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DISTRICT OF ARIZONA
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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

United States of America,

Plaintiff,

v.

1. Jeffrey Broome,
(Counts 1-3, 5-9, 11 and 14)

2. Johneshia McGraw,
(Counts 1 and 4)

3. Kenneth Honea,
(Counts 1, 10 and 13)

4. Linda Krom,
(Counts 1, 12)

Defendants.

**CR '10 11 87 PHX ROS OKO
INDICTMENT**

VIO: 18 U.S.C. § 371
(Conspiracy)
Count 1

18 U.S.C. § 924(a)(1)(A)
(False Statement During Purchase
of Firearm)
Counts 2-14

THE GRAND JURY CHARGES:

INTRODUCTION

At all times material to this Indictment:

1. Defendants, JEFFREY BROOME ("BROOME"), JOHNESHIA MCGRAW ("MCGRAW"), KENNETH HONEA ("HONEA"), and LINDA KROM ("KROM") working with others known and unknown to the grand jury, purchased firearms from federally-licensed firearms dealers located in the District of Arizona, knowing that they never intended to be the actual owners of said firearms and expecting to receive a sum of U.S. currency as payment from others for the purchase of the firearms, and after purchasing said firearms, delivered the firearms to others, known and unknown to the grand jury.

2. On or about February 4, 2010 and continuing to on or about May 5, 2010,

1 BROOME purchased 39 firearms in nine (9) separate transactions on behalf of others, known
2 and unknown to the grand jury. During each transaction, BROOME completed the purchase by
3 executing a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form
4 4473, Firearms Transaction Record ("ATF Form 4473"), in which he stated that he was the
5 "actual buyer" of the firearms. Soon after each transaction, BROOME delivered the firearms
6 to others, known and unknown to the grand jury, and received payment for his services.

7 3. On or about February 26, 2010, MCGRAW purchased seven (7) firearms in one
8 (1) transaction on behalf of BROOME. During the transaction, MCGRAW completed the
9 purchase by executing a Department of Justice, ATF Form 4473, in which she stated that she
10 was the "actual buyer" of the firearms. Soon after the transaction, MCGRAW delivered the
11 firearms to BROOME.

12 4. On or about April 13, 2010 and on or about April 22, 2010, HONEA purchased
13 seven (7) firearms in two (2) separate transactions on behalf of BROOME. During each
14 transaction, HONEA, completed the purchase by executing a Department of Justice, ATF Form
15 4473, in which he stated that he was the "actual buyer" of the firearms. Soon after each
16 transaction, HONEA delivered the firearms to BROOME, and received payment for his services.

17 5. On or about April 15, 2010, KROM purchased five (5) firearms in one (1)
18 transaction on behalf of others, known and unknown to the grand jury. During the transaction,
19 KROM, completed the purchase by executing a Department of Justice, ATF Form 4473, in
20 which she stated that she was the "actual buyer" of the firearms. Soon after each transaction,
21 KROM delivered the firearms to others, known and unknown to the grand jury, and received
22 payment for her services.

23 **COUNT 1**

24 **(CONSPIRACY)**

25 6. The factual allegations in paragraphs 1 - 5 of the Indictment are incorporated by
26 reference and re-alleged as though fully set forth herein.

27 7. Beginning on a date unknown to the grand jury, but no later than February 4, 2010,
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1 and continuing to May 5, 2010, within the District of Arizona and elsewhere, defendants
2 JEFFREY BROOME, JOHNESHIA MCGRAW, KENNETH HONEA, and LINDA KROM and
3 others, known and unknown to the grand jury, knowingly and intentionally agreed, confederated,
4 and conspired with each other to commit the following offense against the United States: Title
5 18, United States Code, Section 924(a)(1)(A) (False Statement in Connection with Acquisition
6 of Firearm).

