

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
SABRINA BROOKS	:	VIOLATIONS:
	:	18 U.S.C. § 924(a)(1)(A) (false statements
	:	to federal firearms licensee – 1 count);
	:	18 U.S.C. § 922(g)(1) (possession of a
	:	firearm by a convicted felon - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INFORMATION

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Frank's Gun Shop & Shooting Range, LLC., located at 4730 Blakiston Street in Pennsylvania, Pennsylvania, possessed a federal firearms license ("FFL") and is authorized to deal in firearms under federal laws.

2. 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.

3. The rules and regulations governing FFL holders require that a person seeking to purchase a handgun 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. The Form 4473 contains language warning that “. . . the making of a false oral or written statement or the exhibiting of any false or misrepresented identification with respect to this transaction is a crime punishable as a felony.”

4. 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, to ensure that the person was not prohibited from purchasing a firearm. For example, convicted felons are persons prohibited by law from buying firearms.

5. On or about October 13, 2015, in the Eastern District of Pennsylvania, defendant

SABRINA BROOKS,

in connection with the acquisition of a firearm, that is, (1) a .380 caliber Magnum Research, Micro Desert Eagle, semi-automatic handgun bearing serial number ME13220; and (2) a nine-millimeter Ruger, Model SR9, semi-automatic handgun bearing serial number 335-66503, from Frank’s Gun Shop & Shooting Range, LLC., located at 4730 Blakiston Street in Pennsylvania, Pennsylvania, an FFL holder, 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 Frank’s Gun Shop & Shooting Range’s records, in that defendant BROOKS certified on the Form 4473 that she was the actual purchaser of the firearms listed on the Form 4473, when in fact, as she knew, this statement was false and fictitious.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 13, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SABRINA BROOKS

and Nathan Manning, charged elsewhere, who, as defendant Brooks knew or had reason to know, had been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, and aided and abetted the possession of, in and affecting interstate commerce, two firearms, that is, (1) a .380 caliber Magnum Research, Micro Desert Eagle, semi-automatic handgun bearing serial number ME13220; and (2) a nine-millimeter Ruger, Model SR9, semi-automatic handgun bearing serial number 335-66503.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(g)(1), 924(a)(1)(A), set forth in this indictment, defendant

SABRINA BROOKS

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

- (1) a .380 caliber Magnum Research, Micro Desert Eagle, semi-automatic handgun bearing serial number ME13220;
- and
- (2) a nine-millimeter Ruger, Model SR9, semi-automatic handgun bearing serial number 335-66503.

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

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney