

TRIDENT LLC's FCI

FCI-32781

12/17/2022 06:59 AM

IC (b)(6) Baltimore V (IO) Field Office

LICENSEE INFORMATION

Licensee Name TRIDENT LLC	RDS Key 8-52-12558	License/Permit Number 8-52-003-11-2E-12558	License Type 11 - Importer of Destructive Devices License
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Business Type
Limited Liability Company (LLC)

Premises Ownership Type
Leased/Rented

Premises Address
2006 HUNTWOOD DR, Unit N/A,
GAMBRILLS, Maryland 21054

Premises Location Type Required
Store Front

Address
2006 HUNTWOOD DR
Unit N/A
GAMBRILLS, Maryland 21054
ANNE ARUNDEL
United States

Address
2006 HUNTWOOD DR
Unit N/A
GAMBRILLS, Maryland 21054
ANNE ARUNDEL
United States

Phone Type	Phone Number	Remarks
Business	+1 716-536-4448	

RECOMMENDATIONS

Final Decision Date
Revocation 10/11/2022

Details

Notice of revocation was issued and FFL chose not to contest. An agreed upon date of October 11, 2022 was selected and the FFL should be considered revoked and out-of-business.

Licensee was advised to submit all records to the FFLC.

Out of Business Records and Inventory Management

Licensee Records

✔ Submitted to the Federal Licensing Center

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

Details

Concur with Field Division recommendation to proceed with revocation.

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

Acting SAC agrees with Acting DIO, IOI and Area Supervisor on recommendation of revocation (b)(6),(b)(7)(C)
(b)(3) (112 Public Law 55 125 Stat 552), (b)(6)

(b)(3) (112 Public Law 55 125 Stat 552) in violation of 18 U.S.C. § 924(a)(1)(A) and 27 C.F.R. § 478.128(a). All of these instances were willful violations of the Gun control Act, which now result in the recommendation of revocation of Trident's Type 11 FFL. Acting DIO is also recommending the revocation of Sullivan's Type 01 FFL, as he (b)(3) (112 Public Law 55 125 Stat 552) in violation of 18 U.S.C. § 922(j) and 27 C.F.R. § 478.112. Acting DIO is also recommending the revocation of Trident's Type 7 FFL (b)(3)(26 USC § 6103), (b)(6),(b)(7)(C) in violation of 27 C.F.R. § 478.50. This recommendation is being forwarded to Division Counsel for review.

Division Counsel (b)(6) review

Licensee Inventory

✔ Inventory transferred to self
✔ Inventory sold to non-licensee or non-permittee

Details

Review completed.

Director of Industry Operations Gilbert Atkins's Recommendation
Revocation

Details

Acting DIO agrees with IOI and Area Supervisor on recommendation of revocation (b)(6),(b)(7)(C)

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

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

in violation of 18 U.S.C. § 924(a)(1)(A) and 27 C.F.R. § 478.128

(a) All of these instances were willful violations of the Gun control Act, which now result in the recommendation of revocation of Trident's Type 11 FFL. Acting DIO is also recommending the revocation of Sullivan's Type 01 FFL, as

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

(b)(3) (112 Public Law 55 125 Stat 552) in violation of 18 U.S.C. § 922(l) and 27 C.F.R. § 478.112. Acting DIO is also recommending the revocation of Trident's Type 7 FFL

(b)(3)(26 USC § 6103), (b)(6),(b)(7)(C)

(b)(3)(26 USC § 6103), (b)(6),(b)(7)(C) in violation of 27 C.F.R. § 478.50. This recommendation is being forwarded to Division Counsel for review.

