



## **Report of Investigation**

**Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant, Variation and Revocation of Firearm Licences and Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).**

**Integrity Commission  
March 2026**

Report 37/2026



This Publication until tabled in Parliament shall be confidential.

Sections 55 (4) and (5) of the Integrity Commission Act state:

“(4) Anything said or information supplied or any document or thing produced by any person for the purpose or in the course of any investigation by or proceedings before the Commission under this Act, shall be absolutely privileged in the same manner as if the investigation or proceedings were proceedings in a court of law.

(5) For the purposes of the Defamation Act, any report made by the Commission under this Act and any fair and accurate comment thereon shall be deemed to be privileged.”

Section 56 of the Integrity Commission Act states:

“Subject to section 42(3)(b), every person having an official duty under this Act, or being employed or otherwise concerned in the administration of this Act (hereinafter called a concerned person) shall regard and deal with as secret and confidential, all information, statutory declarations, government contracts, prescribed licences and all other matters relating to any matter before the Commission, except that no disclosure made by the Commission or other concerned person in the proceedings for an offence under this Act or under the Perjury Act, by virtue of section 17(2) of that Act, shall be deemed inconsistent with any duty imposed by this subsection.

(2) The obligation as to secrecy and confidentiality imposed by this section, in relation to any documents, or information obtained under this Act continues to apply to a person despite the person having ceased to have an official duty, be employed or otherwise concerned in the administration of this Act.

(3) Every concerned person who is required under subsection (1) to deal with matters specified therein as secret and confidential who at any time communicates or attempts to communicate any such information, declaration, letter and other document or thing referred to in subsection (1) disclosed to him in the execution of any of the provisions of this Act to any person —

- (a) other than a person to whom he is authorized under this Act to communicate it; or
- (b) otherwise than for the purpose of this Act,

commits an offence and shall be liable on summary conviction in a Parish Court to a fine not exceeding one million dollars or to a term of imprisonment not exceeding one year.

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## Table of Contents

<b>Chapter 2 – Background</b> .....	<b>5</b>
<i>Jurisdiction</i> .....	5
<i>Allegations</i> .....	6
<i>Individuals Pertinent to the Investigation</i> .....	7
<b>Chapter 3 – Terms of Reference</b> .....	<b>9</b>
<b>Chapter 4 – The Investigation</b> .....	<b>11</b>
<b>Chapter 5 – Law, Policy, Evidence and Discussion of the Findings</b> .....	<b>12</b>
<i>The Requirements to Acquire a Firearm User’s Business Licence and/or Firearm Dealer’s Licence from the FLA</i> .....	12
<i>Storage of Firearms and Ammunition at FLA</i> .....	17
Seizure of Ammunition from Dealers .....	20
Firearms and Ammunition Stored for Destruction .....	21
<i>Circumstances Surrounding the Management and Access of the FLA’s Online Dealer Database System/Licence Management System (LMS)</i> .....	43
<i>Allegations of Corruption Involving Members of Staff of the FLA.</i> .....	58
<b>Chapter 6 – Conclusions</b> .....	<b>62</b>
<i>Allegations of Missing Firearms and Ammunition from the Vaults of the FLA</i> .....	62
<i>The Administration of the FLA’s Licence Management System</i> .....	63
Revocation of Licences.....	64
<i>Allegations of Corruption Involving Members of Staff of the FLA</i> .....	65
<b>Chapter 7 – Recommendations</b> .....	<b>66</b>



## Chapter 1 – Introduction

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### 1.0 Executive Summary

- 1.1 This Investigation was commenced following receipt of a report alleging corruption, impropriety and irregularities in the storage of firearms and ammunition and the issuance, variation and revocation of firearm licences at the Firearms Licensing Authority (FLA).
- 1.2 The investigation found that there are accountability issues in relation to the storage of ammunition at the FLA's main vault located at the entity's Headquarters amongst other governance concerns.
- 1.3 Recommendations are made herein to the FLA and the Ministry of National Security and Peace (MNS) which aim to improve accountability, and prevent reoccurrence of the issues identified.



## Chapter 2 – Background

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2.0 This chapter sets out the background information concerning the investigation, jurisdiction, allegations and a profile of the individuals pertinent to the investigation.

### Initiation of Investigation

2.1 On June 14, 2021, by way of a referral from the Director of Information and Complaints Division dated June 8, 2021, the Director of Investigation (DI) commenced an investigation, into allegations of corruption, impropriety and irregularities in the grant of Firearm Licences and the storage of firearms and ammunition at the FLA.

### Jurisdiction

2.2 **Section 33** of the *Integrity Commission Act* empowers the DI to investigate allegations involving acts of corruption and non-compliance with the provisions of the legislation, as well as the grant, issuance, suspension or revocation of prescribed licences.



## Allegations

- 2.3 By way of an anonymous electronic mail received by the Director of Information and Complaints on May 31, 2021, it was alleged that:
- a) *"Firearm Dealer John Elliott gun shop was shut down... for numerous months but miraculously reopened after, John paid a hefty (\$500,000) sum under the table to have it reopened";*
  - b) *"as long as you, carter[sic] get your monetary kickback yuh nuh care who Shane screws over";*
  - c) *"You are targeting Mr. [Kent] Brown because he didn't gave [sic] Ellsworth Cullum the 2 million dollars that he tried to shake him down";*
  - d) *"Any dealer who doesn't come out of pocket your harassment is nonstop. You and Letine Allen audit Mr. Brown... and can never fine[sic] anything."; and*
  - e) *"The public notice put out by the FLA on April 26, 2021 saying that guns at the FLA for 5 years + will be destroyed, it's a grand ploy to cover up the fact that numerous guns are missing... from vaults of the FLA...we have numerous guns and thousands of bullets missing."*
- 2.4 During the course of the investigation the DI received further allegations germane to the investigation. By way of statement dated August 19, 2021, it was further alleged that:
- a) *"While checking the electronic system at the range I realised that there were four entries made on the system, where three persons purchased at(SIC) total of six thousand (6000) rounds of bird hunting ammunition";*
  - b) *"I sent my response to the FLA highlighting and showing a lot of flaws and mediocrity in the audit report. Also, numerous fabrication[Sic] of*

**Report of Investigation Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant of Firearm Licences and the Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).**



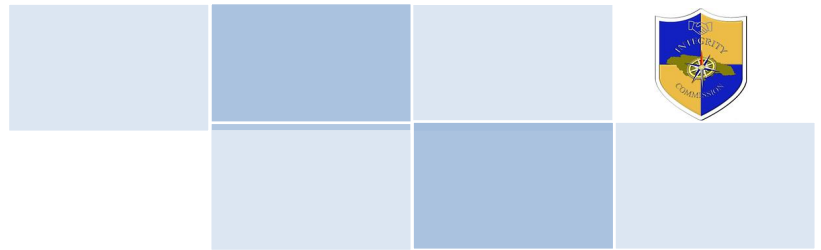
serial numbers that do not exist, makes and models of weapons that do not exist”;

- c) *“In April 2018 I wrote a letter to the Editor of the Observer. My letter made the letter of the day and I heard through the grapevine that CEO of the FLA Mr. Shane Dalling was not happy with the letter and that he was going to cut me down to size because I have too much title and “chat too much”. I understand this to mean that Mr. Dalling is not going to stop until he shuts down my business or destroy my reputation.”;* and
- d) *“In May 2019 I went into the FLA to renew my Dealers and Gunsmith licence for both Maxfield Avenue and Temple Hall locations. After receiving the certificates I saw where half of my Dealer Licence at Temple Hall was revoked. The firearms aspect was removed leaving only the licence to sell ammunition. I called back the FLA and I was told by [name redacted] that “this is how it will be, this is the way forward”.*

### **Individuals Pertinent to the Investigation**

2.5 The following persons were considered pertinent to the investigation:

1. Mr. Kent Brown – Business Owner, KBA Dealers Jamaica Limited/KBTTC;
2. Mr. Shane Dalling – Chief Executive Officer (CEO), (FLA);
3. Ms. Letine Allen – Director, Compliance and Enforcement, FLA;
4. Ms. Deidre Mullings – Director, Application and Certification, FLA;
5. Mr. Christopher Christie – Director, Information Systems and Technology, FLA, (former);



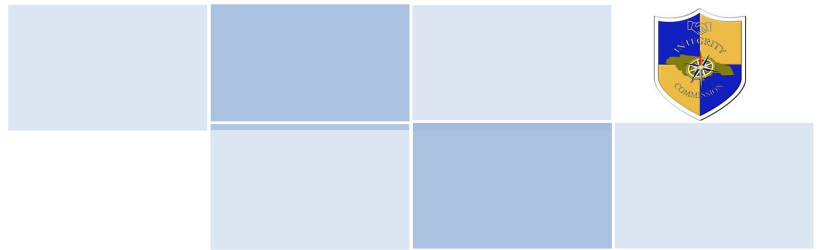
6. Ms. Camille Lennox – Human Resource Manager, FLA;
7. Ms. Natalee Jones-Amaogu – Manager, Examination and Certification, FLA;
8. Ms. Shatary English – Ballistics Manager, FLA;
9. Ms. Kandice Simons – former Senior Auditor, FLA;
10. Mr. David Shady – Programmer, Firearm Licensing Authority (FLA);
11. Mr. Hansel Ramdon – Systems Engineer, FLA;
12. Mr. Shevon Robinson, Database Administrator, FLA (former);
13. Mr. Akeem Meredith – Quality Control Officer, FLA;
14. Mr. Rayshaun Brown – Quality Control Officer, FLA;
15. Mr. Tevin Whyte – Technical Support Officer, FLA; and
16. Major Wayne Barrett – Officer Commanding, Logistics Company, Jamaica Defence Force (JDF).



## Chapter 3 – Terms of Reference

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- 3.0 This chapter outlines the scope of the investigation and the issues that were explored.
- 3.1 The DI sought to establish, *inter alia*, the following:
- 3.1.1 The protocols, policies and/or legislation governing the grant, issuance, suspension and/or revocation of Firearm Users' Business and Firearm Dealers' Licences by the FLA;
  - 3.1.2 The process through which Firearm User's Business and Firearm Dealers' Licences are granted by the FLA;
  - 3.1.3 The requirements which are to be met by applicants for the grant of Firearm Users' Business and Firearm Dealers' Licences;
  - 3.1.4 Whether there is merit in the allegation that "John Elliott's" gun shop which was shut down and reopened by the FLA, after he paid a fee of \$500,000.00 "under the table," and if so, whether same gave rise to an act of corruption;
  - 3.1.5 The veracity of the allegations regarding the access and management of the FLA's database in respect of the altering of records in relation to the sale of firearms and ammunition;



- 3.1.6 The veracity of the allegation that Mr. Kent Brown is being targeted by the FLA because he did not pay two million dollars to Elsworth Callum;
- 3.1.7 The systems employed by the FLA in the storage of firearms and ammunition, for the period January 2016 to June 2021;
- 3.1.8 The protocols, policies and/or legislation governing the storage and disposal of firearms and ammunition by the FLA;
- 3.1.9 The veracity of the allegation that firearms and ammunition are missing from the FLA's vault;
- 3.1.10 Whether there were any improprieties and/or irregularities in relation to the **Firearms Act (1967)**, the **Corruption Prevention Act, Integrity Commission Act**, and/ or any other applicable legislation or policies; and
- 3.1.11 Whether recommendations ought to be made in respect of the subject matter.



## Chapter 4 – The Investigation

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4.0 This chapter outlines the investigative actions that were undertaken throughout the investigation.

4.1 The following actions were taken during the course of the investigation:

- a) During the period June 17, 2021 to September 4, 2025, twenty-three (23) Notices were served on individuals, who were deemed to be pertinent to the investigation, to provide written statements;
- b) During the period January 25, 2022 to July 19, 2023, seven (7) Judicial Hearings were conducted;
- c) During the period June 17, 2021 to November 27, 2023, nineteen (19) site visits were conducted;
- d) During the period June 24, 2021 to January 8, 2026, forty-seven (47) witness statements were recorded and/or obtained; and
- e) A review of the **Integrity Commission Act, Corruption (Prevention) Act**, the **Firearms Act** and other relevant legislation and policies was undertaken.

4.2 A review and cross-referencing of the responses, and supporting documentation including the FLA's 2019 Vault Management Audit Report was conducted in order to inform the DI's conclusions and recommendations.



## Chapter 5 – Law, Policy, Evidence and Discussion of the Findings

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5.0 This chapter sets out the applicable law, policies, evidence, findings and discussion in respect of the investigation.

### **The Requirements to Acquire a Firearm User’s Business Licence and/or Firearm Dealer’s Licence from the FLA.**

5.1 In determining the veracity of the complaint made, the DI examined the legislative framework which governs the establishment and functions of the FLA. The DI notes that at the commencement of the investigation, the **Firearms Act** of **1967** (herein after referred to as the **1967 Act**) was FLA’s enabling legislation. This **1967 Act** was repealed and replaced by the new **Firearms (Prohibition, Restriction and Regulation) Act, 2022**, which received Royal Assent on October 13, 2022.

5.1.1 Based on the foregoing, the DI highlights **Section 26** of the applicable **1967 Act** which, *inter alia*, establishes the FLA. The referenced provision provides, *inter alia*, the following:

**“26A.-(1) There is hereby established for the purposes of this Act, a body to be known as the Firearm Licensing Authority.**

...

**26B.-(1) Subject to section 38, the functions of the Authority shall be-**  
**(a) to receive and consider applications for firearm licences, certificates or permits;**  
**(b) to grant or renew firearm licences, certificates or permits;**



**(c) to revoke any firearm licence; certificate or permit granted under this Act;**

**(d) to amend the terms of a firearm licence, certificate or permit;**

**(e) to receive and investigate any complaint regarding a breach of a firearm licence, certificate or permit.**

**(2) The Authority shall have the power to-**

**(a) summon witnesses;**

**(b) call for and examine documents; and**

**(c) do all such other things as it considers necessary or expedient for the purpose of carrying out its functions under this Act.”<sup>1</sup>**

5.2 In light of the allegations that Dealership Licences were being revoked by the FLA, the DI deemed it necessary to determine the FLA’s internal requirements which are to be met by individuals applying for a Firearm Users’ Business Licence and/or a Firearm Dealers’ Licence.

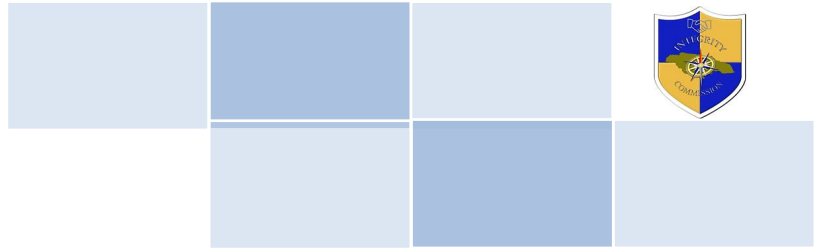
5.2.1 Mr. Shane Dalling, CEO, FLA, indicated in his statement dated June 24, 2021, to the Integrity Commission, *inter alia*, the following:

**“THE APPLICATION PROCESS FOR FIREARM USER’S BUSINESS LICENCE (FUBL)**

*A person who is desirous of possessing a Firearm User’s Business Licence (FUBL), is required to complete and sign, in his/her own handwriting, a single firearm application form showing, among other things:*

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<sup>1</sup> Firearms Act 1967, Section 26



- a. *Name and address of applicant [present and previous]*
- b. *Date of Birth*
- c. *E-mail address [where applicable]*
- d. *Place of birth*
- e. *Nationality*
- f. *Marital Status*
- g. *Nature of Employment*
- h. *Telephone Number [Home, Cellular, Business]*
- i. *Tax Registration Number*
- j. *Name and Address of present and previous employer*
- k. *Type and calibre firearm to which the application relate*

*The completed firearm application form should be accompanied by:*

- a. *Two passport photographs certified by a Justice of the Peace, but not sealed*
- b. *Two recommendations from either a Justice of the Peace, Marriage Officer, School Principal, Medical Doctor, Attorney-at-Law, a Police Officer [not below the rank of Deputy Superintendent] or a member of the Jamaica Defence Force [not below the rank of Major]. Recommendations are to be addressed to the Firearm Licensing Authority.*
- c. *Proof of age [birth certificate or passport]*
- d. *Receipt reflecting payment of the prescribed fee (\$12,000.00 per weapon)*
- e. *Receipt reflecting payment of the fee for fingerprint*



- f. Certificate of Incorporation, a valid Business Tax Compliance Certificate (TCC) and a valid Individual Tax Compliance Certificate (TCC) is required where the applicant is a business i.e. a Company, Sole Trader or Partnership.
- g. Valid company Private Security Regulation Authority (PSRA)
- h. Individual PSRA
- i. Letter of Justification.

...

THE APPLICATION PROCESS FOR THE FIREARM DEALER'S LICENCE.

