

MORGAN THOMAS BLAIN INC's FCI
 FCI-18846
 06/30/2022 04:44 PM
 IOI: (b)(6) Norfolk (IO) Satellite Office

LICENSEE INFORMATION

Licensee Name MORGAN THOMAS BLAIN INC	RDS Key 1-54-15869	License/Permit Number 1-54-810-01-1F-15869	License Type 01 - Dealer License
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Business Type
Corporation

Premises Address

Premises Ownership Type
Leased/Rented

Premises Location Type
Store Front

Mailing Address

Same as Premises Address

Address
 1329 HARPERS RD STE #103
 Unit N/A
 VIRGINIA BEACH, Virginia 23454
 VIRGINIA BEACH CITY United States

Phone Type	Phone Number	Remarks
Business	+1 757-301-8718	

Email Address	Email Remarks
(b)(6)	

Online Presence Type	Online Presence URL	Remarks
Website	www.vbfl.com	

RECOMMENDATIONS

Final Decision
 Revocation
 Date
 06/03/2022

Details

The licensee had requested and was scheduled to attend a hearing on the Revocation on June 10, 2022. On June 2, 2022, (b)(6) attorney for the licensee sent an email and attached letter withdrawing their request for a hearing and consenting to the revocation.

The licensee's records were turned over to IOI (b)(6) on June 14, 2022 and subsequently submitted to ATF OOBRC.

Out of Business Records and Inventory Management

Licensee Records

- ✔ Submitted to the Federal Licensing Center
- ✔ Submitted to an ATF Employee

ATF Employee Name
 (b)(6)

Licensee Inventory

- ✔ Inventory transferred to another licensee/permittee
- | | |
|--|--|
| Date of Inventory Transfer
06/14/2022 | Business Premise Address
1329 HARPERS RD STE #103
VIRGINIA BEACH, VA 23454 |
| Transferee RDS Key
15425098 | |
| Licensee / Permittee
MORGAN THOMAS BLAIN INC | |
| Business Name
GHOST ARMY TACTICAL
FIREARMS | |

Deputy Assistant Director - Industry Operations Hans Hummel's Recommendation
 Revocation

Details

Concur with Field Division proceeding with revocation.

Special Agent in Charge Charlie Patterson's Recommendation

SAC concurs:

"Details

Acting DIO believes that revocation is the appropriate recommendation for this inspection. The ATF Federal Firearms Administrative Action Policy calls for revocation in instances where there is falsification of FFL records and transfer of a firearm without a background check being conducted. The recent Biden/Harris Administration's Comprehensive Strategy to Prevent and Respond to Gun Crime and Ensure Public Safety, has identified certain violations as a zero tolerance violations. Two of the zero tolerance violations highlighted by the administration are the falsification of FFL records and transfer of a firearm without a background check, which was cited during this inspection. Although a background check was originally completed (delayed) on the purchaser, the purchaser did not pick up the firearm until approximately 37 days later. A second background check was not conducted, although it is required after 30 days of the original background. In light of the administration's position, this inspection warrants a recommendation of Revocation. Recommendation sent to Division Counsel."

Division Counsel (b)(6) Review

Details

Review completed.

Director of Industry Operations Gilbert Atkins's Recommendation
Revocation

Details

Acting DIO believes that revocation is the appropriate recommendation for this inspection. The ATF Federal Firearms Administrative Action Policy calls for revocation in instances where there is falsification of FFL records and transfer of a firearm without a background check being conducted. The recent Biden/Harris Administration's Comprehensive Strategy to Prevent and Respond to Gun Crime and Ensure Public Safety, has identified certain violations as a zero tolerance violations. Two of the zero tolerance violations highlighted by the administration are the falsification of FFL records and transfer of a firearm without a background check, which was cited during this inspection. Although a background check was originally completed (delayed) on the purchaser, the purchaser did not pick up the firearm until approximately 37 days later. A second background check was not conducted, although it is required after 30 days of the original background. In light of the administration's position, this inspection warrants a recommendation of Revocation. Recommendation sent to Division Counsel.

