

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

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CLERK, U.S. DISTRICT COURT WESTERN DISTRICT OF TEXAS DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

VS.

URIEL HERNANDEZ, (1) MICHAEL GONZALES, (2) LAURA HERNANDEZ, (3)

Defendants.

SA 07 CR 114 RF

INDICTMENT

[Vio: Cts. 1-12: 18 U.S.C. § 922(a)(6) - False statement during firearms acquisition]

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THE GRAND JURY CHARGES:

COUNT ONE [18 U.S.C. § 922(a)(6)]

That on or about August 19, 2006, within the Western District of Texas, the Defendant,

URIEL HERNANDEZ, (1)

in connection with the acquisition of firearms, from various federally licensed firearms dealers, knowingly made false and fictitious written statements to these federally licensed firearms dealers, which statements were likely to deceive these federally licensed firearms dealers, as to a fact material to the lawfulness of such acquisition of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearms indicated on the ATF 4473 forms, although he was not the actual buyer of the firearms as indicated on the forms, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT TWO
[18 U.S.C. § 922(a)(6)]

That on or about August 26, 2006, within the Western District of Texas, the Defendant,

URIEL HERNANDEZ, (1)

in connection with the acquisition of firearms, from various federally licensed firearms dealers, knowingly made false and fictitious written statements to these federally licensed firearms dealers, which statements were likely to deceive these federally licensed firearms dealers, as to a fact material to the lawfulness of such acquisition of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearms indicated on the ATF 4473 forms, although he was not the actual buyer of the firearms as indicated on the forms, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT THREE
[18 U.S.C. § 922(a)(6)]

That on or about October 9, 2006, within the Western District of Texas, the Defendant,

URIEL HERNANDEZ, (1)

in connection with the acquisition of firearms, from various federally licensed firearms dealers, knowingly made false and fictitious written statements to these federally licensed firearms dealers, which statements were likely to deceive these federally licensed firearms dealers, as to a fact material to the lawfulness of such acquisition of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearms indicated on the ATF 4473 forms, although he was not the actual buyer of the firearms as indicated on the forms, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT FOUR
[18 U.S.C. § 922(a)(6)]

That on or about October 14, 2006, within the Western District of Texas, the Defendant,

URIEL HERNANDEZ, (1)

in connection with the acquisition of firearms, from various federally licensed firearms dealers, knowingly made false and fictitious written statements to these federally licensed firearms dealers, which statements were likely to deceive these federally licensed firearms dealers, as to a fact material to the lawfulness of such acquisition of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearms indicated on the ATF 4473 forms, although he was not the actual buyer of the firearms as indicated on the forms, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT FIVE
[18 U.S.C. § 922(a)(6)]

That on or about October 21, 2006, within the Western District of Texas, the Defendant,

URIEL HERNANDEZ, (1)

in connection with the acquisition of firearms, from various federally licensed firearms dealers, knowingly made false and fictitious written statements to these federally licensed firearms dealers, which statements were likely to deceive these federally licensed firearms dealers, as to a fact material to the lawfulness of such acquisition of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearms indicated on the ATF 4473 forms, although he was not the actual buyer of the firearms as indicated on the forms, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT SIX
[18 U.S.C. § 922(a)(6)]

That on or about October 22, 2006, within the Western District of Texas, the Defendant,

URIEL HERNANDEZ, (1)

in connection with the acquisition of firearms, from various federally licensed firearms dealers, knowingly made false and fictitious written statements to these federally licensed firearms dealers, which statements were likely to deceive these federally licensed firearms dealers, as to a fact material to the lawfulness of such acquisition of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearms indicated on the ATF 4473 forms, although he was not the actual buyer of the firearms as indicated on the forms, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT SEVEN
[18 U.S.C. § 922(a)(6)]

That on or about October 25, 2006, within the Western District of Texas, the Defendant,

URIEL HERNANDEZ, (1)

in connection with the acquisition of firearms, from various federally licensed firearms dealers, knowingly made false and fictitious written statements to these federally licensed firearms dealers, which statements were likely to deceive these federally licensed firearms dealers, as to a fact material to the lawfulness of such acquisition of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearms indicated on the ATF 4473 forms, although he was not the actual buyer of the firearms as indicated on the forms, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT EIGHT
[18 U.S.C. § 922(a)(6)]

That on or about October 28, 2006, within the Western District of Texas, the Defendant,

URIEL HERNANDEZ, (1)

in connection with the acquisition of firearms, from various federally licensed firearms dealers, knowingly made false and fictitious written statements to these federally licensed firearms dealers, which statements were likely to deceive these federally licensed firearms dealers, as to a fact material to the lawfulness of such acquisition of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearms indicated on the ATF 4473 forms, although he was not the actual buyer of the firearms as indicated on the forms, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT NINE
[18 U.S.C. § 922(a)(6)]

That on or about July 6, 2006, within the Western District of Texas, the Defendant,

MICHAEL GONZALES, (2)

in connection with the acquisition of firearms, from various federally licensed firearms dealers, knowingly made false and fictitious written statements to these federally licensed firearms dealers, which statements were likely to deceive these federally licensed firearms dealers, as to a fact material to the lawfulness of such acquisition of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearms indicated on the ATF 4473 forms, although he was not the actual buyer of the firearms as indicated on the forms, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT TEN
[18 U.S.C. § 922(a)(6)]

That on or about July 7, 2006, within the Western District of Texas, the Defendant,

MICHAEL GONZALES, (2)

in connection with the acquisition of firearms, from various federally licensed firearms dealers, knowingly made false and fictitious written statements to these federally licensed firearms dealers, which statements were likely to deceive these federally licensed firearms dealers, as to a fact material to the lawfulness of such acquisition of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearms indicated on the ATF 4473 forms, although he was not the actual buyer of the firearms as indicated on the forms, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT ELEVEN
[18 U.S.C. § 922(a)(6)]

That on or about July 22, 2006, within the Western District of Texas, the Defendant,

MICHAEL GONZALES, (2)

in connection with the acquisition of firearms, from various federally licensed firearms dealers, knowingly made false and fictitious written statements to these federally licensed firearms dealers, which statements were likely to deceive these federally licensed firearms dealers, as to a fact material to the lawfulness of such acquisition of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearms indicated on the ATF 4473 forms, although he was not the actual buyer of the firearms as indicated on the forms, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT TWELVE
[18 U.S.C. § 922(a)(6)]

That on or about August 25, 2006, within the Western District of Texas, the Defendant,

LAURA HERNANDEZ, (3)

in connection with the acquisition of firearms, from various federally licensed firearms dealers, knowingly made false and fictitious written statements to these federally licensed firearms dealers, which statements were likely to deceive these federally licensed firearms dealers, as to a fact material to the lawfulness of such acquisition of the said firearms to the defendant under Chapter 44 of Title 18, in that the defendant represented that he was the actual buyer of the firearms indicated on the ATF 4473 forms, although she was not the actual buyer of the firearms as indicated on the forms, in violation of Title 18, United States Code, Section 922(a)(6).

A TRUE BILL.



FOREPERSON OF THE GRAND JURY

JOHNNY SUTTON
UNITED STATES ATTORNEY

BY:


GERALD H. MATHENY
Special Assistant United States Attorney