Area Supervisor (b)(6) Recommendation

Revocation

Details

Revocation

Industry Operations Investigator (b)(6) Recommendation

Revocation

Details

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

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

in violation of 18 U.S.C. § 924(a)(1)(A) and 27 C.F.R. § 478.128(a). All of these instances

were willful violations of the Gun control Act, so I am recommending the revocation of Trident's Type 11 FFL. I am also recommending the revocation of Sullivan's Type 01 FFL, as

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

in violation of 18 U.S.C. § 922(l) and 27 C.F.R. § 478.112. Finally, I am recommending the revocation of Trident's Type 7 FFL, as the criminal investigation revealed that on or about December 31, 2019

(b)(3)(26 USC § 6103)

(b)(3)(26 USC § 6103)

Inspection Findings

Miscellaneous

4. 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?
TRIDENT LLC	Limited Liability Company (LLC)	Yes

Additional Findings

Attachment(s):
No firearms compliance inspection is to be conducted in association with this assignment.docx

Property Ownership Verification

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

Address
2006 HUNTWOOD DR
Unit N/A
GAMBRILLS, Maryland 21054
ANNE ARUNDEL
United States

Attachment(s):
No firearms compliance inspection is to be conducted in association with this assignment.docx

Rental/Lease Verification

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

Attachment(s):
No firearms compliance inspection is to be conducted in association with this assignment.docx

Zoning Information Verification

Is the proposed business activity in compliance with zoning?

Yes

Attachment(s):

No firearms compliance inspection is to be conducted in association with this assignment.docx

APPOINTMENT DETAILS

Interview Date

11/19/2021

Address

2006 HUNTWOOD DR, Unit N/A, GAMBRILLS, Maryland 21054

Responsible Attendee(s)

Non-Responsible Person(s)

SEAN REIDPATH SULLIVAN

No Items

PETER REED PENZELL

RESPONSIBLE PERSON(S)

SEAN REIDPATH SULLIVAN

Name	Gender	Race	Ethnicity
SEAN REIDPATH SULLIVAN	Male	White	Not Hispanic or Not Latino

Date of Birth	SSN	Job Title
(b)(6)	(b)(6)	CEO

Physical Identifiers

Height	Weight	Hair Color	Eye Color
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Place of Birth

Country	State	City
United States Of America	New York	

Home Address

(b)(6)

Additional Names

Citizenship

United States

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

11/17/2021

Criminal History Check Comments

No firearms compliance inspection is to be conducted in association with this assignment.

PETER REED PENZELL

Name	Gender	Race	Ethnicity
PETER REED PENZELL	Male	White	Not Hispanic or Not Latino

Date of Birth	SSN	Job Title
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(b)(6)

(b)(6)

OPERATIONS MANAGER

Physical Identifiers

Height

Weight

Hair Color

Eye Color

Place of Birth

Country

United States Of America

State

Florida

City

Home Address

(b)(6)

United States

Additional Names

Citizenship

United States

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

Email Address	Email Remarks
(b)(6)	

Criminal History Check

Date Criminal History Check Conducted

11/17/2021

Criminal History Check Comments

No firearms compliance inspection is to be conducted in association with this assignment.

INTERVIEW QUESTIONNAIRE

What is the proposed business activity?

No firearms compliance inspection is to be conducted in association with this assignment.

Do they need an additional license or permit?

No

Who are their primary suppliers?

No firearms compliance inspection is to be conducted in association with this assignment.

Business Activities

Selected Operational Security Measures

No items

Retail

SECURITY WALKTHROUGH

Inspection Area Description

No firearms compliance inspection is to be conducted in association with this assignment.

Primary Activity

Retail

Selected Physical Security Measures

No items

GPS Coordinates

Latitude

39.27725

Longitude

76.57633

ONSITE SUMMARY

Total Number of ATF Form 4473s for Inspection Review Period

Total Number of ATF F 4473 Reviewed

0

Total Number of Open Dispositions in A & D Record

0

Total Number of Firearms in Inventory

0

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

0

Total Number of Dispositions in the Last 12 Months

0

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](#)

Import Documents Verified

Yes

Attachment(s)

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 478.128(a): False statement when applying for a federal firearm license</p> <p>Number of Instances: <input type="text"/></p>	<p>Cease and desist engaging in activities not authorized by current license type.</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)</p>
<p>27 CFR 478.112(a): Unauthorized importation</p> <p>Number of Instances: <input type="text"/></p>	<p>Complete and submit required ATF Form 6 - Part 1 (5330.3A - Application and Permit for Importation of Firearms, Ammunition and Implements of War).</p> <p>Complete and submit an ATF Form 4587 (5330.4 - Application to Register as an Importer of U.S. Munitions Import List Articles).</p>	<p style="text-align: center;">(b)(3)(26 USC § 6103) ,(b)(3) (112 Public Law 55 125 Stat 552)</p>

