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DEC 21 2010	
CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	DEPUTY

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

United States of America,

Plaintiff,

v.

1. Raul Flores Lopez,
(Counts 1, 6-7, 10-11, 13-16)
2. Luis Fernando Mendoza-Zamora,
(Counts 1, 8-9)
3. Fabiola Zaragoza,
(Counts 1, 4-5)
4. Juan Velasquez,
(Count 1, 17)
5. Pablo Sanchez Vasquez, Jr.,
(Count 1, 18)
6. Ulises Quinonez,
(Counts 1, 12)
7. Mary Natalie Lopez,
(Counts 1-2)
8. Jovanny Moraga-Escoboza,
(Counts 1, 3)

Defendants.

CR 101831 PHX FJM ECV

INDICTMENT

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

18 U.S.C. § 924(a)(1)(A) and 2
(False Statement in Acquisition of
Firearm)
Counts 2-4, 6, 9-10, 12-13, 15, 17-18

18 U.S.C. §§ 922(d)(5)(A) and
924(a)(2)
(Transfer Firearm to an Illegal Alien)
Count 5

18 U.S.C. §§ 922(a)(6) and 924(a)(2)
(Material False Statement in
Acquisition of a Firearm)
Counts 7, 8, 11, 14, 16

18 U.S.C. §924(d) and 28 U.S.C.
§2461(c)
(Forfeiture Allegation)

THE GRAND JURY CHARGES:

COUNT 1

Beginning on or about August 3, 2010, and continuing until at least August 18, 2010, in the

1 District of Arizona and elsewhere, the defendants, RAUL FLORES LOPEZ, LUIS MENDOZA-
2 ZAMORA, FABIOLA ZARAGOZA, JUAN VELASQUEZ, PABLO SANCHEZ-VASQUEZ
3 JR, ULISES QUINONEZ, MARY LOPEZ, and JOVANNY MORAGA ESCOBOZA along with
4 other persons known and unknown to the Grand Jury, did willfully, knowingly, and unlawfully,
5 combine, conspire, confederate, and agree together to:

6 make false statements in connection with the acquisition of firearms from federally licensed
7 firearms dealers in violation of Title 18, United States Code, Section 924(a)(1)(A);

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

9 **OVERT ACTS**

10 As part, and in furtherance of the conspiracy, at least one of the conspirators performed or
11 caused to be performed at least one of the following overt acts, among others, in the District of
12 Arizona and elsewhere, including but not limited to:

13 a. On or about August 3, 2010, in or near Phoenix, Arizona, MARY LOPEZ purchased two
14 (2) Romarm/Cugir AK-47 variant firearms from Lone Wolf Trading Company, a federally
15 licensed firearms dealer, and during the course of such purchases falsely represented on the
16 Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that she was the actual
17 purchaser of said firearms.

18 b. On or about August 3, 2010, in or near Phoenix, Arizona, JOVANNY MORAGA-
19 ESCOBOZA purchased two (2) Romarm/Cugir AK-47 variant firearms from Lone Wolf Trading
20 Company, a federally licensed firearms dealer, and during the course of such purchases falsely
21 represented on the Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that he was
22 the actual purchaser of said firearms.

23 c. On or about August 4, 2010, in or near Phoenix, Arizona, LUIS MENDOZA-ZAMORA
24 purchased one Romarm/Cugir AK-47 variant firearm and one Century Arms AK-47 variant
25 firearm from Lone Wolf Trading Company, a federally licensed firearms dealer, and during the
26 course of such purchases falsely represented on the Bureau of Alcohol, Tobacco, Firearms and
27 Explosives Form 4473 that he was the actual purchaser of said firearms.

1 d. On or about August 4, 2010, in or near Phoenix, Arizona, FABIOLA ZARAGOZA
2 purchased two (2) Romarm/Cugir AK-47 variant firearms from Lone Wolf Trading Company,
3 a federally licensed firearms dealer, and during the course of such purchases falsely represented
4 on the Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that she was the actual
5 purchaser of said firearms.

6 e. On or about August 6, 2010, in or near Phoenix, Arizona, RAUL FLORES LOPEZ
7 purchased four (4) Century Arms AK-47 variant firearms from Lone Wolf Trading Company, a
8 federally licensed firearms dealer, and during the course of such purchases represented on the
9 Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that he was not the actual
10 purchaser of said firearms.