7 **OBJECT OF THE CONSPIRACY**

8 8. The object of the conspiracy was to obtain firearms for others, both known and
9 unknown to the grand jury, by making a false statement during the purchase of the firearms.

10
11 **MANNER AND MEANS OF THE CONSPIRACY**

12 9. The manner and means employed by defendants BROOME, MCGRAW, HONEA,
13 and KROM, and other co-conspirators, known and unknown to the grand jury, to effect the
14 object of the conspiracy were as follows:

- 15 (a) BROOME and others, known and unknown to the grand jury, identified certain
16 firearms that they wished to obtain from federally-licensed firearms dealers
17 located in the District of Arizona.
- 18 (b) BROOME either purchased the previously selected firearms, or instructed
19 MCGRAW, HONEA, and KROM to purchase the firearms that had been
20 previously selected at federally-licensed firearms dealers in the District of
21 Arizona.
- 22 (c) BROOME promised to compensate MCGRAW, HONEA, and KROM, and pay
23 them a sum of U.S. currency in consideration for their agreement to purchase and
24 deliver to BROOME the previously selected firearms.
- 25 (d) Prior to each purchase, BROOME transferred U.S. currency in the form of cash
26 to MCGRAW, HONEA, and KROM in order to complete the purchase of the
27 firearms.

- 1 (e) BROOME, MCGRAW, HONEA, and KROM completed the purchase by
2 executing a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and
3 Explosives Form 4473, Firearms Transaction Record (“ATF Form 4473”).
- 4 (f) BROOME, MCGRAW, HONEA, and KROM stated on the ATF Form 4473 that
5 they were the “actual buyer” of the firearm, when, in fact, they were not the actual
6 transferee/buyer.
- 7 (g) After completing the purchase of the firearms, MCGRAW, HONEA, and KROM
8 immediately provided the firearms to JEFFREY BROOME.
- 9 (h) After either BROOME purchased the firearms, or after MCGRAW, HONEA, and
10 KROM delivered the purchased firearms to BROOME, BROOME delivered the
11 firearms to others, known or unknown to the grand jury, in exchange for U.S.
12 currency.

13 **OVERT ACTS**

14 10. In furtherance of the aforesaid conspiracy, and to effect the object of the
15 conspiracy, defendants BROOME, MCGRAW, HONEA, and KROM, and other co-conspirators,
16 known and unknown to the grand jury, committed, or caused to be committed, overt acts,
17 including but not limited to the following:

- 18 (a) On multiple occasions on or before February 4, 2010, and continuing through on
19 or about May 5, 2010, BROOME and others, known and unknown to the grand
20 jury, selected firearms for sale at federally-licensed firearms dealers located in the
21 District of Arizona.
- 22 (b) On multiple occasions on or before February 4, 2010, and continuing through on
23 or about April 22, 2010, BROOME would separately meet with MCGRAW,
24 HONEA, and KROM to complete the purchases of the firearms that had been
25 previously selected. On said occasions, BROOME gave U.S. currency to
26 MCGRAW, HONEA, and KROM to be used to purchase the firearms.
- 27 (c) On or about February 4, 2010, BROOME purchased four (4) firearms from a
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1 federally-licensed firearms dealer located in the District of Arizona. During said
2 purchase, BROOME executed an ATF Form 4473 in which he falsely stated that
3 he was the "actual buyer" of the purchased firearms when in fact he actually
4 intended to deliver the firearms immediately to others, known and unknown to the
5 grand jury.

6 (d) On or about February 20, 2010, BROOME purchased seven (7) firearms from a
7 federally-licensed firearms dealer located in the District of Arizona. During said
8 purchase, BROOME executed an ATF Form 4473 in which he falsely stated that
9 he was the "actual buyer" of the purchased firearms when in fact he actually
10 intended to deliver the firearms immediately to others, known and unknown to the
11 grand jury.

