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CLERK U S DISTRICT COURT
DISTRICT OF ARIZONA
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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

United States of America,

Plaintiff,

v.

(1) Salvador Figueroa Resa,
Counts 1-12

(2) Glen Harrison Goodman,
Counts 1 and 2

(3) Angel Gabriel Ruiz,
Counts 1, 3, 4 and 5

(4) Estefany Jose-Ortiz,
Counts 1, 6 and 7

(5) Alejandro Adalberto Torres, and
Counts 1, 8, 9 and 10

(6) Nolberto Vasquez,
Counts 1 and 11

Defendants.

CR-10-00961-PHX-NVW

SECOND
SUPERSEDING
INDICTMENT

VIO: 18 U.S.C. §§ 924(a)(1)(A) and 371
(Conspiracy to Make a False
Statement in Connection with the
Acquisition of a Firearm)
Count 1

18 U.S.C. §§ 924(a)(1)(A) and 2
(False Statement in Connection
with the Acquisition of a Firearm)
Counts 2-11

18 U.S.C. §§ 924(a)(1)(A), 2 and
3147
(False Statement in Connection
with the Acquisition of a Firearm)
Count 12

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 May 2010, and continuing through on or about August, 2010, in the District of Arizona and elsewhere, defendants SALVADOR FIGUEROA RESA, GLEN HARRISON GOODMAN, ANGEL GABRIEL RUIZ, ESTEFANY JOSE-ORTIZ, ALEJANDRO ADALBERTO TORRES, and NOLBERTO VASQUEZ, did conspire with each

1 other and with others known and unknown to the grand jury to knowingly make a false statement
2 and representation with respect to information required by the provisions of Chapter 44 of Title
3 18, United States Code, to be kept in the records of federally licensed firearms dealers,
4 businesses licensed under the provisions of Chapter 44 of Title 18, United States Code, in that
5 SALVADOR FIGUEROA RESA, recruited others to purchase firearms and knew that in order
6 to do that those persons would execute a Bureau of Alcohol, Tobacco, and Firearms Form 4473,
7 Firearms Transaction Record, representing that he or she was the actual buyer of the firearms
8 indicated on the form, when in fact that person was not the actual buyer of these firearms. It was
9 the object of the conspiracy that the co-conspirators agreed to make a false statement to licensed
10 firearms dealers in order to conceal the actual purchaser of the firearms.

11 **OVERT ACTS**

12 As part, and in furtherance of the conspiracy, overt acts were committed in the District of
13 Arizona including, but not limited to, the following:

14 1. On or before June 18, 2010, SALVADOR FIGUEROA RESA (hereinafter RESA) asked
15 GLEN HARRISON GOODMAN (hereinafter GOODMAN) to purchase firearms for RESA.

16 2. On or about June 18, 2010, GOODMAN went to a federally licensed firearms dealer in
17 Glendale, Arizona, to purchase 16 pistols on behalf of RESA. When purchasing the firearms,
18 GOODMAN represented to the dealer that he was the true purchaser of the firearms when, in
19 truth and in fact, they were purchased for another.

20 3. On or before May 27, 2010, RESA asked ANGEL GABRIEL RUIZ (hereinafter RUIZ)
21 to purchase firearms for RESA.

22 4. On or about May 18, 2010, ANGEL GABRIEL RUIZ went to a federally licensed
23 firearms dealer in Glendale, Arizona, to purchase ten rifles on behalf of RESA. When
24 purchasing the firearms, RUIZ represented to the dealer that he was the true purchaser of the
25 firearms when, in truth and in fact, they were purchased for another.

26 5. On or about May 21, 2010, ANGEL GABRIEL RUIZ went to a federally licensed
27 firearms dealer in Glendale, Arizona, to purchase ten rifles on behalf of RESA. When
28 purchasing the firearms RUIZ represented to the dealer that he was the true purchaser of the

1 firearms when, in truth and in fact, they were purchased for another.

2 6. On or about May 27, 2010, ANGEL GABRIEL RUIZ went to a federally licensed
3 firearms dealer in Glendale, Arizona, to purchase two rifles on behalf of RESA. When
4 purchasing the firearms, RUIZ represented to the dealer that he was the true purchaser of the
5 firearms when, in truth and in fact, they were purchased for another.

