WARRIORS VAULT LASER CORP's FCI FCI-26749 11/10/2022 10:31 AM IOI (b)(6) , Orlando II (IO) Field Office LICENSEE INFORMATION						
Licensee Name RDS H		License/Permit Number	License Type			
WARRIORS VAULT LASER CORP 1-59-3 Business Type Corporation	53036	1-59-117-08-3E-53036	08 - Importer of Firearms Li	ense		
Premises Ownership Type Premis	ses Address BENNETT DRIVE SUITE 233					
	129, Unit N/A, LONGWOOD, Fl					
Other v						
OtherRequired Manufacturing Warehouse Address 1355 BENNETT DRIVE SUITE 233 AND 129 Unit N/A LONGWOOD, Florida 32750 SEMINOLE United States Address 1355 BENNETT DRIVE SUITE 233 AND 129 Unit N/A LONGWOOD, Florida 32750 SEMINOLE United States						
Phone Type	Phone Number		Remarks			
Business	+1 407-720-6683					
Mobile	(b)(6)					
Email Address		Email R	emarks			
(b)(6)		BUSINE	ESS			
RECOMMENDATIONS						
Final DecisionDateRevocation11/09/2022						
Details						
Final Notice of Revocation issued 11/09/2022 with	th effective date of 01/09/2023. OOB red	ords submission will not occu	r until after 01/09/2023.			
Out of Business Records and Inventory Managem	nent					
Licensee Records		Licensee Inventory				
Submitted to the Federal Licensing Center		No inventory on hand				
Deputy Assistant Director - Industry Operations Curr Revocation	tis Gilbert's Recommendation					
Details	Details					
Briefed to DAD(IO) on June 9, 2022. Proceed wi	ith Revocation.					
Special Agent in Charge Craig Saier's Recommendation						
I concur with the recommendation for revocation based on the evidence of hidden ownership.						
Division Counsel (b)(6) Review						
Details						
Revocation.						

Revocation

Details

The IOIs obtained clear evidence of hidden ownership. The business is set up the same as an FFL Revoked by ATF (with the exception of the payment of excise taxes). (b)(6) is using this FFL to import without a license. There is also potential evidence of the falsification of records and thousands of instances of improperly marked firearms entering into commerce.

Updated recommendation: Counsel reviewed. TFD (IO) continues to support Revocation.

Area Supervisor ((b)(6) Recommendation Revocation

Details

Cocnur with Lead IOI - Revocation is appropriate.

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

Details

On 12/14/21, Senior Industry Operations Investigator (b)(6) and Industry Operations Investigator (b)(6) initiated an unannounced Type 08, Importer of Firearms Compliance Inspection on Warriors Vault Laser Corp and completed it on 02/08/22. The onsite inspection dates were 12/14/21, 12/15/21, 01/11/22, 01/12/22, and 02/08/22. President/Responsible Person Mr. John Quidgley was present and interviewed during the inspection. The inspection period consisted of all licensed activities from the inception of business, 04/2020 through 12/14/21. During the inspection, John Quidgley, President/Responsible Person, provided statements and information related to the involvement in the Warriors Vault Laser Corp business by (b)(6). The statements indicate that (b)(6) is heavily involved in the operations of Warriors Vault Laser Corp regarding the importation and payment of imported firearms. All firearms are imported for (b)(6).

The licensee was cited for the following violations:

27 CFR 478.128(a): False statement or representation

27 CFR 478.128(c): False statement or representation

27CFR 478.92(a)(1)(ii)(C): Firearm markings

27 CFR 478.129(d): Record retention

27 CFR 478.122(a): Records maintained by importers

- John Quidgley
- Phone Number
 (b)(6)
- Email: (b)(6)
- Does NOT deal over the internet.
- Does NOT attend gun shows.
- Does NOT deal in NFA firearms.

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.

Firearms

2. Failure to mark imported or manufactured firearms appropriately.

ELIGIBILITY VERIFICATION Business Information Verification		
Licensee Name	Business Type	Is the business valid?
WARRIORS VAULT LASER CORP	Corporation	Yes

Additional Findings

The business structure is a corporation. A query of Florida Division of Corporation records confirmed the corporation is an active entity and lists Mr. John Quidgley as President and **(b)(6)** as Director of Operations. Mr. Quidgley is the only responsible person (RP) on the license.

During the closing conference on 02/08/22, a trade name of Warrior Vault was properly registered with the Florida Division of Corporations as a fictitious name. The licensee currently has shipments at the port of Turkey ready for release which are only marked with Warrior Vault, Longwood, FL.

Attachment(s): Sunbiz.pdf

Property Ownership Verification

Premises Location Type Manufacturing Warehouse Has the property ownership been verified? Yes

Address	
1355 BENNETT DRIVE SUITE 233 AND 12	9
Unit N/A	
LONGWOOD, Florida 32750	
SEMINOLE	
United States	

Additional Findings	
According to the Seminole County Property Appraiser, the providence of the Seminole County Property Appraiser, the Property Appraiser,	operty is owned by (b)(4)

Attachment(s): Property Appraiser.pdf

Rental/Lease Verification

Is the proposed business activity permitted by the property owner?

Yes

Additional Findings

The business location is leased. The licenseeprovided a copy of a Landlord Acknowledgement Letter during the Qualification Inspection. The validity of the acknowledgement letter was verified during this compliance inspection. The letter is valid.

