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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 -oOo-

11 UNITED STATES OF AMERICA,

INDICTMENT

12 Plaintiff,

02:09-CR- 267

13 vs.

14 JONNATAN WEISS, and
15 WILLIAM WEISS,

16 Defendants.

Violations:

17 **18 U.S.C. § 371** - Conspiracy to receive,
transport and deal in firearms, and to transport
firearms into state of residency in violation of
18 U.S.C. §922(a)(1) & 922(a)(3);
18 U.S.C. § 924(n) - interstate or
international travel to acquire, or attempt to
acquire, firearm(s) with intent to engage in
business of dealing in firearms
18 U.S.C. § 922(g)(1) - unlawful possession
of firearm(s) by a convicted felon;
18 U.S.C. § 922(a)(6) - false statement in
connection with acquisition, or attempted
acquisition, of firearm(s)

21
22 **THE GRAND JURY CHARGES:**

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COUNT ONE

Conspiracy to receive, transport and deal in firearms, and to transport firearms into state of residency in violation of 18 U.S.C. §922(a)(1) & 922(a)(3)

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3 1. Beginning on a date unknown, but not later than December 2008, and continuing through on
4 or about June 13, 2009, in the State and Federal District of Nevada and elsewhere within the
5 jurisdiction of this Court,

6 **1. JONNATAN WEISS, and**
7 **2. WILLIAM WEISS,**

8 the defendants herein, while not being licensed dealers of firearms within the meaning of Chapter
9 44, Title 18, United States Code, knowingly and willfully combined, conspired, and agreed with
10 one another, and others to known and unknown to commit offenses against the United States in
11 violation of Title 18, United States Code, Section 922(a), that is:

- 12 (a) to engage in the business of dealing in firearms, and to receive and transport firearms in
13 interstate or foreign commerce for purposes of engaging in the business of dealing in
14 firearms in violation of Title 18, United States Code, Section 922(a)(1); and
15 (b) to transport firearms which defendant **WILLIAM WEISS** purchased in Nevada into
16 California, the State in which **WILLIAM WEISS** resides, in violation of Title 18, United
17 States Code, Section 922(a)(3).

18 **2. JONNATAN WEISS, WILLIAM WEISS,** and others known and unknown conspired and
19 combined for the common objectives of engaging in the business of dealing in firearms, receiving
20 and transporting firearms in interstate or foreign commerce for purposes of engaging in such a
21 business. One or more of the conspirators took substantial steps towards these ends. For example,
22 the defendants committed the following overt acts in furtherance of the conspiracy:.

- 23 (a) On several occasions during the period from December 2008 to June 2009, **JONNATAN**
24 **WEISS, WILLIAM WEISS** and other conspirators traveled from Mexico and California to
25 Nevada for purposes of obtaining and purchasing firearm to resell to others.
26

1 (b) In furtherance of the conspiracy, in December 2008 , **JONNATAN WEISS, WILLIAM**
2 **WEISS** and another conspirator fraudulently obtained a Nevada drivers' license and a
3 Nevada identification card falsely purporting that they each resided at 4037 Rustic Oak
4 Court, North Las Vegas, Nevada. In truth, the defendants did not reside at that address nor
5 in Nevada, but instead resided in California and Mexico.

6 (c) Posing as Nevada residents, the conspirators used the fraudulently obtained Nevada
7 identification documents to circumvent restrictions on the sale of firearms to nonresidents.

8 (d) During the span from December, 2008, through June 13, 2009, the conspirators received,
9 and attempted to acquire, multiple firearms and firearm components in Nevada which had
10 been manufactured elsewhere and transported in interstate or foreign commerce. As part of
11 and in furtherance of the conspiracy, **JONNATAN WEISS** and **WILLIAM WEISS**
12 purchased and attempted to purchase an array of semi-automatic pistols, tactical pistols and
13 tactical rifles including:

14 (i) a Kimber "Pro TLE II" .45 caliber pistol.