6 7. On or before May 26, 2010, RESA asked ESTEFANY JOSE-ORTIZ (hereinafter JOSE-
7 ORTIZ) to purchase firearms for RESA.

8 8. On or about May 19, 2010, JOSE-ORTIZ went to a federally licensed firearms dealer in
9 Glendale, Arizona, to purchase 11 rifles on behalf of RESA. When purchasing the firearms,
10 JOSE-ORTIZ represented to the dealer that she was the true purchaser of the firearms when, in
11 truth and in fact, they were purchased for another.

12 9. On or about May 26, 2010, JOSE-ORTIZ went to a federally licensed firearms dealer in
13 Glendale, Arizona, to purchase 13 rifles on behalf of RESA. When purchasing the firearms,
14 JOSE-ORTIZ represented to the dealer that she was the true purchaser of the firearms when, in
15 truth and in fact, they were purchased for another.

16 10. On or before May 25, 2010, RESA asked ALEJANDRO ADALBERTO TORRES
17 (hereinafter TORRES) to purchase firearms for RESA.

18 11. On or about May 20, 2010, TORRES went to a federally licensed firearms dealer in
19 Glendale, Arizona, to purchase four rifles on behalf of RESA. When purchasing the firearms,
20 TORRES represented to the dealer that he was the true purchaser of the firearms when, in truth
21 and in fact, they were purchased for another.

22 12. On or about May 22, 2010, TORRES went to a federally licensed firearms dealer in
23 Phoenix Arizona, to purchase four rifles on behalf of RESA. When purchasing the firearms,
24 TORRES represented to the dealer that he was the true purchaser of the firearms when, in truth
25 and in fact, they were purchased for another.

26 13. On or about May 25, 2010, TORRES went to a federally licensed firearms dealer in
27 Glendale, Arizona, to purchase ten rifles on behalf of RESA. When purchasing the firearms,
28 TORRES represented to the dealer that he was the true purchaser of the firearms when, in truth

1 and in fact, they were purchased for another.

2 14. On or before May 26, 2010, RESA asked NOLBERTO VASQUEZ (hereinafter
3 VASQUEZ) to purchase firearms for RESA.

4 15. On or about May 26, 2010, VASQUEZ went to a federally licensed firearms dealer in
5 Glendale, Arizona, to purchase four rifles on behalf of RESA. When purchasing the firearms,
6 VASQUEZ represented to the dealer that he was the true purchaser of the firearms when, in truth
7 and in fact, they were purchased for another.

8 16. On or before August 26, 2010, RESA asked another person to purchase firearms for
9 RESA.

10 17. On or between August 22 and 26, 2010, a person went to a federally licensed firearms
11 dealer in Glendale, Arizona, to purchase five pistols on behalf of RESA. When purchasing the
12 firearms, this person represented to the dealer that he/she was the true purchaser of the firearms
13 when, in truth and in fact, they were purchased for another person.

14 All in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 371.

15 **COUNT 2**

16 On or about June 18, 2010, in the District of Arizona, defendants GLEN HARRISON
17 GOODMAN and SALVADOR FIGUEROA RESA, did knowingly make a false statement and
18 representation with respect to information required by the provisions of Chapter 44 of Title 18,
19 United States Code, to be kept in the records of a federally licensed firearms dealer, a business
20 licensed under the provisions of Chapter 44 of Title 18, United States Code, in that GLEN
21 HARRISON GOODMAN executed a Bureau of Alcohol, Tobacco, and Firearms Form 4473,
22 Firearms Transaction Record, representing that he was the actual buyer of the firearms indicated
23 on the form, specifically, 16 Beretta, model FS92, 9mm pistols, when in fact he was purchasing
24 the firearms on behalf of another.

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

26 **COUNT 3**

27 On or about May 18, 2010, in the District of Arizona, defendants ANGEL GABRIEL RUIZ
28 and SALVADOR FIGUEROA RESA, did knowingly make a false statement and representation

1 with respect to information required by the provisions of Chapter 44 of Title 18, United States
2 Code, to be kept in the records of a federally licensed firearms dealer, a business licensed under
3 the provisions of Chapter 44 of Title 18, United States Code, in that ANGEL GABRIEL RUIZ
4 executed a Bureau of Alcohol, Tobacco, and Firearms Form 4473, Firearms Transaction Record,
5 representing that he was the actual buyer of the firearms indicated on the form, specifically, ten
6 Century International Arms, Model GP/WASR10, 7.62 x 39mm rifles, when in fact he was
7 purchasing the firearms on behalf of another.