12 (e) On or about February 26, 2010, MCGRAW purchased seven (7) firearms from a
13 federally-licensed firearms dealer located in the District of Arizona. During said
14 purchase, MCGRAW executed an ATF Form 4473 in which she falsely stated that
15 she was the "actual buyer" of the purchased firearms when in fact she actually
16 intended to deliver the firearms immediately to BROOME.

17 (f) On or about March 6, 2010, BROOME purchased seven (7) firearms from a
18 federally-licensed firearms dealer located in the District of Arizona. During said
19 purchase, BROOME executed an ATF Form 4473 in which he falsely stated that
20 he was the "actual buyer" of the purchased firearms when in fact he actually
21 intended to deliver the firearms immediately to others, known and unknown to the
22 grand jury.

23 (g) On or about March 12, 2010, BROOME purchased three (3) firearms from a
24 federally-licensed firearms dealer located in the District of Arizona. During said
25 purchase, BROOME executed an ATF Form 4473 in which he falsely stated that
26 he was the "actual buyer" of the purchased firearms when in fact he actually
27 intended to deliver the firearms immediately to others, known and unknown to the
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grand jury.

- (h) On or about March 19, 2010, BROOME purchased seven (7) firearms from a federally-licensed firearms dealer located in the District of Arizona. During said purchase, BROOME executed an ATF Form 4473 in which he falsely stated that he was the "actual buyer" of the purchased firearms when in fact he actually intended to deliver the firearms immediately to others, known and unknown to the grand jury.
- (i) On or about March 20, 2010, BROOME purchased five (5) firearms from a federally-licensed firearms dealer located in the District of Arizona. During said purchase, BROOME executed an ATF Form 4473 in which he falsely stated that he was the "actual buyer" of the purchased firearms when in fact he actually intended to deliver the firearms immediately to others, known and unknown to the grand jury.
- (j) On or about April 12, 2010, BROOME purchased two (2) firearms from a federally-licensed firearms dealer located in the District of Arizona. During said purchase, BROOME executed an ATF Form 4473 in which he falsely stated that he was the "actual buyer" of the purchased firearms when in fact he actually intended to deliver the firearms immediately to others, known and unknown to the grand jury.
- (k) On or about April 13, 2010, HONEA purchased five (5) firearms from a federally-licensed firearms dealer located in the District of Arizona. During said purchase, HONEA executed an ATF Form 4473 in which he falsely stated that he was the "actual buyer" of the purchased firearms when in fact he actually intended to deliver the firearms immediately to BROOME.
- (l) On or about April 15, 2010, BROOME purchased three (3) firearms from a federally-licensed firearms dealer located in the District of Arizona. During said purchase, BROOME executed an ATF Form 4473 in which he falsely stated that

1 he was the "actual buyer" of two of the three purchased firearms when in fact he
2 actually intended to deliver two of the firearms immediately to others, known and
3 unknown to the grand jury.

4 (m) On or about April 15, 2010, KROM purchased five (5) firearms from a
5 federally-licensed firearms dealer located in the District of Arizona. During said
6 purchase, KROM executed an ATF Form 4473 in which she falsely stated that she
7 was the "actual buyer" of the purchased firearms when in fact she actually
8 intended to deliver the firearms immediately to others, known and unknown to the
9 grand jury.

10 (n) On or about April 22, 2010, HONEA purchased two (2) firearms from a
11 federally-licensed firearms dealer located in the District of Arizona. During said
12 purchase, HONEA executed an ATF Form 4473 in which he falsely stated that he
13 was the "actual buyer" of the purchased firearms when in fact he actually intended
14 to deliver the firearms immediately to BROOME.

15 (o) On or about May 5, 2010, BROOME purchased two (2) firearms from a
16 federally-licensed firearms dealer located in the District of Arizona. During said
17 purchase, BROOME executed an ATF Form 4473 in which he falsely stated that
18 he was the "actual buyer" of the purchased firearms when in fact he actually
19 intended to deliver the firearms immediately to others, known and unknown to the
20 grand jury.

