

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
**v.** : **DATE FILED:** \_\_\_\_\_  
**ANGELICA LEONORE DELMORAL** : **VIOLATIONS:**  
**a/k/a "Angelica Delmoral"** : **18 U.S.C. § 924(a)(1)(A) (making false**  
**statements to federal firearms licensees -**  
**6 counts)**  
**Notice of forfeiture**

**INDICTMENT**

**COUNTS ONE THROUGH SIX**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. W R M Associates Incorporated, dba Gun Traders, 3201 B Pottsville Pike, Reading, Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.
2. Kinsey's Archery Products Incorporated, dba Kinsey's Outdoors, 1658 Steelway Drive, Mount Joy, Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.
3. Trop Gun Shop, Ltd., 709 Cloverleaf Road, Elizabethtown, Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.
4. Robert David Seebach, dba Bonnie's Guns, 450 South Third Street, Suite A, Chambersburg, Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to

deal in firearms under federal laws.

5. M and B Guns Limited Liability Company, dba Steeles Arms, 1725 Hillcrest Lane, Aston, Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.

6. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.

7. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473. Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form 4473 are true and correct. Question 11.a. of ATF Form 4473 requires that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she is the actual buyer of the firearm. The ATF Form 4473 contains language warning that: **"You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you."** The Form 4473 also includes a certification by the buyer of the firearm(s) that: **"I understand that answering 'yes' to question 11.a. if I am not the actual buyer of the firearm is a crime punishable as a felony under federal law . . ."**

8. To ensure that firearms buyers are not prohibited by law from possessing firearms and to permit firearms to be traced, FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer's home address and date of birth.

9. A person who purchases a firearm for another person and falsely completes the Form 4473 is a "straw purchaser." Acting as a straw purchaser is referred to as "lying and buying."

10. Convicted felons are persons prohibited by law from buying firearms.

11. E.K.B., a person known to the grand jury and a convicted felon, offered to pay the defendant ANGELICA LEONORE DELMORAL, a/k/a "Angelica Delmoral," to buy handguns for him.

12. From on or about July 19, 2011, through on or about July 23, 2011, the defendant ANGELICA LEONORE DELMORAL, a/k/a "Angelica Delmoral," bought a total of ten pistols and ammunition from five FFL holders for E.K.B. and Person # 1, a person unknown to the grand jury, who supplied the defendant DELMORAL cash to buy the pistols.

13. The defendant ANGELICA LEONORE DELMORAL, a/k/a "Angelica Delmoral," immediately turned over each pistol and any ammunition upon their purchase to E.K.B. and Person # 1, who took the handguns to New York City.

14. On or about each of the dates listed in the chart below, at the locations listed in the chart below, in the Eastern District of Pennsylvania, defendant

**ANGELICA LEONORE DELMORAL,  
a/k/a "Angelica Delmoral,"**

in connection with the acquisition of each of the firearms listed below from the FFL holder listed below, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holder's records, in that defendant DELMORAL certified on the Form 4473 that she was the actual buyer of the firearms, when in fact, as she well knew, this statement was false and fictitious, each false

statement and representation constituting a separate count:

<b>Count</b>	<b>Date</b>	<b>FFL and Location</b>	<b>Firearm</b>
1	July 19, 2011	W R M Associates Incorporated, dba Gun Traders, 3201 B Pottsville Pike, Reading, Pennsylvania	Kel-Tec, model P3AT, .380 ACP pistol, serial number KPB76
2	July 20, 2011	Kinsey's Archery Products Incorporated, dba Kinsey's Outdoors, 1658 Steelway Drive, Mount Joy, Pennsylvania	Hi-Point, model C9. 9mm pistol, serial number P1605721
3	July 20, 2011	Trop Gun Shop, Ltd., 709 Cloverleaf Road, Elizabethtown, Pennsylvania	Kel-Tec, model P-32, .32ACP caliber pistol, serial number 67807
4	July 22, 2011	Trop Gun Shop, Ltd., 709 Cloverleaf Road, Elizabethtown, Pennsylvania	Bersa, model Thunder, .380 ACP pistol, serial number B70887  Bersa, model Thunder, .380 ACP pistol, serial number B70880
5	July 23, 2011	Robert David Seebach, dba Bonnie's Guns, 450 South Third Street, Suite A, Chambersburg, Pennsylvania; sale made at a gun show in Allentown, Pennsylvania	Hi-Point, model JCP, .40 caliber pistol, serial number X7138240  Hi-Point, model 9mm CP, 9mm pistol, serial number P1595845
6	July 23, 2011	M and B Guns Limited Liability Company, dba Steeles Arms, 1725 Hillcrest Lane, Aston, Pennsylvania; sale made at a gun show in Allentown, Pennsylvania	Hi-Point, model C9, 9mm pistol, serial number P1604797  Hi-Point, model JCP, .40 caliber pistol, serial number 7141423  Hi-Point, model CF380, .380 caliber pistol, serial number P8046216

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Section 924(a)(1)(A), set forth in this indictment, defendant

**ANGELICA LEONORE DELMORAL,  
a/k/a “Angelica Delmoral,”**

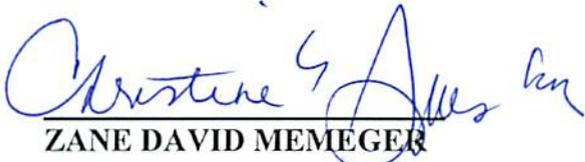
shall forfeit to the United States of America the firearms involved in the commission of such offenses, including, but not limited to:

1. One Kel-Tec, model P3AT, .380 ACP pistol, serial number KPB76;
2. one Hi-Point, model C9, 9mm pistol, serial number P1605721;
3. one Kel-Tec, model P-32, .32ACP caliber pistol, serial number 67807;
4. one Bersa, model Thunder, .380 ACP pistol, serial number B70887;
5. one Bersa, model Thunder, .380 ACP pistol, serial number B70880;
6. one Hi-Point, model JCP, .40 caliber pistol, serial number X7138240;
7. one Hi-Point, model 9mm CP, 9mm pistol, serial number P1595845;
8. one Hi-Point, model C9, 9mm pistol, serial number P1604797;
9. one Hi-Point, model JCP, .40 caliber pistol, serial number 7141423; and

10. one Hi-Point, model CF380, .380 caliber pistol, serial number P8046216.

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

**A TRUE BILL:**

  
**ZANE DAVID MEMEGER**  
United States Attorney

\_\_\_\_\_  
**FOREPERSON**