

did knowingly and willfully conspire and agree together and with other persons known and unknown to the Grand Jurors to Violate Title 18, United States Code, Section 924(a)(1)(A), that is, the object of their conspiracy and agreement was to knowingly make false statements and representations with respect to the information required to be kept in the records of a licensed dealer under Chapter 44 of Title 18, United States Code.

MANNER AND MEANS OF THE CONSPIRACY

1. It was part of the conspiracy that, the defendant, _____, enlisted _____, directed and recruited individuals which included, the defendants _____, ANTHONY C. JARAMILLO, _____, RODOLFO VILLASANA and _____ to purchase firearms for and or to recruit others to purchase firearms for the defendant,

2. As part of the conspiracy, _____, at the behest of _____, recruited the defendant, ANTHONY JARAMILLO to recruit others to purchase firearms. ANTHONY C. JARAMILLO in turn recruited IRENE VIERA to purchase firearms.

3. As part of the conspiracy, _____, at the behest of _____, purchased firearms and also recruited the defendants, ALONZO SEPULVEDA and _____ to purchase firearms.

4. It was further part of the conspiracy that, the defendant, _____, would provide the money for the purchase of the weapons and instruct the co-conspirators as to which weapons to buy. The co-conspirators would be paid a fee for each weapon they purchased.

5. Finally, it was also part of the conspiracy that the purchasers of the firearms, which included the defendants, IRENE VIERA, , ALONZO SEPULVEDA, , RODOLFO VILLASANA and , would acquire and attempt to acquire firearms from licensed dealers by knowingly making false and fictitious statements and representations with respect to the information required to be kept in the records of a licensed dealer under Chapter 44 of Title 18, United States Code.

OVERT ACTS:

1. On or about February 25, 2010, , introduced ANTHONY C. JARAMILLO to as a person who could purchase firearms or recruit others to purchase firearms.
2. On or about February 25, 2010, ANTHONY C. JARAMILLO recruited IRENE VIERA to purchase firearms for
3. On or about February 25, 2010, defendants , and ANTHONY C. JARAMILLO, drove IRENE VIERA to Lone Star Guns and instructed her as to which firearm to purchase.
4. On or about February 25, 2010, the defendant, , provided money to defendant, , for the purchase of a firearm. in turn provided the money to ANTHONY C. JARAMILLO. ANTHONY C. JARAMILLO then provided the money to IRENE VIERA for the purchase of a firearm.

5. On or about February 25, 2010, the defendant, IRENE VIERA, purchased one Beretta, 9mm semi-automatic handgun, serial number J268077, from Lone Star Guns, by knowingly making a false statement and representation.

6. On or about February 25, 2010, IRENE VIERA was paid a fee of one hundred dollars for purchase of the Beretta handgun.

7. On or about February 26, 2010, defendants _____, _____, and ANTHONY C. JARAMILLO, drove IRENE VIERA to Lone Star Guns and instructed her as to which firearms to purchase.

8. On or about February 26, 2010, the defendant, _____, provided money to _____, for the purchase of firearms. _____ in turn provided the money to ANTHONY C. JARAMILLO. ANTHONY C. JARAMILLO then provided the money to IRENE VIERA for the purchase of firearms.

9. On or about February 26, 2010, the defendant, IRENE VIERA, purchased one, .223 caliber rifle, serial number BF1629497 and one, 7.62x39 caliber rifle, serial number 1986RE4563, from Lone Star Guns, by making a false statement and representation.

10. On or about February 26, 2010, IRENE VIERA was paid a fee of one hundred dollars for each rifle purchased.

11. On or about March 24, 2010, _____, recruited _____ to purchase AK-47 type firearms for _____ and also provided the money for the purchase of the firearms.

12. On or about March 24, 2010, _____, purchased six (6), 7.62x39 caliber rifles, serial numbers 1971CP2829, 1970CO4448, 1965NO3310, 1966UV3724, 1979IS2800, and 1979IV4749, by making a false statement and representation.
13. On or about April 7, 2010, _____, recruited RODOLFO VILLASANA to purchase firearms for _____ and also provided the money for the purchase of the firearms.
14. On or about April 7, 2010, the defendant, RODOLFO VILLASANA, purchased two 7.62x39 caliber rifles, serial numbers 1967AL0528 and 1966TU2908, from Lone Star Guns, by making a false statement and representation.
15. On or about April 7, 2010, _____, paid RODOLFO VILLASANA, a fee of two hundred dollars for each of the weapons purchased.
16. On or about April 7, 2010, _____, recruited _____, to purchase firearms for _____ and also provided the money for the purchase of the firearms.
17. On or about April 7, 2010, the defendant, _____, purchased one 7.62x39 caliber rifle, serial number 59408 and one .223 caliber rifle, serial number JF8509, from Johnny's True Value Hardware, by making a false statement and representation.
18. On or about April 7, 2010, _____, paid _____, a fee of two hundred fifty dollars for each of the weapons purchased.