15 (ii) a Beretta "90-Two".40 caliber pistol;

16 (iii) an STI (Strayer Tripp International) "2011 Tactical" 9 millimeter pistol;

17 (iv) a Rock Island Armory "1911" .45 caliber pistol;

18 (v) a Colt "Combat Elite".45 caliber pistol;

19 (vi) a Beretta "84FS (Cheetah)" .380 caliber pistol;

20 (vii) a Bushmaster "EM15-E2S" .223 caliber rifle;

21 (viii) a Rock River Arms "LAR-15" 5.56 millimeter pistol;

22 (ix) a Kimber "Ultra Crimson Carry II" .45 caliber pistol;

23 (x) a Beretta "84FS (Cheetah)" .380 caliber pistol;

24 (xi) a Bushmaster "Carbon 15" 5.56 millimeter pistol;

25 (xii) a Bushmaster "Carbon 15" 5.56 millimeter pistol;

26 (xiii) a SIG Sauer "P556" 5.56 millimeter pistol;

- 1 (xiv) a Kimber "Tactical Pro II" 9 millimeter pistol;
- 2 (xv) a Beretta "84FS (Chettah)" .380 caliber pistol;
- 3 (xvi) a Keltec "PLR-16" .223 caliber pistol;
- 4 (xvii) a Coharie Arms "CA89-40" .40 caliber pistol;
- 5 (xviii) an American Tactical Imports "GSG5-PK" .22 caliber pistol;
- 6 (xix) an American Tactical Imports "GSG5-PK" .22 caliber pistol;
- 7 (xx) a Bushmaster "BA50" .50 caliber rifle;
- 8 (xxi) a Lusa "SGS" 9 millimeter pistol; and
- 9 (xxii) a Bushmaster "XM15-E2S" .223 rifle.

10 (d) After receiving firearms in Nevada, the conspirators transported them in interstate and
11 foreign commerce. As part of and in furtherance of the conspiracy, the defendants combined
12 to transport firearms purchased by **WILLIAM WEISS** in Nevada to California, the State in
13 which he resides.

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

15
16 **COUNT TWO**

17 *Interstate or international travel to acquire, or attempt to acquire,*
18 *a firearm with intent to engage in business of dealing in firearms*
in violation of 18 U.S.C. § 924(n)

19 1. The foregoing allegations are re-alleged and incorporated by reference as though fully set
20 forth herein.

21 2. During the period from December 2008 through June 13, 2009, in the State and Federal
22 District of Nevada and elsewhere within the jurisdiction of this Court,

23
24 **1. JONNATAN WEISS, and**
2. WILLIAM WEISS,

25 the defendants herein, aiding and abetting one another and others known and unknown, traveled
26 from California and Mexico into Nevada with the intent to engage in conduct that constitutes a

1 violation of Title 18, United States Code, Section 922(a)(1)(A), that is, with the intent to engage in
2 the business of dealing in firearms, and in furtherance of that purpose attempted to acquire, and
3 acquired, one or more firearms in Nevada, to wit:

- 4 (i) a Kimber "Pro TLE II" .45 caliber pistol;
- 5 (ii) a Beretta "90-Two".40 caliber pistol;
- 6 (iii) an STI (Strayer Tripp International) "2011 Tactical" 9 millimeter pistol;
- 7 (iv) a Rock Island Armory "1911" .45 caliber pistol;
- 8 (v) a Colt "Combat Elite".45 caliber pistol;
- 9 (vi) a Beretta "84FS (Cheetah)" .380 caliber pistol;
- 10 (vii) a Bushmaster "EM15-E2S" .223 caliber rifle;
- 11 (viii) a Rock River Arms "LAR-15" 5.56 millimeter pistol;
- 12 (ix) a Kimber "Ultra Crimson Carry II" .45 caliber pistol;
- 13 (x) a Beretta "84FS (Cheetah)" .380 caliber pistol;
- 14 (xi) a Bushmaster "Carbon 15" 5.56 millimeter pistol;
- 15 (xii) a Bushmaster "Carbon 15" 5.56 millimeter pistol;
- 16 (xiii) a SIG Sauer "P556" 5.56 millimeter pistol;
- 17 (xiv) a Kimber "Tactical Pro II" 9 millimeter pistol;
- 18 (xv) a Beretta "84FS (Cheetah)" .380 caliber pistol;
- 19 (xvi) a Keltec "PLR-16" .223 caliber pistol;
- 20 (xvii) a Coharie Arms "CA89-40" .40 caliber pistol;
- 21 (xviii) an American Tactical Imports "GSG5-PK" .22 caliber pistol;
- 22 (xix) an American Tactical Imports "GSG5-PK" .22 caliber pistol;
- 23 (xx) a Bushmaster "BA50" .50 caliber rifle;
- 24 (xxi) a Lusa "SGS" 9 millimeter pistol; and
- 25 (xxii) a Bushmaster "XM15-E2S" .223 rifle.

