United States District Court Southern District of Texas

AUG 1 0 2010

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS MCALLEN DIVISION

David J. Bradley, Clerk

UNITED STATES OF AMERICA	§	
	§	
<b>v.</b>	§	
	§	C
JESUS QUINTANILLA	§	

Criminal No.

M - 10 - 1163

### **INDICTMENT**

### THE GRAND JURY CHARGES:

On or about July 8, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendant

## JESUS QUINTANILLA

knowingly made and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory, McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model Draco, 7.62x39mm pistol, serial no.: DR329609; a Century International Arms, Model Draco, 7.62x39mm pistol, serial no.: DR329609; a Century International Arms, Model Draco, 7.62x39mm pistol, serial no.: DR250409; a Beretta, Model 92FS, 9mm semi-automatic caliber pistol, serial no.: J24147Z; and a Berreta, Model 92FS, 9mm pistol, serial no.: J44579Z, in that JESUS QUINTANILLA falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that JESUS QUINTANILLA was the actual purchaser of the firearms described above, when in truth and fact that the defendant knew that those statements and representations were false and that he was not the actual purchaser of the firearms.

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

### Count Two

On or about July 14, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendant

# JESUS QUINTANILLA

knowingly made and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory, McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model Draco, 7.62x39mm pistol, serial no.: DR-2017-09; a Beretta, Model 92FS, 9mm pistol, serial no.: J445767; and a Century Arms, Model WASR-10, 7.62x39mm rifle, serial no.: AF07881989, in that JESUS QUINTANILLA falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that JESUS QUINTANILLA was the actual purchaser of the firearms described above, when in truth and fact that the defendant knew that those statements and representations were false and that he was not the actual purchaser of the firearms.

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

## **Count Three**

On or about July 12, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendant

# JESUS QUINTANILLA

knowingly made and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Danny's Pawn and Sporting Goods, a federally licensed firearms dealer located in McAllen, Texas, in connection with the acquisition of a Century International Arms, Model Draco, 7.62 x39mm pistol, serial no.: DC-1762-10; a Century International Arms, Model Draco, 7.62x39mm pistol, serial no.: DC-2551-10; a Beretta, Model 92FS, 9mm pistol, serial no.: J30224Z, in that JESUS QUINTANILLA falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that JESUS QUINTANILLA was the actual purchaser of the firearms described above, when in truth and fact that the defendant knew that those statements and representations were false and that he was not the actual purchaser of the firearms.

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

### **Count Four**

On or about July 14, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendant

# JESUS QUINTANILLA

knowingly made and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Danny's Pawn and Sporting Goods, McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of and a Century Arms, Model WASR-10, 7.62 caliber rifle, serial no.: 1984-AJ4687, in that **JESUS QUINTANILLA** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that **JESUS QUINTANILLA** was the actual purchaser of the firearms described above, when in truth and fact that the defendant knew that those statements and representations were false and that he was not the actual purchaser of the firearms.

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

A TRUE BILL

FOREPERSON

JOSE ANGEL MORENO UNITED STATES ATTORNEY

ASSISTANT UNITÉD STATES ATTORNEY