Attachment(s): 20200401 Warriors Vault Lease.pdf

Zoning Information Verification

Is the proposed business activity in compliance with zoning?

Yes

Additional Findings

On 09/16/21, Investigator [b)(6) ; Senior Planner. (b)(6) ; Senior Planner. (b)(6) ; Senior Planner. (b)(6) ; advised the location is zoned IND, Industrial. Under this zoning jurisdiction manufacturing, assembly, importation, and retail sales are permitted.

Date Contacted 09/16/2021

Contact Information

Name

(b)(6)

Organization

City of Longwood Community Development Division

Job Title

Senior Planner

Phone Type	Phone Number			Remarks
Business	(b)(6)			
Email Address			Email Remarks	
(b)(6)				
Attachment(s):				
APPOINTMENT DETAILS				
Interview Date 12/14/2021				
Address 1355 BENNETT DRIVE SUITE 233 AND 129, Unit	N/A, LONGWOOD, Florida 32750			
Responsible Attendee(s)		Non-Responsible Per	son(s)	
JOHN EDGAR QUIDGLEY		(Deactiva	ted)	
		(b)(6) (Deactivate	d)	
RESPONSIBLE PERSON(S)				
JOHN EDGAR QUIDGLEY				
Name Gender JOHN EDGAR QUIDGLEY Male		Race White		hnicity ispanic or Latino
Date of Birth SSN (b)(6)		Job Title President		
Physical Identifiers				
HeiøhtWeiøht		.Hair Color		re.Color
	(ਗ਼(ਗ਼)			l
Place of Birth				

(b)(6)

Home Address



Additional Names

Citizenship

United States

ID Type	Countr	у	State	ID Number	
Driver's License	United	States	Florida	(b)(6)	
Driver's License	United	States	Florida	(b)(6)	
Phone Type		Phone Number			Remarks
Mobile		(b)(6)			
Email Address				Email Re	marks
(b)(6)					
(b)(6)					
Criminal History Check					
Date Criminal History Check Conducted 09/16/2021 Criminal History Check Comments JWIN/FCIC/NForce: Negative NON-RESPONSIBLE PERSON(S)					
(b)(6)					
Name Date of (b)(6)	Birth	Job	Title		
(b)(6)					
Name Date of (b)(6)	Birth	Job	Title		
INTERVIEW QUESTIONNAIRE					
What is the proposed business activity? The licensee currently holds this Type 08, Importer the same business premises. This is the licensee's f			20. The licensee al	so holds a Type 07, Ma	nufacturer of Firearms, license (1-59-53035) at
The licensee is co-located with (b)(6)). All records and inventory are maintained separately.					
President/Responsible Person Mr. John Quidgley as and ammunition. Once imported, all firearms are ex- the	lvised W clusivel all impo equisitic	Varriors Vault Laser Corp is contrac y transferred to (b) rted firearms are newly manufactur n & Disposition record. Investigato	ted by Constant of the second shotguns . The first second s	(b)(6) . The licensee conduction interaction in the license of th	ts the importation of firearms ts the importation of firearms and parts from the business premises in Longwood, FL where ow business operations take place and John

 Ammunition and Defense Articles (ATF Form 6) and ATF Form 5330.3C, Release and Receipt of Imported Firearms, Ammunition and Defense Articles (ATF Form 6A), respectively.

 (b)(6)
 directly pays

 (b)(6)
 for all firearms and pays the import broker,

 (b)(4)
 for all services.

Since the inception of business, the licensee has acquired approximately (b)(4) firearms and disposed of approximately (b)(6) firearms.

The licensee does not deal in National Firearms Act (NFA) weapons, deal in used firearms, deal in black powder, reload ammunition, or attend gun shows. The licensee has a business website, www.warriorsvault.com, but does not conduct any business via the site.

The licensee verbally advised that he holds a current occupational license from the City of Longwood but did not have it at the business premises for Investigator (b)(6) to check the validity. The licensee was instructed to email a copy to Investigator (b)(6) to which he did not.

The hours of operation are: Monday - Friday: 9A - 5P.

- John Quidgley
- Phone Number: 407-460-5727
- Email (b)(6)
 Does NOT deal over the internet.
- Does NOT attend gun shows.
- Does NOT deal in NFA firearms.

Who are their primary suppliers?

The licensee's only supplier for firearms and parts is	(b)(4)	The licensee's primary suppliers for ammunition are	(b)(4)
(b)(4)			

Business Activities

Selected Operational Security Measures

Wholesale

Controlled Access to ATF Recordkeeping

SUPPLEMENTAL QUESTIONNAIRE

General Business Operations

If there is a security system, who has access to the security codes? There is not a security system.

Who has keys to the premises?

John Quidgley of Warriors Vault Laser Corp. (b)(6)

Who has keys to locked inventory? Upon arrival, the inventory is immediately transferred to (b)(6).

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

 (b)(6)
 , decides and places all orders directly with
 (b)(4)
 in Turkey. John Quidgley receives an emailed invoice from Hunt Group

 Limited Co when an order is placed. John Quidgley completes the required ATF Form 6 based off the invoice. Upon shipment, Hunt Group Limited Co will send an emailed packing

 slip invoice to John Quidgley. John Quidgley completes the required ATF Form 6A based off the packing slip, and certifies Section III – Verification of Importation, prior to receiving

 the items. Upon arrival of the firearms to the business premises, they are examined, entered into the Warriors Vault Laser Corp A&D record, and then immediately transferred to

 (b)(6)
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Is financial backing provided by anyone that is not a responsible person on the license/permit?