11 f. On or about August 7, 2010, in or near Phoenix, Arizona, RAUL FLORES LOPEZ
12 purchased one (1) Romarm/Cugir AK-47 variant firearm and three (3) Century Arms AK-47
13 variant firearms from Lone Wolf Trading Company, a federally licensed firearms dealer, and
14 during the course of such purchases falsely represented on the Bureau of Alcohol, Tobacco,
15 Firearms and Explosives Form 4473 that he was the actual purchaser of said firearms.

16 g. On or about August 10, 2010, in or near Phoenix, Arizona, RAUL FLORES LOPEZ
17 purchased five (5) Romarm/Cugir AK-47 variant firearms from Lone Wolf Trading Company,
18 a federally licensed firearms dealer, and during the course of such purchases falsely represented
19 on the Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that he was the actual
20 purchaser of said firearms.

21 h. On or about August 10, 2010, in or near Phoenix, Arizona, ULISES QUINONEZ
22 purchased five (5) Romarm/Cugir AK-47 variant firearms from Lone Wolf Trading Company,
23 a federally licensed firearms dealer, and during the course of such purchases falsely represented
24 on the Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that he was the actual
25 purchaser of said firearms.

26 i. On or about August 10, 2010, RAUL FLORES LOPEZ provided ULISES QUINONEZ
27 with United States currency to purchase firearms.

1 j. On or about August 12, 2010, in or near Phoenix, Arizona, RAUL FLORES LOPEZ
2 purchased four (4) Romarm/Cugir AK-47 variant firearms from Shooter's World, a federally
3 licensed firearms dealer, and during the course of such purchases falsely represented on the
4 Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that he was the actual
5 purchaser of said firearms.

6 k. On or about August 13, 2010, in or near Phoenix, Arizona, RAUL FLORES LOPEZ
7 purchased six (6) Romarm/Cugir AK-47 variant firearms from Lone Wolf Trading Company, a
8 federally licensed firearms dealer, and during the course of such purchases falsely represented
9 on the Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that he was the actual
10 purchaser of said firearms.

11 l. On or about August 14, 2010, in or near Phoenix, Arizona, JUAN VELASQUEZ
12 purchased five (5) Century Arms AK-47 variant firearms from Lone Wolf Trading Company, a
13 federally licensed firearms dealer, and during the course of such purchases falsely represented
14 on the Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that he was the actual
15 purchaser of said firearms.

16 m. On or about August 14, 2010, in or near Phoenix, Arizona, PABLO SANCHEZ-
17 VASQUEZ purchased five (5) Century Arms AK-47 variant firearms from Lone Wolf Trading
18 Company, a federally licensed firearms dealer, and during the course of such purchases falsely
19 represented on the Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that he was
20 the actual purchaser of said firearms.

21 n. On or about August 14, 2010, RAUL FLORES LOPEZ gave United States currency to
22 JUAN VELASQUEZ and to PABLO SANCHEZ-VASQUEZ to purchase firearms.

23 **COUNT 2**

24 On or about August 3, 2010, in the District of Arizona, defendant MARY NATALIE LOPEZ
25 in connection with the acquisition of two (2) firearms, to wit: Romarm/Cugir 7.62x39mm rifle
26 model GP-WASR 10/63, serial number 1966AC2969, and Romarm/Cugir 7.62x39mm rifle
27 model GP-WASR 10/63, serial number 1973ES3869 from Lone Wolf Trading Company a
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1 federally licensed firearms dealer, knowingly made a false statement and representation with
2 respect to information required by the provisions of Chapter 44 of Title 18, United States Code,
3 in that the defendant did represent on the Bureau of Alcohol, Tobacco, Firearms and Explosives
4 Form 4473, Firearms Transaction Record, that Mary Lopez was the actual purchaser of the
5 firearms, when in truth and in fact, as the defendant knew, she was not the actual purchaser of
6 the firearms; in violation of Title 18, United States Code, Sections 924(a)(1)(A).