**The requirements for application are as follows:**

- a. One (1) Application Form (FLA#001A)
- b. Two (2) passport photographs certified by a Justice of the Peace, but not sealed
- c. Proof of Age (copy of Birth Certificate or Passport)
- d. Trauma First Aid Certification (must be current)
- e. Two (2) recommendations from either a Justice of the Peace, Marriage Officer, School Principal, Medical Doctor, Attorney-at-Law, a Police Officer [not below the rank of Deputy Superintendent] or a member of the Jamaica Defence Force [not below the rank of Major]. Recommendations are to be addressed to the Firearm Licensing Authority.
- f. Fingerprint Receipt **(only for applicants who are due for Recertification)**
- g. Licence Fee Receipt



- h. **Source of Funding (may include but not limited to – Bank Statement, Land Title, Registration of Current Business, Company Incorporation)**
- i. **Other documents – (may submit photograph of proposed location and structure) {OPTIONAL}.**
- j. *Certificate of Incorporation, a valid Business Tax Compliance Certificate (TCC) and a valid Individual Tax Compliance Certificate (TCC) is required where the applicant is a business i.e. a Company, Sole Trader or Partnership.*
- k. *Declaration of Assets, Liabilities, Income and Source of Funding Form*

**N.B. Applicant must be an existing firearm holder**<sup>2</sup>

5.2.2 Further to the foregoing, Mr. Dalling stated, *inter alia*, the following:

*“a. The applicant must be able to satisfy the Authority that s/he is **fit and proper, has an established need and clear justification for the licence and has a secure residence (non-residential) and adequate storage in place to store firearm(s);***

*b. The applicant must show that his proof of income to establish the business is from a reputable and feasible source; and*

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<sup>2</sup> Statement of Mr. Shane Mr. Dalling, CEO, FLA dated June 24, 2021

**Report of Investigation Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant of Firearm Licences and the Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).**



c. *The type of Storage – Vault, Safe etc, type of entry points to the premises, and availability of surveillance equipment are also taken into consideration.*<sup>3</sup>

5.3 In the circumstances it may be inferred that Mr. Kent Brown satisfied the criteria to be issued with various licences by the FLA. This is supported by a statement received on September 25, 2025 from Mr. Shane Dalling who stated that Mr. Brown was issued with the following licences by the FLA:

- I. Firearm User's Licence;
- II. Firearm User's (Restricted) Licence;
- III. Firearm Dealer's Licence; and
- IV. Gunsmith's Licence.

### **Storage of Firearms and Ammunition at FLA**

5.4 In determining the veracity of the allegation that firearms and ammunition are missing from the vaults of the FLA, the DI sought to ascertain whether firearms and ammunition are stored at the FLA and the circumstances under which these are stored. Mr. Shane Dalling, indicated in his statement to the DI dated June 24, 2021, *inter alia*, the following:

- "i) Yes, firearms and ammunition are stored at the FLA under the following circumstances*
- a) Safekeeping by licence holder(s)*
  - b) Disposals*

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<sup>3</sup> Ibid

Report of Investigation Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant of Firearm Licences and the Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).



- c) *Surrender*
- d) *Seizure*
- e) *Licence not renewed*
- f) *Revocations*
- g) *FLA enquiry*
- h) *Firearms for deceased persons*
- ...<sup>4</sup>

5.4.1 By way of his further statement submitted to the DI dated October 6, 2021, Mr. Dalling detailed the circumstances which account for the storage of ammunition at the FLA. He stated, *inter alia*, the following:

*“Ammunitions may come into the Authority’s custody for the following reasons:*

1. *Seizure – this may include ammunition seized by the Jamaica Constabulary Force (JCF) or Firearm Licensing Authority (FLA) due to an investigation; this may also include collection of ammunition from a relative of a deceased holder; or defective ammunition identified during audit of security companies and ranges and/or excess ammunition taken from licence holders or security companies that falls outside of their allotted amount based on the terms and condition of their licence.*
2. *Safekeeping (ammunition left by licence holder for temporary storage).*

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<sup>4</sup> Statement of Mr. Shane Mr. Dalling, CEO, FLA dated June 24, 2021



3. *Deceased* – the holder is deceased and the firearm and ammunition is retrieved and/or left at the FLA for safekeeping.
4. *Revocation* – the holder's licence is rescinded and the firearm and ammunition is kept by the Authority as no licence is in place. The holder may however, sell and/or transfer the weapon to an approved applicant.
5. *Disposal* – the holder disposes of the weapon for purpose of sale or transfer and the firearm and ammunition is stored pending the completion of the disposal process.
6. *Surrender of licence* – the holder hands over the firearm and/or ammunition to the Authority as s/he no longer has an interest in same.”<sup>5</sup>

5.4.2 Further to Mr. Dalling's assertions, the DI sought to ascertain the length of time firearms and ammunition are kept by the FLA. Mr. Dalling further indicated by way of his statement, *particularly*, that:

*“Firearms stored by the FLA should be stored for a maximum period of 18 months in accordance with the Firearms Act, Section 45(5b). However, firearms are in our storage from as far back as 2012.”*<sup>6</sup>

5.4.3 In light of the foregoing, the DI highlights **Section 45 (5)(b)** of the applicable **Firearms Act** which states the following:

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<sup>5</sup> Further Statement of Mr. Shane Dalling, CEO, FLA dated October 06, 2021

<sup>6</sup> Statement of Mr. Shane Mr. Dalling, CEO, FLA dated June 24, 2021



**“(5) Every firearm and any ammunition received at any police station under this section shall –**

**...**

**(c) if not delivered to any person in accordance with paragraph (a) within twelve months of the date on which it was received at such police station, render the owner thereof liable for payment of a storage fee in such sum or at such rate as may be prescribed and if such fee is not paid within six months of the expiry of the period of twelve months aforesaid the firearm or ammunition, or both, as the case may be, shall be forfeited to the Crown.”<sup>7</sup>**

### **Seizure of Ammunition from Dealers**

5.4.4 As it relates to whether the FLA has ammunition in its storage that were seized from Dealers and/or licence firearm holders, Mr. Dalling provided in his further statement dated October 6, 2021, a list comprising of ten (10) dealers and/or individuals from whom ammunition was seized. Mr. Dalling stated, *inter alia*, the following:

*“Yes, during audits carried out by the Compliance and Enforcement Department, ammunition are taken from dealerships for safekeeping at the Authority if the ammunition is not a part of the dealer’s inventory, based on our records. This may occur if the dealer is stockpiling ammunition on behalf of licensed firearm holders. It is to be noted that dealerships are not authorized, under the law, to store firearms and/or ammunition that does not form a part of their inventory.*

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<sup>7</sup> Firearms Act, Section 45 (5)(b)



...

*Upon conducting audits of dealerships, if ammunition is found that are defective, being stored for firearm holders or cannot be accounted for; then the ammunition is to be seized and taken to the FLA for storage. Kindly note, that dealerships are not approved or gazzetted [sic] as storage locations for ammunition that are not a part of their inventory.”<sup>8</sup>*

### **Firearms and Ammunition Stored for Destruction**

5.4.5 In determining the veracity of the allegations that *“The public notice put out by the FLA on April 26, 2021 saying that guns at the FLA for 5 years + will be destroyed, it’s a grand ploy to cover up the fact that numerous guns are missing, yes, missing from vaults of the FLA... and thousands of bullets missing”*, the DI sought to ascertain whether firearms and ammunition earmarked for destruction are stored at the FLA and/or any other entity acting on its behalf. Mr. Dalling indicated by way of his statement that *“firearms that were earmarked for destruction are stored...at the Jamaica Defence Force (JDF)”*.<sup>9</sup>

5.4.6 Further to the foregoing, Mr. Dalling indicated that the *“intended purpose of the facility [redacted] is to store firearms until a date is set by the Ministry of National Security for them to be destroyed.”*<sup>10</sup>

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<sup>8</sup> Statement of Mr. Shane Mr. Dalling, CEO, FLA dated October 06, 2021

<sup>9</sup> Statement of Mr. Shane Mr. Dalling, CEO, FLA dated June 24, 2021

<sup>10</sup> Statement of Mr. Shane Mr. Dalling, CEO, FLA dated October 06, 2021



5.4.7 In addition, the DI sought to ascertain the protocols germane to the operation of the referenced storage facility. Mr. Shane Dalling indicated in his statement, *particularly*, the following:

*“Before the firearms are moved from the Authority, contact must be made with the JDF to schedule a convenient date and time for the movement of firearms.*

...

*This compound is perimeter fenced and is only accessible by JDF personnel. Therefore, for the Authority’s personnel to access the dual custody [redacted], they must be granted access to the compound by a JDF personnel. The [redacted] locking system is designed so that personnel from [redacted] must be present to open [redacted]. The Authority’s personnel produce two (2) lists of the firearms that are being placed in the [redacted] to which the JDF personnel and the Authority’s personnel sign accordingly. One (1) list is retained by the [redacted] for their records and the other is retained by the [redacted].”<sup>11</sup>*

5.4.8 By way of a statement dated July 26, 2021, Major Wayne Barrett, Officer Commanding, Logistics Company, JDF, stated, *inter alia*, that:

*“JDF personnel do not have access to the facility without the FLA representative being present with their [redacted].*

...

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<sup>11</sup> Statement of Mr. Shane Mr. Dalling, CEO, FLA dated October 06, 2021



*The circumstances under which the facilities are accessed is dependent on when we are contacted by the FLA. The FLA will say that they either have additional firearms for storage or that there are arrangements in place for destruction of the firearms.*

*As far as I am aware, the contents of the storage facilities are unserviceable firearms that are intended for destruction.”<sup>12</sup>*

5.4.9 Further to the foregoing, Mr. Dalling also indicated by way of his statement that “... the FLA has defective ammunition that was retrieved from holders and dealers to be destroyed.”<sup>13</sup>

5.4.10 To further determine the veracity of the allegations that the FLA's intended ammunition destruction exercise is a cover up for the fact that firearms and ammunition are missing from the vaults of the FLA, the DI conducted a verification exercise of the FLA's storage facility at the JDF between Friday, June 18, 2021 and Wednesday, June 23, 2021.

5.4.11 During the referenced verification exercise, the DI checked and confirmed that all firearms and firearm parts were accounted for, in conjunction with lists that were provided by both the FLA and the JDF.

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<sup>12</sup> Statement of Major Wayne Barrett dated July 26, 2021

<sup>13</sup> Statement of Mr. Shane Mr. Dalling, CEO, FLA dated October 06, 2021



#### Verification exercise at FLA's Main Vault

5.4.12 The DI's investigation lead him to conduct a series of verification exercises of the ammunition stored at the FLA's Main Vault located at [redacted]. This was done between November 15, 2021 and June 13, 2023.

5.4.13 During the conduct of the referenced verification exercises at the FLA, the DI observed security bags belonging to individual Licence Holders containing firearms and ammunition, which the DI describes as an 'Entry'. For the purposes of this investigation report, the DI defines an 'entry' as the record of the collection of ammunition and/or firearms stored in security bags belonging to Licence Holders.

5.4.14 The DI highlights that the stock balance of the FLA's vault changes daily, due to the intake and issuance/return of firearms and ammunition on a daily basis. Based on a copy of the FLA's Electronic Vault Management System records examined by the DI, there were four thousand one hundred and three (4103) entries of ammunition record reflected on the electronic vault management system as at June 17, 2021.

5.4.15 By way of a Judicial Hearing held on June 5, 2023, Ms. Deidre Mullings, Director, Application and Certification, FLA stated, *inter alia*, the following:

"Q: ... Share with us, Miss Mullings, the system or systems which are used at the FLA to account for firearms and/or ammunition which enters the FLA vault?

...



A: *When a licence holder is leaving the country the procedure is that that licence holder must leave his or her firearm at a police station or the nearest FLA office. So when the person comes in and indicates to us that they are leaving their firearm we have a firearm receipt book, so we take the firearm and the ammunition, if given. So we check the firearm against the licence to ensure that the firearm that the person has corresponds with the licence. So we write up that firearm—we refer to it as the FLA Receipt Book, and they are issued a receipt so that when they come back they can present it to us. That is done by the Firearm Examination Officer and at the end of the day the firearm and related accessories whether magazine or ammunition is put in a bag -- we refer to them as Security Bags -- so it is checked by the Examination Manager before the Security Bag is sealed, just to ensure that the information that is in the book and the respective firearm that the information corresponds. It is taken and placed in the vault until the person returns. So from the book now, we have what is referred to as the Vault Management System so that information is entered on the Vault Management System in terms of the firearm details, the TRN and the reason why the firearm is being stored.*

Q: *Thank you for sharing that. So this Vault Management System that you made mention of, is it an electronic system or a paper-based system?*



A: *The Vault Management System is electronic.*<sup>14</sup>

5.4.16 The DI notes that, of the four thousand one hundred and three (4103) entries recorded, a total of seven hundred and fourteen (714) entries from the FLA's main vault were examined during the course of the ammunition verification exercise.

5.4.17 Several of the security bags that were examined were deteriorating with visible holes and tears. Table 1 below highlights the findings germane to the investigation.

**Table 1**

Entries Checked	Findings
<b>Seven hundred and fourteen (714)</b>	Three hundred and thirty-five (335) rounds of ammunition were unaccounted for. <b>(Three (3) twelve gauge, thirty-two (32) 9mm and three hundred (300) 0.22 rounds)</b>
	There was Limited storage space within the vault.
	Older storage bags are deteriorating.

<sup>14</sup> Transcript of Judicial Hearing of Ms. Deidre Mullings, held on June 05, 2023, p29-31



	Of the seven hundred and fourteen (714) entries checked, only one hundred and one (101) were found on the electronic database.
	Several of the security bags contained labels which were no longer legible.

5.4.18 Consequent on the foregoing, the DI conducted a further verification exercise on June 13, 2023, at the FLA Headquarters with Ms. Deidre Mullings, Director, Application and Certification. By way of a statement dated June 13, 2023, Ms. Mullings indicated, *inter alia*, the following:

*"On Tuesday June 13, 2023 I did a verification process with the Integrity Commission in regards to findings from a December 2021 audit that the Commission did at the FLA's main vault in regards to firearms and ammunition.*

*I made verification on June 13, 2023 in regards to [name redacted]. This is because it showed that when the rounds were checked by the Commission it indicated that bag number [redacted] contained twenty-seven 0.38 rounds where the record on the bag indicate that it should have been thirty 0.38 rounds. I checked the rounds and confirmed the findings to be twenty-seven. I checked documentation conducted by the Internal Audit Team, on November 27, 2017 it also showed that the rounds were checked as twenty-seven rather than thirty rounds as indicated on the bag.*



...

A second discrepancy was in relation to [name redacted], bag number [redacted]. Ammunition was checked which was twenty-eight 9mm rounds. This too showed that when audited on November 27, 2017 it was found to be twenty-eight 9mm rounds rather than thirty as listed on the bag. In a vault book labelled Tray D, it showed where the rounds were received as thirty.

...

The third discrepancy is in relation to [name redacted], bag number [redacted], had two bags... The bags contained ammunition pertaining to 0.22 and 9mm rounds. On the bag it indicated five hundred and nineteen 0.22 rounds and forty-five 9mm rounds. There was a discrepancy with the 0.22 rounds when they were checked in that when I counted them along with the investigator ... the rounds came up to two hundred and nineteen. When I crossed checked this against the Audit conducted December 6, 2017 the records also indicate five hundred and nineteen 0.22 rounds.

...

Another query was made in regards to [name redacted], bag number [redacted]. On the bag it listed thirteen 9mm rounds. I checked and found the rounds to be thirteen. Contents in the bag corresponded with what was indicated on the bag.

...

There was another discrepancy with regards to [name redacted], bag number [redacted]. The bag indicated fifty-four 9mm rounds.



Upon counting I found it to be fifty-three 9mm rounds. The FLA receipt book also shows that fifty-four rounds were submitted to the FLA.

...

Final discrepancy was in regards to [name redacted] in relation to bag [redacted]. However, when the bag was retrieved the correct name reflected [name redacted]. The bag indicated forty-eight 9mm rounds. When same was counted it was forty-seven.

...

I wish to note here that I was informed by the Examination Manager, Mrs. Natalee Jones Amaogu and Mr. Jeffery Dawkins, Firearm Examination Officer, that from time to time rounds will fall from the storage bags which may become worn overtime and consequently these rounds are gathered and contained in a separate bag and box within the vault. During the verification process these boxes and bags were presented which showed various rounds such as 9mm, 0.38, 0.22, 12 gauge etcetera.”<sup>15</sup>

5.4.19 During the further verification exercise a box was presented by Ms. Mullings' team which contained an assortment of ammunition which is said to contain ammunition that fell from the deteriorating bags. The assortment of ammunition contained in the box were checked. A further one hundred and nine (109) 0.22 rounds were found along with a quantity of 9mm rounds, 0.38 and 12-gauge cartridges.

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<sup>15</sup> Statement of Ms. Deidre Mullings, Director, Application and Certification dated June 13, 2023  
**Report of Investigation Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant of Firearm Licences and the Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).**



5.4.20 The DI is unable to confirm whether the additional one hundred and nine (109) 0.22 rounds that were located among the assortment of ammunition are from the bag which was said to contain five hundred and nineteen (519) 0.22 rounds.