Area Supervisor (b)(6) Recommendation
Warning Conference

Details

The zero tolerance violations highlighted by the administration are the falsification of records and transfer to a prohibited person. AS concurs with IOI recommendation of a Warning Conference in Lieu of Revocation based on the extraordinary circumstances identified by the IOI in their recommendation.

For the instance of falsification of records, the two people involved are both RPs on this license. RP Heather Jones completed the first part of the form for her husband (RP Jeremy Jones) because he was busy with a customer after which he reviewed and certified (signed/dated) that the information filled out was correct. This has only happened once and RP Jeremy Jones has purchased additional firearms since this occurrence without incident.

In the case of the sale of a handgun to an out of state resident, the licensee believes that the purchaser was in the military on PCS orders and that they would have seen these before allowing this transfer since there is a high volume of military customers in this area and they regularly complete transfers to military purchasers using PCS orders.

Industry Operations Investigator Sarah Rouse's Recommendation
Warning Conference

Details

Investigator (b)(6) recommends the alternate administrative action of a Warning Conference. This is the licensee's second compliance inspection. The previous inspection was in 2016 when the FFL was a low volume dealer in acquisitions and dispositions for the inspection period. There were no violations cited as a result of that inspection. Since that time, the FFL has grown to include NFA weapons, gunsmithing and manufacturing (through their 07 license), and they acquired over (b)(4) firearms and disposed of over (b)(4) firearms during this inspection period.

Concerning the falsification of records, a responsible person on the license, Heather Jones, completed an ATF Form 4473 for her husband, Jeremy Jones, who is also a responsible person on the license. She stated that she completed the form because he was busy with a customer but that he signed the form. She stated that she did not know she could not complete the form as long as he verified and signed it. She stated that in the future, she would not complete any forms for others. This is the first occurrence of this violation. The FFL completed (b)(6) ATF Forms 4473 during the inspection period and this was the only instance of a form being completed on behalf of the purchaser.

Concerning the transfer of a handgun to an out of state resident, the licensee believes that the purchaser was in the military on PCS orders. Investigator (b)(6) does not have access to any records that would verify this information. The purchaser listed an AP address on the ATF Form 4473. The licensee entered that Virginia Driver's license was used for identification; however, a query of the license shows that it lists a Camp Pendleton, California address. It is likely that this purchaser is military and may have been on PCS orders. This is the first occurrence of this violation and the (b)(6) instance from the (b)(6) ATF Forms 4473 completed during the inspection period.

Concerning the failure to initiate a new NICS check after 30 days, the licensee stated that he was unaware of the requirement. This is the first occurrence of this violation and the (b)(6) instance from the (b)(6) ATF Forms 4473 completed during the inspection period.

Concerning the failure to file (b)(6) Multiple Sales Reports, the primary record keeper, Heather Jones, relies on the salespersons to inform her of the need to complete a multiple sale form. She stated that she thought they were completing them as required. She stated that they will look into purchasing a computerized A&D record system that will alert them to multiple sales. This is the first occurrence of this violation. The FFL properly filed (b)(6) Multiple Sales Reports during the inspection period and the FFL immediately filed the unreported Multiple Sales Reports.

The licensee has had one previous compliance inspection; however, their volume at the time was very low. The results of that inspection were: no violations and no further action. They have since increased their volume greatly. Investigator (b)(6) stressed to the licensee the need thoroughly read the ATF Form 4473 instructions and the Federal Firearms Regulations Reference Guide. Investigator (b)(6) instructed the licensee to ensure records are properly completed and to ask questions if they are conducting transactions with which they are unfamiliar. The owner expressed interest in purchasing a computer record keeping system that will ensure greater compliance with the regulations. Investigator (b)(6) believes that the FFL is willing and able to come into compliance.

Inspection Findings

Records and Forms

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.

Transfer of Firearm

3. Transfer of any firearm (including lower receiver) other than Rifle / Shotgun to a resident of another State.

NICS

6. Failure to initiate a new NICS check when a transaction is not completed within the 30-day period from the date NICS was initially contacted provided that the person is NOT prohibited.

Failure to Report

1. 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 ^{two} instances.

