

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

United States District Court  
Southern District of Texas  
FILED

JUN 16 2009

Michael N. Milby, Clerk

UNITED STATES OF AMERICA

v.

OSCAR BRAVO HERNANDEZ  
LUIS JAVIER LIRA, JR.  
JOSE MACEDONIO CASTILLO

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Criminal No.

M-09- 809

INDICTMENT

THE GRAND JURY CHARGES:

Count One

On or about January 29, 2009, in the Southern District of Texas and within the jurisdiction of the Court, defendants

OSCAR BRAVO HERNANDEZ  
and  
JOSE MACEDONIO CASTILLO

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Gladiator Guns and Ammo, 2557 N. Highway 83, Roma, Texas 78584, a federally licensed firearms dealer, in connection with the acquisition of the following: a Browning, Model Hi Power, 9mm semi-automatic pistol, serial number 511MV50868; a Colt, Model Talo Government, .38 super caliber semi-automatic pistol, serial number 38SS04037; a Colt, Model Talo Government, .38 super caliber semi-automatic pistol, serial number 38SS04011; and a Colt Model Talo Government, .38 super caliber semi-automatic pistol, serial number 38SS04061, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that **JOSE MACEDONIO CASTILLO** was the actual buyer of the firearms described above, when in truth and fact **JOSE MACEDONIO**

**CASTILLO** knew that those statements and representations were false and that **OSCAR BRAVO HERNANDEZ** was the actual buyer of the firearms.

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

**Count Two**

On or about February 11, 2009, in the Southern District of Texas and within the jurisdiction of the Court, defendants

**OSCAR BRAVO HERNANDEZ**  
**and**  
**JOSE MACEDONIO CASTILLO**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Danny's Pawn and Sporting Goods, 300 South Broadway, McAllen, Texas 78501, a federally licensed firearms dealer, in connection with the acquisition of the following: a Beretta, Model 92 FS, 9mm semi-automatic pistol, serial number BER489683; a Bushmaster, Model XM15-E2S, .223 caliber semi-automatic rifle, serial number BFI591813; a Beretta, Model 92 FS, 9mm semi-automatic pistol, serial number P56575Z; and a DPMS, Model Panther A-15, .223 caliber semi-automatic rifle, serial number F144350, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that **JOSE MACEDONIO CASTILLO** was the actual buyer of the firearms described above, when in truth and fact **JOSE MACEDONIO CASTILLO** knew that those statements and representations were false and that **OSCAR BRAVO HERNANDEZ** was the actual buyer of the firearms.

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

**Count Three**

On or about February 13, 2009, in the Southern District of Texas and within the jurisdiction of the Court, defendants

**OSCAR BRAVO HERNANDEZ**  
**and**  
**LUIS JAVIER LIRA, JR.**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Gladiator Guns and Ammo, 2557 N. Highway 83, Roma, Texas 78584, a federally licensed firearms dealer, in connection with the acquisition of the following: a Colt, Model Government, .38 super caliber semi-automatic pistol, serial number 2822618; a Colt, Model Government, .38 super caliber semi-automatic pistol, serial number 2822616; a Colt, Model Talo Government, .38 super caliber semi-automatic pistol, serial number 0200EZS; and a Colt, Model 2000, 9mm semi-automatic pistol, serial number PF18526, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that **LUIS JAVIER LIRA, JR.** was the actual buyer of the firearms described above, when in truth and fact **LUIS JAVIER LIRA, JR.** knew that those statements and representations were false and that **OSCAR BRAVO HERNANDEZ** was the actual buyer of the firearms.

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

**Count Four**

On or about February 14, 2009, in the Southern District of Texas and within the jurisdiction of the Court, defendants

**OSCAR BRAVO HERNANDEZ**  
**and**  
**LUIS JAVIER LIRA, JR.**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Danny's Pawn and Sporting Goods, 300 South Broadway, McAllen, Texas 78501, a federally licensed firearms dealer, in connection with the acquisition of the following: a Bushmaster, Model XM-15E2S, .223 caliber rifle, serial number BFI538524; an H&K Model 93, .223 caliber semi-automatic rifle, serial number

42-137524; and a Colt, Model 1911 Government, .38 caliber semi-automatic pistol, serial number 38SS02431, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that **LUIS JAVIER LIRA, JR.** was the actual buyer of the firearms described above, when in truth and fact **LUIS JAVIER LIRA, JR.** knew that those statements and representations were false and that **OSCAR BRAVO HERNANDEZ** was the actual buyer of the firearms.

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

**Count Five**

On or about February 18, 2009, in the Southern District of Texas and within the jurisdiction of the Court, defendants

**OSCAR BRAVO HERNANDEZ**  
**and**  
**LUIS JAVIER LIRA, JR.**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Gladiator Guns and Ammo, 2557 N. Highway 83, Roma, Texas 78584, a federally licensed firearms dealer, in connection with the acquisition of the following: a Colt, Model Talo Government, .38 caliber semi-automatic pistol, serial number ELCEN5711; a Century, Model Galil, .223 caliber semi-automatic rifle, serial number GLN03779; and a Beretta, Model 92FS, 9mm semi-automatic pistol, serial number BER508404, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that **LUIS JAVIER LIRA, JR.** was the actual buyer of the firearms described above, when in truth and fact **LUIS JAVIER LIRA, JR.** knew that those statements and representations were false and that **OSCAR BRAVO HERNANDEZ** was the actual buyer of the firearms.

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

**Count Six**

On or about February 18, 2009, in the Southern District of Texas and within the jurisdiction of the Court, defendants

**OSCAR BRAVO HERNANDEZ**  
**and**  
**JOSE MACEDONIO CASTILLO**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Gladiator Guns and Ammo, 2557 N. Highway 83, Roma, Texas 78584, a federally licensed firearms dealer, in connection with the acquisition of the following: a Colt, Model Talo Government, .38 super caliber semi-automatic pistol, serial number ELCEN5724; a Beretta, Model 92FS, 9mm semi-automatic pistol, serial number P65716Z; and a Browning, Model Hi Power, 9mm semi-automatic pistol, serial number T275296, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that **JOSE MACEDONIO CASTILLO** was the actual buyer of the firearms described above, when in truth and fact **JOSE MACEDONIO CASTILLO** knew that those statements and representations were false and that **OSCAR BRAVO HERNANDEZ** was the actual buyer of the firearms.

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

**Count Seven**

On or about March 14, 2009, in the Southern District of Texas and within the jurisdiction of the Court, defendants

**OSCAR BRAVO HERNANDEZ**  
**and**  
**LUIS JAVIER LIRA, JR.**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Danny's Pawn and Sporting Goods, 300 South Broadway, McAllen, Texas 78501, a federally licensed firearms dealer,

in connection with the acquisition of the following: a Beretta, Model 84FS, .380 caliber semi-automatic pistol, serial number H333764; a Beretta, Model 92 FS, 9mm semi-automatic pistol, serial number BER482853; and a DPMS, Model AP4, .223 caliber semi-automatic rifle, serial number F149859, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that **LUIS JAVIER LIRA, JR.** was the actual buyer of the firearms described above, when in truth and fact **LUIS JAVIER LIRA, JR.** knew that those statements and representations were false and that **OSCAR BRAVO HERNANDEZ** was the actual buyer of the firearms.

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

**Count Eight**

On or about March 16, 2009, in the Southern District of Texas and within the jurisdiction of the Court, defendants

**OSCAR BRAVO HERNANDEZ**  
**and**  
**JOSE MACEDONIO CASTILLO**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Danny's Pawn and Sporting Goods, 300 South Broadway, McAllen, Texas 78503, a federally licensed firearms dealer, in connection with the acquisition of the following: a Beretta, Model 92 FS, 9mm semi-automatic pistol, serial number BER251187; a Beretta, Model 92 FS, 9mm semi-automatic pistol, serial number BER482839; and a Bushmaster, Model M4AE, .223 caliber semi-automatic rifle, serial number BFI618553, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that **JOSE MACEDONIO CASTILLO** was the actual buyer of the firearms described above, when in truth and fact **JOSE MACEDONIO CASTILLO** knew that those statements and representations were false and that **OSCAR BRAVO HERNANDEZ** was the actual buyer of the firearms.