5.4.21 The DI also cannot confirm whether the 9mm, 0.38 or the 12-gauge cartridges that were found would reconcile the missing corresponding rounds. In any event, one hundred and ninety-one (191) 0.22 rounds remain unaccounted for.

### **Alleged targeting of Mr. Kent Brown**

5.5 In determining the veracity of the allegation that Mr. Kent Brown is being targeted by the FLA, the DI obtained an account from Mr. Brown. By way of statement dated August 19, 2021, Mr. Kent Brown, Business Owner, KBA Dealers Jamaica Limited/KBTTC, informed the DI of an Audit conducted at his business establishments by the FLA. Mr. Brown stated, *inter alia*, the following:

*“In April 2019 my business was audited by the FLA.*

*...*

*This audit took about three days for both our locations. The FLA sent me a copy of the audit report dated January 07, 2020.*

*...*

*The report stated that I had excesses and shortages of rounds and should immediately give an account for the rounds.*

*...*



In August 2020 the FLA conducted another audit of my business. Mr. Elsworth Cullum was in charge of this audit. At the end of the audit Elsworth Cullum called me on the phone and told me that he will be taking the rounds of ammunition that I have stored at the Pro Shop. I asked him what the customers will do when they come for their rounds and he told me that they will have to apply to FLA to get them.”<sup>16</sup>

5.5.1 The DI perused a letter dated July 20, 2019 from Mr. Kent Brown addressed to Mr. Shane Dalling, CEO, FLA. The letter stated, *inter alia*, the following:

*“Dear Mr. Dalling,*

*After doing my annual Firearm Dealers License renewal for both Maxfield Avenue and Temple Hall locations, in May 2019, I got the renewed Firearm License Certificates for both, only to realize that the “Firearm” aspect of the **Dealers License – Temple Hall** was omitted from the certificate; when I called [name redacted] I was told to send back the certificate to be amended; this was done, but in approximately two weeks when I got back the “amended” certificate it still had “Firearms” omitted from it.*

*When I called and enquired why, [name redacted] response was “this is how it will be, this is the way forward”*

*What she said to me made no sense as I have had a “Full” Dealers License at Temple Hall from 2014 which was applied for and approved by the then board and CEO.*

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<sup>16</sup> Statement of Mr. Kent Brown dated August 19, 2021



*I am therefore, formally requesting the grounds on which my full dealers license has been changed to a half dealership as no correspondence was received about this change.”<sup>17</sup>*

5.5.2 Further to the foregoing, the DI examined a letter dated September 9, 2019 from Ms. Kimoy Gaynor, Director, Corporate Planning and Client Relations, FLA, captioned “Re: Firearm Dealer Certificate – Temple Hall”<sup>18</sup>. The letter stated, *inter alia*, the following:

*“The Firearm Licensing Authority writes in response to your letter dated July 20, 2019, regarding the conditions of your Firearm Dealers Certificate for operations at Temple Hall, St. Andrew.*

*Please be advised that the Authority had not made any changes to your Firearm Dealers Licence for the Temple Hall location. Instead, we took corrective measures to align the conditions of said licence with the certificate issued. We have on file a letter from you requesting that the Temple Hall location be placed on your Dealers Licence for the Maxfield Address. While this request was approved by the former CEO, Dr. Kenroy Wedderburn, it was never intended to allow for the sale of firearms and ammunition at the Temple Hall location.*

*Please be guided that in order to effect such a change for the allowance of both firearms and ammunition at Temple Hall location, it would have a(SIC) required an application form being completed,*

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<sup>17</sup> Ibid

<sup>18</sup> Statement of Mr. Kent Brown dated August 19, 2021



the necessary investigation and a decision from the Board of the Authority.

The Authority therefore recommends that an application be submitted for consideration of full dealership for said location. We extend an apology for any inconvenience this may cause, and ask that you be guided accordingly.”<sup>19</sup>

5.5.3 Consequent on Ms. Gaynor’s letter, the DI perused a letter dated September 13, 2019, from Mr. Kent Brown addressed to Ms. Kimoy Gaynor captioned “Re: Firearm Dealers License – Temple Hall”<sup>20</sup>. The letter stated, *inter alia*, the following:

*“I am responding to your letter dated September 9, 2019 and in particular the first three paragraphs; the fact is changes are being made to a duly approved and authorized Full Firearm Dealer’s License; all the necessary and required documentation was submitted at that time for such a decision to be made. This license was also renewed every year without fail from it was approved in 2014 to present.*

*I find it very strange that in 2019 you have arrived at the conclusion that the FULL FIREARM DEALERS LICENSE issued **“was never intended for me to sell firearms and ammunition at Temple Hall.”***

*The dealers license issued clearly states what the license is for (please see attached copy), Therefore there is no interpretation necessary; it*

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<sup>19</sup> Ibid

<sup>20</sup> Statement of Mr. Kent Brown dated August 19, 2021



clearly states :- **THIS AUTHORIZES THE DEALER TO BUY OR SELL OR BUY AND SELL FIREARMS AND AMMUNITION**

**137 MAXFIELD AVENUE SUITE #9, KINGSTON 10 & TEMPLE HALL ST. ANDREW**

*I therefore see this action as an illegal act and I am once again, requesting that my full dealer's Licence be reinstated."*<sup>21</sup>

5.5.4 In light of the foregoing, the DI highlights, **sections 26B (1), 33(2)** and **35** of the applicable **1967 Act**. The Acts states, *inter alia*, the following:

**"26B. -(1) Subject to section 38, the functions of the of Authority shall be –**

- a) to receive and consider applications for firearm licences, certificates or permits;**
- b) to grant or renew firearm licences, certificates or permits;**
- c) to revoke any firearm licence; certificate or permit granted under this Act;**
- d) to amend the terms of a firearm licence, certificate or permit...**

**33...**

**(2) Subject to subsection (1), every licence, certificate or permit shall be subject to the prescribed conditions and to such other terms and conditions as the Authority may impose...**

**35. – (1) Subject to section 37 the Authority may at any time by notice in writing to the holder of a licence, certificate or permit vary the**

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<sup>21</sup> Ibid

Report of Investigation Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant of Firearm Licences and the Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).



**conditions subject to which such licence, certificate or permit is held except such of them as may be prescribed.”<sup>22</sup>**

5.5.5 Further to Mr. Brown’s assertion that he is being targeted by the FLA, the DI perused correspondence between Mr. Kent Brown and the FLA between the period January 7, 2020 to May 4, 2022. The DI highlights below, letters germane to the investigation.

5.5.6 The DI perused a letter dated January 7, 2020, addressed to Mr. Kent Brown from Ms. Letine Allen, Director, Compliance and Enforcement Department, FLA, captioned “*FIREARM DEALER AUDIT AND INSPECTION 2019*”.<sup>23</sup> The letter states, *inter alia*, the following:

**“Reconciliation of Ammunition**

*Only the .45 calibre ammunition were reconciled. There were excesses of 115,700 - .22, 11,856 - .223, 8,317 - .380, eight hundred (800) - .38super, seven hundred & forty-one (741) - .40, and 17441 9mm. There were shortage of 1,132 - .38spl. and four hundred and eight 12 ga.*

*You are required to immediately give an account for the shortage and excesses of ammunition mentioned above.*

**Conclusion / Actions to be taken by the company**

- *The KBA Dealers Jamaica Limited is to account for the shortage and excess ammunition outlined in this report on or before January 17, 2020.*

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<sup>22</sup> Firearms Act 1967

<sup>23</sup> Statement of Mr. Kent Brown dated August 19, 2021



- *Eighteen (18) firearms are included on your physical inventory, (see serial numbers above in the report), but were not seen in the inventory retrieve from the FLA Database, please provide documents to account for these firearms on or before January 17, 2020.*
- *Fifteen (15) firearms were sold, however, they were still included in your inventory on the FLA's database as ACTIVE. (see serial numbers above in the report. Please Provide documents (Declaration of Sale) to account for the sale of these on or before January 17, 2020."*<sup>24</sup>

5.5.7 The DI examined a letter dated January 15, 2020, addressed to Ms. Letine Allen, Director, Compliance and Enforcement Department from Mr. Kent Brown addressing the findings of the FLA's Audit. The letter states, *inter alia*, the following:

*"I am writing to you in response to the audit report that I received from you dated January 7, 2020 with answers to your concerns as follows:-*

*...*

***We at KBA Dealers offered the Audit team our ammunition sales figures as is customarily done, (used to cross check the ammo sales) and as seen from previous FLA audits: note, this was not used or accepted.***

***I therefore have come to the conclusion that figures, quantities, balances and totals FROM THE FLA are all incorrect and seriously***

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<sup>24</sup> Ibid

Report of Investigation Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant of Firearm Licences and the Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).



***compromised and holds no integrity whatsoever. It is very disturbing as these words, SET UP / ENTRAPMENT AND VICTIMIZATION rears its ugly head. I have lost all trust and faith in the FLA system as it stands now, as it is HIGHLY SUSPECT that so many errors, mistakes etc have occurred.***<sup>25</sup>

5.5.8 The DI perused another letter dated April 27, 2022 from Mr. Kent Brown addressed to Mr. Shane Dalling. The letter stated, *inter alia*, the following:

*“Due to the fact, that I was forced out of business by the Firearm Licensing Authority and some of its officers, I am requesting that the Firearm Licensing Authority make arrangements to check off inventory of arms, ammunition and gun magazines in my possession at KBA Dealers Jamaica Ltd... and collect same to be taken to the Authority for safe keeping, as I am no longer able to store these items...”*

5.5.9 In response, by way of a letter dated May 4, 2022, addressed to Mr. Kent Brown, captioned **“Re: Request for audit and collection of ammunition, firearms, and their component parts”** Mr. Dalling stated, *inter alia*, the following:

*“Reference is made to your letter dated April 27, 2022 for which we note the content therein.*

*We are unaware of any action of the Firearm Licensing Authority (FLA) or its officers, which could lead you to believe that we are forcing you out of business.*

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<sup>25</sup> Statement of Mr. Kent Brown dated August 19, 2021



The FLA, as a regulatory body, has a responsibility to ensure that all holders of licences, certificates and permits act in accordance with the law and its regulations thereto. As such, all dealerships and other relevant stakeholders are audited on an annual basis. Thereafter, the findings are outlined in an audit report, which is shared with the stakeholder, allowing them the opportunity to respond to the findings and implement corrective measures. It is to be noted that your operation was not treated differently, and we will continue to maintain our standard and execute our regulatory duties without malice to any of our stakeholders.

Based on your request, we ask that you make an application, in accordance with Section 32 of the Firearms Act, for the disposal of the firearms and ammunition that form part of your operation. Please note that the FLA will store the ammunition, firearms, and their component parts until the disposal process as outlined in law is completed. **We attach hereto a disposal application form, for your completion.**"<sup>26</sup>

### **Revocation of Mr. Brown's Firearm Licences**

5.5.10 The DI sought to ascertain whether the Firearm Licences for Mr. Kent Brown, KBA Dealers Jamaica Limited and/or Kent Brown Tactical Training Centre (KBTTTC) were revoked by the FLA. By way of further statement dated February 20, 2024, Mr. Kent Brown stated, *inter alia*, the following:

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<sup>26</sup> FLA Letter from Mr. Shane Dalling addressed to Mr. Kent Brown, dated May 04, 2022

**Report of Investigation Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant of Firearm Licences and the Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).**



*“My businesses KBA Dealers and KBTTC are now both closed. KBTTC was closed on July 21, 2021 and KBA Dealers was closed on February 06, 2022. Both businesses were closed because I no longer had a valid Firearm Dealer’s Licence to import goods. I no longer had a Dealer’s Licence for the Shop at Maxfield Avenue, the Range at Temple Hall nor did I have my gunsmith Licence. This is because the FLA withheld the certificates for my licences. I wish to say that my business cannot operate without the physical certificates because I need it to present to Jamaica Customs, firearm suppliers and the Trade Board. Sometimes Homeland Security would request a copy of the up to date certificate.*

*In relation to the Dealer’s Licence for KBTTC, the licence has to be renewed on or before May 10 each year. In 2021, I submitted the application before the date and paid the necessary fees. The receipt was stamped approved by the Compliance and Enforcement Department at the FLA as customary. Normally I would get the new certificates a few days later, however, this did not happen. When I realised that I did not get the new certificates, I sent an email to Ms. Deidre Mullings who is in charge of Application and Certification, however, I did not get a response. I sent her another email and she did not respond. I then asked my Attorney Mr. Hugh Wildman to send them a letter and they also did not respond. I had to shut down the Range/KBTTC on July 21, 2021 because I was out of ammunition to sell and my licence was not granted for me to be able to purchase ammunition for that location.*



*In relation to the Dealer's Licence for KBA Dealers, the licence is renewed on or before May 10 each year. The renewal date is also my birthday as is customary with the FLA. In 2021, I submitted my application and I paid all the necessary fees and my receipt was stamped approved by the Compliance and Enforcement Department at the FLA. However, my certificate was not issued to me.*

*In relation to my Gunsmith Licence, I applied for its renewal the same time as my Dealership Licence, my receipt was stamped approved by the FLA, however, I did not receive my approval certificate.*

*Subsequent to the FLA not issuing my certificates, I filed a suit in October 2021 to compel the FLA to issue the certificates that they were withholding..."<sup>27</sup>*

5.5.11 Further to Mr. Brown's assertions that he filed a Claim against the FLA, the DI examined a Claim bearing Number SU2021CV05141 filed in the Supreme Court of Judicature of Jamaica Civil Division. The parties were Kent Brown (Claimant) and the Firearm Licensing Authority (Defendant). The matter was decided in favour of the FLA. The Hon. Mrs. Justice Sonya Wint-Blair in her judgement indicated, *inter alia*, the following:

*"The court cannot find based on the evidence presented, that there has been a breach of duty, therefore a mandatory order is not the appropriate form of relief in all the circumstances of the case.*

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<sup>27</sup> Statement of Mr. Kent Brown dated February 20, 2024



Mandatory orders will not lie to compel the Authority to order anything to be done that is contrary to law.

**ORDERS:**

- a) *The declaration sought that the Defendant is not permitted under the Firearms Act to withhold the three certificates representing the three licences which were approved for renewal by the Defendant on May 7, 2021 and which have not been issued to the Claimant is refused.*
- b) *The order of Mandamus sought compelling the Defendant to issue to the claimant the three certificates representing the three licences which were approved for renewal by the Defendant on May 7, 2021 and which have not been issued to the Claimant is refused..."<sup>28</sup>*

5.5.12 Further to the foregoing, the DI perused a letter dated January 25, 2024, addressed to Mr. Kent Brown from Mr. Shane Dalling. The letter stated, *inter alia*, the following:

***“Re: Advisory of non-recognition of Trainer and Range Status by the Firearm licensing Authority***

...

*Please be advised that the Firearm Licensing Authority (FLA) made a decision on October 10, 2023, to withdraw your recognition as a Firearm Trainer and/or Range Operator.*

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<sup>28</sup> Claim Number SU2021CV05141 in the Supreme Court of Judicature of Jamaica Civil Division, 2023, between Kent Brown and the Firearm Licensing Authority  
**Report of Investigation Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant of Firearm Licences and the Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).**



*In view of the above, we request that you promptly halt operations at your range and refrain from conducting any training activities if you have not already done so. Additionally, your name will be excluded from the Authority's roster of Trainers and Range Operators."*<sup>29</sup>

5.5.13 The DI highlights three (3) Revocation Orders signed by the Chairman of the FLA's Board on February 6, 2024, relating to Mr. Kent Brown. The orders revoked Mr. Brown's Gunsmith Licence and two Firearm Dealers Licence pursuant to **Section 84** of the **Firearms (Prohibition, Restriction and Regulation) Act, 2022**. All three orders stated, *inter alia*, the following:

***"THE REASON FOR THIS REVOCATION IS BECAUSE THE INVESTIGATION HAS UNEARTHED CIRCUMSTANCES WITH WHICH THE BOARD IS EXTREMELY UNCOMFORTABLE. FROM ALL INDICATIONS, THE HOLDER'S INTEGRITY AND FITNESS HAVE NOW RENDERED HIM UNSUITABLE TO BE IN POSSESSION OF FIREARMS AND AMMUNITION."***<sup>30</sup>

5.5.14 The DI perused copies of the files relating to Mr. Kent Brown, maintained by the FLA. A thorough examination of the files was conducted with particular attention given to an investigation concerning Mr. Brown's business operations. Given the evidence obtained throughout the investigation and the subsequent preparation of an Investigation Report containing recommendations to the Board of the FLA, the DI is sufficiently satisfied that

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<sup>29</sup> Statement of Mr. Kent Brown dated February 20, 2024, Attachment KB1/2024

<sup>30</sup> Statement of Mr. Kent Brown dated February 20, 2024, Attachment KB3/2024



the basis of the revocations was fair and just. The DI further acknowledges that in this instance, the FLA did not act *ultra vires* to their statutory authority.