21 (p) After BROOME purchased and received the firearms described above in
22 paragraphs (c)-(o), BROOME transferred ownership/possession of all firearms to
23 others, known and unknown to the grand jury.

24 All in violation of Title 18, United States Code, Section 371.

1 **COUNT 2**

2 **(False Statement During Purchase of Firearm)**

3 11. On or about February 4, 2010, in the District of Arizona, the defendant, JEFFREY
4 BROOME, knowingly made a false statement and representation to J & G Sales, Ltd., a licensed
5 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect
6 to information required by the provisions of Chapter 44 of Title 18, United States Code, to be
7 kept in the records of J & G Sales, Ltd., and did execute a Department of Justice, Bureau of
8 Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he
9 was the actual transferee/buyer of the firearms indicated on the Form 4473, specifically, one (1)
10 Beretta, model 92FS, 9 mm pistol, serial number BER373656Z, two (2) Lucznik, Fabryka Broni,
11 model P 64, 9x18mm pistols, serial numbers LK03649 and WS04893, and one (1)
12 Romarm/Cugir, model PSL-54, 7.62x54 mm rifle, serial number R9407-08, when in fact, as
13 JEFFREY BROOME then knew, he was not the actual buyer of the firearms.

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

15
16 **COUNT 3**

17 **(False Statement During Purchase of Firearm)**

18 12. On or about February 20, 2010, in the District of Arizona, the defendant,
19 JEFFREY BROOME, knowingly made a false statement and representation to J & G Sales, Ltd.,
20 a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
21 with respect to information required by the provisions of Chapter 44 of Title 18, United States
22 Code, to be kept in the records of J & G Sales, Ltd., and did execute a Department of Justice,
23 Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the
24 effect that he was the actual transferee/buyer of the firearms indicated on the Form 4473,
25 specifically, seven (7) Romarm/Cugir, model Draco, 7.62x39 mm pistols, serial numbers
26 DR797810, DR778109, DR818510, DR840310, DR821210, DR779309, and DR840710, when
27 in fact, as JEFFREY BROOME then knew, he was not the actual buyer of the firearms.

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

2
3 **COUNT 4**

4 **(False Statement During Purchase of Firearm)**

5 13. On or about February 26, 2010, in the District of Arizona, the defendant,
6 JOHNESHIA MCGRAW, knowingly made a false statement and representation to J & G Sales,
7 Ltd., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States
8 Code, with respect to information required by the provisions of Chapter 44 of Title 18, United
9 States Code, to be kept in the records of J & G Sales, Ltd., and did execute a Department of
10 Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to
11 the effect that she was the actual transferee/buyer of the firearms indicated on the Form 4473,
12 specifically, seven (7) Romarm/Cugir, model Draco, 7.62x39 mm pistols, serial numbers
13 DR829310, DR841610, DR842410, DR781009, DR878810, DR842710, and DR842910, when
14 in fact, as JOHNESHIA MCGRAW then knew, she was not the actual buyer of the firearms.

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

16
17 **COUNT 5**

18 **(False Statement During Purchase of Firearm)**

19 14. On or about March 6, 2010, in the District of Arizona, the defendant, JEFFREY
20 BROOME, knowingly made a false statement and representation to J & G Sales, Ltd., a licensed
21 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect
22 to information required by the provisions of Chapter 44 of Title 18, United States Code, to be
23 kept in the records of J & G Sales, Ltd., and did execute a Department of Justice, Bureau of
24 Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he
25 was the actual transferee/buyer of the firearms indicated on the Form 4473, specifically, seven
26 (7) FEG, model SA 2000M, 7.62x39 mm rifles, serial numbers ED8971H, EE1293H, DH3561H,
27 DA5166H, DZ7012H, EF7295H, and DN5761H, when in fact, as JEFFREY BROOME then

1 knew, he was not the actual buyer of the firearms.