(b)(6) directly pays the _______ for all firearms, as well as pays for all importation broker fees.

Are any employees known to be prohibited?

No.

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

John Quidgley was a Responsible Person on DGAS Parts & Supplies, LLC (1-59-52086) which was revoked in October 2021 for hidden ownership.

(b)(6) has entered a Settlement Agreement with the Bureau of Alcohol, Tobacco, Firearms, and Explosives/United States Department of Justice (ATF) to forfeit the Type 07, Manufacturer of Firearms license (1-59-18600). Under the same Settlement Agreement, the Type 08, Importer of Firearms under TTC Performance Products, LLC 1-59-51775, application was withdrawn.

SECURITY WALKTHROUGH

Inspection Area Description

The business premise, 1355 Bennett Drive, Suite 129 & 233, Longwood, FL 32750, is a commercial warehouse located in an urban area of Seminole County, within the city limits of Longwood. There are no known zoning issues.

Investigator [b)(6] inspected the business premise and found it to be suitable for conducting the importation of firearms, as well as retail activities. The premise is secured with a monitored alarm system equipped with indoor/outdoor cameras and motion sensors. All doors are equipped with deadbolt locks, which remain locked during and after business hours. All windows are heavily tinted so you cannot see inside, and the suites are not marked with the business name. The licensee advised he usually does not have any inventory, but will (b)(6)

Investigator [006] discussed in detail the contents of the Loss Prevention for Firearms Retailers pamphlet with the licensee. Investigator [006] provided the licensee a copy of the pamphlet. The licensee stated he understood and would evaluate the current security measures to ensure all firearms are safeguarded from thefts.

Investigator [19(0)] reminded the licensee of the ATF's right of entry and that the records, inventory, and premise are subject to inspection during the stated business hours. The licensee stated the understood and would comply.

Primary Activity	Selected Physical Security Measures
Manufacturing	Alarm Monitoring (with Cellular Back-Up)
GPS Coordinates	Deadbolts
	Local Audible Alarm
Latitude	Locked Gates
28.68494	Motion Sensors
Longitude	Safe(s)/Vault(s)
-081.35308	Security Cameras
	Window Film/Tinting/Mirroring

INTERVIEW NOTES

Senior Investigator [0)(6)] and Investigator [0)(6)] conducted a closing conference and final review of the records on 02/08/22 with President/Responsible Person, Mr. John Quidgley. The Report of Violations was issued during the conference and the violations disclosed were discussed with the licensee. Investigator [0)(6)] explained to the licensee that the Report of Violations does not reflect the true and accurate number of instances per violation and explained how many instances per violation there were. The licensee stated he understood the accurate number of instances per violation. The Icensee signed and dated the Report of Violations. The Acknowledgement of Federal Firearms Regulations was also reviewed with the licensee. All applicable regulatory requirements were discussed, and emphasis was placed on importation regulations, completion of the ATF Forms 6 and 6A, required markings, and accurate Acquisition & Disposition record entries. The licensee signed Acknowledgement of Federal Firearms Regulations indicating that he understood the regulations and his responsibilities. A copy of the signed Report of Violations, the signed Acknowledgement of Federal Firearms Regulations, and a list of important ATF addresses and telephone numbers were provided to the licensee. The licensee stated that he would contact the local ATF office if he had any future questions or concerns.

The licensee was reminded to comply with State and local requirements, including waiting periods. The licensee stated he understood and would comply.

The licensee was reminded that as a licensed Type 08 FFL, he may not use the NICS system, but must utilize FDLE to conduct background checks. The licensee stated he understood and would comply.

No referrals were generated as a result of this inspection.

The licensee does not possess any current variances and did not request any variances during the inspection.

This licensee is in compliance with the Youth Handgun Safety Act, has secure gun storage/safety devices available, and understands the requirements for child safety locks on

handguns.

Investigator (b)(6) discussed the contents of the Important Notice regarding the Selling Firearms After Revocation, Expiration, or Surrender of an FFL. Investigator (b)(6) provided the licensee with a copy of the notice. The licensee stated he understood and would comply.

1. Is there a sub-lease? 4. If filing under a dba/rade name, whose name is on the application? No No No Stho is the registered taxpayer? M. Jahn Quidgley of Warriors Vault Laser Corp advised he is the registered taxpayer. No A. Wo applied for them? No No work is the registered taxpayer. M. State or local licenses or permits are required? Whose name was on the application? N. Wo applied for them? No No work is the registered taxpayer. No N. There are preexisting issues, whon did zoning authorities work with? D. In whose name are they held? Unknown. Information broker fees. No No applied for the incorporation? D. In whose name are associated with the business? No how preexisting issues, whon did zoning authorities work with? No. Nonewn. Information broker fees. No No are the corporate officers per the articles of incorporation? No how preexisting issues. Oid of the incorporation? S. What bank accounts are associated with the business? Unknown. Difficult of the incorporation? S. Who are the corporate officers per the articles of incorporation? I. If the new business to any degree a continuation of a previous business of which the mover was the proprietor? S. Is the incorporation of the new business concidental wh, perhape, the suppered hidden owner?	General Business Operations			
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Height Weight Hair Color Eye Color Place of Birth	No Was revocation or denial action re uspected hidden owner? (es SUSPECTED HIDDEN OWNER (b)(6) Status Proven	cently commenced or completed in regards to the	Inden owner having been recently indicted or convicted of a prohibiting crime? No Justification: Senior Investigator (b)(6) (b)(6) (b)(6) (b)(6) (b)(6) (b)(4) (b)(4) (b)(5) (b)(4) (b)(6) (b)(4) (b)(6) <td>b) (b)(4) (b)(4) (b)(4) ey r is e paid-fo packing IF Form o the aser. Corr</td>	b) (b)(4) (b)(4) (b)(4) ey r is e paid-fo packing IF Form o the aser. Corr
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Additional Names