19. On or about April 7, 2010, _____, recruited and introduced ALONZO SEPULVEDA to _____ as a person who could purchase firearms for a fee.
20. On or about April 7, 2010, _____, provided ALONZO SEPULVEDA with money for the purchase of a firearm.
21. On or about April 7, 2010, ALONZO SEPULVEDA, purchased one 7.62x39 caliber rifle, serial number 1971CV0371, from Johnny's True Value Hardware, by making a false statement and representation.
22. On or about April 7, 2010, _____, paid ALONZO SEPULVEDA, a fee of one hundred fifty dollars for the weapon purchased.
23. On or about April 17, 2010, _____, recruited to buy firearms for _____ in return for a fee.
24. On or about April 17, 2010, _____, provided money for the purchase of a firearm by _____.
25. On or about April 17, 2010, _____, purchased one .308 caliber rifle, serial number 61332, from Johnny's True Value Hardware, by making a false statement and representation and received money provided by _____ as a fee for the purchase of the firearm.
26. On or about June 23, 2010, _____, recruited RODOLFO VILLASANA to purchase firearms for _____ and also provided the money for the purchase of the firearms.

27. On or about June 23, 2010, the defendant, RODOLFO VILLASANA, purchased one 7.62x39 caliber rifle, serial number 1972EA1889, from Johnny's True Value Hardware, by making a false statement and representation.

28. On or about June 23, 2010, _____, paid RODOLFO VILLASANA, a fee of two hundred dollars for the weapon purchased.

In violation of Title 18, United States Code, Sections 371, 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT TWO

On or about February 25, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

ANTHONY C. JARAMILLO,
and
IRENE VIERA,

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Lone Star Guns, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, IRENE VIERA, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of one Beretta, 9mm pistol, serial number J268077, whereas in truth and in fact, she was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT THREE

On or about February 26, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

ANTHONY C. JARAMILLO,
and
IRENE VIERA,

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Lone Star Guns, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, IRENE VIERA, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of one 7.62x39 caliber semi-automatic rifle, serial number 1986RE4562 and one .223 caliber semi-automatic rifle, serial number BF1629497, whereas in truth and in fact, she was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT FOUR

On or about March 24, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

and

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Mason's, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, _____, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of six 7.62x39 caliber semiautomatic rifles, serial numbers, 1971CP2829, 1970CO4448, 1965NO3310, 1966UV3724, 1979IS2800, and 1979IV4749, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT FIVE

On or about April 7, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

and
RODOLFO VILLASANA,

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Lone Star Guns, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, RODOLFO VILLASANA, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of two 7.62x39 caliber semiautomatic rifles, serial numbers, 1967AL0528 and 1966TU2908, whereas in truth and in fact, he was acquiring the firearms on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT SIX

On or about April 7, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

and

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Johnny's True Value Hardware, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, _____, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and

Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one 7.62x39 caliber semiautomatic rifle, serial number, 59408 and one .223 caliber semiautomatic rifle, serial number JF8509, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about April 7, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

and
ALONZO SEPULVEDA,

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Johnny's True Value Hardware, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, ALONZO SEPULVEDA, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one 7.62x39 caliber semiautomatic rifle, serial number, 1971CV0371, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT EIGHT

On or about April 17, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

and

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Johnny's True Value Hardware, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, _____, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of one .308 caliber semiautomatic rifle, serial number, 61332, whereas in truth and in fact, she was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT NINE

On or about April 13, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

and
ALONZO SEPULVEDA,

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Lone Star Guns, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, ALONZO SEPULVEDA, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one Bushmaster, .223 caliber semiautomatic rifle, serial number, L523900, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT TEN

On or about April 21, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

and

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Johnny's True Value Hardware, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, _____, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of one

Bushmaster, .223 caliber semiautomatic rifle, serial number, L523358, whereas in truth and in fact, she was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT ELEVEN

On or about May 6, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

and

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Collectors Firearms, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, _____, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of two Century Arms, 7.62x39 caliber semiautomatic rifles, serial numbers, 1964000068 and 196000161, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT TWELVE

On or about June 23, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

and
RODOLFO VILLASANA,

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Johnny's True Value Hardware, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant, RODOLFO VILLASANA, did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one 7.62x39 caliber semiautomatic rifle, serial number, 1972EH1889, whereas in truth and in fact, he was acquiring the firearms on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT THIRTEEN

On or about July 19, 2011, in the Southern District of Texas, and within the jurisdiction of the court, the defendant,

knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records

of Johnny's True Value Hardware, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendant caused, Eduardo Villasana, to execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of one 7.62x39 caliber semiautomatic rifle, serial number, 1967AD2530, whereas in truth and in fact, he was acquiring the firearm on behalf of another person,

In violation of Title 18, United States Code, Section 924(a)(1)(A) and Title 18, United States Code, Section 2.

COUNT FOURTEEN

On or about March 24, 2010, in the Southern District of Texas, and within the jurisdiction of the court, the defendants,

and

in connection with the acquisition of firearms, namely six 7.62x39 caliber semiautomatic rifles, serial numbers, 1971CP2829, 1970CO4448, 1965NO3310, 1966UV3724, 1979IS2800, and 1979IV4749, from Mason's, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States code, knowingly made a false and fictitious written statement to Mason's, which statement was intended and likely to deceive Mason's, as to a fact material to the lawfulness of such sale of said firearms to the defendant under chapter 44 of Title 18, in that the defendant, , did execute a U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual

buyer of the firearms indicated on the Form 4473, when in fact, as the defendant then knew, he was not the actual buyer of the firearms.

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

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
UNITED STATES ATTORNEY



ANGEL CASTRO
Assistant United States Attorney