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

3
4 **COUNT 6**

5 **(False Statement During Purchase of Firearm)**

6 15. On or about March 12, 2010, in the District of Arizona, the defendant, JEFFREY
7 BROOME, knowingly made a false statement and representation to A.J.I. Sports, a licensed
8 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect
9 to information required by the provisions of Chapter 44 of Title 18, United States Code, to be
10 kept in the records of A.J.I. Sports, and did execute a Department of Justice, Bureau of Alcohol,
11 Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the
12 actual transferee/buyer of the firearms indicated on the Form 4473, specifically, three (3) Ceska
13 Zbrojovka, model AKP, 7.62x39 mm pistols, serial numbers C900369, CP00157, and C900345,
14 when in fact, as JEFFREY BROOME then knew, he was not the actual buyer of the firearms.

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

16
17 **COUNT 7**

18 **(False Statement During Purchase of Firearm)**

19 16. On or about March 19, 2010, in the District of Arizona, the defendant, JEFFREY
20 BROOME, knowingly made a false statement and representation to A.J.I. Sports, a licensed
21 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect
22 to information required by the provisions of Chapter 44 of Title 18, United States Code, to be
23 kept in the records of A.J.I. Sports, and did execute a Department of Justice, Bureau of Alcohol,
24 Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the
25 actual transferee/buyer of the firearms indicated on the Form 4473, specifically, seven (7)
26 Romarm/Cugir, model PAK, 7.62x39 mm pistols, serial numbers C900223, C900159, C900192,
27 C900206, C900300, C900368, and C900050, when in fact, as JEFFREY BROOME then knew,

1 he was not the actual buyer of the firearms.

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

3
4 **COUNT 8**

5 **(False Statement During Purchase of Firearm)**

6 17. On or about March 20, 2010, in the District of Arizona, the defendant, JEFFREY
7 BROOME, knowingly made a false statement and representation to J & G Sales, Ltd., a licensed
8 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect
9 to information required by the provisions of Chapter 44 of Title 18, United States Code, to be
10 kept in the records of J & G Sales, Ltd., and did execute a Department of Justice, Bureau of
11 Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he
12 was the actual transferee/buyer of the firearms indicated on the Form 4473, specifically, five (5)
13 FEG, model SA200M, 7.62x39 mm rifles, serial numbers EE1030H, DN4978H, EE0630H,
14 DA8382H, and DA8436H, when in fact, as JEFFREY BROOME then knew, he was not the
15 actual buyer of the firearms.

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

17
18 **COUNT 9**

19 **(False Statement During Purchase of Firearm)**

20 18. On or about April 12, 2010, in the District of Arizona, the defendant, JEFFREY
21 BROOME, knowingly made a false statement and representation to A.J.I. Sports, a licensed
22 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect
23 to information required by the provisions of Chapter 44 of Title 18, United States Code, to be
24 kept in the records of A.J.I. Sports, and did execute a Department of Justice, Bureau of Alcohol,
25 Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the
26 actual transferee/buyer of the firearms indicated on the Form 4473, specifically, two (2) Ceska
27 Zbrojovka, model AKP, 7.62x39 mm pistols, serial numbers C900225 and C900220, when in

1 fact, as JEFFREY BROOME then knew, he was not the actual buyer of the firearms.

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

3
4 **COUNT 10**

5 **(False Statement During Purchase of Firearm)**

6 19. On or about April 13, 2010, in the District of Arizona, the defendant, KENNETH
7 HONEA, knowingly made a false statement and representation to A.J.I. Sports, a licensed dealer
8 of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect to
9 information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept
10 in the records of A.J.I. Sports, and did execute a Department of Justice, Bureau of Alcohol,
11 Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the
12 actual transferee/buyer of the firearms indicated on the Form 4473, specifically, three (3) Ceska
13 Zbrojovka, model AKP, 7.62x39 mm pistols, serial numbers C900092, C900372, and C900267,
14 and two (2) Ceska Zbrojovka, model WASR, 7.62x39 mm rifles, serial number 1965JL1136 and
15 1974F44406, when in fact, as KENNETH HONEA then knew, he was not the actual buyer of
16 the firearms.