7 **COUNT 3**

8 On or about August 3, 2010 in the District of Arizona, defendant JOVANNY MORAGA-
9 ESCOBOZA in connection with the acquisition of two (2) firearms to wit: Romarm/Cugir
10 7.62x39mm rifle model GP-WASR 10/63, serial number 1973FS3414 and Romarm/Cugir
11 7.62x39mm rifle model GP-WASR 10/63, serial number 1967AH3241 from Lone Wolf Trading
12 Company, a federally licensed firearms dealer, knowingly made a false statement and
13 representation with respect to information required by the provisions of Chapter 44 of Title 18,
14 United States Code, in that the defendant did represent on the Bureau of Alcohol, Tobacco,
15 Firearms and Explosives Form 4473, Firearms Transaction Record, that he was the actual
16 purchaser of the firearms, when in truth and in fact, as the defendant knew, he was not the actual
17 purchaser of the firearms; in violation of Title 18, United States Code, Sections 924(a)(1)(A).

18 **COUNT 4**

19 On or about August 4, 2010, in the District of Arizona, defendant FABIOLA ZARAGOZA
20 in connection with the acquisition of two (2) firearms, to wit: Romarm/Cugir 7.62x39mm rifle
21 model GP-WASR 10/63, serial number 1993AEZ3726 and Romarm/Cugir 7.62x39mm rifle
22 model GP-WASR 10/63, serial number 1985PO5536 from Lone Wolf Trading Company, a
23 federally licensed firearms dealer, knowingly made a false statement and representation with
24 respect to information required by the provisions of Chapter 44 of Title 18, United States Code,
25 in that the defendant did represent on the Bureau of Alcohol, Tobacco, Firearms and Explosives
26 Form 4473, Firearms Transaction Record, that she was the actual purchaser of the firearms, when
27 in truth and in fact, as the defendant knew, she was not the actual purchaser of the firearms; in
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1 violation of Title 18, United States Code, Sections 924(a)(1)(A).

2 **COUNT 5**

3 On or about August 4, 2010, in the District of Arizona, the defendant, FABIOLA
4 ZARAGOZA, knowingly transferred the firearms listed in Count 4 and incorporated herein, to
5 Ramon Rivas- Bojorquez, knowing and having reasonable cause to believe that Ramon Rivas-
6 Bojorquez was then an alien illegally and unlawfully in the United States in violation of Title 18,
7 United States Code, 922(d)(5)(A) and 924(a)(2).

8 **COUNT 6**

9 On or about August 7, 2010, in the District of Arizona, defendant RAUL FLORES LOPEZ
10 in connection with the acquisition of four (4) firearms to wit: one Romarm/Cugir 7.62x39mm
11 rifle model GP-WASR 10/63, serial number 1982MP2004, one Century Arms International
12 7.62x39mm rifle, model GP-1975, serial number GP-C500196, one Century Arms International
13 7.62x39mm rifle, model GP-1975, serial number GP-C500285, and one Century Arms
14 International 7.62x39mm rifle model GP-1975, serial number GP-C500385 from Lone Wolf
15 Trading Company, a federally licensed firearms dealer, knowingly made a false statement and
16 representation with respect to information required by the provisions of Chapter 44 of Title 18,
17 United States Code, in that the defendant did represent on the Bureau of Alcohol, Tobacco,
18 Firearms and Explosives Form 4473, Firearms Transaction Record, that he was the actual
19 purchaser of the firearms, when in truth and in fact, as the defendant knew, he was not the actual
20 purchaser of the firearms; in violation of Title 18, United States Code, Sections 924(a)(1)(A).

21 **COUNT 7**

22 On or about August 7, 2010 in the District of Arizona, the Defendant RAUL FLORES
23 LOPEZ in connection with the acquisition of four (4) firearms to wit: one Romarm/Cugir
24 7.62x39mm rifle model GP-WASR 10/63, serial number 1982MP2004, one Century Arms
25 International 7.62x39mm rifle model GP-1975, serial number GP-C500196, one Century Arms
26 International 7.62x39mm rifle model GP-1975, serial number GP-C500285, and one Century
27 Arms International 7.62x39mm rifle model GP-1975, serial number GP-C500385 from Lone

1 Wolf Trading Company, a federally licensed firearms dealer, knowingly made a false and
2 fictitious written statement which statement was intended and likely to deceive Lone Wolf
3 Trading Company as to a fact material to the lawfulness of such acquisition of said firearms by
4 the defendant under chapter 44 of Title 18, in that the defendant represented that he was the
5 actual purchaser of the firearms, when in truth and in fact, as the defendant knew, he was not the
6 actual purchaser of the firearms; in violation of Title 18 §922(a)(6) and 924(a)(2).