ELIGIBILITY VERIFICATION

Business Information Verification

Licensee Name	Business Type	Is the business valid?
MORGAN THOMAS BLAIN INC	Corporation	Yes

Additional Findings
Morgan Thomas Blain Inc. is properly registered with the State Corporation Commission.

Attachment(s):
Business Verification.pdf

Property Ownership Verification

Premises Ownership Type	Premises Location Type	Has the property ownership been verified?
Leased/Rented	Store Front	Yes

Address
1329 HARPERS RD STE #103
Unit N/A
VIRGINIA BEACH, Virginia 23454
VIRGINIA BEACH CITY United States

Additional Findings
Premises is owned by (b)(4)

Attachment(s):
Property Details.pdf

Trade Name/DBA Verification

Trade Name/DBA	Is the trade name/DBA registered?
GHOST ARMY TACTICAL FIREARMS	Yes

Additional Findings
The trade name is properly registered with the City of Virginia Beach.

Attachment(s):
Fictitious Name Filing.pdf

Rental/Lease Verification

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

Additional Findings
Investigator (b)(6) reviewed the licensee's lease and found no restrictions on the operations.

Attachment(s):
Lease.pdf

Zoning Information Verification

Is the proposed business activity in compliance with zoning?
Yes

Additional Findings
Premises is zoned B2- Business which permits retail operations.

Attachment(s):
Zoning B2- Business.pdf

APPOINTMENT DETAILS

Interview Date
10/12/2021
Address
1329 HARPERS RD STE #103, Unit N/A, VIRGINIA BEACH, Virginia 23454

Responsible Attendee(s)

WILLIAM M JONES
HEATHER Michelle JONES
JEREMY Thomas JONES

Non-Responsible Person(s)

No Items

RESPONSIBLE PERSON(S)

WILLIAM M JONES

Name	Gender	Race	Ethnicity
Mr. WILLIAM M JONES	Male	White	Not Hispanic or Not Latino
Date of Birth	SSN	Job Title	
(b)(6)		VP	

Physical Identifiers

Height	Weight	Hair Color	Eye Color
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Place of Birth

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

Home Address

(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)	

Criminal History Check

Date Criminal History Check Conducted
03/23/2020

Criminal History Check Comments
NCIC Check: NForce/NCIC – Negative

HEATHER Michelle JONES

Name	Gender	Race	Ethnicity
HEATHER Michelle JONES	Female	White	Not Hispanic or Not Latino
Date of Birth	SSN	Job Title	
(b)(6)		Operations Manager	

Physical Identifiers

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

Place of Birth

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

Home Address

(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)	
(b)(6)	

Criminal History Check

Date Criminal History Check Conducted
11/09/2021

Criminal History Check Comments
NCIC Check: NForce/NCIC – Negative

Reason for Adding Responsible Person

Responsible Person is:
Store/Regional Manager

Comments

JEREMY Thomas JONES

Name	Gender	Race	Ethnicity
Mr. JEREMY Thomas JONES	Male	White	Not Hispanic or Not Latino
Date of Birth	SSN	Job Title	
(b)(6)	(b)(6)	Director	

Physical Identifiers

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

Place of Birth

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

Home Address

(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)	
Business	+1 757-650-9564	

Email Address	Email Remarks
(b)(6)	

Criminal History Check

Date Criminal History Check Conducted
11/09/2021

Criminal History Check Comments
NCIC Check: NForce/NCIC – Negative

Reason for Adding Responsible Person

Responsible Person is:
Corporate Director or Officer

Comments
(b)(6)

INTERVIEW QUESTIONNAIRE

What is the proposed business activity?

Licensee conducts sales of firearms under this Type 01 license. The licensee is also licensed as a Type 07 (b)(3)(26 USC § 6103). The licensee incorrectly used the 01 license to transfer (b)(3)(26 USC § 6103) knowledge and the transferees put the wrong FFL number on the forms. (b)(3)(26 USC § 6103), (b)(6)

(b)(3)(26 USC § 6103)

License held: Type 01; Dealer of Firearms; Other Firearm-Descriptive Devices.