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

18
19 **COUNT 11**

20 **(False Statement During Purchase of Firearm)**

21 20. On or about April 15, 2010, in the District of Arizona, the defendant, JEFFREY
22 BROOME, knowingly made a false statement and representation to J & G Sales, Ltd., a licensed
23 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect
24 to information required by the provisions of Chapter 44 of Title 18, United States Code, to be
25 kept in the records of J & G Sales, Ltd., and did execute a Department of Justice, Bureau of
26 Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he
27 was the actual transferee/buyer of the firearms indicated on the Form 4473, specifically, two (2)

1 FEG, model AMD65, 7.62x39 mm rifles, serial numbers EN4564H and DN1763H, when in fact,
2 as JEFFREY BROOME then knew, he was not the actual buyer of the firearms.

3 In violation of Title 18, United States Code, Section 924(a)(1)(A).
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5 **COUNT 12**

6 **(False Statement During Purchase of Firearm)**

7 21. On or about April 15, 2010, in the District of Arizona, the defendant, LINDA
8 KROM, knowingly made a false statement and representation to J & G Sales, Ltd., a licensed
9 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect
10 to information required by the provisions of Chapter 44 of Title 18, United States Code, to be
11 kept in the records of J & G Sales, Ltd., and did execute a Department of Justice, Bureau of
12 Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she
13 was the actual transferee/buyer of the firearms indicated on the Form 4473, specifically, five (5)
14 FEG, model AMD65, 7.62x39 mm rifles, serial numbers ED6487H, DC0494H, EN1332H,
15 ED5348H, and DI1161H, when in fact, as LINDA KROM then knew, she was not the actual
16 buyer of the firearms.

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

19 **COUNT 13**

20 **(False Statement During Purchase of Firearm)**

21 22. On or about April 22, 2010, in the District of Arizona, the defendant, KENNETH
22 HONEA, knowingly made a false statement and representation to A.J.I. Sports, a licensed dealer
23 of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect to
24 information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept
25 in the records of A.J.I. Sports, and did execute a Department of Justice, Bureau of Alcohol,
26 Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the
27 actual transferee/buyer of the firearms indicated on the Form 4473, specifically, two (2) Ceska
28

1 Zbrojovka, model Tantal, 5.45x39 mm rifles, serial numbers TTL02370 and Y001450, when in
2 fact, as KENNETH HONEA then knew, he was not the actual buyer of the firearms.

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

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5

COUNT 14

(False Statement During Purchase of Firearm)

7 23. On or about May 5, 2010, in the District of Arizona, the defendant, JEFFREY
8 BROOME, knowingly made a false statement and representation to A.J.I. Sports, a licensed
9 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, with respect
10 to information required by the provisions of Chapter 44 of Title 18, United States Code, to be
11 kept in the records of A.J.I. Sports, and did execute a Department of Justice, Bureau of Alcohol,
12 Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the
13 actual transferee/buyer of the firearms indicated on the Form 4473, specifically two (2) Ceska
14 Zbrojovka, model Draco, 7.62x39 mm pistols, serial numbers DR-9821-10 and DR-9704-10,
15 when in fact, as JEFFREY BROOME then knew, he was not the actual buyer of the firearm.

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

17
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A TRUE BILL

19

/s/

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FOREPERSON OF THE GRAND JURY

21

Date: August 18, 2010

22

DENNIS K. BURKE
United States Attorney
District of Arizona

23
24

/s/

25

WALTER PERKEL
Assistant U.S. Attorney
26 JOSHUA FISHER
Special Assistant U.S. Attorney
27

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