1

2

(b)(3)(26 USC § 6103) ,(b)(3) (112 Public Law 55 125 Stat 552)

3

18 U.S.C. § 2 & 18 U.S.C. § 922
(a)(1)(A): Aiding and abetting
dealing, importing,
manufacturing without a license

Cease and desist from engaging in deceptive
practices.

(b)(7)(A),(b)(7)(C),(b)(6)

Number of Instances: 1

LICENSEE RESPONSE REPORT

Regulation	Corrective Actions	Licensee Response	Status Details
27 CFR 478.128(a): False statement when applying for a federal firearm license Number of Instances: <input type="text"/>	Cease and desist <u>engaging</u> in activities not authorized by current license type. Cease and desist from engaging in deceptive practices.	No firearms compliance inspection is to be conducted in association with this assignment. The Report of Violations was not discussed with the responsible person.	Status Licensee Notified Verified Method In Person Date Licensee Notified 11/19/2021
27 CFR 478.112(a): Unauthorized importation Number of Instances: <input type="text"/>	Complete and submit required ATF Form 6 - Part 1 (5330.3A - Application and Permit for Importation of Firearms, Ammunition and Implements of War). Complete and submit an ATF Form 4587 (5330.4 - Application to Register as an Importer of U.S. Munitions Import List Articles).	No firearms compliance inspection is to be conducted in association with this assignment. The Report of Violations was not discussed with the responsible person.	Status Licensee Notified Verified Method In Person Date Licensee Notified

1

2			11/19/2021
3	18 U.S.C. § 2 & 18 U.S.C. § 922(a)(1)(A): Aiding and abetting dealing, importing, manufacturing without a license Number of Instances: 1	Cease and desist from engaging in deceptive practices.	No firearms compliance inspection is to be conducted in association with this assignment. The Report of Violations was not discussed with the responsible person. Status Licensee Notified Verified Method In Person Date Licensee Notified 11/19/2021

REFERRAL(S)

ID	Status	Agency	Outcome
R-10	Referral Approved	DDTC	Referral sent
R-100	Unfounded (Closed)		
R-1000	Referral Denied	ATF Detroit CGIC	
R-1001	Referral Denied	ATF&E	
R-1004	Referral Denied	Mobile Police Department	
R-1007	Referral Denied	Houston CGIC	
R-1013	Referral Approved	Michigan State Police, Firearms Records Unit	Referral sent
R-1014	Referral Denied	ATF	
R-1015	Referral Approved	Berlin Township	Referral sent
R-1017	Referral Approved	ATF	Referral sent
R-1018	Referral Approved	Bureau of ATF - St. Paul III CGIC	Referral sent
R-1019	Referral Approved	ATF	Referral sent
R-102	Referral Approved	ATF	Referral sent
R-1020	Referral Approved	NYS Department of Labor	Referral sent
R-1024	Referral Approved	ATF	Referral sent
R-1025	Referral Approved	ATF	Referral sent
R-1026	Referral Approved	ATF	Referral sent
R-1027	Referral Approved	ATF	Referral sent
R-1028	Referral Approved	ATF	Referral sent
R-1029	Referral Approved	ATF	Referral sent
R-103	Referral Approved	CGIC	Referral sent
R-1030	Referral Approved	ATF	
R-1031	Referral Approved	ATF	Referral sent
R-1032	Referral Approved	ATF	Referral sent
R-1033	Referral Approved	ATF	Referral sent
R-1034	Referral Approved	ATF	Referral sent
R-1035	Referral Denied	Frederick County Maryland	
R-1037	Referral Denied	ATF	
R-1038	Referral Approved	Frederick County Maryland	Referral sent
R-1039	Referral Approved	Bureau of Alcohol Tobacco Firearms and Explosives	Referral sent
R-104	Referral Approved	California Department of Justice, Bureau of Firearms	Referral sent
R-1040	Referral Approved	Bureau of Alcohol Tobacco Firearms and Explosives	Referral sent
R-1042	Referral Approved	Harris County Sheriff's Office	Referral sent
R-1043	Referral Approved	U.S. Department of Justice, Bureau of ATF	Referral sent

R-1045	Referral Approved	California Bureau of Firearms	Referral sent
R-1046	Referral Approved	Indianapolis Department of Business and Neighborhood Services	Referral sent
R-1047	Referral Approved	Prince George's County Permitting Enforcement	Referral sent
R-1049	Unfounded (Closed)		
R-1050	Unfounded (Closed)		
R-1053	Referral Approved	Dawson County, Nebraska	Referral sent
R-1056	Referral Approved	Miami Dade Police Department	Referral sent
R-1057	Referral Approved	ATF	Referral sent
R-1063	Referral Approved	ATF, St. Paul III Intell/St. Paul Division	Referral sent
R-1064	Referral Approved	ATF, St. Paul Division Group I	Referral sent
R-1067	Referral Denied	ATF	
R-1068	Referral Approved	Michigan State Police Records Unit	Referral sent
R-1069	Referral Approved	Bureau of ATF	Referral sent
R-107	Referral Approved	ATF	Referral sent
R-1070	Referral Denied	Seneca County Office Building	
R-1072	Referral Denied	ATF -- Created in Error	
R-1073	Referral Denied	ATF-Atlanta CGIC	
R-1074	Referral Approved	Federal Motor Carrier Safety Administration (DOT)	Referral sent
R-1075	Referral Approved	Lowndes County Probate Court	Referral sent
R-108	Referral Approved	Colorado Bureau of Investigation	Referral sent
R-1082	Referral Approved	Bureau of Alcohol Tobacco Firearms and Explosives	Referral sent
R-1086	Referral Approved	Prince George's County Permitting Enforcement	Referral sent
R-1087	Referral Approved	ATF	Referral sent
R-1088	Referral Approved	ATF	Referral sent
R-1089	Referral Denied	Lake County Sheriff's Office	
R-1091	Referral Approved	Coffee County Sheriff's Office	Referral sent
R-1092	Referral Approved	ATF	Referral sent
R-1093	Referral Denied	ATF - Ft. Pierce CE	
R-1094	Referral Denied	Bureau of Alcohol, Tobacco, Firearms and Explosives	
R-1095	Referral Approved	Bureau of Alcohol, Tobacco, Firearms & Explosives	Referral sent
R-1097	Referral Approved	Lake County Sheriff's Office	Referral sent
R-1098	Referral Approved	BATFE	Referral sent
R-1099	Referral Approved	Michigan State Police Firearms Records Unit	Referral sent
R-11	Referral Approved	Alcohol and Tobacco Tax and Trade Bureau	Referral sent
R-1103	Unfounded (Closed)		
R-1105	Referral Approved	Michigan State Police	Referral sent
R-1109	Referral Approved	The Commonwealth of Massachusetts Office of Attorney General	Referral sent
R-111	Referral Approved	Bureau of ATF - KCFD	Referral sent
R-1110	Referral Approved	The Commonwealth of Massachusetts Office of Attorney General	Referral sent
R-1111	Referral Approved	The Commonwealth of Massachusetts Office of Attorney General	Referral sent
R-1116	Referral Approved	ATF	Referral sent
R-1117	Referral Approved	Customs and Border Protection	Referral sent
R-1119	Referral Denied	Customs and Border Protection	
R-1120	Unfounded (Closed)		
R-1122	Referral Denied	Customs and Border Protection	
R-1124	Referral Approved	Riley County Police Department	Referral sent
R-1127	Referral Denied	Customs and Border Protection	