- Originally issued: 5/21/15.
- Conducts business with new and used firearms.
- Licensee does not have any government contracts.
- Licensee is compliant with local and state laws.
- There are no other businesses operated from the premises.
- Licensee advertises through their website- www.vbffl.com.
- Does not attend gun shows, reload ammunition, or deal in black powder.

Do they need an additional license or permit?
No

Who are their primary suppliers?
Firearms are acquired from a wide variety of sources. Some repeat orders have been placed with (b)(4)

Business Activities

Internet Sales/Transfers
Retail

Selected Operational Security Measures

(b)(6)

Internet Sales/Transfers Website

www.vbffl.com

PREMISES INFORMATION

Inspection Area Description

- Commercial Store Front in urban Virginia Beach, VA. Premises is zoned B2- Business which permits retail sales, gunsmithing, assembly, and some manufacturing. Licensee is compliant with this requirement.
- Business premises suitable for gunsmithing, retail sales, and manufacture of firearms.
- The licensee does not maintain off-site storage.
- Discussed the Loss Prevention for Firearms Retailers pamphlet. Provided a copy to licensee.
- Discussed ATF's right of entry and that the records, inventory and premise are subject to inspection during the stated business hours.

Primary Activity
Retail

Selected Physical Security Measures

- Alarm Monitoring/Other Signage
- Motion Sensors
- Security Cameras
- Glass Breakage Detection
- Local Audible Alarm
- Deadbolts
- Lockable Display Rack(s)/Case(s)
- Safe(s)/Vault(s)

GPS Coordinates

Latitude
36.79906

Longitude
-76.00497

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

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

Actual Number of Firearms Verified

Number of Firearms Missing Before Reconciliation

Total Number of Firearms Missing After Reconciliation

0

Total Number of Acquisitions in the Last 12 Months

(b)(4)

Total Number of Dispositions in the Last 12 Months

(b)(4)

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

1. The Audit Review Period: From 10/12/20 to 10/12/21. IOI (b)(6) assisted with the inspection.
2. The Original issue date & expiration date of FFL: Iss: 5/21/15 Exp: 6/1/24
3. DN (b)(6)
4. Number of traces: Unresolved: 0
5. Number of A&D/4473 Cross References: 50 Methodology: Investigators verified every other disposition entry starting with line 159, dated 8/2/21 against the corresponding ATF Forms 4473 until 25 were chosen. Investigators verified every other ATF Forms 4473 starting with Form (b)(3) (112 Public Law 55 125 Stat 552) against the corresponding A&D disposition entries until 25 were chosen. No discrepancies were found.
6. Number of VSP approval codes verified: 25, no discrepancies found

• Inspection History:

Date of Inspection: 4/18/2016; Investigator: (b)(6)

Type of Inspection: Firearms Compliance Inspection

UI#: 768035-2016-0222

Inspection Results: No violations, No Further Action, No Referrals

Cited Violations: N/A

Attachment(s)

Report of Violations.pdf

Licensee Response to Violations Report.pdf

REPORT OF VIOLATIONS

Regulation	Corrective Actions	Instance Details
27 CFR 478.128(c): False statement made by a licensee on any ATF record 1 Number of Instances:	Cease and desist from engaging in deceptive practices.	FFL Responsible person Heather Jones stated that she completed an ATF Form 4473 on 5/10/21 for her husband, Jeremy Jones, because he was talking to a customer. She stated that he was aware of her completing the form and signed it himself.
27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers 2 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)
27 CFR 478.102(c): Failure to initiate a new NICS check after 30-day lapse of initial check 3 ATF Forms 4473: Number of Instances:	Execute and accurately record (on an ATF Form 4473) a new NICS/POC background check, after any 30-day expiration of a previously conducted NICS/POC check, on all future over-the-counter firearm transactions.	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)

4

27 CFR 478.99(a): Unlawful sale or delivery of a handgun to an out of state resident and/or transfer of a long gun in violation of state law

ATF Forms 4473
Number of Instances:

Cease and desist all firearm transfers (including lower receivers) other than a rifle or shotgun, to residents of another state.