7 **COUNT 8**

8 On or about August 4, 2010, in the District of Arizona, defendant LUIS FERNANDO
9 MENDOZA-ZAMORA in connection with the acquisition of two (2) firearms, to wit: one
10 Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1976GV0164 and one
11 Century Arms 7.62x39mm rifle model GP-1975, serial number GP-C501049 from Lone Wolf
12 Trading Company, a federally licensed firearms dealer, knowingly made a false and fictitious
13 written statement which statement was intended and likely to deceive Lone Wolf Trading
14 Company as to a fact material to the lawfulness of such acquisition of said firearms by the
15 defendant under chapter 44 of Title 18, in that the defendant represented that he was the actual
16 purchaser of the firearms, when in truth and in fact, as the defendant knew, he was not the actual
17 purchaser of the firearms; in violation of Title 18 §922(a)(6) and 924(a)(2).

18 **COUNT 9**

19 On or about August 4, 2010, in the District of Arizona, defendant LUIS FERNANDO
20 MENDOZA-ZAMORA in connection with the acquisition of two (2) firearms, to wit: one
21 Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1976GV0164 and one
22 Century Arms 7.62x39mm rifle model GP-1975, serial number GP-C501049 from Lone Wolf
23 Trading Company, a federally licensed firearms dealer, knowingly made a false statement and
24 representation with respect to information required by the provisions of Chapter 44 of Title 18,
25 United States Code, in that the defendant did represent on the Bureau of Alcohol, Tobacco,
26 Firearms and Explosives Form 4473, Firearms Transaction Record, that he was the actual
27

1 purchaser of the firearms, when in truth and in fact, as the defendant knew, he was not the actual
2 purchaser of the firearms; in violation of Title 18, United States Code, Sections 924(a)(1)(A).

3 **COUNT 10**

4 On or about August 10, 2010, in the District of Arizona, defendant RAUL FLORES
5 LOPEZ in connection with the acquisition of five (5) firearms, to wit: one Romarm/Cugir
6 7.62x39mm rifle model GP-WASR 10/63, serial number 1993AEZ3150, one Romarm/Cugir
7 7.62x39mm rifle model GP-WASR 10/63, serial number 1985PO9838, one Romarm/Cugir
8 7.62x39mm rifle model GP-WASR 10/63, serial number 1983SAU1768, one Romarm/Cugir
9 7.62x39mm rifle model GP-WASR 10/63, serial number 1970CP0300, and one Romarm/Cugir
10 7.62x39mm rifle model GP-WASR 10/63, serial number 1984PF6829 from Lone Wolf Trading
11 Company, a federally licensed firearms dealer, knowingly made a false statement and
12 representation with respect to information required by the provisions of Chapter 44 of Title 18,
13 United States Code, in that the defendant did represent on the Bureau of Alcohol, Tobacco,
14 Firearms and Explosives Form 4473, Firearms Transaction Record, that he was the actual
15 purchaser of the firearms, when in truth and in fact, as the defendant knew, he was not the actual
16 purchaser of the firearms; in violation of Title 18, United States Code, Sections 924(a)(1)(A).

17 **COUNT 11**

18 On or about August 10, 2010, in the District of Arizona, defendant RAUL FLORES
19 LOPEZ in connection with the acquisition of five (5) firearms, to wit: one Romarm/Cugir
20 7.62x39mm rifle model GP-WASR 10/63, serial number 1993AEZ3150, one Romarm/Cugir
21 7.62x39mm rifle model GP-WASR 10/63, serial number 1985PO9838, one Romarm/Cugir
22 7.62x39mm rifle, model GP-WASR 10/63, serial number 1983SAU1768, one Romarm/Cugir
23 7.62x39mm rifle model GP-WASR 10/63, serial number 1970CP0300, and one Romarm/Cugir
24 7.62x39mm rifle model GP-WASR 10/63, serial number 1984PF6829 from Lone Wolf Trading
25 Company, a federally licensed firearms dealer, knowingly made a false and fictitious written
26 statement which statement was intended and likely to deceive Lone Wolf Trading Company as
27 to a fact material to the lawfulness of such acquisition of said firearms by the defendant under
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1 chapter 44 of Title 18, in that the defendant represented that he was the actual purchaser of the
2 firearms when in truth and in fact, as the defendant knew, he was not the actual purchaser of the
3 firearms; in violation of Title 18 §922(a)(6) and 924(a)(2).

