in the Last 12 Months

Onsite Start Date

Onsite End Date

Number of Reported Lost/Stolen Firearms During Inspection Period

Total Number of Traces During Inspection Review Period

Total Number of Those Traces That Were Unresolved

Inspection Period Start Date

Inspection Period End Date

Number Of Traces Resolved By IOI

[Click Here to See List of Perfected Traces](#)

Additional Comments

Please see attachment

Attachment(s)

Report of Violations.pdf

Licensee Response to Violations Report.pdf

Firearm Theft Loss List.pdf

REPORT OF VIOLATIONS

Regulation	Corrective Actions	Instance Details
27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers 1 ATF Forms 4473 Number of Instances	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. 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)
18 U.S.C. 2(a) & 18 U.S.C. 922 (g): Aiding and abetting a prohibited person	Cease and desist allowance of actual or constructive possession of all firearm inventory by employee who is prohibited and/or any	The Licensee employed (b)(6) who he identified as (b)(6) in the office (b)(6) (b)(6)

2	Number of Instances: 1	employee having reasonable cause to believe is prohibited.
3	<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>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>Create A&D Record from all available sources of record (i.e. invoices, work/claim tags, receipts, etc).</p> <p>Complete and submit ATF Form 3310.11 - Firearms Inventory Theft/Loss Report.</p> <p style="text-align: center;">(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
4	<p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473 <input type="text"/></p> <p>Number of Instances: <input type="text"/></p>	<p>Correct/Update photocopies of all specified ATF Form 4473 discrepancies, in accordance with form headings and instructions.</p> <p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p> <p style="text-align: center;">(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
5	<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"/></p> <p>Number of Instances: <input type="text"/></p>	<p>Ensure that all required transferee/buyer identification information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p> <p style="text-align: center;">(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
6	<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"/></p> <p>Number of Instances: <input type="text"/></p>	<p>Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p> <p style="text-align: center;">(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
7	<p>27 CFR 478.124(a): Failure to execute an ATF F 4473</p> <p>ATF Forms 4473 <input type="text"/></p> <p>Number of Instances: <input type="text"/></p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p> <p style="text-align: center;">(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>Number of Instances: <input type="text"/></p>	<p>Cease and desist from engaging in deceptive practices.</p> <p style="text-align: center;">(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>

8

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

9

27 CFR 478.102(a): Failure to complete a NICS/POC background check

ATF Forms 4473: 6
Number of Instances: 10

Execute a required NICS/POC background check for all future over-the-counter firearm transactions.

NICS Violation, Unknown
NICS Violation, Unknown
NICS Violation, Unknown
NICS Violation,
NICS Violation,
NICS Violation,
NICS Violation,
NICS Violation,
NICS Violation, Unknown
NICS Violation, Unknown

(b)(6)

THEFT/LOSS REPORT

Acquisition Date Type Manufacturer Importer Model Caliber/Gauge Serial Number

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

LICENSEE RESPONSE REPORT

Regulation	Corrective Actions	Licensee Response	Status Details
27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers ATF Forms 4473: [] Number of Instances: []	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. 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.	IO [(b)(6)] was not able to close with the RP. IO [(b)(6)] submitted the missing reports	Status Correction Verified Verified Method In Person Date Correction Verified 06/07/2021
18 U.S.C. 2(a) & 18 U.S.C. 922(g): Aiding and abetting a prohibited person Number of Instances: 1	Cease and desist allowance of actual or constructive possession of all firearm inventory by employee who is prohibited and/or any employee having reasonable cause to believe is prohibited.	RP states individual does not have access to firearms	Status Correction Verified Verified Method In Person Date Correction