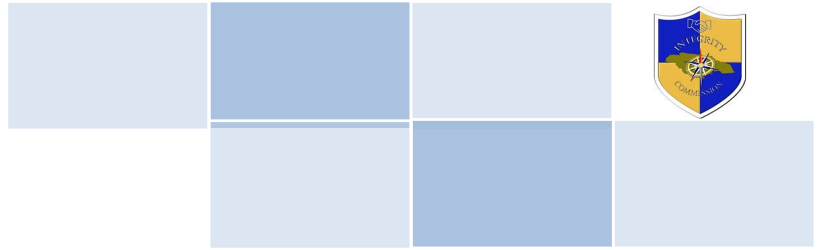
### **Circumstances Surrounding the Management and Access of the FLA's Online Dealer Database System/Licence Management System (LMS).**

5.6 During the course of the investigation, the DI received a further complaint regarding alleged fabrication of information on the FLA's Online Dealership System. As a result of the foregoing, the DI expanded the scope of the investigation to include an enquiry into the veracity of said allegations.

5.6.1 From the DI's enquiries it appears that the Licence Management System (LMS) is an online system used by the FLA and Licenced Dealers to manage the sale of ammunition and firearm by licenced firearm dealers.

5.6.2 Ms. Shatory English, Ballistics Manager at the FLA by way of a statement, dated September 29, 2022, described the LMS as follows:

*"The FLA Online Dealer database is used to specifically transact sales and to keep records of the inventory. The FLA adds inventory to the FLA Dealer Online database and the Dealers transact the sales. The dealers will seek approval to import firearms and ammunition. Once approval is given the Dealers will import the firearms and ammunition into the country and the firearms are ballistically tested and inspected. Documents are vetted and then the FLA proceeds to update the firearms and ammunition to the dealer inventory. Once*



*the firearms are on the inventory, the dealers can log into the FLA Online Dealer database and transact sales.”<sup>31</sup>*

5.6.3 As it relates to the reported irregularities being experienced with the FLA’s online Dealer System Database, Mr. Kent Brown advised the Commission by way of his statement, *inter alia*, that:

*“In April 2019 my business was audited by the FLA.*

*...*

*This audit took about three days for both our locations. The FLA sent me a copy of the audit report dated January 07, 2020.*

*...*

*The report stated that I had excesses and shortages of rounds and should immediately give an account for the rounds. As a result [name redacted] checked the electronic system at the Maxfield Avenue location and I went to the range to check the electronic system there. While checking the electronic system at the range I realised that there were four entries made on the system, where three persons purchased at[sic] total of six thousand (6000) rounds of bird hunting ammunition.*

*...*

*As a result of this discovery I sent a letter to Ms. Letine Allen of the FLA asking for more time to complete my response to her to address the shortages and excess pointed out in the audit report.*

*...*

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<sup>31</sup> Statement of Ms. Shatory English, Ballistic Manager, FLA dated September 29, 2022



The first thing to understand is that the database will not accept a purchase of more than two hundred 200 rounds per person each day. Secondly I do not sell bird hunting rounds on the range. And thirdly I have no records of the listed persons entering my range on that day or making any sales to them. Moreover the range was not opened on that day. I am the only person that can access the range database from my end. However, there are instances in the past where the FLA accessed my database from their end. This happens sometimes when the system is down and I send the information manually for them to input it onto the system.

...

Additionally, checks were made on the system which shows that firearms are in our possession however our physical records show that the firearms were legally sold. These entries are as far back as 2012. It is important to understand that once a firearm is sold, the entry is automatically deleted from the system once the entry is updated. However, these entries returned to the system for some strange reason. After pointing out this flaw I was blocked on the system from viewing past 2018 on the range system and at the Maxfield Avenue location I was blocked from seeing past 2016.”<sup>32</sup>

5.6.4 Consequent on the foregoing, the DI sought to ascertain whether and in what circumstances the FLA’s Online Dealership System may be accessed

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<sup>32</sup> Statement of Kent Brown dated August 19, 2021



by FLA staff members. Mr. Hansel Ramdon, Systems Engineer, FLA, by way of a statement dated October 26, 2022, stated the following:

*“For someone to access the Online Dealer Database System it will have to be authorized by the Director of the department. The Director will have to provide proper justification as to why an individual would need to access the system based on their job functions. This authorization would be done in a Memo format and when it is approved it is sent in an email to the persons who will create the logins. This is currently done by the Quality Control Officers.”<sup>33</sup>*

5.6.5 Further and having regard to the FLA's Online Dealership System, Mr. Hansel Ramdon further stated, *inter alia*, that *“The only time I interact with it is when a dealer or range are having connectivity issues. It could be service provider issues such as flow and it could also be the software itself meaning it could be corrupted or disrupted due to improper shutdowns or power outages.*

*We would call first to find out what the issue is in terms of the error message they are seeing on screen.*

...

*When I do troubleshooting and reinstall the software, the representative from the dealer or range would normally be around me. When the troubleshooting is completed, this person would have to log into the system to check and ensure the software is working. Improper shutdowns and power outages are the main causes of errors on the system. I am not able*

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<sup>33</sup> Statement of Mr. Hansel Ramdon, Systems Engineer, FLA dated October 26, 2022



to pull reports from the system. In addressing internal issues with the Online Dealer Database System, someone with log in credentials would log in to the system and I will address the issues they are faced with. That person would be around me while attending to the error and when I am complete they would log in to the system to ensure that it is working correctly.”<sup>34</sup>

5.6.6 Further to the foregoing, Mr. Rayshaun Brown, Quality Control Officer, FLA explained by way of a statement dated October 26, 2022, stated, *inter alia*, the following:

“...nothing on any Database can be amended without a written request sent to the Quality Control Manager. Once the Manager gives us the go ahead, we can make the amendments. Sometimes, other departments will require for the information to be amended on the Dealer Database and the request goes from the Manager of that unit to the Manager of Quality Control.

...

The information stored on the Dealer Database is firearm details. When I say firearm details I mean firearm type, caliber[sic], serial number and dealership... The Database has a log of each person who accesses the Database. For example, the Database can see who accesses an application and what change is made to the application. Information Systems and Technology Department, ISTD, can access this audit trail. When I say audit trail I mean the log of who accesses the application. The audit trail is stored electronically. In the event that the Audit Trail highlights

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<sup>34</sup> Statement of Mr. Hansel Ramdon, Systems Engineer, FLA dated October 26, 2022



any discrepancy, it would be for the Database Administrator to take the necessary steps. The Audit Trail information is not disposed of so it stores from the first log.

...

FLA is able to alter information that has been inputted by the Firearm Dealer. This happens only if the Dealer inputs, on his end, incorrect information onto the Database. The Dealer then submits a request to Firearms Application and Certification Department, then it is moved to ISTD then to Quality Control. Once the request is at the Quality Control Unit, it goes through the Manager for approval and then we make the necessary change to the Database. In my experience, the main quality control issue that I come across is incorrect information being inputted. There is a Data Entry Unit in the Application and Certification Department and often times there are human errors which causes the incorrect information on the Database.

I have not come across any situation where a Dealer disputes the information put in the Database. But if that were to happen, for example a serial number is incorrect, there would be several Departments involved to correct that information. We would ensure that the information from the different Departments then match and once that is verified then we can make the change and then notify all parties involved that the change has been made.

The Database Administrator and the Programmer are the other persons who can access the Database outside of the Quality Control Unit. The



Database Administrator position is currently vacant and the last person who was in said post was Mr. Shevon Robinson.”<sup>35</sup>

5.6.7 In light of the allegation made by Mr. Kent Brown in respect of the four entries seen on the LMS, showing that three persons purchased a total of six thousand (6000) bird hunting ammunition, the DI examined the FLA's systems transaction history records in respect of KBA Dealers/KBTTTC, relating to ammunition sales for the period July 2018.

5.6.8 By way of a statement dated March 13, 2023, Mr. Christopher Christie, Director, Information Systems and Technology, FLA, indicated, specifically, the information in table 2 below, in respect of the concerned ammunition sales by KBA Dealers (Ja.) Limited and KB Tactical Training Center, for the month of July in 2018:

**Table 2**<sup>36</sup>

Name	TRN	Calibre	Quantity Sold	Dealership	Certificate Number	Licence Number	Transaction Type	Entry Date	Transaction Date	Processed By
Witness A01	[redacted]	12GA	2000	KBA Dealers (Ja.) Limited	[redacted]	[redacted]	Bird Hunting Ammunition	2018-07-11 12:25	2018-07-11 0:00	Shevon Robinson
Witness A02	[redacted]	12GA	2000	KBA Dealers (Ja.) Limited	[redacted]	[redacted]	Bird Hunting Ammunition	2018-07-11 12:24	2018-07-11 0:00	Shevon Robinson
Witness A03	[redacted]	12GA	1000	KBA Dealers (Ja.) Limited	[redacted]	[redacted]	Bird Hunting Ammunition	2018-07-11 12:15	2018-07-11 0:00	Shevon Robinson

<sup>35</sup> Statement of Mr. Rayshaun Brown, Quality Control Officer dated October 25, 2022

<sup>36</sup> Statement of Mr. Christopher Christie, Director, IST dated March 13, 2023



Witness A03	[redacted]	12GA	1000	KBA Dealers (Ja.) Limited	[redacted]	[redacted]	Bird Hunting Ammunition	2018- 07-11 12:16	2018-07-11 0:00	Shevon Robinson
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5.6.9 In light of the foregoing, the DI sought to ascertain whether the individuals named as the purchasers of the ammunition in question were in possession of the requisite Firearm Users' Licence in order to purchase Bird Hunting Ammunition for the referenced July 2018 period.

5.6.10 In this regard, by way of a further statement dated November 27, 2023, Ms. Deidre Mullings stated, in particular, that "Witness A01 was in possession of a Firearm Users Licence for July 2018 which permitted him to be the holder of a 12 Gauge shot gun. The 12 Gauge shot gun is one of the calibres of shot guns used in bird hunting... Witness A02 was in possession of a Firearms Users Licence for July 2018 which permitted him to be the holder of a 12 Gauge shot gun... Witness A03 based on the system, was a license firearm holder for a 12 Gauge shotgun which expired on May 7, 2018. The records showed that he came in to the Firearm Licensing Authority on the 4th of May 2018 to renew his licence. In renewing, two things can take place. Firstly, if the licence card which is valid for five years is coming to an expiration, back then he would have been advised to complete a recertification process along with his regular renewal. The system currently shows that his renewal was in a created state which means he started the process of renewal but same was not completed. Secondly, if a person needed recertification, they would have been given a temporary licence which would have allowed them to maintain possession of the firearm until



they complete the recertification process. Witness A03 was granted a temporary licence on May 4th 2018 with an expiration date of September 20, 2018. A person with a temporary licence would not be permitted to purchase ammunition.

5.6.11 Further to the foregoing, the DI enquired whether individual Licenced Firearm Holders were permitted to purchase more than two hundred (200) rounds of ammunition per day from an authorized Firearm Dealer. This specific enquiry was made based on assertions made by Mr. Brown as to the maximum number of shot gun rounds a person (licensee) is permitted to purchase in any given day.

5.6.12 Ms. Letine Allen, by way of a further statement dated November 27, 2023 stated that *“From my knowledge at the Firearm Licensing Authority, Firearm Authorization Holders who have the current licences for shotguns are allowed to purchase a maximum of two thousand (2000) shotgun rounds for the bird hunting season. By Firearm Authorization Holder I mean the persons who are granted a firearm licence by the Firearm Licensing Authority. It is important to note that a Firearm Authorization Holder is permitted to purchase no more than two hundred (200) training rounds per day to be used on a licenced range unless otherwise permitted by the Authority. From my knowledge, bird hunting rounds are not considered or classified as training rounds.”*<sup>37</sup>

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<sup>37</sup> Further Statement of Ms. Letine Allen Director, Compliance and Enforcement dated November 27, 2023  
**Report of Investigation Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant of Firearm Licences and the Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).**



5.6.13 Ms. Allen also indicated in a further statement dated February 5, 2024, *inter alia*, that “... I wish to say that from my knowledge at the Firearm Licensing Authority, Firearm Authorization Holders who have the current licences for shotguns are allowed to purchase a maximum of two thousand (2000) shotgun rounds for the bird hunting season. These two thousand rounds can be purchased at once in one day. The process at the time in 2018 to best of my knowledge enabled a licensed firearm holder or firearm authorization holder to purchase all or a portion of the two thousand (2000) bird hunting rounds from a licenced dealer in one day or in one single purchase.”<sup>38</sup>

5.6.14 Mr. Christopher Christie, Director, Information Systems and Technology, FLA by way of a further statement dated November 28, 2023, stated that “As it relates to the amount of rounds an individual firearm licence holder may purchase per day from an approved dealer, an individual licence holder is permitted to purchase fifty 9mm/pistol rounds as per their certificate, two hundred (200) training rounds per day at a range facility and two thousand (2000) bird hunting rounds for the bird hunting season. Additional approval is required for any ammunition purchase outside the established ammunition purchase policies. This required and[sic] APV (Additional Ammunition Approval). During 2018, dealers were permitted to sell up to two thousand bird hunting rounds to an individual licence holder per shotgun for the bird hunting season. The Licence Management System (LMS) which is an online system used by the FLA and Licenced Dealers is a system that is used to manage the authorized sale of ammunition and firearm by the dealers. During 2018, the system did permit dealers to sell up

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<sup>38</sup> Further Statement of Ms. Director, Compliance and Enforcement dated February 05, 2024  
**Report of Investigation Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant of Firearm Licences and the Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).**



to two thousand (2000) bird hunting rounds to an individual licence holder per shotgun for the bird hunting season.”<sup>39</sup>

5.6.15 The DI also sought to ascertain whether the concerned individuals were in possession of the requisite Hunting Permits in July of 2018, in order to purchase the bird hunting ammunition.

5.6.16 By way of a statement dated June 12, 2025, Mr. Leonard Francis, Chief Executive Officer of the National Environment and Planning Agency (NEPA) stated that *“The Agency Records does not show that an application was received by NEPA from Witnesses A01, A02 or A03 for the purchasing a[sic] Hunter’s Licence for the 2017, 2018 and 2019 Bird Shooting Season.”*<sup>40</sup>

5.6.17 Subsequent to the foregoing, the DI sought an account from the three individuals whose particulars appeared on the LMS as having purchased the concerned six thousand rounds of Bird Hunting Ammunition.

5.6.18 By way of a Statement dated February 12, 2025, **Witness A01** stated that *“On Sunday 16 May 2021, I received a call from Mr. Kent Brown; I have known Mr. Brown since 1997... Mr. Brown advised me that my name appeared on a document in his possession, and invited me to visit his business place to see it. On Monday 17 May 2021, I met with Mr. Brown at his firearm dealership, KBA Dealers Ltd. He showed me a stack of pages that he said had been printed out from the FLA ammunition sales authorization computer installed at his firing range, KBTTC in St. Andrew. On*

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<sup>39</sup> Further Statement of Christopher Christie, Director, IST dated November 28, 2023

<sup>40</sup> Statement of Mr. Leonard Francis, CEO, NEPA dated June 12, 2025



one of those pages, I saw my TRN number [redacted] and name [redacted] in a record of sale for 2,000 rounds of 12-GA "Bird Hunting Ammunition" on July 11, 2018. There were similar entries for two other individuals... I told Mr. Brown that I certainly had not made any such purchase that year, and certainly had not been in possession of the required Bird Hunting Permit. I explained that while I used to regularly participate in Bird Hunting each year, I had actually not done so since purchasing a house in 2015..."<sup>41</sup>

5.6.19 By way of a statement dated February 28, 2025 **Witness A02** stated that "I have known Mr. Brown for about seventeen years. I first met him on his range in Golden Spring... Sometime in about 2021 or 2022, Mr. Brown called me to come by his store on Maxfield Avenue. I stopped by the store and he told me that my name along with two other persons appeared on a list which appears to be suspicious transactions. The list indicated that I purchased two thousand rounds of bird hunting ammunition from his shooting range in Golden Spring and also that the other two persons also purchased a large quantity of bird hunting ammunition. I immediately confirmed with Mr. Brown that this was not true and I did not purchase the rounds...I wish to say that I have never participated in bird hunting. I have never purchased bird hunting rounds and I did not purchase 2000 bird hunting rounds from KBA dealers or anyone else."<sup>42</sup>

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<sup>41</sup> Statement of Witness A01 dated February 12, 2025

<sup>42</sup> Statement of Witness A02, dated February 28, 2025



5.6.20 The DI attempted to obtain a witness statement from **Witness A03**. A media search revealed that an individual by the same name as Witness A03 died on June 16, 2018. Subsequently, enquiries were made of the Registrar General Department concerning Witness A03.

5.6.21 By way of a statement dated January 30, 2025, Mr. Desmond Davis, Acting Chief Executive Officer of the Registrar General's Department stated that *"The Agency has in its possession death record bearing registration code [redacted] for [Witness A03]. According to the record, the deceased died on June 16, 2018..."* A certified copy of the original death record was also appended to the witness statement of the Acting CEO of the RGD.