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

5

27 CFR 478.125(e): Failure to maintain an accurate/complete/timely acquisition and disposition record of firearms

Number of Instances:

Amend/Update A&D Record to accurately record all required firearm acquisition information.
Amend/Update A&D Record to accurately record all required firearm disposition information.

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

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

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.

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

6

27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473

ATF Forms 4473:
Number of Instances:

Ensure that all required ATF Form 4473 Section A items are completed/provided by the transferee/buyer on all future transactions.

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

7

		<p style="text-align: center;">(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)</p>
<p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473: <input type="checkbox"/></p> <p>Number of Instances: <input type="checkbox"/></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 style="text-align: center;">(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="checkbox"/></p> <p>Number of Instances: <input type="checkbox"/></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>

9		(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
10	27 CFR 478.124(c)(3)(iii): Failure to verify or record non alien immigrant exception on an ATF F 4473 ATF Forms 4473: <input type="checkbox"/> Number of Instances: <input type="checkbox"/>	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
11	27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473 ATF Forms 4473: <input type="checkbox"/> Number of Instances: <input type="checkbox"/>	(b)(3) (112 Public Law 55 125 Stat 552),(b)(6)
12	27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473 ATF Forms 4473: <input type="checkbox"/> Number of Instances: <input type="checkbox"/>	(b)(3) (112 Public Law 55 125 Stat 552)

LICENSEE RESPONSE REPORT

Regulation	Corrective Actions	Licensee Response	Status Details
1 27 CFR 478.128(c): False statement made by a licensee on any ATF record Number of Instances: <input type="checkbox"/>	Cease and desist from engaging in deceptive practices.	Heather Jones stated that she would not completed any sections in Part B or D in the future.	Status Licensee Notified Verified Method In Person Date Licensee Notified 11/04/2021
2 27 CFR 478.126a: Failure to report multiple sales or other dispositions of pistols and revolvers ATF Forms 4473: <input type="checkbox"/> Number of Instances: <input type="checkbox"/>	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.	Heather Jones stated that if her husband does not notify her that a Multiple Sales form is required, she does not complete one. She stated that she will consider purchasing a computerized A&D book that alerts FFLs when reports are required.	Status Licensee Notified Verified Method In Person Date Licensee Notified 11/04/2021

<p>27 CFR 478.102(c): Failure to initiate a new NICS check after 30-day lapse of initial check</p> <p>ATF Forms 4473: 1 Number of Instances: 1</p>	<p>Execute and accurately record (on an ATF Form 4473) a new NICS/POC background check, after any 30-day expiration of a previously conducted NICS/POC check, on all future over-the-counter firearm transactions.</p>	<p>William Jones stated that he was unaware of the requirement to conduct a new background check.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 11/04/2021</p>
<p>27 CFR 478.99(a): Unlawful sale or delivery of a handgun to an out of state resident and/or transfer of a long gun in violation of state law</p> <p>ATF Forms 4473: [] Number of Instances: []</p>	<p>Cease and desist all firearm transfers (including lower receivers) other than a rifle or shotgun, to residents of another state.</p>	<p>William Jones stated that the person was probably a member of the military but could not say for sure.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 11/04/2021</p>
<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>Amend/Update A&D Record to accurately record all required firearm acquisition information. Amend/Update A&D Record to accurately record all required firearm disposition information.</p>	<p>Heather Jones, who primarily completes the required records, stated that she knows what information is required but she is sometimes in a hurry and forgets to enter it into the A&D book. She stated that the firearms disposed to [(b)(6)] were sold to a business they both run, and that [(b)(6)] name was pre-filled into the A&D record. Investigator [(b)(6)] instructed the FFL to stop entering disposition information prior to disposition.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 11/04/2021</p>
<p>27 CFR 478.124(c)(4): Failure to record firearm information on 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>Licensee stated that the errors were an oversight.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 11/04/2021</p>
<p>27 CFR 478.124(c)(1): Failure to obtain a completed ATF F 4473</p> <p>ATF Forms 4473: [] 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.</p>	<p>Licensee stated that the errors were an oversight.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 11/04/2021</p>
<p>27 CFR 478.21(a): Failure to complete forms as prescribed</p> <p>ATF Forms 4473: [] Number of Instances: []</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>Licensee stated that the errors were an oversight.</p>	<p>Status Licensee Notified</p> <p>Verified Method In Person</p> <p>Date Licensee Notified 11/04/2021</p>
<p>27 CFR 478.124(c)(3)(i): Failure to verify or record Identification document on ATF F 4473</p>	<p>Execute and retain a complete and accurate ATF Form 4473 on all future firearm transactions.</p>	<p>Licensee stated that the errors were an oversight.</p>	<p>Status Licensee Notified</p> <p>Verified Method</p>

