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> DISTRICT OF TEXAS **DEL RIO DIVISION**

2011 JA 19 AM 11:55

UNITED STATES OF AMERICA

Cause No.:

INDICTMENT

٧.

KEITH EDWARDS

[Vio: COUNT ONE: 18 U.S.C. §§ 554(a) & 2, Aiding and Abetting Smuggling Goods from the United States; COUNTS TWO-THREE: 18 U.S.C. § 922(a)(6) False Statement in Acquisition of Firearm; COUNT FOUR: 18 U.S.C. §922(k) &

§924(a)(1) Possession of Firearm with Obliterated Serial Number.]

DR11CR0093

THE GRAND JURY CHARGES:

**COUNT ONE** [18 U.S.C. §§ 554(a) & 2]

On or about July 29, 2010, in the Western District of Texas, the Defendant,

## KEITH EDWARDS

and others, aiding and abetting one another, did knowingly and unlawfully export or attempt to export, from the United States, any merchandise, article, or object, including but not limited to 15 AK-47 style assault rifles, which are defense articles as defined under Category I of the United States Munitions List, contrary to any law or regulation of the United States, in that the Defendant had not obtained a license or written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2) & 2778(c) and Title 22, Code of Federal Regulations, Parts 121, 123, & 127, all in violation of Title 18, United States Code, Sections 554(a) and 2.

[18 U.S.C. §§ 922(a)(6) & 924(a)(2)]

On or about July 10, 2010, in the Western District of Texas, the Defendant,

**KEITH EDWARDS** 

in connection with the acquisition of a firearm, a Romanian WASR-10 7.62 x 39 rifle, serial number 1975 FL 4460, from Tex-Guns, a federally licensed firearms dealer, knowingly made a false and fictitious oral or written statement, which statement was intended and likely to deceive the dealer as to a fact material to the lawfulness of such sale of the said firearm to the Defendant, in that the Defendant represented that he was the actual buyer of the firearm, when in fact he was not the actual buyer of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

<u>COUNT THREE</u> [18 U.S.C. §§ 922(a)(6) & 924(a)(2)]

On or about July 17, 2010, in the Western District of Texas, the Defendant,

## KEITH EDWARDS

in connection with the acquisition of a firearm, a Century Arms Drako 7.62 x 39 pistol, serial number DC-1593-10, from Unique Guns and Collectibles, a federally licensed firearms dealer, knowingly made a false and fictitious oral or written statement, which statement was intended and likely to deceive the dealer as to a fact material to the lawfulness of such sale of the said firearm to the Defendant, in that the Defendant represented that he was the actual buyer of the firearm, when in fact he was not the actual buyer of the firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

<u>COUNT FOUR</u> [18 U.S.C. §922(k) & §924(a)(1)]

That on or about July 17, 2010, in the Western District of Texas, Defendant,

## KEITH EDWARDS,

did knowingly possess and receive a firearm, namely a Romanian WASR-107.62 x 39 rifle, that had been shipped or transported in interstate or foreign commerce, from which the manufacturer's serial number had been removed, altered and obliterated, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1).

A TRUE BILL

JOHN E. MURPHY

United States Attorney

By:∠

BENJAMIN D. SEAL

Assistant United States Attorney

SEALED:

**UNSEALED: XX** 

## PERSONAL DATA SHEET UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS DEL RIO DIVISION

COUNTY: BEXAR

USAO#: 2011R00376

DATE: JANUARY 19, 2011

MAG. CT. #: MATTER

AUSA: BENJAMIN D. SEAL

**DEFENDANT: KEITH EDWARDS** 

DR11CR0093

CITIZENSHIP: UNITED STATES

INTERPRETER NEEDED: NO

Language: **ENGLISH** 

DEFENSE ATTORNEY: N/A

ADDRESS OF ATTORNEY: N/A

**DEFENDANT IS:** 

DATE OF ARREST:

BENCH WARRANT NEEDED:

PROBATION OFFICER: N/A

NAME AND ADDRESS OF SURETY: N/A

YOUTH CORRECTIONS ACT APPLICABLE: NO

PROSECUTION BY: INDICTMENT

OFFENSE: (Code & Description): COUNT ONE: 18 U.S.C. §§ 554(a) & 2 - Aiding and Abetting

Smuggling Goods from the United States; COUNTS TWO-THREE: 18 U.S.C. § 922(a)(6) - False

Statement in Acquisition of Firearm; COUNT FOUR: 18 U.S.C. §922(k) & §924(a)(1) - Possession

of Firearm with Obliterated Serial Number.

OFFENSE IS A: FELONY

MAXIMUM SENTENCE: On all counts: 10 years imprisonment; a \$250,000 fine; 3 years of

supervised release; and a \$100 special assessment.

PENALTY IS MANDATORY: YES & NO

REMARKS: <u>SEE ABOVE</u>

W/DT-CR-3