5.6.22 Subsequent to an examination of the certified copy of the referenced original death record, the DI is sufficiently satisfied that **Witness A03** is deceased as at June 16, 2018.

5.6.23 The DI highlights that **Witness A03** died on June 16, 2018 and the concerned entries were made to the LMS on July 11, 2018 with "Transaction Date 2018-07-11"<sup>43</sup>.

5.6.24 Consequent on the foregoing, the DI sought to ascertain the circumstances under which the impugned entries were made on the FLA's Licence Management System (LMS).

5.6.25 By way of a further statement dated December 19, 2023, Mr. Shevon Robinson, former Database Administrator, FLA, and also the person who the

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<sup>43</sup> Further Statement of Christopher Christie, Director, IST dated November 28, 2023



LMS records as having made the entries in question indicated, *inter alia*, the following:

*“In 2018 the Policy and Standard Operating Procedure (SOP) of the Information Systems and Technology Department (ISTD) of the Firearm Licensing Authority (FLA) relating to the update of Firearm and Ammunition Sales states that when a Dealership or Range Operator is unable to enter a transaction into the LMS the entries of those transactions will be entered by the staff of the ISTD to ensure record management as directed by the Director, ISTD. Based on the aforementioned, ISTD staff would update these records for the Dealership or Range using their login credentials to the LMS and assigning their location to that of the company that made the request. Additionally, submission for the update of Firearm and Ammunition Sales are given to staff via two [sic] formats;*

- 1. Email sent by the Dealership or Range to the Director, ISTD and forwarded to the ISTD staff*
- 2. Email sent by the Dealership or Range to the establish [istd@fla.gov.jm](mailto:istd@fla.gov.jm) checked by the ISTD staff*
- 3. Memorandum given by the Director, ISTD or the CEO”<sup>44</sup>*

5.6.26 As it relates to the four concerned entries made on the LMS in respect of the purchase of six thousand bird hunting ammunition, Mr. Shevon Robinson, by way of a statement dated February 17, 2025, stated that *“As it relates to these particular entries, I was given the instruction either by*

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<sup>44</sup> Statement of Mr. Shevon Robinson, former Database Administrator dated December 19, 2023  
**Report of Investigation Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant of Firearm Licences and the Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).**



*email or memo from the Director Information System and Technology Department (ISTD) or the Chief Executive Officer (CEO), to make the entries on the Licence Management System (LMS). However, I cannot say for sure which of the two methods the instructions were given at the time. When I made these entries in the Licence Management System, I was the Database Administrator. It is not unusual however for staff of ISTD to make the entries into the LMS because sometimes the Dealership may have challenges connecting to the system and so they may send an email to the FLA and request that we update the LMS from the FLA's end."*

5.6.27 Consequent on the above, the DI sought to ascertain whether any requests were sent to the FLA by Mr. Kent Brown for the information reflected in Table 2 above, to be added to the Licence Management System on his behalf. Mr. Christopher Christie further advised, by way of a statement dated March 13, 2023, that he is *"unable to provide emails for the period requested as the server for that period experienced a catastrophic failure and has been decommissioned since 2019."*<sup>45</sup> Mr. Christie further stated that efforts were being made to recover emails from the failed server.

5.6.28 The DI subsequently enquired on the status of the recovery of the data from the failed server. By way of a statement dated January 29, 2025, Mr. Shane Dalling, CEO of the FLA stated that *"...I am duly informed... that despite extensive efforts and the application of all available resources, the project to recover the lost data was ultimately unsuccessful."*<sup>46</sup>

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<sup>45</sup> Statement of Mr. Christopher Christie Former Director, IST, FLA, dated March 13, 2023

<sup>46</sup> Statement of Mr. Shane Mr. Dalling, CEO, FLA dated January 29, 2025



5.6.29 The DI highlights **section 5** of the **Cybercrimes Act** which stipulates the following:

**“(1) A person who does any act which that person knows is likely to cause any unauthorised modification of the contents of any computer, commits an offence.**

**(2) For the purpose of subsection (1) –**

**(a) the act in question need not be directed at –**

**(i) any specifically identifiable program or data or type of program or data;**

**(ii) any program or data held in a specifically identifiable computer; and**

**(b) it is immaterial whether the modification is, or is intended to be, permanent or temporary.”<sup>47</sup>**

### **Allegations of Corruption Involving Members of Staff of the FLA.**

5.7 The DI examined the following allegations of corruption:

- a) *Firearm Dealer John Elliott gun shop was shut down... for numerous months but miraculously reopened after, John paid you a hefty (\$500,000) sum “under the table” to have it reopened;*
- b) *as long as you, carter[sic] get your monetary kickback yuh nuh care who Shane screws over...; and*

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<sup>47</sup> Cybercrimes Act

Report of Investigation Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant of Firearm Licences and the Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).



c) You are targeting Mr. [Kent] Brown because he didn't'[sic] gave[sic] Ellsworth Cullum[sic] the 2 million dollars he tried to shake him down.

5.7.1 In light of the foregoing allegations, Mr. Kent Brown, by way of a statement dated August 19, 2021 stated, *inter alia*, the following:

*"In 2018/2019 I received a phone call from a private number. The person on the phone identified himself as Elsworth Cullum[sic] and I could identify him from his voice as well. He stated that he needed two million dollars \$2,000,000 payment for my business to continue operating smoothly. I told him that I was not going to pay him any money. He then said "ok if that's your decision". I told him some expletives and hung up the phone. I mentioned this to John Elliott and he shared with me that he was also being pressured by the FLA. I know for a fact that John's business was shut down by the FLA for between six to nine months."*<sup>48</sup>

5.7.2 The DI sought to ascertain whether Ellsworth Cullum[sic] was employed to the FLA and in what capacity. Mr. Shane Dalling in his statement dated June 24, 2021 indicated, *inter alia*, the following:

*"... Mr. "Elsworth Callum" was employed to the FLA; Mr. Callum was employed from August 22, 2017 in the capacity of Compliance and Enforcement Officer. He acted as Senior Compliance Officer from May 1, 2018 to January 1, 2019. He was appointed as Senior*

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<sup>48</sup> Statement of Kent Brown dated August 19, 2021



*Compliance Officer on January 2 2019 up until his separation on July 17, 2020. His role included the supervision of all Compliance and Enforcement Officers in the conduct of audits and complaints investigation, the collection of firearms and ammunition from various locations, transportation of firearms earmarked for destruction and the preparation of reports thereof.”<sup>49</sup>*

5.7.3 The DI's efforts to locate John Elliott, were unsuccessful. The DI's investigation revealed that Mr. John Elliot died in July 2021, shortly after the commencement of this investigation. Other enquiries made by the DI into the veracity of the allegations of corruption made against staff of the FLA proved futile.

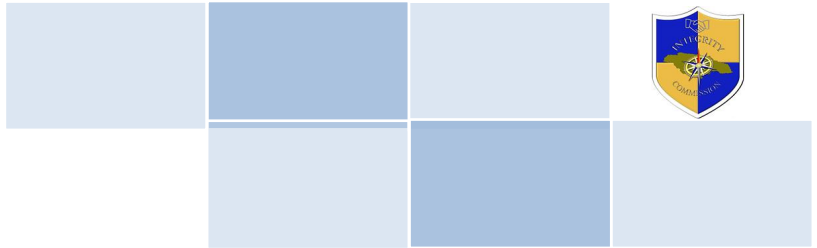
5.7.4 The DI's enquiry into the allegation that Elsworth Callum, former Senior Compliance Officer at the FLA demanded two million dollars from the complainant, in order for his business to continue operating smoothly did not yield any findings in support of or contrary to the allegation.

5.7.5 Respecting the foregoing allegations, the DI highlights here **Section 14(1)(a)(c)** of the **Corruption Prevention Act** which states:

**“14. –(1) A public servant commits an act of corruption if he–**  
**(a) corruptly solicits or accepts, whether directly or indirectly, any**  
**article or money or other benefit, being a gift, favour, promise or**

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<sup>49</sup> Statement of Mr. Shane Mr. Dalling, Chief Executive Officer of the FLA dated June 24, 2021  
**Report of Investigation Concerning Allegations of Corruption, Impropriety and Irregularities in the Grant of Firearm Licences and the Storage of Firearms and Ammunition at the Firearm Licensing Authority (FLA).**



**advantage for himself or another person for doing any act or omitting to do any act in the performance of his public functions;**  
**(b) in the performance of his public functions does any act or omits to do any act for the purpose of obtaining any illicit benefit for himself or any other person;”<sup>50</sup>**

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<sup>50</sup> Corruption Prevention Act



## Chapter 6 – Conclusions

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6.0 This chapter outlines the conclusions drawn by the DI.

### **Allegations of Missing Firearms and Ammunition from the Vaults of the FLA**

- 6.1 The DI concludes that the FLA actively stores firearms and ammunition belonging to Licence Holders. The DI further concludes that, the firearms are stored by the FLA for safekeeping, disposal, surrender, seizure, licences not renewed, revocations, FLA enquiry and firearms for deceased persons.
- 6.2 The DI concludes that up to June 23, 2021, the FLA had one thousand two hundred and twenty-four (1224) firearms and firearm parts stored for destruction. The DI further concludes that, there is no evidence to support the allegation that any of the firearms and/or firearm parts stored for destruction by the FLA are unaccounted for.
- 6.3 The DI concludes that one hundred and ninety-one (191) 0.22 rounds of ammunition belonging to a private firearm holder are unaccounted for at the FLA's main vault up to June 13, 2023. The DI's conclusion is premised on the fact that the respective storage bag labelled as containing five hundred and nineteen (519) 0.22 rounds of ammunition, was found to contain two hundred and nineteen (219) 0.22 rounds of ammunition. A further one hundred and nine (109) 0.22 rounds of ammunition were found amongst an assortment of ammunition. It is important to note that there was no clear indication from the FLA that the one hundred and nine (109)



0.22 rounds of ammunition that were found amongst the assortment of ammunition belonged to the private firearm holder. Notwithstanding, one hundred and ninety-one (191) of the total amount of five hundred and nineteen (519) 0.22 rounds of ammunition remains unaccounted for.

- 6.4 The DI further concludes that the FLA failed to adequately maintain the inventory stored in their main vault and that there ought to be greater accountability in the storage of firearms and ammunition by the FLA. The DI's conclusion is premised on the fact that only seventeen percent (17%) of the four thousand one hundred and three (4103) entries on the Electronic Vault Management System were checked and significant anomalies were detected, most noteworthy of which is ammunition being unaccounted for, as well as the deteriorating storage bags found.

### **The Administration of the FLA's Licence Management System**

- 6.5 The DI concludes that the FLA's Licence Management System (LMS) was manipulated by the FLA and it appears that inaccurate information was inputted in Mr. Kent Brown's LMS account. The DI's conclusion is premised on the fact that Shevon Robinson, former Database Administrator at the FLA, made four entries to the LMS of Mr. Brown, of three individuals purchasing a total of six thousand 12 Gauge bird hunting ammunition, without the request or consent of Mr. Kent Brown. Two of the alleged purchasers did not possess the requisite permits from NEPA in order to make the alleged purchases. One of the alleged purchasers stated that he had never done bird hunting and had never purchased bird hunting ammunition. The second alleged purchaser admitted to participating in



bird hunting but had not done so since 2015. The confirmed death of the third alleged purchaser who died approximately three weeks before he allegedly purchased 2000 rounds, 1000 in two instances, coupled with the fact that at the material time, he was in possession of a temporary licence which would not permit him to purchase ammunition, further supports Mr. Brown's account that the LMS was manipulated to reflect incorrect data to his detriment.

The DI further concludes that the instruction, *if any*, to input and the act of inputting what appears to be fabricated information *prima facie* constitute a breach of **section 5** of the **Cybercrimes Act**. Ordinarily, this matter would have been referred for prosecutorial consideration but given certain evidentiary gap occasioned by the reported failure of FLA's server, no such referral is being made.

### **Revocation of Licences**

- 6.6 The DI concludes that Mr. Kent Brown's Gunsmith and Dealership Licences were revoked by the FLA. The DI's conclusion is premised upon the Revocation Orders issued by the FLA, pursuant to **Section 84** of the **Firearms (Prohibition, Restriction and Regulation) Act, 2022**. The DI further concludes that the FLA did not act *ultra vires* to their statutory authority in revoking the referenced licences.



### **Allegations of Corruption Involving Members of Staff of the FLA**

- 6.7 The DI is unable to resolve the allegation that Mr. John Elliott corruptly paid five hundred thousand dollars (\$500,000) to anyone at the FLA to have his business reopened because Mr. John Elliott died shortly after the commencement of this investigation. This prevented the DI from exploring the referenced allegations with him.
- 6.8 The DI concludes that the act of manipulating the LMS and the inputting of what appears to be inaccurate information on the system by an employee of the FLA, to the detriment of Mr. Brown is sufficient basis for a reasonable and detached observer to form the view that Mr. Kent Brown was targeted by the FLA. The DI's conclusion is premised on the fact that without any reasonable justification or Mr. Brown's request or consent, Mr. Shevon Robinson made what appears to be inaccurate entries to Mr. Brown's LMS. These entries had the potential to cause adverse consequences for Mr. Brown's business operations. Further, and as has been established above, one of the three individuals who is alleged to have purchased two thousand (2000) rounds was deceased at the material time. The other two individuals have denied purchasing said rounds. This is consistent with Mr. Brown's account that the sale of the referenced rounds to the individuals identified did not occur. The DI is however unable to conclude whether Mr. Kent Brown was targeted because he did not pay two million dollars (\$2,000,000) to Mr. Elsworth Callum, former Senior Compliance Officer at the FLA, as was alleged.



## Chapter 7 – Recommendations

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- 7.0 Having regard to the findings made herein, the DI recommends to the Commission that copies of this report be referred to the public officials and/or parliamentarians identified below in accordance with **section 54 (3) (a) (i) and (ii)** of *the Integrity Commission Act* for appropriate action.

### **Recommendations to the Firearm Licensing Authority (FLA)**

- 7.1 The DI recommends that, if not yet done, the FLA must take the necessary steps to address the accountability concerns around the storage of ammunition at its Main Vault. The DI's recommendation is grounded in the fact that there is limited storage space available in the FLA's Main Vault. Additionally, the security storage bags held in the vault are deteriorating with corresponding fading labels. The foregoing may have contributed to the FLA's inability to account for a number of the rounds at the time of the DI's inspection. This is an issue which demands **urgent** and **immediate** corrective action.
- 7.2 The DI recommends that given the critical nature of the operation of the FLA, if not yet done, the FLA must ensure that their servers are properly maintained and that a backup server exists. This may ensure that in the event of a failure of the main server, all data is not lost. The DI's recommendation is grounded in the fact that the FLA's server reportedly

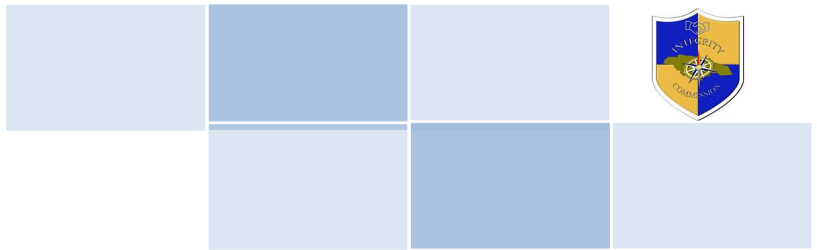


suffered a catastrophic failure, the data stored thereon could not be recovered and there was no backup storage in place.

- 7.3 The DI recommends that the FLA implements a standardised and documented process to treat with the inputting of information to the LMS, once a request is made by a Dealer. The FLA should also ensure that any request made by a Dealer is properly documented and the record maintained for transparency, accountability and auditing purposes.
- 7.4 The DI further recommends that where applicable, the FLA should not make entries to the LMS without the written consent and/or request of the respective Authorised Dealer and documented approval of a duly authorised officer of the FLA. The DI's recommendation is premised on the fact that an employee of the FLA, without a written request or consent from Mr. Kent Brown (based on Mr. Brown's evidence), made entries to the LMS, contrary to the established procedures and the principles of good governance.

### **Recommendation to the Ministry of National Security and Peace (MNS)**

- 7.5 The DI recommends that the MNS conduct a full independent audit of all the FLA's Vaults with a view of determining the full extent of missing ammunition and to ensure that all firearms on record are properly accounted for. The DI's recommendation is based on the fact that only seventeen percent (17%) of the four thousand one hundred and three (4103) entries on the Electronic Vault Management System were checked



and significant anomalies were detected, most noteworthy of which is ammunition being unaccounted for. The DI posits that considering the country's current climate in respect of the use of firearms to commit violent crimes, one missing round of ammunition is one too many. Consequently, the DI recommends that the referenced audit be expedited.