9	ATF Forms 4473: [] Number of Instances: []			In Person Date Licensee Notified 11/04/2021
10	27 CFR 478.124(c)(3)(iii): Failure to verify or record non alien immigrant exception on an ATF F 4473 ATF Forms 4473: [] Number of Instances: []	Ensure that all required transferee/buyer nonimmigrant alien exception documentation is obtained, validated, accurately recorded on, and retained with all future ATF Forms 4473, Section B.	William Jones stated that he did not know why the information had not been obtained.	Status Licensee Notified Verified Method In Person Date Licensee Notified 11/04/2021
11	27 CFR 478.124(c)(3)(iv): Failure to record NICS contact information on an ATF F 4473 ATF Forms 4473: [] Number of Instances: []	Ensure that all required transferee/buyer identification information is obtained and accurately recorded on all future ATF Forms 4473, Section B.	Licensee stated that the errors were an oversight.	Status Licensee Notified Verified Method In Person Date Licensee Notified 11/04/2021
12	27 CFR 478.124(c)(5): Failure by transferor to sign and/or date an ATF F 4473 ATF Forms 4473: [] Number of Instances: []	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.	Licensee stated that the errors were an oversight.	Status Licensee Notified Verified Method In Person Date Licensee Notified 11/04/2021

REFERRAL(S)

ID	Status	Agency	Outcome
R-1852	Referral Approved	State Police Firearms Transaction Center	Referral sent

CLOSING CONFERENCE

Review Regulations conducted offline

(11/4/2021)
11/04/2021

Closing Conference Additional Notes

- Closing Conference conducted: 11/4/21.
- Present: William Jones, Vice President and Responsible Person, and Heather Jones, Operations Manager and Responsible Person.
- Acknowledgement of Federal Firearms Regulations reviewed, certified, and given to licensee.
- Report of Violations reviewed, certified, and given to licensee.
- Youth Handgun Safety Act reviewed with licensee.
- Last Date Records Reviewed: 10/19/2021
- Licensee provided with the following handouts:
 - o Loss Prevention for Firearms Retailers Pamphlet
 - o Safety and Security Information for Federal Firearms Licensees
 - o Washington Field Division FFL related addresses and phone numbers.
- No current variances
- No variances requested.
- Investigator (b)(6) generated and forwarded a referral to the Virginia State Police Firearms Transaction Unit for violations concerning State forms (SP-65). See referral #R-1852.

Attachment(s)

Attendee(s)

WILLIAM M JONES

HEATHER Michelle JONES

EXHIBITS

Category	Attachment Name
Correspondence	Spartan Notification RE: 1-54-15869 Inspection Results
Correspondence	Spartan Notification RE: 1-54-15869 Monitored Case
Correspondence	Spartan Notification RE: 1-54-15869 Monitored Case
Correspondence	Spartan Notification RE: 1-54-15869 Monitored Case
Correspondence	Spartan Notification RE: 1-54-15869 Monitored Case
UpdateLicensingCenter	Morgan T Blain Notice of Hearing 4.26.22.pdf
Correspondence	Spartan Notification RE: 1-54-15869 Monitored Case
Correspondence	Spartan Notification RE: 1-54-15869 Monitored Case
Correspondence	Spartan Notification RE: 1-54-15869 Monitored Case
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Correspondence	Spartan Notification RE: 1-54-15869 Monitored Case
LicenseeResponseToViolationsPDF	Licensee Response to Violations Report.pdf
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
ViolationsPDF	Report of Violations.pdf
ZoningVerification	Zoning B2- Business.pdf
PropertyOwnershipVerification	Property Details.pdf
RentalLeaseVerification	Lease.pdf
TradeNameVerification	Fictitious Name Filing.pdf
BusinessVerification	Business Verification.pdf