Citizenship

No items	
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	
Total Number of Firearms in Inventory 1	
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	
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
Import Documents Verified Yes	
Additional Comments Inspection History: The licensee was originally issued the Type 08 FFL in April 2020. This is the licensee': Date of Inspection: 04/09/2020; Investigator (b)(6) Type of Inspection: Qualification Inspection UI#: FAI-15948 Inspection Results: Application Approved Cited Violations: None	s first Compliance Inspection.
The A&D discrepancy is disclosed on the Report of Violations. Senior Investigator (b)(6), Investigator (b)(6), and the licensee reconciled the firear information in the A&D Record. The licensee utilizes computerized A&D Records. The records contain acquisitions date ATF required information. Senior Investigator (b)(6) and Investigator (b)(6) did not discover any obliterated see The licensee did not report any thefts/losses during the inspection period. No thefts/loss	ed March 2021 through the present. The A&D Record is properly formatted and contains all rial numbers or illegal firearms during this inspection. No trafficking issues were noted.
ATF Forms 4473 – NICS & Other Dispositions: The licensee has not conducted business to non-licensees, therefore no ATF Form 4473 [10]	s were on file. As previously mentioned, the licensee exclusively transfers all firearms to (10)(0)

Investigator [b][6]] reminded the licensee if a transaction involving a non-licensee should occur, an ATF Form 4473 must be completed, and a background check must be conducted. The licensee stated he understood and would comply. Investigator [b][6] also reminded the licensee that he must possess a Florida Department of Law Enforcement (FDLE) account to conduct all background queries for transfers to non-licensees. The licensee stated he understood and would comply.

Multiple Sales: A review of the Violent Crime Analysis Branch (VCAB) query results for Warriors Vault Laser Corp disclosed no results. There were no unreported multiple sales discovered during the inspection.

Suspicious/Prohibited Purchasers:

The inspection did not disclose any traffickers, straw purchasers, prohibited persons, or any other suspicious purchasers. As a result, no computerized criminal history checks were deemed necessary or conducted on any purchasers.

Trace Activity:

The Violent Crime Analysis Branch (VCAB) dealer query disclosed no results for Warriors Vault Laser Corp. No unsuccessful traces were identified. The licensee does not deal in used firearms, therefore no NCIC or Crime Gun Intelligence Analytics/eTrace checks on firearms were conducted.

NFA/Importer/Collector/Manufacturer:

The licensee is a Type 08 Importer of Firearms. The licensee does not conduct activities as a manufacturer or collector under this FFL. Since the inception of business, the licensee has imported approximately firearms. The licensee conducts the importation of firearms and parts from **(b)(4)** located in Turkey. The licensee also conducts the (b)(4) importation of ammunition from various foreign sellers in Turkey and Italy.

The licensee had ______ firearm in inventory at the time of inspection. Senior Investigator (b)(6) and Investigator (b)(6) examined the firearm to determine if the firearm was properly marked upon importation/acquisition. The firearm was marked with the correct city and state, as prescribed by the regulations, but the licensee's name was not accurately marked. Instead, the firearm was marked with Warrior Vault.

Investigator (19)(6) cited a violation for failure to accurately mark all imported firearms with the full name of the company, Warriors Vault Laser Corp.

can correct the markings on their behalf. The licensee provided On 02/08/22, the licensee registered the trade name of Warrior Vault to be utilized until (b)(4) Investigator 1000 with a letter advising the addition, as well as a confirmation of payment receipt from the Florida Division of Corporations. The licensee currently has shipments at the Port of Turkey ready for release that were only marked with Warrior Vault, Longwood, FL.

Senior Investigator [10)(6) k and Investigator (10)(6) reviewed all ATF Form 5330.3A, Application and Permit for Importation of Firearms, Ammunition and Defense Articles (ATF Form 6) and ATF Form 5330.3C, Release and Receipt of Imported Firearms, Ammunition and Defense Articles (ATF Form 6A), and compared them to the A&D record. Multiple discrepancies were discovered regarding the dates of acquisition in the A&D record and the certification dates on the ATF Form 6A(s). John Quidgley stated that (b)(6) [b)(4) [b)(4) [b)(4] [b)

Investigator (b)(6) cited a violation for certifying all ATF Form 6A(s), Section III – Verification of Importation, before receiving the shipments. All shipments and imported items must be certified on the ATF Form 6A, Section III - Verification of Importation, within 15 days of the release from Customs and Border Protection (CBP).

The licensee does not properly file the ATF Form 6(s) and ATF Form 6A(s) as prescribed by the regulations. The licensee provided Investigator (b)(6) copies of approved ATF Form 6(s). The licensee did not have any approved ATF Form 6A(s) on file.

Investigator (b)(6) cited a violation for failure to maintain all records of importation as required. The licensee had ATF Form 6(s) and zero (0) ATF Form 6A(s), out of the ATF Form 6(s) and ATF Form 6A(s) that had been submitted since the inception of business.

Attachment(s) Report of Violations.pdf

Report of Violations.pdf

Report of Violations.pdf

Licensee Response to Violations Report.pdf

REPORT OF VIOLATIONS

	Regulation	Corrective Actions	Instance Details
1	27 CFR 478.92(a)(1)(ii)(C): Failure to properly mark firearm (s) with licensee name Number of Instances:	Cease and desist transacting firearms until required identification markings are properly engraved, casted, stamped or otherwise conspicuously placed on each firearm.	(b)(3) (112 Public Law 55 125 Stat 552)
2	27 CFR 478.128(a): False statement when applying for a federal firearm license Number of Instances:	Cease and desist from engaging in deceptive practices.	The licensee, at the time of application, failed to disclose all responsible persons involved. (b)(6) ihad the power to direct the management and policies of the applicant. (b)(6) placed all orders with and made all payments to the manufacturer for all firearms imported.
3	27 CFR 478.128(c): False statement made by a licensee on any ATF record Number of Instances:	Cease and desist from engaging in deceptive practices.	The licensee signed 56 ATF Form 5330.3C (ATF Form 6A), Release and Receipt of Imported Firearms, Ammunition and Defense Articles, certifying the accuracy of shipments before receiving the shipments. All shipments and imported items must be certified on the ATF Form 6A, Section III - Verification of Importation, within 15 days of the release from Customs and Border Protection (CBP).
4	27 CFR 478.129(d): Failure to retain ATF Forms 6/6A Number of Instances:	Ensure that required records are retained at the licensed premises for prescribed 20-year retention period.	Warriors Vault Laser Corp
5	27 CFR 478.122(a): Failure to maintain an accurate/complete/timely import or acquisition record	Accurately, completely & timely record all required future firearm acquisition information. Amend/Update A&D Record to accurately record all required firearm acquisition information. Resume proper maintenance of required acquisition and disposition record.	(b)(3) (112 Public Law 55 125 Stat 552)

	Regulation	Corrective Actions	Licensee Response	Status Details
1	27 CFR 478.92(a)(1)(ii)(C): Failure to properly mark firearm(s) with licensee name Number of Instances:	Cease and desist transacting firearms until required identification markings are properly engraved, casted, stamped or otherwise conspicuously placed on each firearm.	The licensee registered Warrior Vault as a fictitious name under Warriors Vault Laser Corp. The licensee stated he will advise (b)(4) to correct the name of the company for future imports.	Status Correction Verified Verified Method In Person Date Correction Verified 02/08/2022
2	27 CFR 478.128(a): False statement when applying for a federal firearm license Number of Instances:	Cease and desist from engaging in deceptive practices.	The licensee stated he wasn't aware that he needed to add <u>(b)(6)</u> as a Responsible Person to import firearms for him. The licensee stated he attempted to add (b)(6) as a Responsible Person in June 2021.	Status Licensee Notified Verified Method In Person Date Licensee Notified 02/08/2022
3	27 CFR 478.128(c): False statement made by a licensee on any ATF record Number of Instances:	Cease and desist from engaging in deceptive practices.	The licensee stated he has to provide a hard copy to the import broker to present to Customs and Border Protection. The licensee stated in order to print from eForms, they signature is automatically generated on the pdf for printing. The licensee will complete a separate copy for future imports to give to the import broker.	Status Licensee Notified Verified Method In Person Date Licensee Notified 02/08/2022
4	27 CFR 478.129(d): Failure to retain ATF Forms 6/6A Number of Instances:	Ensure that required records are retained at the licensed premises for prescribed 20-year retention period.	The licensee has printed all ATF Form 6 and ATF Form 6As and have filed them accordingly. The licensee stated he has them saved electronically on the business computer as well.	Status Correction Verified Verified Method In Person Date Correction Verified 02/08/2022
5	27 CFR 478.122(a): Failure to maintain an accurate/complete/timely import or acquisition record Number of Instances:	Accurately, completely & timely record all required future firearm acquisition information. Amend/Update A&D Record to accurately record all required firearm acquisition information. Resume proper maintenance of required acquisition and disposition record.	The licensee stated the serial number was missed due to oversight. The licensee stated he thought the list went in numerical order.	Status Correction Verified Verified Method In Person Date Correction Verified 02/08/2022

CLOSING CONFERENCE

(2/8/2022) 02/08/2022

Closing Conference Additional Notes

Closing Conference Additional Notes
During the inspection, Senior Investigator [b)(6) and Investigator [b)(6) found that [b)(6), decides and places all orders directly with [b)(6) [b)(4) [b)(4] [b)(6] pays for the firearms directly td [b)(6] is a well as pays for all importation broker fees. John Quidgley receives an emailed invoice from [b)(4] [b)(4] [b)(4] [b)(4] [b)(4] [b)(4] [b)(6] [b)(6

Investigator (b)(6) forwarded an 8C Monitored Case Program notification to through the Area Supervisor to DIO Aaron Gerber referencing the possible hidden (b)(6) ownership.

