

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

RICARDO LARREA

No.

Violation: Title 18, United States Code,
Section 371

The SPECIAL APRIL 2021 GRAND JURY charges:

1. Beginning no later than on or about May 2, 2016, and continuing until on or about July 19, 2019, in Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

RICARDO LARREA,

defendant herein, did conspire with others known and unknown to the Grand Jury, to knowingly make a false and fictitious written statement to a licensed firearms dealer, in connection with the acquisition of a firearm, which statement was intended and likely to deceive the licensed firearm dealer with respect to a fact material to the lawfulness of the sale of the firearm to defendant, under Title 18 United States Code, Chapter 44, in that defendant represented on the Department of Justice Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, that he was the actual buyer of the firearm, when, in fact, as defendant knew, he was not the actual buyer of the firearm, in violation of Title 18, United States Code, Section 922(a)(6).

2. It was part of the conspiracy that defendant RICARDO LARREA agreed to purchase approximately 27 firearms on behalf of Co-Conspirator-1, from licensed firearms dealers in Indiana.

3. It was further part of the conspiracy that Co-Conspirator-1 gave direction to defendant RICARDO LARREA regarding the particular type of firearm LARREA should purchase on Co-Conspirator-1's behalf.

4. It was further part of the conspiracy that defendant RICARDO LARREA falsely stated on ATF Form 4473s that he was the actual buyer of the firearms, when he knew that he was not.

5. It was further part of the conspiracy that defendant RICARDO LARREA provided Co-Conspirator-1 with approximately 27 firearms purchased in Indiana.

6. It was further part of the conspiracy that Co-Conspirator-1 would pay defendant RICARDO LARREA for purchasing firearms on Co-Conspirator-1's behalf.

7. It was further part of the conspiracy that defendant RICARDO LARREA and Co-Conspirator-1 would travel between the Northern District of Illinois and the Northern District of Indiana for the purpose of purchasing the firearms.

8. It was further part of the conspiracy that defendant RICARDO LARREA and Co-Conspirator-1 did conceal and hide, and cause to be concealed and hidden, the purposes of acts done in furtherance of the conspiracy.

OVERT ACTS

9. In furtherance of the conspiracy and to accomplish the objectives of the conspiracy, defendant RICARDO LARREA, and others known and unknown to the

Grand Jury committed one more overt acts in the Northern District of Illinois, and elsewhere, which overt acts included but were not limited to the following:

- (a) On or about January 15, 2019, defendant RICARDO LARREA met with Co-Conspirator-1 in Chicago, Illinois and traveled with Co-Conspirator-1 from Chicago, Illinois to Deb's Gun Range, a licensed dealer of firearms, in Hammond, Indiana.
- (b) On or about January 15, 2019, Co-Conspirator-1 provided RICARDO LARREA with money to purchase a firearm from Deb's Gun Range.
- (c) On or about January 15, 2019, defendant RICARDO LARREA completed an ATF Form 4473 and falsely stated that he was the actual buyer of a Ruger EC9s 9mm pistol bearing serial number 455-08900, when he was not.
- (d) On or about January 15, 2019, defendant RICARDO LARREA purchased a Ruger EC9s 9mm pistol bearing serial number 455-08900 and provided it to Co-Conspirator-1.
- (e) On or about the dates listed below, defendant RICARDO LARREA purchased the following additional firearms for Co-Conspirator-1 and, in doing so, falsely completed an ATF Form 4473 by stating that he was the actual buyer of the firearm, when he knew that he was not:

Overt Act	Date	Location	Firearm	Serial Number
e-1	5/2/2016	Cabela's, Hammond, Indiana	Strassell's Machine Inc. C9 9mm Luger Pistol	P1939554
e-2	4/6/2017	Deb's Gun Range, Hammond, Indiana	Mossberg Maverick 88 12 Gauge Shotgun	MV0284748
e-3	3/22/2018	Cabela's, Hammond, Indiana	Taurus 605 357 Magnum Revolver	LM50046
e-4	7/15/2018	Deb's Gun Range, Hammond, Indiana	Hi-Point C9 9mm Pistol	P10032526
e-5	9/16/2018	Deb's Gun Range, Hammond, Indiana	Smith & Wesson SD9 9mm Pistol	FZX4423
e-6	10/10/2018	Deb's Gun Range, Hammond, Indiana	Springfield XD-S 40 Caliber Pistol	53530545
e-7	11/2/2018	Cabela's, Hammond, Indiana	ACP M1911 A1-FS .45 Auto Pistol	RIA1994433
e-8	11/4/2018	Cabela's, Hammond, Indiana	Smith & Wesson SD40 VE .40 S&W Pistol	FZU9229
e-9	12/4/2018	Cabela's, Hammond, Indiana	Beretta 92FS 9mm Luger Pistol	M82855Z
e-10	12/19/2018	Cabela's, Hammond, Indiana	Taurus PT101P .40 S&W Pistol	SCS00946
e-11	1/10/2019	Cabela's, Hammond, Indiana	Taurus G2S 9mm Luger Pistol	TLT61567
e-12	1/11/2019	Cabela's, Hammond, Indiana	Glock Model 30 .45 Auto Pistol	EGP271US
e-13	1/16/2019	Cabela's, Hammond, Indiana	Ruger LCR .357 Magnum Revolver	1540-52549
e-14	1/19/2019	Cabela's, Hammond, Indiana	HS Produkt XD-S .45 Auto Pistol	S4115834
e-15	1/31/2019	Cabela's, Hammond, Indiana	Glock Model 42 .380 ACP Pistol	AASW006
e-16	2/5/2019	Cabela's, Hammond, Indiana	Taurus G2S 9mm Luger Pistol	TLT61780
e-17	2/11/2019	Cabela's, Hammond, Indiana	Ruger LCP .380 ACP Pistol	372210406
e-18	2/28/2019	Deb's Gun Range, Hammond, Indiana	Taurus G2C 9mm Pistol	TLW22658
e-19	3/13/2019	Deb's Gun Range, Hammond, Indiana	Century Arms Star Model BM 9mm Pistol	34442-SBM109594

Overt Act	Date	Location	Firearm	Serial Number
e-20	4/18/2019	Deb's Gun Range, Hammond, Indiana	Glock Model 43X 9mm Pistol	BLLLG12
e-21	5/9/2019	Cabela's, Hammond, Indiana	Sig Sauer P220 .45 Auto Pistol	G370599
e-22	5/31/2019	Deb's Gun Range, Hammond, Indiana	Phoenix Arms Model HP22A .22 Caliber Pistol	4547364
e-23	6/20/2019	Deb's Gun Range, Hammond, Indiana	Smith & Wesson M&P9C 9mm Pistol	JCJ6800
e-24	6/28/2019	Cabela's, Hammond, Indiana	Kahr CM40 .40 S&W Pistol	J01669
e-25	7/2/2019	Deb's Gun Range, Hammond, Indiana	Taurus G2C 9mm Pistol	TMD58894
e-26	7/10/2019	Cabela's, Hammond, Indiana	Ruger LC380 .380 ACP Pistol	326-46002

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

A TRUE BILL:

FOREPERSON

signed by Sarah Streicker on behalf of the
UNITED STATES ATTORNEY