R-1852

Category	Attachment Name
ReferralDocument	Referral.pdf
Correspondence	Referral of Information from the Bureau of Alcohol, Tobacco, Firearms and Explosives

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

In the matter of License Number 1-54-810-01-1F-15869 _____, as a/an

Dealer in Firearms _____ issued to:

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

Morgan Thomas Blain
1329 Harpers Road, Suite 103,
Virginia Beach, VA 23454

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 (b)(6)@atf.gov, (b)(6) 310 First St, Suite 500, Roanoke, VA 24011, (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
03/10/2022	<u>(b)(6)</u> Acting Director of Industry Operations	<u>(b)(6)</u>

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
3/10/21	<u>(b)(6)</u> Industry Operations Investigator	<u>(b)(6)</u>

Print Name and Title of Person Served	Signature of Person Served (if applicable)
<u>William Jones, Responsible Person and Vice President</u>	

Address Where Notice Served
1329 Harpers Road #103, Virginia Beach, VA 23454

**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 1-54-810-01-1F-15869 as a/an

Morgan Thomas Blain Inc., d/b/a Ghost Army Tactical Firearms, issued to:

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

Morgan Thomas Blain Inc.
d/b/a Ghost Army Tactical Firearms
1329 Harpers Road, Suite 103
Virginia Beach, VA 23454

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 July 27, 2022
 - 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 07/27/2022	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official Andrew M. Perdas, Director, Industry Operations	Signature (b)(6)	Digitally signed by Andrew M. Perdas Date: 2022.07.27 12:07:02 -0400'
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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: 7010 1870 0003 2128 5029

Or

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

Date Notice Served	Title of Person Serving Notice	Signature of Person Serving Notice
Print Name and Title of Person Served		Signature of Person Served
Address Where Notice Served		

Note: Previous Edition is Obsolete

Page 2 – ATF Form 5300.13, Final Notice of Denial of Application, Revocation,
Suspension and/or Fine of Firearms License

Morgan Thomas Blain Inc d/b/a
Ghost Army Tactical Firearms
1-54-810-01-1F-15869
1329 Harpers Rd., Ste. #103
Virginia Beach, VA 23454

Morgan Thomas Blain Inc., d/b/a Ghost Army Tactical Firearms, 1329 Harpers Rd., Ste. #103, Virginia Beach, VA 23454 (licensee), holds Federal firearm license 1-54-810-01-1F-15869 as a dealer, including pawnbroker, in firearms other than destructive devices 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.

On March 18, 2022, ATF issued a Notice to Revoke or Suspend License and/or Impose a Civil Fine, ATF Form 4500 (5300.4) (“Notice to Revoke”) advising the licensee that ATF intended to revoke its Federal firearms license. The Notice to Revoke alleged that the licensee willfully violated the provisions of the GCA, and the regulations issued thereunder. The Notice to Revoke further specified that if the licensee wished to challenge the revocation, it may file a request with ATF for a hearing “within 15 days after receipt of this notice.” See 18 U.S.C. § 923(f)(2); 27 C.F.R. § 478.73(b).

On March 30, 2022, the licensee submitted a timely request for a hearing to review the Notice to Revoke. The hearing was scheduled for June 10, 2022. On June 2, 2022, the licensee submitted a letter withdrawing the previously filed request for a hearing.

For reasons set forth in the Notice to Revoke issued on March 18, 2022, the Federal Firearms License 1-54-810-01-1F-15869 held by Morgan Thomas Blain Inc. d/b/a Ghost Army Tactical Firearms is hereby REVOKED.

Dated this 27th day of July, 2022

(b)(6)

Andrew M. Perdas
Director, Industry Operations
Washington Field Division
Bureau of Alcohol, Tobacco, Firearms and Explosives
United States Department of Justice



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
Deputy Assistant Director (Industry Operations)
Field Operations