### **Post Investigation Actions**

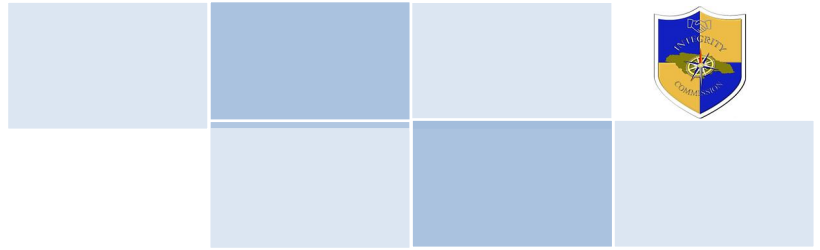
As part of the Commission's policy to share the findings and recommendations of the DI with persons in respect of whom adverse findings are made during the course of an investigation, save for matters referred to the Director of Corruption Prosecution, the DI invited Mr. Shane Dalling, Chief Executive Officer of the Firearm Licensing Authority to a meeting where the findings and recommendations made herein were shared.

Mr. Dalling was given an opportunity to respond to the DI's findings orally and/or in writing. The written response received (except the attachments to Mr. Dalling's response containing sensitive information) and meeting transcript are appended to this report (see appendices 1 and 2, respectively). The DI has not been presented with any evidence in Mr. Dalling's response that would alter his conclusions and recommendations.

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Kevon A. Stephenson, J.P  
Director of Investigation

March 27, 2026  
Date



# Appendices

"FLA... Regulating with purpose."

Head Office  
91A Old Hope Road  
Kingston 6, Jamaica W.I.  
Telephone: 927-5158 - 60, Fax: 978-0249

St. Ann Regional Office  
Lot 60, Dairy Road  
Discovery Bay, St. Ann  
Telephone: FLOW- 876-670-0812  
Digicel- 876-618-2920-21

Website: [www fla.gov jm](http://www fla.gov jm)  
Email: [fla@cwjamaica.com](mailto:fla@cwjamaica.com)



Mandeville Regional Office  
Shop G15, James Warehouse Plaza  
Mandeville, Manchester  
Telephone: 962-3063; Fax: 962-3062

Montego Bay Regional Office  
Shop 9, Bogue City Centre, Bogue,  
Montego Bay, St. James  
Telephone: 978-0245, Fax: 971-3270

March 24, 2026

**URGENT  
BY BEARER**

Mr. Sanjay Harrisingh  
Senior Contract, Procurement and Corruption Investigating Officer  
Contract, Procurement and Corruption Investigation Unit  
Integrity Commission  
1<sup>st</sup> Floor, PIOJ Building  
16 Oxford Road  
Kingston 5

Appendix 1

**Attention: Mr. Sanjay Harrisingh**

**Dear Sirs:**

**Re: Formal objection to publication of current report on investigation into allegations concerning corruption, impropriety, and irregularities in the storage of firearms and ammunition, and the award of Firearm Licences at Firearm Licensing Authority (FLA)**

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**Background**

- 1) We write further to meeting held on **March 19, 2026**, at your office, in which we were informed of the Integrity Commission's ("the Commission") findings regarding the captioned investigation. This serves as our formal response to the findings and recommendations you read to us. We further state that we were hearing the allegations on which you premised the abovementioned investigation for the first time. Therefore, we were not given the benefit of the entire report since we were not provided with a copy of

March 24, 2026

**Re: Formal objection to publication of current report on investigation into allegations concerning corruption, impropriety, and irregularities in the storage of firearms and ammunition, and the award of Firearm Licences at Firearm Licensing Authority (FLA)**

same and the entire report was not disclosed to us. As such, our response is disadvantaged in the circumstances.

- 2) We acknowledge the role of the Integrity Commission in preventing corruption by monitoring public authorities, investigating complaints, promoting transparency and we have always and will continue to support and cooperate with the Commission in executing its role. The FLA is remains dedicated to regulating and licensing firearms and ammunition, preventing the misuse of firearms and ammunition and by extension assisting in the reduction of gun related crimes. The FLA stands for transparency and would be the first to report any staff involved in corruption and any suspicion of corruption being carried out at the FLA.

**Objection**

- 3) Based on the foregoing, we strongly object to the findings and conclusions as currently stated within the Commission's report. The Commission upon embarking on this investigation only disclosed to the FLA that they are conducting an "*Investigation into allegations concerning corruption, impropriety, and irregularities in the storage of firearms and ammunition and the award of firearms at the Firearm Licensing Authority (FLA)*" and we believe that if this report is allowed to be publicized and tabled in parliament in its current form, would amount to a grave injustice to the FLA and the individuals named within this report. This report will also cause reputational damage and endanger the lives of the parties named therein.

**Breach of Natural Justice and Procedural Fairness**

- 4) The principles of natural justice and fairness require that the FLA be given a full opportunity to respond to any adverse findings in an investigation of this caliber before its publications. To date, we have not been allowed to do so. In our meeting, we were merely told that if we have any 'questions' regarding the report, we should submit same by **March 24, 2026**. As per Lord Mustill in *R v Secretary of State for the Home Department ex parte Doody* "*What does fairness require in the present case? My Lords, I think it's unnecessary*

March 24, 2026

**Re: Formal objection to publication of current report on investigation into allegations concerning corruption, impropriety, and irregularities in the storage of firearms and ammunition, and the award of Firearm Licences at Firearm Licensing Authority (FLA)**

*to refer by name or to quote from any of the often-cited authorities in which the courts have explained what is essentially an intuitive judgment. They are far too well-known. From them, I derive that (1) Where an act of parliament confers an administrative power, there is a presumption that it will be exercised in a manner which is fair in all the circumstances. (2) The standards of fairness are not immutable. They may change with the passage of time... (3) The principles of fairness are not to be applied by rote identically in every situation. What fairness demands it depends on the context of the decision, and this is to be taken into account in all its aspects. (4) An essential feature of the context is the statute which creates the discretion as regards both its language and the shape of the legal and administrative system within which the decision is taken. (5) Fairness will very often require that a person who may be adversely affected by the decision will have an opportunity to make representations on his own behalf either before the decision is taken with a view to producing a favorable result or after it is taken with a view to procuring its modification or both."* Publication in these circumstances, without taking into consideration our response and modifying the report, would be fundamentally unfair.

**Allegations**

- 5) ***Anonymous Email*** – It was stated that you received an anonymous email outlining the allegations which forms the premise of this investigation. We believe that your legislation does not allow for the Commission to conduct investigations from complaints received from anonymous emails. Sections 37 and 38 of the Integrity Commission Act (“ICA”) deal with the making of complaints and the role of the Director of Information and Complaints. Section 37 of the does not allow for the Commission to accept anonymous complainants as the person who makes the complaint must be able to be held accountable in the event that their complaint was made knowing that it was false, misleading, and made in bad faith. Given that the foundation of this investigation and, by default, this report is an anonymous email, we believe that this is a breach of the ICA.

March 24, 2026

**Re: Formal objection to publication of current report on investigation into allegations concerning corruption, impropriety, and irregularities in the storage of firearms and ammunition, and the award of Firearm Licences at Firearm Licensing Authority (FLA)**

*Section 37(4)*

*“A person who, whether orally or in writing makes a complaint, gives information or notifies the Commission about any matter knowing it to be false or misleading or being reckless as to whether it is false or misleading commits an offense and is liable on summary conviction in a parish court to a fine not exceeding one million dollars or to imprisonment for a period not exceeding one year.”*

*Section 37(5)*

*“No person shall be obligated or permitted to disclose the name or address of a person who makes a complaint under subsection (1) or state any matter which may lead to the identity of such person being known.”*

*“Section 38 (1) On receipt of a complaint, information or notification under section 37(1) the Director of Information and Complaints shall:-*

- (a) record it or cause it to be recorded;*
- (b) supply to the person or cause to be supplied to the person a copy of the record made of that complaint, information or notification and;*
- (c) subject to subsection (3), submit the complaint to the appropriate Director for further necessary action...”*

- 6) Additionally, had the Commission given the FLA the opportunity, we would have been able to provide the Commission with information and evidence that the allegations read to us were replicated from an e-mail which was sent to the FLA and widely circulated to various parties, including MOCA, Patrick Hilton, the Gleaner, the Prime Minister, US Embassy, State Department and other persons in the business community. This particular anonymous email mentioned by the Commission was email number 19 of the list of 30 emails mentioned within a Court Order obtained by us from the SUPERIOR COURT OF

March 24, 2026

**Re: Formal objection to publication of current report on investigation into allegations concerning corruption, impropriety, and irregularities in the storage of firearms and ammunition, and the award of Firearm Licences at Firearm Licensing Authority (FLA)**

THE STATE OF CALIFORNIA IN AND FOR THE COUNTY OF SANTA CLARA, on the 4<sup>th</sup> of June 2021. For ease of reference, we enclose a copy of the said email along with the said Court Order. We say that a court in the United States found sufficient basis, having reviewed and considered sufficient evidence, and found good cause to make an order granting us an ex parte motion for expedited discovery against Verizon Media, formally known as Yahoo, Google, and Microsoft Corporation, to release information against persons participating in a malicious smear campaign against the FLA and its employees. After the matter was taken to court to resolve the issue, we sought the assistance of MOCA and the US embassy and had meetings to resolve the constant attacks through this medium by several persons.

- 7) We state further that the ICA provides that the Commission should not embark on issues already ventilated by the Court. The order from the court would mean that the court in the US was satisfied that there were justifiable and sufficient reasons and evidence to support a deviation and breach of the constitutional right to privacy to resolve these issues. Therefore, the Commission should not have embarked on this investigation, and had the Commission disclosed the allegations to the FLA, there would have been no need to investigate. We believe that this is a violation of the ICA. Sections 47(2)(b) and (c) state as follows:

*“The Director of Investigation shall, in determining whether to investigate a matter that has been referred to him, consider-*

*(a) ...*

*(b) whether or not the matter is frivolous or vexatious;*

*(c) whether or not the conduct to which the matter relates is or has been the subject of an investigation or other action by any other authority on any other enactment.”*

***Missing Ammunition***

- 8) We are confident that there are no ammunitions missing or unaccounted for, as stated by the Commission. What we will say is that the storage bags with the stated .22 round

March 24, 2026

**Re: Formal objection to publication of current report on investigation into allegations concerning corruption, impropriety, and irregularities in the storage of firearms and ammunition, and the award of Firearm Licences at Firearm Licensing Authority (FLA)**

ammunition were within the vault for several years, and as such, over time, the bags deteriorated. In the circumstances, the storage space, consistent moving off the bags within the vault for inventory purposes, contributed to ammunition falling out of their assigned bags and into the general vault area. Upon this ammunition falling out, they are collected and placed in other containers and storage bags within the said vault. We have taken several steps, including stockpile management and destruction, to address this issue.

***Administration of Licensing Management System ("LMS")***

- 9) We strongly refute that there was any manipulation of the FLA LMS system and any fabrication of information concerning Mr. Kent Brown. What we will say is that the entries were made and that the supporting documents were not presented to the Commission; we believe that is a fair conclusion. The allegation as read to us is that the FLA system was manipulated to input information against Mr. Brown's instructions. One would ask the question, what interest would the FLA have in doing this? The FLA has no interest in entering false transactions as suggested nor was Mr. Kent Brown targeted. The dealer, in this case, Mr. Kent Brown, would still have the physical rounds within his possession. The FLA only makes entries on the LMS system for any dealer upon their request, orally or in writing. These requests are facilitated by the FLA in situations where the dealer's system goes down or where the dealer is unable to log on for reasons such as poor internet connection and so on. Dealers, from time to time, will contact the FLA and inform of the system challenges they are experiencing and, in an effort, to ensure that dealers are monitored, the FLA will enter the provided information. We also bring to the Commissions attention to the fact that Mr. Kent Brown was never sanctioned in relations to any information inputted on the LMS system. Our audits revealed the information in issue and Mr. Brown was written to by us in an effort to reconcile same. We have enclosed copies of our correspondence for the Commission's reference.
- 10) We further state that Software Manipulation refers to the intentional alteration or interference with a system's functionality, logic, or outputs to produce an unauthorized or misleading result. The FLA's systems are auditable and have been audited. Our findings

March 24, 2026

**Re: Formal objection to publication of current report on investigation into allegations concerning corruption, impropriety, and irregularities in the storage of firearms and ammunition, and the award of Firearm Licences at Firearm Licensing Authority (FLA)**

indicate that there has been no system manipulation. Additionally, system logs, audit trails, and access controls were reviewed and show no signs of unauthorized activity or tampering.

***Entries made by Mr. Shevon Robinson***

- 11) We will say that the FLA only makes entries on the LMS system for any dealer upon their request, orally or in writing on request where the dealer's system is down for reasons such as network failure or where the dealer is unable to log on. We are not aware of who instructed Mr. Robinson since we are not privy to the information he gave to the Commission.
- 12) The LMS system was not manipulated in an effort to target Mr. Kent Brown. Even if entries were made, Mr. Brown would suffer no detriment. The FLA has never and does not target licence holders.

***Mr. John Elliot***

- 13) The manner in which the findings of the Commission are crafted gives the impression that the allegations made concerning Mr. John Elliot are true, but for the death of Mr. Elliot. We are suggesting to the Commission that it find that there is no evidence, or none was provided to the Commission to substantiate the allegations made, and not state that the Commission was 'unable to resolve' the allegations. We will further state that Mr. Elliot paid \$500,000 less \$50,000 that is \$450,000, to the FLA on February 23, 2021. Receipts were issued to him for the said payment as the payments represent \$200,000 for the renewal of his licences and \$250,000 for late fees. The following is the history of events concerning the FLA and Mr. John Elliot:

- (a) On July 29, 2019, and July 30, 2019, an audit was completed by the FLA's Compliance and Enforcement on Eagle Arms Distributors Limited, which is Mr. Elliot's Company;
- (b) On December 20, 2019, a report of the said audit was prepared by the FLA and submitted to Mr. John Elliott on December 23, 2019, outlining the team's

March 24, 2026

**Re: Formal objection to publication of current report on investigation into allegations concerning corruption, impropriety, and irregularities in the storage of firearms and ammunition, and the award of Firearm Licences at Firearm Licensing Authority (FLA)**

findings and actions to be taken by Mr. Elliot as the audit conducted revealed that there was a shortage of ammunition in some respects and excess of ammunition in other respect as well as no dealer to dealer form was submitted for a Keltic .22 rifle to verify a proof of purchase.

- (c) Mr. Elliot wrote to the FLA in response to our letter and requested multiple extensions of time to comply with our requests, and the said request for extension of time was granted until his licenses were eventually suspended due to non-compliance with the terms and conditions of his licence and until Mr. Elliot reconciled the discrepancies found in the audit. We have enclosed copies of all our correspondence between the FLA and Mr. Elliot concerning this issue and his receipt for the said payment made to the FLA.

***Mr. Kent Brown and the allegation of a required \$2,000,000 payment for operation***

- 14) We believe that the Commission should be mindful of the allegations concerning the demand for a payment of \$2,000,000 and, in the findings, state whether any evidence was presented to them; if not, state that there was no evidence presented to the Commission to conclude the issue.

**Recommendations**

- 15) Save, and except that we believe that the report should be amended by the Commission, and it is the amended report that should be referred to public officials and parliament for appropriate action, the FLA has no further issue with the recommendations as stated by the Commission.

**Unresolved Allegations**

- 16) Several of the allegations mentioned by the Commission were not addressed by the Commission, bearing in mind that these allegations in an official report could have reputational damage and life-threatening consequences. There has never been a targeting of Mr. Kent Brown or any other dealer. When Mr. Brown wrote to the Gleaner on April

March 24, 2026

**Re: Formal objection to publication of current report on investigation into allegations concerning corruption, impropriety, and irregularities in the storage of firearms and ammunition, and the award of Firearm Licences at Firearm Licensing Authority (FLA)**

16, 2018, the FLA wrote a response to his letter in the Gleaner on April 26, 2018. Mr. Brown wrote again in May 2021 regarding the conduct of the FLA team, and the FLA also responded to this his second letter. We have enclosed these letters hereto for ease of reference. Mr. Brown has gone as far as to file a claim against the FLA, accusing the FLA of shutting down his business when the truth is that he had gone through a separation with his wife, and the court ordered him to pay her as per the case. This is what caused his business to be closed, not the FLA.

We trust that the Commission will give urgent and careful consideration to this objection in keeping with its statutory mandate and the requirements of fairness and justice. We enclose herewith the documents mentioned above and listed in the **Schedule of Enclosures** attached hereto, which we rely on in support of this objection. Should the Commission require additional documentation, we are more than willing to present same upon request.