4 **COUNT 12**

5 On or about August 10, 2010 in the District of Arizona, defendant ULISES QUINONEZ
6 in connection with the acquisition of five (5) firearms, to wit: one Century Arms International
7 7.62x39mm rifle model GP-1975, serial number GP-C501050, one Romarm/Cugir 7.62x39mm
8 rifle model GP-WASR 10/63, serial number 1984AI3325, one Romarm/Cugir 7.62x39mm rifle
9 model GP-WASR 10/63, serial number 1973EP1595, one Romarm/Cugir 7.62x39mm rifle,
10 model GP-WASR 10/63, serial number TB41941992, and one Romarm/Cugir 7.62x39mm rifle
11 model GP-WASR 10/63, serial number TD31481993 , from Lone Wolf Trading Company, a
12 federally licensed firearms dealer, knowingly made a false statement and representation with
13 respect to information required by the provisions of Chapter 44 of Title 18, United States Code,
14 in that the defendant did represent on the Bureau of Alcohol, Tobacco, Firearms and Explosives
15 Form 4473, Firearms Transaction Record, that he was the actual purchaser of the firearms, when
16 in truth and in fact, as the defendant knew, he was not the actual purchaser of the firearms; in
17 violation of Title 18, United States Code, Sections 924(a)(1)(A).

18 **COUNT 13**

19 On or about August 12, 2010, in the District of Arizona, defendant RAUL FLORES
20 LOPEZ in connection with the acquisition of four (4) firearms, to wit: one Romarm/Cugir
21 7.62x39mm rifle model GP-WASR10/63, serial number 1975FL2236, one Romarm/Cugir
22 7.62x39mm rifle model GP-WASR 10/63, serial number 1983AH4118, one Romarm/Cugir
23 7.62x39mm rifle model GP-WASR 10/63, serial number 1972EH1351, and one Romarm/Cugir
24 7.62x39mm rifle model GP-WASR 10/63, serial number 1977HE2799, from Shooter's World,
25 a federally licensed firearms dealer, knowingly made a false statement and representation with
26 respect to information required by the provisions of Chapter 44 of Title 18, United States Code,
27 in that the defendant did represent on the Bureau of Alcohol, Tobacco, Firearms and Explosives

1 Form 4473, Firearms Transaction Record, that he was the actual purchaser of the firearms, when
2 in truth and in fact, as the defendant knew, he was not the actual purchaser of the firearms; in
3 violation of Title 18, United States Code, Sections 924(a)(1)(A).

4 **COUNT 14**

5 On or about August 12, 2010, in the District of Arizona, defendant RAUL FLORES
6 LOPEZ in connection with the acquisition of four (4) firearms, to wit: one Romarm/Cugir
7 7.62x39mm rifle model GP-WASR10/63, serial number 1975FL2236, one Romarm/Cugir
8 7.62x39mm rifle model GP-WASR 10/63, serial number 1983AH4118, one Romarm/Cugir
9 7.62x39mm rifle model GP-WASR 10/63, serial number 1972EH1351, and one Romarm/Cugir
10 7.62x39mm rifle model GP-WASR 10/63, serial number 1977HE2799, from Shooter's World,
11 a federally licensed firearms dealer, knowingly made a false and fictitious written statement
12 which statement was intended and likely to deceive Shooter's World as to a fact material to the
13 lawfulness of such acquisition of said firearms by the defendant under chapter 44 of Title 18, in
14 that the defendant represented that he was the actual purchaser of the firearms when in truth and
15 in fact, as the defendant knew, he was not the actual purchaser of the firearms; in violation of
16 Title 18 §922(a)(6) and 924(a)(2).