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

**Count Nine**

On or about May 5, 2009, in the Southern District of Texas and within the jurisdiction of the Court, defendants

**OSCAR BRAVO HERNANDEZ  
and  
LUIS JAVIER LIRA, JR.**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Danny's Pawn and Sporting Goods, 300 South Broadway, McAllen, Texas 78501, a federally licensed firearms dealer, in connection with the acquisition of the following: a Colt, Model El Grito, .38 super caliber semi-automatic pistol, serial number MHC0221; and a Beretta, Model 92FS, 9mm semi-automatic pistol, serial number BER482847, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that **LUIS JAVIER LIRA, JR.** was the actual buyer of the firearms described above, when in truth and fact **LUIS JAVIER LIRA, JR.** knew that those statements and representations were false and that **OSCAR BRAVO HERNANDEZ** was the actual buyer of the firearms.

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

**Count Ten**

On or about May 13, 2009, in the Southern District of Texas and within the jurisdiction of the Court, defendants

**OSCAR BRAVO HERNANDEZ  
and  
LUIS JAVIER LIRA, JR.**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Riverview True Value Hardware, 1005 East Highway 83, Roma, Texas 78584, a federally licensed firearms dealer, in

connection with the acquisition of the following: a Colt, Model MKIV, .38 super caliber semi-automatic pistol, serial number FR23669E; and a Colt, Model Government, .38 super caliber semi-automatic pistol, serial number 38SS01002, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that **LUIS JAVIER LIRA, JR.** was the actual buyer of the firearms described above, when in truth and fact **LUIS JAVIER LIRA, JR.** knew that those statements and representations were false and that **OSCAR BRAVO HERNANDEZ** was the actual buyer of the firearms.

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

**Count Eleven**

On or about May 14, 2009, in the Southern District of Texas and within the jurisdiction of the Court, defendants

**OSCAR BRAVO HERNANDEZ**  
**and**  
**LUIS JAVIER LIRA, JR.**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Gladiator Guns and Ammo, 2557 N. Highway 83, Roma, Texas 78584, a federally licensed firearms dealer, in connection with the acquisition of the following: a Bushmaster, Model XM15-E2S, .223 caliber rifle, serial number BFI624173; a TNG Hungry, Model AMD-65 SA 200M, 7.62X39 semi-automatic caliber semi-automatic rifle, serial number DG8333H; and a Colt, Model Government, .38 super caliber semi-automatic pistol, serial number 2825581, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that **LUIS JAVIER LIRA, JR.** was the actual buyer of the firearms described above, when in truth and fact **LUIS JAVIER LIRA, JR.** knew that those statements and representations were false and that **OSCAR BRAVO HERNANDEZ** was the actual buyer of the firearms.



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

**Count Twelve**

On or about May 20, 2009, in the Southern District of Texas and within the jurisdiction of the Court, defendants

**OSCAR BRAVO HERNANDEZ**  
**and**  
**LUIS JAVIER LIRA, JR.**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Danny's Pawn and Sporting Goods, 300 South Broadway, McAllen, Texas 78501, a federally licensed firearms dealer, in connection with the acquisition of the following: a PTR, Model PTR 91, .308 caliber semi-automatic rifle, serial number AW5759; and a Smith & Wesson, Model M&P 15, .223 caliber semi-automatic rifle, serial number SM29796, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that **LUIS JAVIER LIRA, JR.** was the actual buyer of the firearms described above, when in truth and fact **LUIS JAVIER LIRA, JR.** knew that those statements and representations were false and that **OSCAR BRAVO HERNANDEZ** was the actual buyer of the firearms.

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

A TRUE BILL

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FOREPERSON

TIM JOHNSON  
UNITED STATES ATTORNEY

  
ASSISTANT UNITED STATES ATTORNEY