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

9 **COUNT 4**

10 On or about May 21, 2010, in the District of Arizona, defendants ANGEL GABRIEL RUIZ
11 and SALVADOR FIGUEROA RESA, did knowingly make a false statement and representation
12 with respect to information required by the provisions of Chapter 44 of Title 18, United States
13 Code, to be kept in the records of a federally licensed firearms dealer, a business licensed under
14 the provisions of Chapter 44 of Title 18, United States Code, in that ANGEL GABRIEL RUIZ
15 executed a Bureau of Alcohol, Tobacco, and Firearms Form 4473, Firearms Transaction Record,
16 representing that he was the actual buyer of the firearms indicated on the form, specifically, ten
17 Century International Arms, Model GP/WASR10, 7.62 x 39mm rifles, when in fact he was
18 purchasing the firearms on behalf of another.

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

20 **COUNT 5**

21 On or about May 27, 2010, in the District of Arizona, defendants ANGEL GABRIEL RUIZ
22 and SALVADOR FIGUEROA RESA, did knowingly make a false statement and representation
23 with respect to information required by the provisions of Chapter 44 of Title 18, United States
24 Code, to be kept in the records of a federally licensed firearms dealer, a business licensed under
25 the provisions of Chapter 44 of Title 18, United States Code, in that ANGEL GABRIEL RUIZ
26 executed a Bureau of Alcohol, Tobacco, and Firearms Form 4473, Firearms Transaction Record,
27 representing that he was the actual buyer of the firearms indicated on the form, specifically, two
28 Century International Arms, Model GP/WASR10, 7.62 x 39mm rifles, when in fact he was

1 purchasing the firearms on behalf of another.

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

3 **COUNT 6**

4 On or about May 19, 2010, in the District of Arizona, defendants ESTEFANY JOSE-ORTIZ
5 and SALVADOR FIGUEROA RESA, did knowingly make a false statement and representation
6 with respect to information required by the provisions of Chapter 44 of Title 18, United States
7 Code, to be kept in the records of a federally licensed firearms dealer, a business licensed under
8 the provisions of Chapter 44 of Title 18, United States Code, in that ESTEFANY JOSE-ORTIZ
9 executed a Bureau of Alcohol, Tobacco, and Firearms Form 4473, Firearms Transaction Record,
10 representing that she was the actual buyer of the firearms indicated on the form, specifically,
11 seven Century International Arms, Model GP/WASR10, 7.62 x 39mm rifles and four Century
12 International Arms, Model GP1975, 7.62 x 39mm rifles, when in fact she was purchasing the
13 firearms on behalf of another.

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

15 **COUNT 7**

16 On or about May 26, 2010, in the District of Arizona, defendants ESTEFANY JOSE-ORTIZ
17 and SALVADOR FIGUEROA RESA, did knowingly make a false statement and representation
18 with respect to information required by the provisions of Chapter 44 of Title 18, United States
19 Code, to be kept in the records of a federally licensed firearms dealer, a business licensed under
20 the provisions of Chapter 44 of Title 18, United States Code, in that ESTEFANY JOSE-ORTIZ
21 executed a Bureau of Alcohol, Tobacco, and Firearms Form 4473, Firearms Transaction Record,
22 representing that she was the actual buyer of the firearms indicated on the form, specifically, 13
23 Century International Arms, Model GP/WASR10, 7.62 x 39mm rifles, when in fact she was
24 purchasing the firearms on behalf of another.

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

26 **COUNT 8**

27 On or about May 20, 2010, in the District of Arizona, defendants ALEJANDRO
28 ADALBERTO TORRES and SALVADOR FIGUEROA RESA, did knowingly make a false

1 statement and representation with respect to information required by the provisions of Chapter
2 44 of Title 18, United States Code, to be kept in the records of a federally licensed firearms
3 dealer, a business licensed under the provisions of Chapter 44 of Title 18, United States Code,
4 in that ALEJANDRO ADALBERTO TORRES executed a Bureau of Alcohol, Tobacco, and
5 Firearms Form 4473, Firearms Transaction Record, representing that he was the actual buyer of
6 the firearms indicated on the form, specifically, four Century International Arms, Model
7 WASR10, 7.62 x 39mm rifles, when in fact he was purchasing the firearms on behalf of another.