26 All in violation of Title 18, United States Code, Section 924(n).

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COUNT THREE

Unlawful possession of firearm by convicted felon in violation of 18 U.S.C. § 922(g)(1)

On or about February 10, 2009, in the State and Federal District of Nevada,

1. JONNATAN WEISS,

a defendant herein, a person who had previously been convicted in court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess and transport, in and affecting interstate commerce, one or more firearms that had been transported in interstate or foreign commerce, to wit, two (2) American Tactical Imports "GSG5-PK" .22 caliber pistols, and a Bushmaster "BA50" .50 caliber sniper or target rifle, all in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

Unlawful possession of firearm by convicted felon in violation of 18 U.S.C. § 922(g)(1)

On or about June 13, 2009, in the State and Federal District of Nevada,

1. JONNATAN WEISS,

a defendant herein, a person who had previously been convicted in court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, one or more firearms that had been transported in interstate or foreign commerce, to wit, a Lusa "SGS" 9 millimeter pistol, and a Bushmaster "XM15-E2S" .223 rifle, all in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

False Statement in Connection with Acquisition, or Attempted Acquisition, of Firearm in violation of 18 U.S.C. § 922(a)(6)

On or about December 5, 2008, in the State and Federal District of Nevada,

1. JONNATAN WEISS,

1 a defendant herein, in connection with the attempted acquisition of a firearm, to wit: a Kimber "Pro
2 TLE II" .45 caliber pistol, from AS Hend, Inc., doing business as American Shooters HD, a licensed
3 dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made
4 false and fictitious written statements and knowingly furnished and exhibited a false, fictitious, and
5 misrepresented identification to American Shooters HD and its agents and employees, which
6 statements and identification was intended and likely to deceive American Shooters HD as to a fact
7 material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title
8 18, in that the defendant falsely represented that he had not previously been convicted in any court
9 for a felony, and the defendant falsely represented that he then resided at 4037 Rustic Oak Court,
10 North Las Vegas, Nevada, and the defendant presented a fraudulently obtained Nevada
11 identification card falsely purporting that he resided at 4037 Rustic Oak Court, North Las Vegas,
12 Nevada. All in violation of Title 18, United States Code, Section 922(a)(6).

13
14 **COUNT SIX**

15 *False Statement in Connection with Acquisition, or Attempted*
16 *Acquisition, of Firearm in violation of 18 U.S.C. § 922(a)(6)*

17 On or about December 13, 2008, in the State and Federal District of Nevada,

18 **2. WILLIAM WEISS,**

19 a defendant herein, in connection with the acquisition of firearms, to wit: a Beretta "90-Two".40
20 caliber pistol and an STI (Strayer Tripp International) "2011 Tactical" 9 millimeter pistol, from AS
21 LV, Inc., doing business as American Shooters LV, a licensed dealer of firearms within the meaning
22 of Chapter 44, Title 18, United States Code, knowingly made false and fictitious written statements
23 and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to
24 American Shooters LV and its agents and employees, which statements and identification was
25 intended and likely to deceive American Shooters LV as to a fact material to the lawfulness of such
26 sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant falsely
represented that he then resided at 4037 Rustic Oak Court, North Las Vegas, Nevada, and

1 presented a fraudulently obtained Nevada driver's license falsely purporting that he resided at 4037
2 Rustic Oak Court, North Las Vegas, Nevada. All in violation of Title 18, United States Code,
3 Section 922(a)(6).

4
5 **COUNT SEVEN**

6 *False Statement in Connection with Acquisition, or Attempted
Acquisition, of Firearm in violation of 18 U.S.C. § 922(a)(6)*

7 On or about December 13, 2008, in the State and Federal District of Nevada,

8 **2. WILLIAM WEISS,**

9 a defendant herein, in connection with the acquisition of firearms, to wit: a Rock Island Armory
10 "1911" .45 caliber pistol, from Bargain Pawn, Inc., a licensed dealer of firearms within the meaning
11 of Chapter 44, Title 18, United States Code, knowingly made false and fictitious written statements
12 and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to
13 Bargain Pawn and its agents and employees, which statements and identification was intended and
14 likely to deceive Bargain Pawn as to a fact material to the lawfulness of such sale of the said firearm
15 to the defendant under chapter 44 of Title 18, in that the defendant falsely represented that he then
16 resided at 4037 Rustic Oak Court, North Las Vegas, Nevada, and presented a fraudulently obtained
17 Nevada driver's license falsely purporting that he resided at 4037 Rustic Oak Court, North Las
18 Vegas, Nevada. All in violation of Title 18, United States Code, Section 922(a)(6).