2			Verified 06/07/2021
3	<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>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>Create A&D Record from all available sources of record (i.e. invoices, work/claim tags, receipts, etc).</p> <p>Complete and submit ATF Form 3310.11 - Firearms Inventory Theft/Loss Report.</p>	<p>IOI <input type="text"/> was not able to close with the RP.</p> <p>Status Licensee Notified Verified Method In Person Date Licensee Notified 06/07/2021</p>
4	<p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473: <input type="text"/></p> <p>Number of Instances: <input type="text"/></p>	<p>Correct/Update photocopies of all specified ATF Form 4473 discrepancies, in accordance with form headings and instructions.</p> <p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>IOI <input type="text"/> was not able to close with the RP.</p> <p>Status Licensee Notified Verified Method In Person Date Licensee Notified 06/07/2021</p>
5	<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"/></p> <p>Number of Instances: <input type="text"/></p>	<p>Ensure that all required transferee/buyer identification information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p>	<p>IOI <input type="text"/> was not able to close with the RP.</p> <p>Status Licensee Notified Verified Method In Person Date Licensee Notified 06/07/2021</p>
6	<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"/></p> <p>Number of Instances: <input type="text"/></p>	<p>Ensure that all required NICS/POC background check information is obtained and accurately recorded on all future ATF Forms 4473, Section B.</p>	<p>IOI <input type="text"/> was not able to close with the RP.</p> <p>Status Licensee Notified Verified Method In Person Date Licensee Notified 06/07/2021</p>
7	<p>27 CFR 478.124(a): Failure to execute an ATF F 4473</p> <p>ATF Forms 4473: <input type="text"/></p> <p>Number of Instances: <input type="text"/></p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>IOI <input type="text"/> was not able to close with the RP.</p> <p>Status Licensee Notified Verified Method In Person Date Licensee Notified 06/07/2021</p>
8	<p>27 CFR 478.121(c): Making false entry, omitting entry, or failing to properly maintain required recordkeeping</p> <p>Number of Instances: <input type="text"/></p>	<p>Cease and desist from engaging in deceptive practices.</p>	<p>IOI <input type="text"/> was not able to close with the RP.</p> <p>Status Licensee Notified Verified Method In Person Date Licensee Notified 06/07/2021</p>
	<p>27 CFR 478.102(a): Failure to</p>	<p>IOI <input type="text"/> was not able to close with</p>	

complete a NICS/POC background check ATF Forms 4473: 6 Number of Instances: 10	Execute a required NICS/POC background check for all future over-the-counter firearm transactions.	the RP.	Status Licensee Notified Verified Method In Person Date Licensee Notified 06/07/2021
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RECORD(S) OF CONVERSATION

Name

When Contacted

02/10/2021

Method of Contact

In-Person

Phone

Location Contacted

4010 S Central, Phoenix, Arizona 85040

Investigative Participant(s)

Narrative

On Monday, February 8, 2021, IOI (b)(6) attempted to start a Firearms Compliance Inspection of JLS Group LLC, dba Luke Armory, FCI 26008 / FFL #9-86-09257. The door to the premises was locked and after knocking, there was no response. IOI (b)(6) left voice mails on two phone numbers found in the FFLS. After 30 minutes without a callback, IOI (b)(6) left the premises.

On the afternoon of February 8, 2021, IOI (b)(6) received a return call from Responsible Person (RP) Jerry Simpson and an inspection appointment was made for Wednesday morning, February 10, 2021.

Later on the afternoon of Tuesday, February 9, 2021, IOI (b)(6) received a call from TFO (b)(6) who indicated that he had learned from Duty IOI (b)(6) that an inspection of Luke Armory was pending with IOI (b)(6). After discussing the issues of interest, that included (b)(7)(A) the TFO suggested going together the next morning, and indicated he would check and see if OK.

Arrangements were later made for the TFO and IOI (b)(6) to meet at the premises at 10AM on February 10, 2021. IOI (b)(6) sent a text to RP (b)(6) advising him to expect the IOI at 10AM.

Prior to departure on the morning of the 10th, IOI (b)(6) placed a phone call to Area Supervisor (b)(6) and briefed him on the situation.

At 10AM on Wednesday, February 10, 2021, IOI (b)(6) met the TFO at the licensed premises. At that time the TFO indicated two Phoenix Detectives would be arriving shortly and would conduct an interview with the RP. The TFO suggested that IOI (b)(6) stand by initially and they would see how the interview progressed.

The interview was conducted outside in front of the premises. During the course of the interview, the RP indicated all the paperwork was inside and I could start my inspection. With no objections from Phoenix PD, IOI (b)(6) entered the premises and found approximately ATF Forms 4473 on the desk but no A&D records. IOI (b)(6) moved back to the interview area and during a break, asked the RP where his A&D was. He indicated that it was on his computer and that IOI (b)(6) could sit in front of the terminal and have access. IOI (b)(6) declined and directed the RP to provide a printed copy, as required by ATF's Ruling on electronic record keeping. The RP indicated he would print out the record, however during the course of events, the RP never did.

IOI (b)(6) performed a cursory examination of the ATF Forms 4473 available and noted some NICS issues. Also noted was that half of the forms were for July of 2020 and only four for transfers during the previous six months. The NICS audit report lists four background checks for the last 60 days.

The interview moved into the office area and at the appropriate time, IOI (b)(6) asked the RP for all voided and denied ATF Forms 4473. The RP stated he did not know where they were located.

The TFO then requested that (b)(6) departed the premises and called AS (b)(6) to advise of the discontinued inspection.

Name

When Contacted

06/22/2021

Method of Contact

Phone

Phone

(b)(6)

Location Contacted

Investigative Participant(s)

Narrative

On June 22, 2021, IOI (b)(6) as part of a forward trace initiative, spoke by telephone with FFL customer (b)(6). The sole Responsible Person for Luke Armory, Jerry Simson, produced an A&D entry indicating that (b)(3) (112 Public Law 55-125 Stat 552) (b)(6) for which an ATF Form 4473 was not found.

(b)(6) stated that he never received the firearm from the FFL.

Name

When Contacted

10/25/2021

Method of Contact

In-Person

Phone

Location Contacted

(b)(6)

Investigative Participant(s)

	Monitored Case
Correspondence	
Correspondence	DIO Kristina Babcock Returned Inspection FCI-26008 Spartan
Correspondence	Notification RE: 9-86-09257 Monitored Case Spartan
Correspondence	Notification RE: 9-86-09257 Monitored Case Spartan
Correspondence	Notification RE: 9-86-09257 Monitored Case Spartan Additional
OnSiteSummaryInformation	Comments - Luke 11082021.pdf
LicenseeResponseToViolationsPDF	to Violations Report.pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit Report of Violations.pdf
ViolationsPDF	Licensee Response
LicenseeResponseToViolationsPDF	to Violations Report.pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit Report of Violations.pdf
ViolationsPDF	Licensee Response
LicenseeResponseToViolationsPDF	to Violations Report.pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit Report of Violations.pdf
ViolationsPDF	Licensee Response
LicenseeResponseToViolationsPDF	to Violations Report.pdf
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit Report of Violations.pdf
ViolationsPDF	
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit Report of Violations.pdf
ViolationsPDF	Phoenix Zoning District A2 Section 628 Industrial.pdf
ZoningVerification	Maricopa County Assessors Office - 1542 E. Victory Street Phoenix AZ 85040.pdf
PropertyOwnershipVerification	Report of Violations 10182021b.pdf
ReturnedSignedROV	
Correspondence	
Correspondence	Information Concerning Your Federal License/Permit Report of Violations.pdf
ViolationsPDF	Licensee Response
LicenseeResponseToViolationsPDF	to Violations

	Report.pdf
	Licensee Response
LicenseeResponseToViolationsPDF	to Violations
	Report.pdf
ReturnedSignedROV	Report of
	Violations
	10182021.pdf
	Information
Correspondence	Concerning Your
	Federal
	License/Permit
Correspondence	
ViolationsPDF	Report of
	Violations.pdf
	[EXTERNAL]
	RE_1542 E
RentalLeaseVerification	Victory Street,
	Phoenix, AZ
	85040.pdf
	Registering Trade
TradeNameVerification	Name not
	Required.pdf
	Licensee Response
LicenseeResponseToViolationsPDF	to Violations
	Report.pdf
	Information
Correspondence	Concerning Your
	Federal
	License/Permit
Correspondence	
ViolationsPDF	Report of
	Violations.pdf
	Licensee Response
LicenseeResponseToViolationsPDF	to Violations
	Report.pdf
ViolationsPDF	Report of
	Violations.pdf
ViolationsPDF	Report of
	Violations.pdf
FirearmTheftLossList	Firearm Theft Loss
	List.pdf
BusinessVerification	ACC Record -
	JLS.pdf

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

In the matter of License Number 9-86-013-01-2K-09257, as a/an
dealer in firearms other than destructive devices issued to:

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

JLS Group LLC
dba Luke Armory
Attn: Jerry Simson
1542 East Victory Street
Suite 4
Phoenix, AZ 85040

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 40 North Central Avenue, Suite 1000, Phoenix, AZ 85004, 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
05/09/2022	Kristina Babcock, Director, Industry Operations	KRISTINA BABCOCK

Digitally signed by KRISTINA
BABCOCK
Date: 2022.05.09 12:13:35 -0700

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: 7021035000079957933 Or Delivering a copy of the notice to
the address shown below.

Date Notice Served	Title of Person Serving Notice	(b)(6)
05/09/2022	Executive Assistant	

Print Name and Title of Person Served	Signature of Person Served (if applicable)
Jerry Simson, Responsible Person	

Address Where Notice Served
1542 East Victory Street, Suite 4, Phoenix, AZ 85040

Under the provisions of 18 U.S.C. § 923(e) and 27 C.F.R. § 478.73, notice is hereby given that that the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) intends to revoke the Federal firearms license held by JLS Group LLC dba Luke Armory (“Licensee”), 1542 East Victory Street, Suite 4, Phoenix, AZ 85040, a Dealer in Firearms. Specifically, the Director, Industry Operations, United States Department of Justice, ATF, Phoenix Field Division, has reason to believe that Licensee 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 (collectively, “GCA”) as described herein.

Compliance History

ATF first issued a Federal firearms license to Licensee in 2016. The laws and regulations issued under the GCA were reviewed with Licensee Responsible Person Jerry Simson as part of the application inspection. ATF conducted a compliance inspection of Licensee in March 2019 at which point the relevant laws and regulations were again reviewed with Jerry Simson.

Current Inspection

Beginning on or about February 10, 2021, ATF Industry Operations Investigator (“IOI”) (b)(6) (b)(6) conducted a compliance inspection of Licensee’s premises. The inspection revealed the following:

Aid and Abet Prohibited Person

1. On one occasion, Licensee willfully and knowingly aided and abetted a prohibited person to possess firearms in violation of 18 U.S.C. §§ 2(a) and 922(g). The Licensee employed (b)(6) in the firearms business during calendar years 2020 and 2021 (b)(6)

(b)(6)

Background Check Violations

2. On ten occasions, Licensee willfully transferred a firearm to an unlicensed person without first contacting the National Instant Criminal Background Check System (“NICS”) before allowing the transfer, in violation of 18 U.S.C. § 922(t) and 27 C.F.R. § 478.102(a). See Appendix ¶ 1.

Falsified Statements in Records

3. On [] occasions, Licensee willfully and knowingly made a false entry in, failed to make appropriate entry in, or failed to properly maintain any record of importation, production shipment, receipt sale or other disposition as required by the GCA, in violation of 18 U.S.C. § 922(m) and 27 C.F.R. § 478.121(c). See Appendix ¶ 2.

ATF Form 4473 Violations

4. On occasions, Licensee willfully failed to obtain/execute a complete and/or accurate Firearms Transaction Record, ATF Form 4473, from the transferee prior to making an over-the-counter transfer of a firearm to a non-licensee, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.124(a). See Appendix ¶ 3.

Acquisition and Disposition Record Violations

5. On occasions, Licensee willfully failed to timely and/or accurately record the acquisition and/or disposition of firearms, in violation of 18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.125(e). See Appendix ¶ 4.

Failure to Report Multiple Sales

6. On occasions, Licensee willfully failed to timely and/or accurately report the sale or other disposition of two or more pistols and/or revolvers during any five consecutive business days to an unlicensed person, in violation of 18 U.S.C. § 923(g)(3)(A) and 27 C.F.R. § 478.126a. See Appendix ¶ 5.

Appendix

Paragraph 1

18 U.S.C. § 922(t) and 27 CFR 478.102(a): Failure to complete a NICS background check

#	Transferee	Date	Firearm(s)/Discrepancy
1	(b)(6)	5/1/2020	(b)(6)
2		5/4/2020	
3		6/19/2020	
4		9/10/2020	
5		9/16/2020	
6	Unknown	Unknown	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
7	Unknown	Unknown	
8	Unknown	Unknown	
9	Unknown	Unknown	
10	Unknown	Unknown	

Paragraph 2

18 U.S.C. § 922(m) and 27 C.F.R. § 478.121(c): Falsified Statements in Records

#	Transferee	Date	Firearm(s)
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 3

18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.124(a): Failure to obtain a Form 4473

#	Transferee	Date	Firearm(s)/Discrepancy
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(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

Paragraph 4

18 U.S.C. § 923(g)(1)(A) and 27 C.F.R. § 478.125(e): Failure to timely and/or accurately record the acquisition and/or disposition of firearms

#	Date	Firearm	Discrepancy
(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)			

Paragraph 5

27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers

#	Transferee	Date	Firearm(s)
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(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 9-86-013-01-2K-09257 as a/an
Type 01 - Dealer of Firearms other than Destructive Devices, issued to:

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

JLS Group LLC dba Victory Tactical
Attn: Jerry Simpson
1542 E Victory Street
Phoenix, AZ 85040

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 _____,
 - 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 40 North Central Avenue, Suite 1000, Phoenix, AZ 85004

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 08/01/2022	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official Kristina Babcock, Director, Industry Operations	Signature KRISTINA BABCOCK <small>Digitally signed by KRISTINA BABCOCK Date: 2022.08.01 13:21:16 -0700</small>
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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: 7022041000081497588

Or

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

Date Notice Served 08/01/2022	Title of Person Serving Notice Executive Assistant
----------------------------------	---

(b)(6)

Print Name and Title of Person Served
Jerry Simpson, Responsible Person

Address Where Notice Served
1542 E Victory Street, Phoenix, AZ 85040

Note: Previous Edition is Obsolete

JLS Group LLC dba Luke Armory (“Licensee”), a Dealer in Firearms, holds Federal firearms license 9-86-013-01-2K-09257 issued by the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) pursuant to the Gun Control Act of 1968 (“GCA”), as amended, 18 U.S.C. Chapter 44, and the regulations issued thereunder, 27 C.F.R. Part 478 (collectively GCA).

On May 9, 2022, ATF issued a Notice to Revoke or Suspend and/or Impose Civil Fine, ATF Form 5300.4 (4500), to Licensee. The Notice alleged Licensee willfully violated the provisions of the GCA. The Notice was mailed with the United States Post Service (USPS) by certified mail, return receipt requested. The USPS attempted delivery but was unable to do so. The mail was returned as undeliverable. Emails and telephone call communications were also attempted without success. Emails were sent and voice messages left at the addresses and phone numbers associated with Licensee. ATF attempted to personally serve the Notice on several occasions at Licensee’s last known business addresses during business hours to no avail.

No request for hearing was timely filed or received.

For the reasons set forth in the Notice of Revocation, the Federal firearms license held by Licensee is hereby REVOKED per 18 U.S.C. § 923(e).



U.S. Department of Justice

**Bureau of Alcohol, Tobacco,
Firearms and Explosives**

Washington DC

www.atf.gov

IMPORTANT NOTICE

Selling Firearms AFTER Revocation, Expiration, or Surrender of an FFL

Former Federal Firearms licensees (FFLs) who continue to sell firearms after the revocation, expiration, or surrender of their license are subject to the same rules as persons who have never been licensed in determining whether they are "engaged in the business" of selling firearms without a license in violation of 18 U.S.C. § 922(a)(1)(A). Accordingly, former licensees who wish to dispose of any remaining business inventory must adhere to the following guidance:

Business inventory must be disposed of by the former FFL in a manner that, objectively, does not constitute being engaged in the business of dealing in firearms using the same facts and circumstances test that would apply to persons who have never been licensed.

The preferred manner of disposition is for the former licensee to:

- Arrange for another FFL to purchase the business inventory (and other assets) of the business; or
- Consign the inventory to another FFL to sell on consignment, or at auction.

Should a former FFL decide against those options, he/she should be aware that future sales - whether from his/her personal firearms collection or otherwise - will be evaluated for a potential violation of 18 U.S.C. § 922(a)(1)(A), just as would occur with a person who had never been licensed.

If a former FFL is disposing of business inventory, the fact that no purchases are made after the date of license revocation, expiration, or surrender does not immunize him/her from potential violations of 18 U.S.C. § 922(a)(1)(A). Instead, business inventory acquired through repetitive purchases while licensed are attributed to the former FFL when evaluating whether subsequent sales constitute engaging in the business of dealing in firearms without a license.

ATF remains committed to assisting former licensees in complying with Federal firearms laws. If you have questions, please contact your local ATF office.

**CURTIS
GILBERT** Digitally signed by
CURTIS GILBERT
Date: 2022.04.04
16:12:22 -04'00'

Curtis Gilbert
Deputy Assistant Director (Industry Operations)
Field Operations