Yours sincerely,

**FIREARM LICENSING AUTHORITY**

  
Shane Dalling, J.P.  
Chief Executive Officer

March 24, 2026

**Re: Formal objection to publication of current report on investigation into allegations concerning corruption, impropriety, and irregularities in the storage of firearms and ammunition, and the award of Firearm Licences at Firearm Licensing Authority (FLA)**

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**SCHEDULE OF ENCLOSURES**

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<b>DOCUMENT DESCRIPTION</b>	<b>DOCUMENT DATE</b>
Email from "Denise Williams" bearing allegations	April 29, 2021
Court Order	June 4, 2021
<b>KENT BROWN</b>	
Letter to the Editor written by Kent Brown	April 16, 2018
Letter to the Editor written by FLA	April 26, 2018
Letter to FLA written by Kent Brown	May 22, 2021
Letter to Kent Brown written by FLA	June 2, 2021
Letter to Kent Brown written by the FLA	January 7, 2020
NIB Report	August 9, 2022
<b>JOHN ELLIOT</b>	
Correspondence and relevant documents between FLA and John Elliot:	
• Audit and Inspection Report for Eagle Arms	December 20, 2019
• Letter from Mr. John Elliott	January 29, 2020
• Letter to Mr. Elliot regarding Suspension of his Dealership	May 11, 2020
	June 10, 2020

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March 24, 2026

**Re: Formal objection to publication of current report on investigation into allegations concerning corruption, impropriety, and irregularities in the storage of firearms and ammunition, and the award of Firearm Licences at Firearm Licensing Authority (FLA)**

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- Letter from Mr. John Elliott  
July 7, 2020
  
  - Letter to Mr. Elliot
  
  - Audit and Inspection Report for Eagle Arms  
September 28, 2020
  
  - Letter from Mr. John Elliott received by the Authority  
November 17, 2020
  
  - Report from Mr. Rahjean Sortie, Senior Compliance Officer  
November 25, 2020
  
  - Memorandum from Miss Letine Allen, Director Compliance and Enforcement  
November 27, 2020
  
  - Renewal Documents, including receipt for payment received from John Elliot  
February 23, 2021
-

**INTEGRITY COMMISSION MEETING**

with

**Mr. Shane Dalling**

re

**(Firearm Licensing Authority Investigation)**

held at

**Main Conference Room, PIOJ Building,**

**16 Oxford Road, Kingston 5**

on

**Thursday, March 19, 2026**

Present were:

***Integrity Commission Representatives***

Mr. Shadane Williams

*(Manager, Contracts, Procurement & Corruption Investigations)*

Mr. Sanjay Harrisingh

*(Senior Investigating Officer)*

***Firearm Licensing Authority Representatives***

Mr. Shane Dalling

*(CEO)*

Mrs. Abegayle Miller-Lawrence

*(Legal Officer)*

**Commenced at 11:15 a.m.**

MR. HARRISINGH: Good morning, everyone. The time is now 11:15 a.m. My name is Sanjay Harrisingh. I'm a Senior Investigating Officer at the Integrity Commission, and we're currently located in the Main Conference Room, 1<sup>st</sup> Floor, PIOJ Building, 16, Oxford Road, Kingston 5.

At this time, will all other persons present in the room introduce themselves, please, starting to my right?

MR. WILLIAMS: Good morning, everyone. My name is Shadane Williams. I am the Manager for Contracts, Procurement & Corruption Investigations.

MR. DALLING: Shadae?

MR. WILLIAMS: Shadane Williams.

MR. DALLING: Dane? Okay.

MR. WILLIAMS: S-H-A-D-A-N-E Williams.

MS. HENRY: Phebe-Ann Henry, Stenographer, Office of the Services Commissions.

MRS. RAMSAY: Dorothy Ramsay, Senior Stenotype Writer from the Office of the Services Commissions.

MR. DALLING: Shane Dalling, CEO of the Firearm Licensing Authority.

MRS. LAWRENCE: Abegayle Miller-Lawrence, Legal Officer for FLA.

*(Audibility issue mentioned)*

MR. HARRISINGH: For the purpose of the stenographers or the stenotype writer, as Mrs. Ramsay alluded to, I'm going to ask us to just project our voices a bit more so they can accurately record the proceedings.

All right, thank you for that.

Mr. Dalling, the Commission has taken the approach that, at the conclusion of an investigation, the affected parties or the entities involved in the investigation, we invite them to a session such as this where we share the findings of our investigation before the matter is sent to Parliament for

tabling. Bear in mind, however, that these proceedings, whatever is shared here must be kept confidential and must not be shared with anyone else.

MR. DALLING: Okay.

MR. HARRISINGH: So this investigation that was conducted, it concerned allegations of corruption, impropriety, and irregularities in the grant, variation, and revocation of firearm licences and the storage of firearms and ammunition at the Firearm Licensing Authority.

I should advise you that, at the end, any questions or concerns that you may have you can put them in writing and send to us by about Tuesday of next week.

MR. DALLING: Sure.

MR. HARRISINGH: The introduction of our report, and this is the Executive Summary:

***"This investigation was commenced following receipt of a report alleging***

*corruption, impropriety, and irregularities in the storage of firearms and ammunition, and the issuance, variation, and revocation of firearm licences at the Firearm Licencing Authority (FLA).*

"The investigation found that there are accountability issues in relation to the storage of ammunition at the FLA's main vault located at the entity's headquarters, amongst other governance concerns. Recommendations are made herein to the FLA and the Ministry of National Security which aim to improve accountability and prevent reoccurrence of the issues identified."

So the background:

*"On June 14, 2021, by way of a referral from the Director of Information and Complaints Division dated June 8, 2021, the Director of Investigation commenced*

*an investigation into allegations of corruption, impropriety, and irregularities in the grant of firearm licences and the storage of firearms and ammunition of the FLA. Section 33 of the Integrity Commission Act empowers the DI, the Director of Investigation, to investigate allegations involving acts of corruption and noncompliance with the provisions of the legislation as well as the grant, issuance, suspension or revocation of prescribed licences."*

These are the allegations that were made:

*"By way of an anonymous electronic email received by the Director of Information and Complaints on May 31, 2021, it was alleged that:*

*(a) Firearms dealer, John Elliot's gun shop was shut down for numerous months but miraculously reopened after John paid a hefty five hundred thousand*

dollars (\$500,000) sum under the table to have it reopened

(b) As long as you, Carter, get your monetary kickback, yuh nuh care who Shane screws over

(c) You are targeting Mr. Brown because he didn't give Ellsworth Callum the \$2 million (\$2,000,000) that he tried to shake him down

(d) Any dealer who doesn't come out of pocket your harassment is non-stop. You and Letine Allen audit Mr. Brown and can never find anything, and

(e) The public notice put out by the FLA on April 26, 2021 saying that guns at the FLA for five (5) years plus will be destroyed is a grand ploy to cover up the fact that numerous guns are missing from vaults of the FLA. We have numerous guns and thousands of bullets missing.

"During the course of the investigation, the DI received further allegations germane to the investigation. By way of

*a statement dated August 19, 2021, it was further alleged that:*

*(a) While checking the electronic system at the range, I realised that there were four entries made on the system where three persons purchased a total of six thousand (6,000) rounds of bird hunting ammunition.*

*(b) I sent my response to the FLA highlighting and showing a lot of flaws and mediocrity in the audit report; also numerous fabrications of serial numbers that do not exist; makes and models of weapons that do not exist*

*(c) In April 2018, I wrote a letter to the editor of the Observer. My letter made the Letter of the Day, and I heard through the grapevine that CEO of the FLA, Mr. Shane Dalling, was not happy with the letter and that he was going to 'cut me down to size,' because I have 'too much title and chat too much.' I understand this to mean that Mr. Dalling is not going to stop until he shuts down*

*my business or destroys my reputation.*

*And*

*(d) In May 2019, I went into the FLA to renew my Dealers and Gunsmith Licence for both the Maxfield Avenue and Temple Hall locations. After receiving the certificates, I saw where half of my dealer licence at Temple Hall was revoked. The firearms aspect was removed leaving only the licence to sell ammunition. I called back the FLA, and I was told by..." name redacted "...that this is how it will be. This is the way forward."*

And so, throughout the investigation, we found about 16 persons who were pertinent. We're not going to name those persons now.

The terms of reference which guided our investigation are as follows:

*"The DI sought to establish, among other things, the following:*

- The protocols, policies and/or legislation governing the grant, issuance, suspension and/or revocation of Firearm User's (Business) and Firearm Dealer's licences by the FLA*
- The process through which Firearm User's (Business) and Firearm Dealer's licences are granted by the FLA*
- The requirements which are to be met by applicants for the grant of Firearm User's (Business) and Firearm Dealer's licences*
- Whether there is merit to the allegation that John Elliot's gun shop, which was shut down and reopened by the FLA after he paid a fee of..."* five-hundred dollars (\$500) under the table...

MR. WILLIAMS: Five hundred thousand dollars (\$500,000).

MR. HARRISINGH: *"Five hundred thousand dollars (\$500,000)..."* my apology *"...under the*

*table, and, if so, whether same gave rise to an act of corruption.*

- The veracity of the allegations regarding the access and the management of the FLA's database in respect of the altering of records in relation to the sale of firearms and ammunition*

- The veracity of the allegation that Mr. Kent Brown is being targeted by the FLA because he did not pay \$2 million (\$2,000,000) to Ellsworth Callum*

- The systems employed by the FLA in the storing of firearms and ammunition for the period January 2016 to June 2021*

- The protocols, policies and/or legislation governing the storage and disposal of firearms and ammunition by the FLA*

- The veracity of the allegation that firearms and ammunition are missing from the FLA's vault*

- Whether there were any improprieties and/or irregularities in relation to the Firearms Act (1967), The Corruption*

*Prevention Act, Integrity Commission Act and/or any other applicable legislation or policies, and*

*• Whether recommendations ought to be made in respect of the subject matter."*

At this time, we won't be able to go into the investigative actions, but what we can share with you are the conclusions of the investigation.

The conclusions are as follows:

*"Allegations of missing firearms and ammunition from the vaults of the FLA.*

*"The DI concludes that the FLA actively stores firearms and ammunition belonging to licenced firearm holders.*

*"The DI further concludes that the firearms are stored by the FLA for safekeeping, disposal, surrender, seizure, licences not renewed,*

*revocations, FLA enquiry, and firearms for deceased persons.*

*"The DI concludes that, up to June 23, 2021, the FLA had one thousand, two hundred and twenty-four (1,224) firearms and firearm parts stored for destruction.*

*"The DI further concludes that there is no evidence to support the allegation that any of the firearms and/or firearm parts stored for destruction by the FLA are accounted (sic) for."*

*(Crosstalk)*

MRS. LAWRENCE: Accounted for or unaccounted?

MR. DALLING: Accounted for or unaccounted?

MR. HARRISINGH: Are unaccounted for.

MR. DALLING: Okay.

MR. HARRISINGH: Unaccounted for, sorry. So let me read that last part again.

*"The DI further concludes that there is no evidence to support the allegation*

*that any of the firearms and/or firearm parts stored for destruction by the FLA are unaccounted for.*

*"The DI concludes that one hundred and ninety-one (191) 0.22 rounds of ammunition belonging to a private firearm holder are unaccounted for."*

MR. DALLING: Say that figure again.

MR. HARRISINGH: One hundred and ninety-one (191).

MR. DALLING: One ninety-one?

MR. HARRISINGH: Yes.

MR. DALLING: Of?

MR. HARRISINGH: 0.22 rounds.

MR. DALLING: 0.22 rounds. Okay.

MR. HARRISINGH: So let's go again.

*"The DI concludes that one hundred and ninety-one (191) 0.22 rounds of ammunition belonging to a private firearm holder are unaccounted for at the FLA's main vault up to June 13, 2023. The DI's conclusion is premised on the fact that the respective storage bag,*

labelled as containing five hundred and nineteen (519) 0.22 rounds of ammunition was found to contain two hundred and nineteen (219) 0.22 rounds of ammunition.

"A further one hundred and nine (109) 0.22 rounds of ammunition were found amongst an assortment of ammunition. However, there was no clear indication from the FLA that the one hundred and nine (109) 0.22 rounds of ammunition that were found among the assortment of ammunition belonged to the private firearm holder. Notwithstanding, one hundred and ninety-one (191) of the total amount of five hundred and nineteen (519) 0.22 rounds of ammunition remains unaccounted for.

"The DI further concludes that the FLA failed to adequately maintain the inventory stored in their main vault, and that there ought to be greater

*accountability in the storage of firearms and ammunition by the FLA.*

*"The DI's conclusion is premised on the fact that only seventeen (17) percent of the four thousand, one hundred and three (4,103) entries on the electronic vault management system were checked and significant anomalies were detected. Most noteworthy of which is ammunition being unaccounted for as well as the deteriorating storage bags found."*

Those are the conclusions as it relates to the allegations of missing firearms and ammunition from the vaults of the FLA.

These are the conclusions for the administration of the FLA's Licence Management System.

MR. DALLING: Yeah.

MR. HARRISINGH: *"The DI concludes that the FLA's Licence Management System (LMS) was manipulated*

by the FLA, and it appears that fabricated information was inputted in Mr. Kent Brown's LMS account.

"The DI's conclusion is premised on the fact that Shevon Robinson, former Database Administrator at the FLA, made four entries to the LMS of Mr. Brown of three individuals purchasing a total of six thousand (6,000) 12-gauge bird hunting ammunition without the request or consent of Mr. Kent Brown. Two of the alleged purchasers did not possess the requisite permits from NEPA in order to make the alleged purchases.

"One of the alleged purchasers stated that he had never done bird hunting and had never purchased bird hunting ammunition.

"The second alleged purchaser admitted to participating in bird hunting but had not done so since 2015.

*"The confirmed death of the third alleged purchaser, who died approximately three weeks before he allegedly purchased two thousand (2,000) rounds, one thousand (1,000) in two instances, coupled with the fact that, at the material time, he was in possession of a temporary licence which would not permit him to purchase ammunition, further supports Mr. Brown's account that the LMS was manipulated to reflect incorrect data to his detriment.*

*"The DI further concludes that the instruction, if any, to input, and the act of inputting what appears to be fabricated information, prima facie, constitutes a breach of Section 5 of the Cybercrimes Act."*

So those are the conclusions as it relates to the Licence Management System (LMS).

MR. DALLING:

Yes.

MR. HARRISINGH: These are the conclusions as it relates to revocation of licences.

*"The DI concludes that Mr. Kent Brown's gunsmith and dealership licences were revoked by the FLA. The DI's conclusion is premised upon the revocation orders issued by the FLA pursuant to Section 84 of the Firearms (Prohibition, Restriction and Regulation) Act, 2022.*

*"The DI further concludes that the FLA did not act ultra vires to their statutory authority in revoking the referenced licences."*

These are the conclusions as it relates to allegations of corruption involving members of staff of the FLA.

*"The DI..."*

MR. DALLING: Sorry, this is conclusion of?

MR. HARRISINGH: In relation to allegations of corruption involving members of staff of the FLA.

MR. DALLING: Yes.

MR. HARRISINGH: *"The DI is unable to resolve the allegation that Mr. John Elliot corruptly paid five hundred thousand dollars (\$500,000) to anyone at the FLA to have his business reopened, because Mr. John Elliot died shortly after the commencement of this investigation.*

*"The DI concludes that the act of manipulating the LMS, and the inputting of what appears to be false information on the system by an employee of the FLA, to the detriment of Mr. Brown, is sufficient evidence to substantiate the allegation that Mr. Kent Brown was targeted by the FLA. The DI is, however, unable to conclude whether Mr. Kent Brown was targeted because he did not pay \$2 million (\$2,000,000) to Mr. Ellsworth*

*Callum, former Senior Compliance Officer at the FLA, as was alleged."*

Those are the conclusions.

MR. DALLING: Okay.

MR. HARRISINGH: We're going to move on to the recommendations.

MR. DALLING: Okay.

MR. HARRISINGH: These are the recommendations:

*"Having regard to the findings made herein, the DI recommends to the Commission that copies of this report be referred to the public officials and/or parliamentarians identified below in accordance with Section 54 subsection (3) (a) (i) and (ii) of the Integrity Commission Act for appropriate action."*

Recommendations to the Firearm

Licensing Authority, FLA:

*"The DI recommends that, if not yet done, the FLA must take the necessary steps to*

*address the accountability concerns around the storage of ammunition at its main vault.*

*"The DI's recommendation is grounded in the fact that there is limited storage space available in the FLA's main vault, and the security storage bags are deteriorating, with corresponding fading labels. Furthermore, the FLA was unable to account for a number of the rounds at the time of the DI's inspection.*

*"The DI recommends that, given the critical nature of the operation of the FLA, if not yet done, the FLA must ensure that their servers are properly maintained and that a backup server exists. This may ensure that, in the event of a failure of the main server, all data is not lost.*

*"The DI's recommendation is grounded in the fact that the FLA's server apparently*

suffered a catastrophic failure, the data stored thereon could not be recovered, and there was no backup storage in place.

"The DI recommends that the FLA implements a standardised and documented process to treat with the inputting of information to the LMS once a request is made by a dealer.

"The FLA must also ensure that any request made by a dealer is properly documented and the record maintained for transparency, accountability, and auditing purposes.

"The DI further recommends that, where applicable, the FLA should not make entries to the LMS without the written consent and/or request of the respective authorised dealer and documented approval of a duly authorised officer of the FLA. DI's recommendation is premised

*on the fact that an employee of the FLA, without a written request or consent from Kent Brown, made entries to the LMS contrary to the established procedures and the principles of good governance."*

And those are the recommendations that we're able to share with you now, Mr. Dalling.