19
20 **COUNT EIGHT**

21 *False Statement in Connection with Acquisition, or Attempted
Acquisition, of Firearm in violation of 18 U.S.C. § 922(a)(6)*

22 On or about December 13, 2008, in the State and Federal District of Nevada,

23 **2. WILLIAM WEISS,**

24 a defendant herein, in connection with the acquisition of firearms, to wit: a Colt "Combat Elite".45
25 caliber pistol, from Center Mass Firearms, a licensed dealer of firearms within the meaning of
26 Chapter 44, Title 18, United States Code, knowingly made false and fictitious written statements

1 and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to
2 Center Mass Firearms and its agents and employees, which statements and identification was
3 intended and likely to deceive Center Mass Firearms as to a fact material to the lawfulness of such
4 sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant falsely
5 represented that he then resided at 4037 Rustic Oak Court, North Las Vegas, Nevada, and
6 presented a fraudulently obtained Nevada driver's license falsely purporting that he resided at 4037
7 Rustic Oak Court, North Las Vegas, Nevada. All in violation of Title 18, United States Code,
8 Section 922(a)(6).

9
10 **COUNT NINE**

11 *False Statement in Connection with Acquisition, or Attempted*
12 *Acquisition, of Firearm in violation of 18 U.S.C. § 922(a)(6)*

13 On or about December 17, 2008, in the State and Federal District of Nevada,

14 **2. WILLIAM WEISS,**

15 a defendant herein, in connection with the acquisition of firearms, to wit: a Beretta "84FS
16 (Cheetah)" .380 caliber pistol, and a Bushmaster "EM15-E2S" .223 caliber rifle, from AS LV, Inc.,
17 doing business as American Shooters LV, a licensed dealer of firearms within the meaning of
18 Chapter 44, Title 18, United States Code, knowingly made false and fictitious written statements
19 and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to
20 American Shooters LV and its agents and employees, which statements and identification was
21 intended and likely to deceive American Shooters LV as to a fact material to the lawfulness of such
22 sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant falsely
23 represented that he then resided at 4037 Rustic Oak Court, North Las Vegas, Nevada, and
24 presented a fraudulently obtained Nevada driver's license falsely purporting that he resided at 4037
25 Rustic Oak Court, North Las Vegas, Nevada. All in violation of Title 18, United States Code,
26 Section 922(a)(6).

COUNT TEN

False Statement in Connection with Acquisition, or Attempted Acquisition, of Firearm in violation of 18 U.S.C. § 922(a)(6)

On or about December 17, 2008, in the State and Federal District of Nevada,

2. WILLIAM WEISS,

a defendant herein, in connection with the acquisition of firearms, to wit: a Rock River Arms "LAR-15" 5.56 millimeter pistol, from Citadel Gun and Safe, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made false and fictitious written statements and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to Citadel Gun and Safe and its agents and employees, which statements and identification was intended and likely to deceive Citadel Gun and Safe as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant falsely represented that he then resided at 4037 Rustic Oak Court, North Las Vegas, Nevada, and presented a fraudulently obtained Nevada driver's license falsely purporting that he resided at 4037 Rustic Oak Court, North Las Vegas, Nevada. All in violation of Title 18, United States Code, Section 922(a)(6).

COUNT ELEVEN

False Statement in Connection with Acquisition, or Attempted Acquisition, of Firearm in violation of 18 U.S.C. § 922(a)(6)

On or about December 18, 2008, in the State and Federal District of Nevada,

2. WILLIAM WEISS,

a defendant herein, in connection with the acquisition of firearms, to wit: a Kimber "Ultra Crimson Carry II" .45 caliber pistol, from Absolute Firearms, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made false and fictitious written statements and knowingly furnished and exhibited a false, fictitious, and misrepresented identification to Absolute Firearms and its agents and employees, which statements and identification was intended and likely to deceive Absolute Firearms as to a fact material to the

1 lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the
2 defendant falsely represented that he then resided at 4037 Rustic Oak Court, North Las Vegas,
3 Nevada, and presented a fraudulently obtained Nevada driver's license falsely purporting that he
4 resided at 4037 Rustic Oak Court, North Las Vegas, Nevada. All in violation of Title 18, United
5 States Code, Section 922(a)(6).