Attendee(s)

JOHN EDGAR QUIDGLEY

EXHIBITS Inspection

Category	Attachment Name
Correspondence	Spartan Notification RE: 1-59-53036 Inspection Results
FinalDecision	Warriors Vault Final Notice of Revocation (1-59-53035 and 1-59-53036) 11.9.2022(Faucette).pdf
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
UpdateLicensingCenter	Power of Attorney Warriors Vault.pdf
UpdateLicensingCenter	Request for Hearing Warriors Vault.pdf
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
Correspondence	Spartan Notification RE: 1-59-53036 National Licensing Center
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
UpdateLicensingCenter	WVLC Rebuttal .pdf
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
Correspondence	Spartan Notification RE: 1-59-53036 Monitored Case
UpdateLicensingCenter	8C Initial Submission Tampa FCI-26749 (08) and FCI-26750 (07) (Warriors Vault).pdf
HiddenOwnership	Warriors Vault Laser Corp Summary of Events.docx
Correspondence	Information Concerning Your Federal License/Permit
ClosingConferenceSummary	Acknowledgment of Regulations.pdf
LicenseeResponseToViolationsPDF	Licensee Response to Violations Report.pdf
Correspondence	Information Concerning Your Federal License/Permit
Correspondence	
ViolationsPDF	Report of Violations.pdf
ViolationsPDF	Report of Violations.pdf
ViolationsPDF	Report of Violations.pdf
RentalLeaseVerification	20200401 Warriors Vault Lease.pdf
PropertyOwnershipVerification	Property Appraiser.pdf

n the matter of License Number	I-59-117-07-3E-53035	, as a/an	manufacturer in firearm other than destructive devices

issued to:

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

Warriors Vault Laser Corporation 1355 Bennett Drive. Suites 233 and 129 Longwood, Florida 32750

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 <u>400 N Tampa Street, Suite 2100, Tampa, Florida 33602</u>, 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	(6)(6)
07/06/2022	Aaron R. Gerber, Director of Industry Operations, Tampa Field Division	(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: 7773 1487 1308 (Fed Ex) 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
07/06/2022	(b)(6) Division Counsel, Tampa Field Division	For	(b)(6)
Print Name and Title o	f Person Served		Signature of Person Served
Warriors Vault Laser	Corporation		

Address Where Notice Served

1355 Bennett Drive, Suite 233 and 129, Longwood, Florida 32750

Page 2 - ATF Form 4500, Notice to Revoke, Suspend License and/or Impose a Civil Fine

Warriors Vault Laser Corporation 1355 Bennett Drive, Suites 233 and 129 Longwood, Florida 32750

License Nos. 1-59-117-07-3E-53035 1-59-117-08-3E-53036

Under the provisions of 18 U.S.C. § 923(e), and 27 C.F.R. § 478.73, notice is given that ATF is initiating revocation proceedings regarding the Federal firearms licenses specified above. The Director of Industry Operations, United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Tampa Field Division, has reason to believe that Warriors Vault Laser Corporation, located at 1355 Bennett Drive, Suites 233 and 129, Longwood, Florida 34748, an Importer and Manufacturer of firearms and ammunition for firearms other than destructive devices or ammunition other than armor piercing ammunition, willfully violated the provisions of the Gun Control Act of 1968, as amended, 18 U.S.C. Chapter 44, and the regulations thereunder, 27 C.F.R., Part 478, as described herein.

WILLFUL VIOLATIONS

- The Licensee failed to include (b)(6) as a responsible party on its application. However, (b)(6) was an individual possessing the potential capability of directly or indirectly possessing the power to direct or cause the direction of the management and policies of the firearms operations Warriors Vault Laser Corporation. This omission involved the failure to include a material fact in connection with the application in violation of 18 U.S.C. § 923(d)(1)(D) and 27 C.F.R. § 478.47(b)(4).
- 2. The Licensee knowingly made false statements and representations in applying for its Federal firearms licenses in violation of 18 U.S.C. § 924(a)(1)(A) and 27 C.F.R. § 478.128(a). The Application for Federal Firearms License, ATF Form 7, submitted by the Licensee, received by ATF on or about March 9th, 2020, and amended during the qualification inspection held on April 9th, 2020, failed to include in the Responsible Person Questionnaire, Part B of the application, (b)(6). However, the application should have included (b)(6) as he was a person possessing the potential capability of directly or indirectly possessing the power to direct or cause the direction of the management and policies of the firearms operations Warriors Vault Laser Corporation as to the importation and manufacture of firearms. This constituted a violation of 18 U.S.C. § 924(a)(1)(A) and 27 C.F.R. § 478.128(a).

3. The licensee willfully made false statements or representations with respect to information required by the provisions of Title 18, United States Code, Chapter 44 or Title 27, Code of Federal Regulations, Part 478, to be kept in the records of a licensee in violation of 18 U.S.C. §§ 922(m) and 924(a)(3) and 27 C.F.R. §§ 478.121(c) and 478.128(c) in that the licensee signed fifty-six (56) ATF Forms 5330.3C (ATF Forms 6A), Release and Receipt of Imported Firearms, Ammunition and Defense Articles, certifying the accuracy of shipments before the licensee received the shipments. See Attached 56 Forms from on or about April 1, 2021 through on or about May 20, 2021.



U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Director of Industry Operations

July 6, 2022

www.atf.gov

EXPLANATION LETTER RE: NOTICE OF REVOCATION

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Warriors Vault Laser Corporation 1355 Bennett Drive, Suites 233 and 129 Longwood, Florida 32750

RE: In the Matter of the Notice to Revoke FFL 1-59-117-07-3E-53035 and 1-59-117-08-3E-53036 issued to Warriors Vault Laser Corporation

Licensee

Based on the results of your compliance inspection starting on or about December 14, 2021 through on or about February 8, 2022, the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) is contemplating revoking your Federal firearms licenses and has decided to initiate the revocation process. Please see enclosed, Notice to Revoke or Suspend License and/or Impose a Civil Fine, ATF Form 4500(5300.4) issued to Warriors Vault Laser Corporation, Federal firearms number 1-59-117-07-3E-53035 and 1-59-117-08-3E-53036, located at 1355 Bennett Drive, Suites 233 129, Longwood, Florida 32750.

This letter explains the Notice and Hearing process.

Your Response to the Notice

As indicated on the Notice, you may request a hearing within 15 days of receipt of Notice to Revoke or Suspend License and/or Impose a Civil Fine, ATF Form 4500(5300.4) that is enclosed, to contest the revocation by submitting a written request to me at:

Aaron R. Gerber Director of Industry Operations Tampa Field Division, ATF 400 N Tampa Street, Suite 2100 Tampa, Florida 33602

If you do not request a hearing within 15 days, and/or the request is not received

within 15 days, the revocation of your license will become final. If you submit a letter requesting a hearing, ATF will make appropriate arrangements. ATF regularly conducts hearings in-person. However, due to the COVID-19 pandemic, hearings may also be held virtually, either by videoconference, audio-conference, or by written submission. Please let me know immediately if you will be represented at the hearing so that we can expeditiously schedule the hearing at a time mutually convenient to all parties involved, including your representative.¹ Once the date, time and place are set, ATF will notify you via certified mail. Under limited circumstances, the DIO may reschedule the hearing for good cause.

Prior to the hearing date, you may request a meeting with the DIO to address the violations cited in the Notices. While ATF is not obligated to grant such requests, if it does, at or before the meeting, you may submit mitigating facts, arguments, and proposals for settlement for review and consideration. You may also submit offers of potential resolution to the DIO after the hearing, however, the DIO will not entertain settlement offers at the hearing itself.

What to Expect at the Hearing

<u>Under no circumstances may you, your representative, your witnesses, or anyone else,</u> <u>bring firearms or any other weapons to an in-person hearing</u>. The hearing will not begin, or will cease, if it is determined that this policy has been violated. Moreover, the possession of firearms or weapons in a Federal facility is a violation of 18 U.S.C. § 930.

The hearing itself is informal in nature and does not require adherence to civil court rules and formal courtroom procedures. An ATF-hired stenographer will be present to transcribe the hearing; however, there is no sworn testimony.² The resulting transcript, along with the exhibits presented at the hearing, constitute the official record of the hearing. You may order a copy of the transcript at your own expense. ATF does not make a video recording of the hearing proceedings. You may not do so either.

The DIO will preside over the hearing and ensure that it occurs in an orderly and professional manner. The primary purpose of the hearing is to give the DIO the opportunity to hear your explanation/argument in response to the proposed licensing action.

During the hearing, ATF, through an attorney, will enter in the official record all evidence establishing the violations cited in the enclosed Notices. The ATF attorney will generally ask the ATF investigator(s) who conducted the inspection, or other ATF

¹ See 27 C.F.Rs § 478.76 for information regarding who may represent you at the hearing.

² False statement made during the hearing are subject to the penalties prescribed under 18 U.S.C. § 1001.

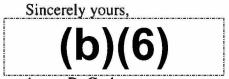
In the Matter of the Notice to Revoke 1-59-117-07-3E-53035 and 1-59-117-08-3E-53036 issued to Warriors Vault Laser Corporation

employees or witnesses who have relevant information concerning your case, to describe their findings. At the conclusion of the government's presentation, you will have the opportunity to respond. You are encouraged to state your case as clearly and factually as possible. Be willing and prepared to address each violation described in the Notice. You may also present relevant evidence, such as documents, pictures, or witness testimony that tends to show that the violations listed in the Notices did not occur in the manner described.

You will have the opportunity to ask questions about any of the evidence that ATF puts on the record, and to question any ATF witnesses about their findings. Similarly, ATF will have the opportunity to ask questions about your evidence, and of your witnesses. When the DIO is satisfied that all evidence and arguments have been fully presented, the DIO will conclude the hearing.

After the Hearing

If after review of the entire record, the DIO concludes that you committed one or more willful violations, the DIO may issue a Final Notice of Revocation, which will be sent to you via certified mail. Similarly, you will be notified if the DIO decides that your FFL should not be revoked. If you are not satisfied with the final decision, you may appeal the decision to federal district court within 60 days. The record of the hearing (including all presented evidence) may become part of the official court record.