R-1129	Referral Approved	Minnesota State Fire Marshal Division	Referral sent
R-113	Referral Approved	ATF	Referral sent
R-1134	Referral Approved	Michigan State Police - Firearms Records Unit	Referral sent
R-114	Referral Approved	ATF	Referral sent
R-1145	Referral Approved	Bureau of Alcohol, Tobacco, Firearms, and Explosives	Referral sent
R-1146	Referral Approved	ATF	Referral sent
R-1150	Referral Approved	Oklahoma Tax Commission	Referral sent
R-1151	Unfounded (Closed)		
R-1153	Referral Approved	ATF-NY Group 7 (CGIC)	Referral sent
R-1156	Referral Approved	Bureau of Alcohol, Tobacco, Firearms, and Explosives	Referral sent
R-1157	Referral Approved	ATF	Referral sent
R-1159	Referral Approved	Bernalillo County Zoning	Referral sent
R-1161	Referral Approved	Bureau Of Alcohol, Tobacco, Firearms and Explosives	Referral sent
R-1165	Referral Approved	ATF- Richmond II, Field Office	Referral sent
R-1168	Referral Approved	ATF	Referral sent
R-1170	Unfounded (Closed)		
R-1178	Referral Denied	ATF	
R-118	Referral Approved	Bureau of Alcohol, Tobacco, Firearms and Explosives	Referral sent

CLOSING CONFERENCE

Review Regulations conducted offline

(11/19/2021)

11/19/2021

Attachment(s)

Attendee(s)

SEAN REIDPATH SULLIVAN

EXHIBITS

Inspection

Category	Attachment Name
Correspondence	Spartan Notification RE: 8-52-12558 Inspection Results
Correspondence	Spartan Notification RE: 8-52-12558 Monitored Case
Correspondence	Spartan Notification RE: 8-52-12558 Monitored Case
Correspondence	Spartan Notification RE: 8-52-12558 Monitored Case
UpdateLicensingCenter	Sullivan and Trident Final Notice 8.9.22 to (b)(6).pdf
Correspondence	Spartan Notification RE: 8-52-12558 Monitored Case
Correspondence	Spartan Notification RE: 8-52-12558 Monitored Case
Correspondence	Spartan Notification RE: 8-52-12558 Monitored Case
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Correspondence	Spartan Notification RE: 8-52-12558 Monitored Case
Correspondence	Spartan Notification RE: 8-52-12558 Monitored Case
ReturnedSignedROV	No firearms compliance inspection is to be conducted in association with this assignment.docx
ViolationsPDF	Report of Violations.pdf
ViolationsPDF	Report of Violations.pdf
LicenseeResponseToViolationsPDF	Licensee Response to Violations Report.pdf
RentalLeaseVerification	No firearms compliance inspection is to be conducted in association with this assignment.docx
ZoningVerification	No firearms compliance inspection is to be conducted in association with this assignment.docx
PropertyOwnershipVerification	No firearms compliance inspection is to be conducted in association with this assignment.docx
BusinessVerification	No firearms compliance inspection is to be conducted in association with this assignment.docx

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

In the matter of License Number 8-52-12558, as a/an

Importer of Firearms _____ issued to:

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

Trident, LLC
2006 Huntwood Drive
Gambrills, MD 21054

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 31 Hopkins Plaza, 5th Floor, Baltimore, Maryland 21201, 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
4/29/2022	Andrew M. Perdas Director, Industry Operations	(b)(6)

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	Notice
4/29/2022	Industry Operations Investigator	(b)(6)	NOT applicable

Print Name and Title of Person Served

(b)(6)

Receptionist

Address Where Notice Served

2050 M Street, NW Washington, DC 20036 (Wiley Rein, LLP)

Page 2 – Amended Notice of Revocation of License and Notice of Denial of Application for License

Sean Reidpath Sullivan
2006 Huntwood Drive
Gambrills, MD 21054

8-52-08035

Trident, LLC
2006 Huntwood Drive
Gambrills, MD 21054

8-52-08550
8-52-12558

Under the provisions of 18 U.S.C. § 923(e) and 27 C.F.R. § 478.73, notice is hereby given of the revocation of the federal firearms licenses specified above, in that the Director, Industry Operations, Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), Baltimore Field Division, has reason to believe that Sean Sullivan, a Dealer in Firearms Other than Destructive Devices and Trident, LLC (“Licensee” or “Trident”), a Manufacturer of Firearms other than Destructive Devices and an Importer of Destructive Devices have willfully violated the provisions of the Gun Control Act of 1968, 18 U.S.C. Chapter 44, and the regulations issued thereunder, 27 C.F.R., Part 478.

Trident, LLC
107 Executive Drive
Dulles, Virginia 20166

1-54-25888

Your application for license # 1-54-25888 to manufacture destructive devices, ammunition for destructive devices, or armor piercing ammunition at 107 Executive Drive, Dulles, Virginia 20166, is denied. Under the provisions of 18 U.S.C. § 923(d) and 27 C.F.R. §§ 478.47 and 71, the Attorney General shall approve an application for a federal firearms license (“FFL”) if, among other things:

The applicant has not willfully violated any provisions of the Gun Control Act or any rules or regulations prescribed thereunder . . .

the applicant has in a State (i) premises from which he conducts business subject to license under this chapter or from which he intends to conduct such business within a reasonable period of time.

18 U.S.C. § 923(d)(1)(C) and (E) and 27 C.F.R. § 478.47(b)(3) and (5). An investigation into your application indicates that you fail to satisfy these criteria. Specifically, you are a previous willful violator of the Gun Control Act, and CDS Air Freight, Inc. has refused permission to allow the proposed business at 107 Executive Drive in Dulles, Virginia.

VIOLATIONS SUPPORTING THE REVOCATION OF TRIDENT'S TYPE 11 FFL

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

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

Trident submitted the sam

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

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

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

VIOLATIONS SUPPORTING THE REVOCATION OF TRIDENT’S TYPE 07 FFL

- (28) On or about December 31, 2019, Trident willfully manufactured (b)(3)(26 USC § 6103) (b)(3)(26 USC § 6103) a location other than the licensed premises in violation of 27 C.F.R. § 478.50. (ATF Form 2 dated December 23, 2019).

DENIAL OF TRIDENT’S APPLICATION FOR A TYPE 10 FFL IN DULLES, VA

- (29) Trident does not meet the minimum requirements for licensing pursuant to 18 U.S.C. § 923(d)(1)(C) and 27 C.F.R. § 478.47(b)(3) because, as detailed above, Trident is a previous willful violator of the Gun Control Act.
- (30) Trident does not meet the minimum requirements for licensing pursuant to 18 U.S.C. § 923(d)(1)(E) and 27 C.F.R. § 478.47(b)(5) because it does not have premises from which to lawfully conduct business or from which it intends to conduct such business within a reasonable period of time, to wit: CDS Air Freight, Inc. has refused to allow Trident to operate at its proposed location.

VIOLATIONS SUPPORTING THE REVOCATION OF SULLIVAN’S TYPE 01 FFL

- (31) On or about March 17, 2020, Sean Sullivan knowingly and willfully received (b)(3)(26 USC § 6103) firearms that had been imported and brought into the United States under false pretenses and without proper authorization, in violation of 18 U.S.C. § 922(l) and 27 C.F.R. § 478.112. Specifically, Sullivan’s individually owned FFL received the following: (b)(3)(26 USC § 6103)

(b)(3)(26 USC § 6103)

**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 Manufacturer of Destructive Devices 1-54-25888, filed by:

or

License Number 8-52-08035; 8-52-08550; 8-52-12558 as a/an
Dealer in Firearms; Manufacturer of Firearms; Importer of Destructive Devices;, issued to:

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

Sean Reidpath Sullivan

(b)(6)

Trident, LLC
107 Executive Drive
Dulles, Virginia 20166
1-54-25888

Trident, LLC
2006 Huntwood Drive
Gambrills, MD 21054
8-52-08550
8-52-12558

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 October 11, 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 31 Hopkins Plaza, 5th Floor, Baltimore, MD 21201 or (b)(6)

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	Name and Title of Bureau of Alcohol, Tobacco, Firearms and Explosives Official	Signature
08/12/2022	Andrew M. Perdas Director, Industry Operations	(b)(6)

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 5128
- 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
 2050 M St. NW, Washington, DC 20036

Note: Previous Edition is Obsolete