6
7 **COUNT TWELVE**

8 *False Statement in Connection with Acquisition, or Attempted
9 Acquisition, of Firearm in violation of 18 U.S.C. § 922(a)(6)*

10 On or about December 18, 2008, in the State and Federal District of Nevada,

11 **2. WILLIAM WEISS,**

12 a defendant herein, in connection with the acquisition of firearms, to wit: a Beretta "84FS
13 (Cheetah)" .380 caliber pistol, from AS LV, Inc., doing business as American Shooters LV, a
14 licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
15 knowingly made false and fictitious written statements and knowingly furnished and exhibited a
16 false, fictitious, and misrepresented identification to American Shooters LV and its agents and
17 employees, which statements and identification was intended and likely to deceive American
18 Shooters LV as to a fact material to the lawfulness of such sale of the said firearm to the defendant
19 under chapter 44 of Title 18, in that the defendant falsely represented that he then resided at 4037
20 Rustic Oak Court, North Las Vegas, Nevada, and presented a fraudulently obtained Nevada
21 driver's license falsely purporting that he resided at 4037 Rustic Oak Court, North Las Vegas,
22 Nevada. All in violation of Title 18, United States Code, Section 922(a)(6).

23 **COUNT THIRTEEN**

24 *False Statement in Connection with Acquisition, or Attempted
25 Acquisition, of Firearm in violation of 18 U.S.C. § 922(a)(6)*

26 On or about December 27, 2008, in the State and Federal District of Nevada,

2. WILLIAM WEISS,

1 a defendant herein, in connection with the acquisition of firearms, to wit: a Bushmaster "Carbon 15"
2 5.56 millimeter pistol, from Las Vegas Gun Range & Firearms Center, a licensed dealer of firearms
3 within the meaning of Chapter 44, Title 18, United States Code, knowingly made false and
4 fictitious written statements and knowingly furnished and exhibited a false, fictitious, and
5 misrepresented identification to Las Vegas Gun Range & Firearms Center and its agents and
6 employees, which statements and identification was intended and likely to deceive Las Vegas Gun
7 Range & Firearms Center as to a fact material to the lawfulness of such sale of the said firearm to
8 the defendant under chapter 44 of Title 18, in that the defendant falsely represented that he then
9 resided at 4037 Rustic Oak Court, North Las Vegas, Nevada, and presented a fraudulently obtained
10 Nevada driver's license falsely purporting that he resided at 4037 Rustic Oak Court, North Las
11 Vegas, Nevada. All in violation of Title 18, United States Code, Section 922(a)(6).

12
13 **COUNT FOURTEEN**

14 *False Statement in Connection with Acquisition, or Attempted
15 Acquisition, of Firearm in violation of 18 U.S.C. § 922(a)(6)*

16 On or about January 10, 2009, in the State and Federal District of Nevada,

17 **2. WILLIAM WEISS,**

18 a defendant herein, in connection with the acquisition of firearms, to wit: a Bushmaster "Carbon 15"
19 5.56 millimeter pistol, and a SIG Sauer "P556" 5.56 millimeter pistol, from Citadel Gun and Safe, a
20 licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
21 knowingly made false and fictitious written statements and knowingly furnished and exhibited a
22 false, fictitious, and misrepresented identification to Citadel Gun and Safe and its agents and
23 employees, which statements and identification was intended and likely to deceive Citadel Gun and
24 Safe as to a fact material to the lawfulness of such sale of the said firearm to the defendant under
25 chapter 44 of Title 18, in that the defendant falsely represented that he then resided at 4037 Rustic
26 Oak Court, North Las Vegas, Nevada, and presented a fraudulently obtained Nevada driver's

1 license falsely purporting that he resided at 4037 Rustic Oak Court, North Las Vegas, Nevada. All
2 in violation of Title 18, United States Code, Section 922(a)(6).