Aaron R. Gerber Director of Industry Operations

Enclosures

In the	e matter of:	
	The application for license as a/an	_ , filed by:
\checkmark		
	Importer in firearms other than destructive devices	_ , issued to:
Warr 1355	e and Address of Applicant or Licensee (Show number, street, city, state and ZIP Code) riors Vault Laser Corporation 5 Bennett Drive, Suites 233 and 129 gwood, Florida 32750	
Notic	ce 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 of your	locument,
	✓ 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 ✓ January 9, 2023	
	license is suspended for calendar days, effective, pursuant to 18 U.S.C. § 922(t)(5) or 924	(p).
I	icensee is fined <u>\$</u> , 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 	
1	☐ 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).
1	Dicensee is fined \$, payment due:, pursuant to 18 U.S.C. § 922(t)(5) or 924(p).	
pursu you ii	there 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 pet uant 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 b intend to continue operations after the effective date of this action while you pursue filing for judicial review or otherwise, you must request a n from the Director of Industry Operations (DIO), Bureau of Alcohol, Tobacco, Firearms and Explosives, at	business. If

, 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 a	and Title of Bureau of Alcohol, Tobacco, Fireau	ms and Explosiv	es Officia	1	Signature	
11/09/2022	Aaron R. Gerber, Director of Industry Operations, Tampa Field DivisionDigitally signed by AARON GERBE Date: 2022.11.09 11:35:02-05'00'					Digitally signed by AARON GERBER Date: 2022.11.09 11:35:02 -05'00'	
I certify that, on the date below, I served the above notice on the person identified below by:							
N 1		mail to the address shown below. Number: 7018 3090 0002 0441 0683	Or			ng a copy of the notice ss shown below.	to
Date Notice Serv	ved	Title of Person Serving Notice				Signature of Person Serv	i
11/09/2022 (b)(6), Division Counsel, Tampa Field Division				(b)	(6)		
Print Name and Title of Person Served				Signature of Person Serv	/ed		
Warriors Vault Laser Corp							
Address Where Notice Served							
1355 Bennett Drive, Suite 233, Longwood, Florida 32750							

Note: Previous Edition is Obsolete

UNITED STATES OF AMERICA

DEPARTMENT OF JUSTICE

BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES

IN THE MATTER OF THE:	
NOTICE TO REVOKE OR SUSPEND LICENSE AND/OR IMPOSE A CIVIL FINE ISSUED TO:	TAMPA FIELD DIVISION
WARRIORS VAULT LASER CORP. 1355 BENNETT DRIVE, SUITES 233 AND 129 LONGWOOD, FLORIDA 32750	DEPARTMENT OF JUSTICE BUREAU OF ALCOHOL, TOBACCO
LICENSE NOS. 1-59-117-07-3E-53035 1-59-117-08-3E-53036	FIREARMS AND EXPLOSIVES

SUMMARY OF FINDINGS AND CONCLUSIONS

On July 6th, 2022, the Director of Industry Operations, Bureau of Alcohol, Tobacco, Firearms and Explosives, Tampa Field Division, issued Warriors Vault Laser Corporation, 1355 Bennett Drive, Suites 233 and 129, Longwood, Florida 32750, a Notice to Revoke or Suspend License and/or Impose a Civil Fine, ATF Form 4500(5300.4), with reasons therefore attached as page 2.

FINDINGS

- Warriors Vault Laser Corporation, (the Licensee) is the holder of Federal Firearms Licenses, license numbers 1-59-117-07-3E-53035 and 1-59-08-3E-53036, as a manufacturer and an importer in firearms and ammunition for firearms other than destructive devices or ammunition other than armor piercing ammunition.
- On July 10th, 2022, Licensee designated Responsible Person John E. Quidgley timely requested a hearing on behalf of the Licensee.

- ATF also received a Power of Attorney, dated July 18th, 2022, from Responsible Person John E. Quidgley regarding Wiley Rein LLP's ability to represent the Licensee. Attorney
 (b)(6) was the representative of Wiley Rein LLP.
- 4. On August 10th, 2022, ATF issued a Notice informing the Licensee that their requested hearing would take place on Wednesday, October 5th, 2022, at 9:00 am EST. Due to Hurricane Ian, ATF requested that the hearing be rescheduled, to which the Licensee agreed.
- On October 17th, 2022, ATF issued a Notice that the hearing would be rescheduled for Thursday, October 20th, 2022, at 10:00 am EST.
- 6. In an electronic mail from Attorney (b)(6) dated October 19th, 2022, the License withdrew its request for a hearing on Notice to Revoke or Suspend License and/or Impose a Civil Fine, ATF Form 4500(5300.4), with reasons therefore attached as page 2 issued by ATF on July 6th, 2022.
- 7. The Licensee stated that the withdrawal of the hearing request "...in no way constitutes any admission of wrongdoing or violation of any federal, state, or local law by Warriors Vault Laser Corp or John Quidgley".
- I find that the Licensee willfully violated the GCA, and its implementing regulations as set forth in Notice to Revoke or Suspend License and/or Impose a Civil Fine, ATF Form 4500(5300.4), with reasons attached as page 2, issued by ATF to the Licensee on July 6th, 2022.

CONCLUSIONS

The Licenses held by Warriors Vault Laser Corporation, are revoked as provided by 18 U.S.C. § 923(e) and 27 C.F.R. § 478.73 for the reasons outlined above and set forth in the Notice to Revoke or Suspend License and/or Impose a Civil Fine issued July 6th, 2022.

Dated this 9th day of November 2022.



Aaron R. Gerber Director of Industry Operations Tampa Field Division