DANIEL G. BOGDEN
United States Attorney
PHILLIP N. SMITH, JR.
Assistant United States Attorney
Lloyd D. George United States Courthouse
333 Las Vegas Blvd South, Suite 5000
Las Vegas, Nevada 89101
(702) 388-6336

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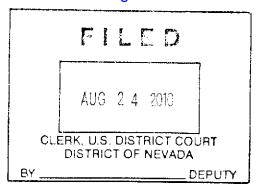
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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA -000-

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9	UNITED STATES OF AMERICA,	CRIMINAL INDICTMENT
10	PLAINTIFF,	2:10-cr- <u>428</u>
11	vs.	VIOLATIONS:
12	CHRISTIAN ROMERO,	18 U.S.C. §§ 922(a)6), 924(a)(2) - Illegal Acquisition of a Firearm
13	DEFENDANT.	Acquisition of a filteann
	<u> </u>	18 U.S.C. § 2 - Aiding and Abetting
14		18 U.S.C. §§ 922(g)(5)(A) and 924(a)(2) - Illegal Alien in Possession of a Firearm
15		Illegal Alien in Possession of a Firearm
16	THE GRAND JURY CHARGES THAT:	
17	COUNT ONE	

Illegal Acquisition of a Firearm

megai Acquisition of a Firearm

On or about July 7, 2010, in the State and Federal District of Nevada,

CHRISTIAN ROMERO,

defendant herein, in connection with the acquisition of firearms, to wit: a CMMG model M4LE .223-caliber semi-automatic rifle, bearing serial number A-7708; and a Bushmaster model M4A3 .223-caliber semi-automatic rifle, bearing serial number BFI669792, from "New Frontier Armory," a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly made and caused to be made a false and fictitious written statement to "New Frontier Armory," which statement was intended and likely to deceive

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Illegal Acquisition of a Firearm

On or about July 7, 2010, in the State and Federal District of Nevada,

"New Frontier Armory" as to a fact material to the lawfulness of the sale of said firearms

under Chapter 44 of Title 18, United States Code, in that another person, under the direction

of CHRISTIAN ROMERO, did execute a Bureau of Alcohol, Tobacco, Firearms and

Explosives Form 4473 Firearms Transaction Record, wherein the other person represented

that he was the actual buyer of the firearms indicated on the Form 4473, when in fact as the

defendant well knew, CHRISTIAN ROMERO was the actual buyer of the firearms; all in

COUNT TWO

violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

CHRISTIAN ROMERO.

defendant herein, in connection with the acquisition of firearms, to wit: a Century Arms model M70AB2 7.62 millimeter semi-automatic rifle, bearing serial number M70AB23647; and a Century Arms model M70AB2 7.62 millimeter semi-automatic rifle, bearing serial number M70AB23659, from "Discount Firearms," a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly made and caused to be made a false and fictitious written statement to "Discount Firearms," which statement was intended and likely to deceive "Discount Firearms" as to a fact material to the lawfulness of the sale of said firearms under Chapter 44 of Title 18, United States Code, in that another person, under the direction of CHRISTIAN ROMERO, did execute a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein the other person represented that he was the actual buyer of the firearms indicated on the Form 4473, when in fact as the defendant well knew, CHRISTIAN ROMERO was the actual buyer of the firearms: all in violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and 2.

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COUNT THREE Illegal Alien in Possession of a Firearm

On or about July 7, 2010, in the State and Federal District of Nevada,

CHRISTIAN ROMERO,

defendant herein, being an alien illegally or unlawfully in the United States, did knowingly possess a firearm, to wit: a CMMG model M4LE .223-caliber semi-automatic rifle, bearing serial number A-7708; and a Bushmaster model M4A3 .223-caliber semi-automatic rifle, bearing serial number BFI669792, said possession being in and affecting interstate commerce and said firearms having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(2).

COUNT FOUR Illegal Alien in Possession of a Firearm

On or about July 7, 2010, in the State and Federal District of Nevada,

CHRISTIAN ROMERO,

defendant herein, being an alien illegally or unlawfully in the United States, did knowingly possess a firearm, to wit: a Century Arms model M70AB2 7.62 millimeter semi-automatic rifle, bearing serial number M70AB23647; and a Century Arms model M70AB2 7.62 millimeter semi-automatic rifle, bearing serial number M70AB23659, said possession being in and affecting interstate commerce and said firearms having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(2).

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FORFEITURE ALLEGATION 1. 2 The allegations contained in Counts One through Four of this Indictment 3 are hereby re-alleged and incorporated herein by reference for the purpose of alleging 4 forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d)(1) and 5 Title 28, United States Code, Section 2461(c). 6 2. Upon a conviction of the felony offenses charged in Counts One through 7 Four of this Indictment, CHRISTIAN ROMERO, defendant herein, shall forfeit to the United 8 States the firearm and ammunition involved in the commission of the violation of Title 18. 9 United States Code, Sections 922(a)(6) and 922(g)(5)(A): 10 a CMMG model M4LE .223-caliber semi-automatic rifle, bearing serial (a) number A-7708, 11 12 (b) a Bushmaster model M4A3 .223-caliber semi-automatic rifle, bearing 13 serial number BFI669792, 14 © a Century Arms model M70AB2 7.62 millimeter semi-automatic rifle, 15 bearing serial number M70AB23647, a Century Arms model M70AB2 7.62 millimeter semi-automatic rifle, 16 (d) 17 bearing serial number M70AB23659, and 18 (e) any and all ammunition. 19 All pursuant to Title 18, United States Code, Sections 922(a)(6), 922(g)(5)(A), 20 and 924(d), and Title 28, United States Code, Section 2461(c). **DATED**: this $\underline{\cancel{94}}$ day of August, 2010. 21 A TRUE BILL: 22 23 24 DANIEL G. BOGDEN **United States Attorney** 25 26

Assistant United States Attorney