MR. DALLING: I just, for my benefit, just wanted to ask if Shevon Robinson was interviewed.

MR. HARRISINGH: He was.

MR. DALLING: Okay, and said that he never had permission from Mr. Brown?

MR. HARRISINGH: Well, he did not say he did not have permission from Mr. Brown.

MR. DALLING: Right.

MR. HARRISINGH: But the – what he shared with us I cannot share with you now until the publishing of the...

MR. DALLING: The report?

MR. HARRISINGH: Right.

MR. DALLING: But it's in the report.

MR. HARRISINGH: The finding is contained in the body of the report.

MR. DALLING: But you see, Mr. Harrisingh, that is unfair to me that the first time I'll get to see what Mr. Robinson said is when everybody else gets see it, and I am the entity.

MRS. LAWRENCE: And how will we be effective in asking questions?

MR. DALLING: In going through that, meaning here at the moment that - if persons make these statements...

Because some of this is actually new to me in terms of what is being said here in terms of the findings, because I could have assisted further in terms of the conclusions that you have drawn based on some of these very allegations that are made, and, to be frank with you, are spurious. Spurious in the main, even some of the findings I could have assisted had I known the extent of these allegations that were made.

For one, Mr. Harrisingh, that the allegation you read by way of anonymous email, that is something that I will share with you that the FLA has been targeted by persons who we have had to investigate and create these allegations. So much so that I went – they were doing it so much for over a period of maybe four years, sending those malicious emails – the one that you have premised your investigation on – that I went to the United States, in the court, the Supreme Court of California, to get a court order against Yahoo, Google and Microsoft that I could share with you that was granted by a judge in the Superior Court of California against these persons for... because I'd placed these very emails that you have before the court to say that these were targeted attacks against the FLA, against the very persons you mentioned – the

chairman, myself, other staff members – making all spurious allegations, and I know where it was coming from because the court granted us an order requiring Google, Yahoo, and Microsoft to release the information of the persons behind the emails made, so it was an attack against us and it was in the public domain because I did go public once I got the thing. In fact, we were assisted by the FBI in this probe against these persons who were making these malicious and spurious allegations.

And Kent Brown, of course, I believe was behind it. We were told which number they were using and how they had masterminded the plot of doing these things. The emails that they sent, they would create an email with one of the providers and then send the malicious email then delete it from the system knowing that the providers purge their

system in a particular period. So when we got the court order, which I'll share in my official response with you..

MR. HARRISINGH: Definitely.

MR. DALLING: ...the companies provided us that these persons would have just opened the email - created an email, used..

Now, the backup, the backup number that they used, because you have to use a backup number or backup email to get the confirmation of the email.

Now, what they were using was an old MiPhone number. That was long before they started the registration now that you buy a phone you would have to give your name and everything, so they used a - MiPhone don't even exist anymore, but they were using it, because it was operating out of, I think, Digicel, on Digicel's network.

And so they used that number to open the email as the – what you call when they ask for the confirmation of a backup that you would have to send – for them to send a code, they would use that and then delete the email from the system after.

Now, those providers purge their systems. Once you delete an email out of their system, they purge their system so that they don't have a lot of backed up, what you call, dead files. They purge it, so they have no information on the person after that.

But how we got it was that, when we got the court order, they happened to send one of those again, and we had the court order in hand and we were able to provide it to the provider and they gave us certain information about the persons.

MOCA was a part of this extensive plot with us – not plot, investigation that FLA, MOCA, and the FBI did with National Security in order to find out who was behind all of these. I have about a file this thick with emails just like that, that you have read.

So it comes on the back of those, I would say to you. And, had I been shared, I would have been able to assist you to show you that what you're seeing there is not a one-off allegation; this is years of persons doing that, and I know where it's coming from and why they did it in order to do exactly what you're doing today, hoping that you would..

In fact, the Auditor General, mails were sent... Let me tell you how far they went, you know, Mr. Harrisingh. I'll set it out right here. They went as far as to the State Department in the US to

say we're smuggling drugs and that we were collecting money from persons at the FLA and channelling it in the United States. When I travelled I would bring some of that money to the US with me.

In fact, the US embassy assisted me in California when we were going for it, because they were copying everybody that they could to smear persons, and so that was their whole drive.

So the US embassy came onboard with us, brought in the FBI, assisted MOCA and myself and the Ministry of National Security to unearth what these persons were doing, and this is what they wanted. They always wanted you and the Auditor General to come in to make some report that would make it validate their position.

When they complained to the Auditor General that we were stealing money from all the investment accounts, the Auditor General came for six months to do a forensic audit, didn't find one shred of evidence of it, but this is what you call a smear attack on the FLA.

And why I ask if Mr. Robinson stated that he never had permission, the challenge we have, which I'll make quite clear, is this: the dealers operate on a system - for example, I'll go straight to Mr. Brown - that they breach the FLA protocols from time to time, and when we go in to audit and detect, they believe that they can use any means that they can in terms of lobbying of parliamentarians, everybody, to try to shut down the investigation around them.

Mr. Kent Brown's grievance is simply this: Mr. Kent Brown had two sons who were trainers, and Mr. Kent Brown is a dealer. We authorise trainers to buy two hundred (200) rounds of ammunition to train the students. [Redacted]

The ammunition in relation to bird shooting and the revocation of his licence as it relates to him saying he operates two dealerships at Temple Hall, Mr. Brown was trying to go around or beat the systems of the FLA by simply doing this. Mr. Brown has a dealership in Cross Roads. That dealership, you're allowed to sell firearms and ammunition at that dealership. Now, it's restricted. The sale of the ammunition there is restricted to only fifty (50) rounds, fifty (50) rounds, or two-fifty (250) for shut guns; no more.

What Mr. Brown did some time ago - long before I went to the FLA - was, somehow, write a letter to the CEO asking him to issue the licence for Temple Hall with the Cross Roads address on it, which would mean that what he's allowed to do at Cross Roads he was allowed to do at Temple Hall, which was not, because the board had not granted any licence to Mr. Brown to operate the business that he had at Cross Roads at Temple Hall, and why? Because they are two separate businesses. You can leave the business in Cross Roads with the fifty (50) rounds and the two-fifty (250) rounds for shut guns. You can't leave at the Temple Hall with them; you have to use them there at the range to shoot them out, because it's a training ground, and so you're authorised to sell the ammunition there only for training, but if you tack on the one down there up there, you could have persons leaving

with the ammunition because you are assuming that the conditions there apply there too, which was not the case, because the board had never granted him any licence to operate that way in Temple Hall.

So on that basis of him talking about the two licences, that is what we corrected to say to him there is no board approval for you to have that dealership in Cross Roads operating in Temple Hall, and that was one of the issues, now, he had, because there was no approval. What happened, the certificate was printed, you know. The licence was printed with the business address from the business there at Temple Hall. The same licence had both addresses, the Temple Hall and the Cross Roads, but that couldn't be because the licence only was germane to Cross Roads, so we had to make that correction.

He had a challenge with it because of course what I'm saying here is that when he sells the ammunition, persons would gravitate to going up there, why? Because they're able to leave with the ammunition. That is the whole point, and that would increase his sales, his business, because at the range you're allowed to sell at least two hundred (200) per day, but it's only because you have to use them there; you can't leave with them. At the dealership, you are only allowed to buy fifty (50) per year versus two hundred (200) per day at the range, because you're restricted.

MR. HARRISINGH: Right.

MR. DALLING: It's just for training. Now, that would increase your sale, because all you have to do if a person wants two thousand (2,000) rounds of ammunition, not to let him go to Cross Roads but to let him go to Temple Hall to buy it,

and he could leave with it because you're operating the Cross Roads operation at Temple Hall on the basis that you're selling two hundred (200) rounds per day. That is what we corrected with Mr. Brown that spurred Mr. Brown on this thing.

I'm sorry in relation to the investigation relating to Mr. Elliot...

MR. HARRISINGH: Before you go to Mr. Elliot.

MR. DALLING: Yes?

MR. HARRISINGH: On the point of Mr. Kent Brown and his activities as it relates to the cross activities with Cross Roads and Temple Hall...

MR. DALLING: Yes?

MR. HARRISINGH: ...we took that into consideration and the investigation that was conducted, which is what informed our conclusion as it relates to the revocation of the licences that, ***"The DI further concludes that the FLA did not act ultra vires to their statutory***

***authority in revoking the referenced  
licence."***

MR. DALLING: Right, but...

MR. HARRISINGH: So when I was reviewing... because, the last set of submissions that you made, that helped greatly in informing this and giving us a better perspective as to why Mr. Brown was under investigation and the outcome of the investigation, so in that regard, there is no finding – no unfair finding, I would say, in respect of the FLA in that regard.

MR. DALLING: No, no, no. I'm not – I'm not complaining about that.

MR. HARRISINGH: Okay.

MR. DALLING: I'm complaining – my issue was with the two thousand (2,000) rounds, because I'm coming to that in terms of the six thousand (6,000) rounds.

MR. HARRISINGH: Right.

MR. DALLING: The challenge is not one of manipulation; that is what I'll say in relation to the report, and I accept

the recommendations, clearly, and wholeheartedly, because I believe the recommendations are fair in what is said, based on what has been provided to you, but relation to the rounds in terms of manipulation of the system, I'll say to you there was no manipulation of the system. There was none.

The issue is simple, straightforward here, that procedures were not followed, but no manipulation of the system, but procedures were not followed. I'll explain.

When the dealers sell firearms or ammunition, if their systems are down they ought to - ought to - report it to us. There was no proper documentation setting out clear guidelines to them except for the computerised agreement we have in terms of the installation of the system that we have with them, and

so the rule is that you should not sell any firearm or ammunition without entering the information in the system, because the system is tied to the FLA.

What happened is, it's an inventory system, as you are aware. Whatever they post in their system we are able to see on our side, because we are tracking the inventory in their system, so when we audit, we go there with an idea that you should have forty thousand (40,000) rounds of ammunition, and if we audit and we see less or more, you have to give account of it.

Here is what took place in cases like Kent Brown. They post the transactions, so they make – they post the transactions or they make the sale. If the system is down, they make the sale on paper and don't post the transaction. They then later either call us – and this is where I say the

breakdown is - call us, which is the IT department, to ask them to assist in the completion of it, or they'll write to us to advise us of it, and the information is then uploaded by us because they are not allowed to because their system is down. There is where I believe that issue of the transfer took place, not the manipulation of the system, and I'll tell you why, in terms of a global look at it, why the FLA would have no need to manipulate the system here.

The three persons who the two thousand (2,000) rounds each were transferred to, one dead, one hadn't been to bird shooting from 2015, and one said he didn't purchase any. Now, what the investigation is saying is that the FLA transferred six thousand (6,000) rounds out of Kent Brown's dealership to assign to these individuals, but the bottom line, Mr. Harrisingh, is that

that six thousand (6,000) rounds would still remain with Mr. Brown, which means they were still physically in Mr. Brown's possession because what you're saying, there is a system transfer and, therefore, the individuals who they are intended for would not physically get them. It's not a bank account where they could go somewhere and swipe and utilise; it's ammunition that they would have to physically get to use. Therefore, they never got them, but Mr. Brown still physically had them but in Mr. Brown's system they had been removed to these persons, but these persons don't get them. Who would stand to benefit from that? Neither the individuals who didn't get them nor the FLA. Mr. Brown. Why? Because Mr. Brown, now, would have six thousand (6,000) rounds which he could say to the FLA that *I sold to these persons* that Mr. Brown could sell on the black market or could sell to anybody because they had

been moved out of his system to persons, so the FLA would not stand to benefit anything from that aspect of it. The only benefactor is the person who still has the physical rounds of ammunition in his possession, right?

And I'm saying to you that the FLA - Mr. Robinson posting those transactions would - and I'm saying this is where I would agree that a breach may have taken place, that he ought to not have taken any directive on the phone or otherwise but should have gotten it in writing. That is where I believe the breakdown took place and not a case of manipulating the system.

I don't believe - I'm not agreeing, at any point, that the system was manipulated to do this because it would not redound to any benefit of Mr. Robinson or anyone else at the FLA to do that, because if you note, Mr.

Brown's licence was never revoked for that. It was revoked for the other things that he was doing, so the FLA would have no basis on that matter.

And I'm saying to you, this is what not Kent Brown alone do; several other dealers participate in that activity in terms of – especially during the bird shooting season. They are so eager to get the sale from the individuals, and they sell sometimes without first getting the requisite documentation from the individuals, and then later just input somebody's name and details in the system. I'm telling you; I know it takes place.

In fact, we just had to warn a dealer because he was only inputting sales that he did from bird shooting after we had shut down the bird shooting season sale, and he had to write to us to ask

us, now, to allow him to input, so we know what takes place in these cases.

So I object strongly to the word that the "manipulation" of the FLA's system was done to facilitate this. I would say I agree that proper protocol or documentation was not presented or available to substantiate the FLA's movement of the ammunition or transfer of it, but not the manipulation of the system to do it. The system was not manipulated. The system was used to do exactly what it is there to be used to do to, but what I'm saying is that we ought to have — Mr. Robinson ought to have gotten written communication, and it is the way that people operate sometimes to facilitate persons, being on the phone with them, talking to them and assisting them rather than hanging up the phone and saying, *Please send me an email to get this done*. That, I believe, is the challenge, and that is

one of my greatest objections to the report in terms of that aspect of it.

In relation to the ammunition unaccountability, the challenge I think you captured quite well in relation to that. You saw the vault.

MR. HARRISINGH: Right.

MR. DALLING: It's overflowing. Everybody wants a firearm in this country, but it's really a showpiece. It's really just machoism that is taking place when people talk about wanting a firearm to protect themselves, because you see what happens: after they get it, they park it at the FLA. They get bored with it. It costs a lot of money to maintain to pay every year, so they store it at the FLA and the vault is overflowing.

What is happening, as you say, the deterioration of the bags, everything, and you saw the condition: people have to be stepping over the bags, and as

you step over the bags, the bags break, ammunition leak out of the bag all over in the vault. We have a container there with thousands of rounds of ammunition, .22, 2, 9mm, everything, because that is just...

I had an inspection with the Ministry of National Security yesterday, and while going through pointing out the same matters to them, we took up a bag and several rounds fell out, and I said, "See this is what takes place." They are all over the place because of the conditions.

The vault – not the vault. The storage container at the JDF is also overflowing, because we moved them out of there to create space to put them at the JDF to clear the same challenge we have in terms of accountability, so I accept the finding and the recommendation as per those, because it

is the reality of what is in place and is taking place there now.

How we fix it is a challenge, and it's not that we are not taking steps. We're actually trying to acquire a shredder, a firearm shredder to shred the firearms that people leave there. That would help in terms of the stockpile management in the vault. And then, as it relates to the ammunition in terms of addressing it, we have come up with a way in terms of burning the ammunition, because the ammunition can be burnt, and that would allow for greater management of it.

And just as an aside, I will say to you, the rounds are not missing, and I can assure the country that none of those rounds are missing, those .22 rounds. Let me explain to you why I say that.

The .22 rounds in a vault represent what the red money represents in the BOJ vault. In the scheme of firearms, the .22 rounds... For the layman to understand what's the value of the .22 round, if you went into a vault, it would be you seeing from the red money to the \$1 to \$2, \$3, \$5. The .22 is what we would refer to in money as the red money that nobody wants, that everybody throws away because they are not valuable. They're of no value. People use them as just props, just props. They're not any value. You have never heard a person being killed by a .22. You couldn't get it sold on the market for anybody. It's not of any use. It's the only round I could tell you, in the entire scheme of things as I said, like the red money that if you get the red money you'll throw away. That is what a .22 represents in the firearms business.

But it's an accountability issue, and if it happens to that, it can happen to 9mm and others, so I get the point on that. Not that I'm discounting; I'm just explaining that's why I don't believe it's, for example, diversion of this. It's just the challenge that you have pointed out with what is taking place there.

So, for me, as I said, outside of the manipulation...

MR. HARRISINGH: Right.

MR. DALLING: And I'm sorry Mr. Elliot died to not give account of that madness about him paying to reopen his businesses of some sort or not.

MR. HARRISINGH: All right, Mr. Dalling. You see everything that you shared with me just now...

MR. DALLING: Yes?

MR. HARRISINGH: ...feel free to put it in writing as a response to today's proceedings.

MR. DALLING: Right, I will.

MR. HARRISINGH: And we will treat with it going forward.

MR. DALLING: No problem. I will.

MR. HARRISINGH: If you have no further question, then thank you for coming today.

The time is now 12:08 p.m., and we are concluding proceedings.

MR. DALLING: Thank you. Thank you, both. I appreciate it.

MR. HARRISINGH: Thanks for coming as well, and we appreciate it. Remember, try as best as possible to get the response to us by Tuesday.

MR. DALLING: Okay. I'll definitely work on it.

**ADJOURNED**