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

9 **COUNT 9**

10 On or about May 22, 2010, in the District of Arizona, defendants ALEJANDRO
11 ADALBERTO TORRES and SALVADOR FIGUEROA RESA, did knowingly make a false
12 statement and representation with respect to information required by the provisions of Chapter
13 44 of Title 18, United States Code, to be kept in the records of a federally licensed firearms
14 dealer, a business licensed under the provisions of Chapter 44 of Title 18, United States Code,
15 in that ALEJANDRO ADALBERTO TORRES executed a Bureau of Alcohol, Tobacco, and
16 Firearms Form 4473, Firearms Transaction Record, representing that he was the actual buyer of
17 the firearms indicated on the form, specifically, four Century International Arms, Model
18 WASR10, 7.62 x 39mm rifles, when in fact he was purchasing the firearms on behalf of another.

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

20 **COUNT 10**

21 On or about May 25, 2010, in the District of Arizona, defendants ALEJANDRO
22 ADALBERTO TORRES and SALVADOR FIGUEROA RESA, did knowingly make a false
23 statement and representation with respect to information required by the provisions of Chapter
24 44 of Title 18, United States Code, to be kept in the records of a federally licensed firearms
25 dealer, a business licensed under the provisions of Chapter 44 of Title 18, United States Code,
26 in that ALEJANDRO ADALBERTO TORRES executed a Bureau of Alcohol, Tobacco, and
27 Firearms Form 4473, Firearms Transaction Record, representing that he was the actual buyer of
28 the firearms indicated on the form, specifically, ten Century International Arms, Model

1 GP/WASR10, 7.62 x 39mm rifles, when in fact he was purchasing the firearms on behalf of
2 another.

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

4 **COUNT 11**

5 On or about May 26, 2010, in the District of Arizona, defendants NOLBERTO VASQUEZ
6 and SALVADOR FIGUEROA RESA, did knowingly make a false statement and representation
7 with respect to information required by the provisions of Chapter 44 of Title 18, United States
8 Code, to be kept in the records of a federally licensed firearms dealer, a business licensed under
9 the provisions of Chapter 44 of Title 18, United States Code, in that NOLBERTO VASQUEZ
10 executed a Bureau of Alcohol, Tobacco, and Firearms Form 4473, Firearms Transaction Record,
11 representing that he was the actual buyer of the firearms indicated on the form, specifically, four
12 Century International Arms, Model WASR10, 7.62 x 39mm rifles, when in fact he was
13 purchasing the firearms on behalf of another.

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

15 **COUNT 12**

16 On or about August 26, 2010, in the District of Arizona, defendant SALVADOR
17 FIGUEROA RESA, intentionally and knowingly aided, abetted, counseled, commanded,
18 induced, and procured another person, to knowingly make a false statement and representation
19 with respect to information required by the provisions of Chapter 44 of Title 18, United States
20 Code, to be kept in the records of a federally licensed firearms dealer, a business licensed under
21 the provisions of Chapter 44 of Title 18, United States Code, in that this other person executed
22 a Bureau of Alcohol, Tobacco, and Firearms Form 4473, Firearms Transaction Record,
23 representing that he or she was the actual buyer of the firearms indicated on the form,
24 specifically, five Century International Arms, Model Draco, 7.62 x 39mm pistols, when in truth
25 and in fact, he or she was purchasing the firearms on behalf of defendant SALVADOR
26 FIGUEROA RESA.

27 In violation of Title 18, United States Code, Sections 924(a)(1)(A), 2 and 3147.
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FORFEITURE ALLEGATION

Upon conviction of the offenses in violation of Title 18 United States Code, Section 924(a)(1)(A), set forth in Counts 2 thorough 12, defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and/or ammunition involved in or used in the knowing violation of the statutes set forth above.

If any of the above-described forfeitable property, as a result of any act or omission of the defendants: (1) cannot be located upon the exercise of due diligence; (2) has been transferred or sold to, or deposited with, a third person; (3) has been placed beyond the jurisdiction of the Court; (4) has been substantially diminished in value; or (5) has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

/s/

FOREPERSON OF THE GRAND JURY
Date: February 8, 2011

DENNIS K. BURKE
United States Attorney
District of Arizona

/s/

LISA JENNIS SETTEL
Assistant U.S. Attorney