17 **COUNT 15**

18 On or about August 13, 2010, in the District of Arizona, defendant RAUL FLORES
19 LOPEZ in connection with the acquisition of six (6) firearms, to wit: one Romarm/Cugir
20 7.62x39mm rifle model GP-WASR10/63, serial number 1981MF8578, one Romarm/Cugir
21 7.62x39mm rifle model GP-WASR 10/63, serial number 1978IA2318, one Romarm/Cugir
22 7.62x39mm rifle model GP-WASR 10/63, serial number 1976GV1787, one Romarm/Cugir
23 7.62x39mm rifle model GP-WASR 10/63, serial number 1984PG7687, one Romarm/Cugir
24 7.62x39mm rifle model GP-WASR 10/63, serial number 1984PG7020 and , one Romarm/Cugir
25 7.62x39mm rifle model GP-WASR 10/63, serial number 1972EA1780 from Lone Wolf Trading
26 Company, a federally licensed firearms dealer, knowingly made a false statement and
27 representation with respect to information required by the provisions of Chapter 44 of Title 18,
28

1 United States Code, in that the defendant did represent on the Bureau of Alcohol, Tobacco,
2 Firearms and Explosives Form 4473, Firearms Transaction Record, that he was the actual
3 purchaser of the firearms, when in truth and in fact, as the defendant knew, he was not the actual
4 purchaser of the firearms; in violation of Title 18, United States Code, Sections 924(a)(1)(A).

5 **COUNT 16**

6 On or about August 13, 2010, in the District of Arizona, defendant RAUL FLORES
7 LOPEZ in connection with the acquisition of six (6) firearms, to wit: one Romarm/Cugir
8 7.62x39mm rifle model GP-WASR10/63, serial number 1981MF8578, one Romarm/Cugir
9 7.62x39mm rifle model GP-WASR 10/63, serial number 1978IA2318, one Romarm/Cugir
10 7.62x39mm rifle model GP-WASR 10/63, serial number 1976GV1787, one Romarm/Cugir
11 7.62x39mm rifle model GP-WASR 10/63, serial number 1984PG7687, one Romarm/Cugir
12 7.62x39mm rifle model GP-WASR 10/63, serial number 1984PG7020 and, one Romarm/Cugir
13 7.62x39mm rifle model GP-WASR 10/63, serial number 1972EA1780 from Lone Wolf Trading
14 Company, a federally licensed firearms dealer, knowingly made a false and fictitious written
15 statement which statement was intended and likely to deceive Lone Wolf Trading Company as
16 to a fact material to the lawfulness of such acquisition of said firearms by the defendant under
17 chapter 44 of Title 18, in that the defendant represented that he was the actual purchaser of the
18 firearms when in truth and in fact, as the defendant knew, he was not the actual purchaser of the
19 firearms; in violation of Title 18 §922(a)(6) and 924(a)(2).

20 **COUNT 17**

21 On or about August 14, 2010 in the District of Arizona, defendant JUAN VELASQUEZ
22 in connection with the acquisition of five (5) firearms, to wit: one Century Arms International
23 7.62x39mm rifle model GP-1975, serial number GP-C501107, one Century Arms International
24 7.62x39mm rifle model GP-1975, serial number GP-C500819, one Century Arms International
25 7.62x39mm rifle model GP-1975, serial number GP-C500799, one Century Arms International
26 7.62x39mm rifle model GP-1975, serial number GP-C500071, and one Century Arms
27 International 7.62x39mm rifle,model GP-1975, serial number GP-C501500 from Lone Wolf
28

1 Trading Company, a federally licensed firearms dealer, knowingly made a false statement and
2 representation with respect to information required by the provisions of Chapter 44 of Title 18,
3 United States Code, in that the defendant did represent on the Bureau of Alcohol, Tobacco,
4 Firearms and Explosives Form 4473, Firearms Transaction Record, that he was the actual
5 purchaser of the firearms, when in truth and in fact, as the defendant knew, he was not the actual
6 purchaser of the firearms; in violation of Title 18, United States Code, Sections 924(a)(1)(A).

7 **COUNT 18**

8 On or about August 14, 2010 in the District of Arizona, defendant PABLO SANCHEZ-
9 VASQUEZ in connection with the acquisition of five (5) firearms, to wit: one Century Arms
10 International 7.62x39mm rifle model GP-1975, serial number GP-C500885, one Century Arms
11 International 7.62x39mm rifle model GP-1975, serial number GP-C500094, one Century Arms
12 International 7.62x39mm rifle model GP-1975, serial number GP-C500293, one Century Arms
13 International 7.62x39mm rifle model GP-1975, serial number GP-C500457, and one Century
14 Arms International 7.62x39mm rifle model GP-1975, serial number GP-C500581 from Lone
15 Wolf Trading Company, a federally licensed firearms dealer, knowingly made a false statement
16 and representation with respect to information required by the provisions of Chapter 44 of Title
17 18, United States Code, in that the defendant did represent on the Bureau of Alcohol, Tobacco,
18 Firearms and Explosives Form 4473, Firearms Transaction Record, that he was the actual
19 purchaser of the firearms, when in truth and in fact, as the defendant knew, he was not the actual
20 purchaser of the firearms; in violation of Title 18, United States Code, Sections 924(a)(1)(A).