3
4 **COUNT FIFTEEN**

5 *False Statement in Connection with Acquisition, or Attempted*
6 *Acquisition, of Firearm in violation of 18 U.S.C. § 922(a)(6)*

7 On or about January 24, 2009, in the State and Federal District of Nevada,

8 **2. WILLIAM WEISS,**

9 a defendant herein, in connection with the acquisition of firearms, to wit: a Kimber "Tactical Pro II"
10 9 millimeter pistol, from AS LV, Inc., doing business as American Shooters LV, a licensed dealer
11 of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made false
12 and fictitious written statements and knowingly furnished and exhibited a false, fictitious, and
13 misrepresented identification to American Shooters LV and its agents and employees, which
14 statements and identification was intended and likely to deceive American Shooters LV as to a fact
15 material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title
16 18, in that the defendant falsely represented that he then resided at 4037 Rustic Oak Court, North
17 Las Vegas, Nevada, and presented a fraudulently obtained Nevada driver's license falsely
18 purporting that he resided at 4037 Rustic Oak Court, North Las Vegas, Nevada. All in violation of
19 Title 18, United States Code, Section 922(a)(6).

20 **COUNT SIXTEEN**

21 *False Statement in Connection with Acquisition, or Attempted*
22 *Acquisition, of Firearm in violation of 18 U.S.C. § 922(a)(6)*

23 On or about January 24, 2009, in the State and Federal District of Nevada,

24 **2. WILLIAM WEISS,**

25 a defendant herein, in connection with the acquisition of firearms, to wit: a Beretta "84FS
26 (Chettah)" .380 caliber pistol, and a Keltec "PLR-16" .223 caliber pistol, from Las Vegas Gun
Range & Firearms Center, a licensed dealer of firearms within the meaning of Chapter 44, Title 18,

1 United States Code, knowingly made false and fictitious written statements and knowingly
2 furnished and exhibited a false, fictitious, and misrepresented identification to Las Vegas Gun
3 Range & Firearms Center and its agents and employees, which statements and identification was
4 intended and likely to deceive Las Vegas Gun Range & Firearms Center as to a fact material to the
5 lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the
6 defendant falsely represented that he then resided at 4037 Rustic Oak Court, North Las Vegas,
7 Nevada, and presented a fraudulently obtained Nevada driver's license falsely purporting that he
8 resided at 4037 Rustic Oak Court, North Las Vegas, Nevada. All in violation of Title 18, United
9 States Code, Section 922(a)(6).

10
11 **COUNT SEVENTEEN**

12 *False Statement in Connection with Acquisition, or Attempted
Acquisition, of Firearm in violation of 18 U.S.C. § 922(a)(6)*

13 On or about January 24, 2009, in the State and Federal District of Nevada,

14 **2. WILLIAM WEISS,**

15 a defendant herein, in connection with the acquisition of firearms, to wit: a Coharie Arms
16 "CA89-40" .40 caliber pistol, from The Gun Vault, Inc., a licensed dealer of firearms within the
17 meaning of Chapter 44, Title 18, United States Code, knowingly made false and fictitious written
18 statements and knowingly furnished and exhibited a false, fictitious, and misrepresented
19 identification to The Gun Vault and its agents and employees, which statements and identification
20 was intended and likely to deceive The Gun Vault as to a fact material to the lawfulness of such sale
21 of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant falsely
22 represented that he then resided at 4037 Rustic Oak Court, North Las Vegas, Nevada, and
23 presented a fraudulently obtained Nevada driver's license falsely purporting that he resided at 4037
24 Rustic Oak Court, North Las Vegas, Nevada. All in violation of Title 18, United States Code,
25 Section 922(a)(6).

1 lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the
2 defendant falsely represented that he then resided at 4037 Rustic Oak Court, North Las Vegas,
3 Nevada, and presented a fraudulently obtained Nevada driver's license falsely purporting that he
4 resided at 4037 Rustic Oak Court, North Las Vegas, Nevada. All in violation of Title 18, United
5 States Code, Section 922(a)(6).

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1 **FORFEITURE ALLEGATIONS**

2 **FORFEITURE ALLEGATION ONE**

3 1. The foregoing allegations of Count One and Count Two of this indictment are hereby
4 realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the
5 provisions of Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code,
6 Section 2461(c).