21 **FORFEITURE ALLEGATION**

22
23 1. The allegations contained in Count[s] One through Eighteen (1 through 18) of this
24 Indictment are hereby realleged and incorporated by reference for the purpose of alleging
25 forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States
26 Code, Section 2461(c).

1 2. Upon conviction of the offenses in violation of Title 18, United States Code,
2 Section 922(a)(6) and/or 924 set forth in Counts Two through Eighteen (2 through 18) of this
3 Indictment, the defendant, RAUL FLORES LOPEZ, LUIS MENDOZA-ZAMORA, FABIOLA
4 ZARAGOZA, JUAN VELASQUEZ, PABLO SANCHEZ-VASQUEZ JR, ULISES QUINONEZ,
5 MARY LOPEZ, and JOVANNY MORAGA ESCOBOZA , shall forfeit to the United States
6 pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code,
7 Section 2461(c), any firearms and/or ammunition involved in or used in the knowing violation
8 of the statutes set forth above, including, but not limited to:

9 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1966AC2969;
10 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1973ES3869;
11 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1973FS3414;
12 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1967AH3241;
13 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1993AEZ3726;
14 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1985PO5536 ;
15 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1982MP2004;
16 one Century Arms International 7.62x39mm rifle, model GP-1975, serial number GP-C500196;
17 one Century Arms International 7.62x39mm rifle, model GP-1975, serial number GP-C500285;
18 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C500385;
19 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1976GV0164;
20 one Century Arms 7.62x39mm rifle model GP-1975, serial number GP-C501049;
21 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1993AEZ3150;
22 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1985PO9838;
23 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1983SAU1768;
24 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1970CP0300;
25 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1984PF6829;
26 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C501050;
27 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1984AI3325;

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- 1 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1973EP1595;
- 2 one Romarm/Cugir 7.62x39mm rifle, model GP-WASR 10/63, serial number TB41941992;
- 3 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number TD31481993
- 4 one Romarm/Cugir 7.62x39mm rifle model GP-WASR10/63, serial number 1981MF8578;
- 5 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1978IA2318;
- 6 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1976GV1787;
- 7 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1984PG7687;
- 8 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1984PG7020;
- 9 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1972EA1780;
- 10 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C501047;
- 11 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C501072;
- 12 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C501158;
- 13 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C500896;
- 14 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C501107;
- 15 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C500819;
- 16 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C500799;
- 17 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C500071;
- 18 one Century Arms International 7.62x39mm rifle, model GP-1975, serial number GP-C501500;
- 19 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C500885;
- 20 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C500094;
- 21 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C500293;
- 22 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C500457;
- 23 one Century Arms International 7.62x39mm rifle model GP-1975, serial number GP-C500581;
- 24 one Romarm/Cugir 7.62x39mm rifle model GP-WASR10/63, serial number 1975FL2236;
- 25 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1983AH4118;
- 26 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1972EH1351;

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1 one Romarm/Cugir 7.62x39mm rifle model GP-WASR 10/63, serial number 1977HE2799.

2 3. If any of the property described above, as a result of any act or omission
3 of the defendants:

4 a. cannot be located upon the exercise of due diligence;

5
6 b. has been transferred or sold to, or deposited with, a third party;

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8 c. has been placed beyond the jurisdiction of the court;

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10 d. has been substantially diminished in value; or

11
12 e. has been commingled with other property which cannot be divided without
13 difficulty,

14 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title
15 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section
16 2461(c).

17 All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

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A TRUE BILL

/s/
FOREPERSON OF THE GRAND JURY
Date: December 21, 2010

DENNIS K. BURKE
United States Attorney
District of Arizona

/s/
LAURA GWINN
Trial Attorney