7 2. Upon a conviction of the felony offense charged in Count Two of this Indictment,

- 8
9 **1. JONNATAN WEISS, and**
2. WILLIAM WEISS,

10 the defendants herein, shall forfeit to the United States of America any and all firearms or ammunition
11 involved in or used in violation of Title 18, United States Code, Section 924(n), specifically including
12 any interest in or claim to:

- 13 a. a Beretta "90-Two".40 caliber pistol;
14 b. an STI (Strayer Tripp International) "2011 Tactical" 9 millimeter pistol;
15 c. a Rock Island Armory "1911" .45 caliber pistol;
16 d. a Colt "Combat Elite".45 caliber pistol;
17 e. a Beretta "84FS (Cheetah)" .380 caliber pistol;
18 f. a Bushmaster "EM15-E2S" .223 caliber rifle;
19 g. a Rock River Arms "LAR-15" 5.56 millimeter pistol;
20 h. a Kimber "Ultra Crimson Carry II" .45 caliber pistol;
21 i. a Beretta "84FS (Cheetah)" .380 caliber pistol;
22 j. a Bushmaster "Carbon 15" 5.56 millimeter pistol;
23 k. a Bushmaster "Carbon 15" 5.56 millimeter pistol;
24 l. a SIG Sauer "P556" 5.56 millimeter pistol;
25 m. a Kimber "Tactical Pro II" 9 millimeter pistol;
26 n. a Beretta "84FS (Chettah)" .380 caliber pistol;

- 1 o. a Keltec "PLR-16" .223 caliber pistol;
- 2 p. a Coharie Arms "CA89-40" .40 caliber pistol;
- 3 q. an American Tactical Imports "GSG5-PK" .22 caliber pistol;
- 4 r. an American Tactical Imports "GSG5-PK" .22 caliber pistol;
- 5 s. a Bushmaster "BA50" .50 caliber sniper/target rifle;
- 6 t. a Lusa "SGS" 9 millimeter pistol; and
- 7 u. a Bushmaster "XM15-E2S" .223 rifle.

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

10
11 **FORFEITURE ALLEGATION TWO**

12 1. The allegation contained in Counts Three and Four of this Indictment are hereby realleged
13 and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provisions
14 of Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section
15 2461(c).

16 2. Upon a conviction of a felony offense charged in Counts Three and Four of this Indictment,

17 **1. JONNATAN WEISS,**

18 a defendant herein, shall forfeit to the United States of America any and all firearms or ammunition
19 involved in or used in violation of Title 18, United States Code, Section 922(g)(1), including any
20 interest in or claim to:

- 21 a. an American Tactical Imports "GSG5-PK" .22 caliber pistol;
- 22 b. an American Tactical Imports "GSG5-PK" .22 caliber pistol;
- 23 c. a Bushmaster "BA50" .50 caliber sniper/target rifle;
- 24 d. a Lusa "SGS" 9 millimeter pistol; and
- 25 e. a Bushmaster "XM15-E2S" .223 rifle.

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

3
4 **FORFEITURE ALLEGATION THREE**

5 **1.** The allegations contained in Counts Six through Nineteen of this Indictment are hereby
6 re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the
7 provisions of Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code,
8 Section 2461(c).

9 **2.** Upon a conviction of a felony offense charged in Counts Six through Nineteen of this
10 Indictment,

11
12 **1. JONNATAN WEISS, and**
2. WILLIAM WEISS,

13 the defendants herein, shall forfeit to the United States of America any and all firearms or
14 ammunition involved in the violation of Title 18, United States Code, Section 922(a)(6), including
15 any interest in or claim to: a. a Beretta "90-Two".40 caliber pistol;

16 b. an STI (Strayer Tripp International) "2011 Tactical" 9 millimeter pistol;

17 c. a Rock Island Armory "1911" .45 caliber pistol;

18 d. a Colt "Combat Elite".45 caliber pistol;

19 e. a Beretta "84FS (Cheetah)" .380 caliber pistol;

20 f. a Bushmaster "EM15-E2S" .223 caliber rifle;

21 g. a Rock River Arms "LAR-15" 5.56 millimeter pistol;

22 h. a Kimber "Ultra Crimson Carry II" .45 caliber pistol;

23 i. a Beretta "84FS (Cheetah)" .380 caliber pistol;

24 j. a Bushmaster "Carbon 15" 5.56 millimeter pistol;

25 k. a Bushmaster "Carbon 15" 5.56 millimeter pistol;

26 l. a SIG Sauer "P556" 5.56 millimeter pistol;

