

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**

AUG 09 2021 *CRV*

UNITED STATES OF AMERICA

v.

JUSTIN GARCIA

~~UNDER SEAL~~

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Case No.

Violation: Title 18, United States Code,  
Section 922(a)(6)

1:21-cr-00492  
Judge Franklin U. Valderrama  
Magistrate Judge Gabriel A. Fuentes

COUNT ONE

The SPECIAL NOVEMBER 2020 GRAND JURY charges:

On or about November 27, 2019, at Crete, in the Northern District of Illinois,  
Eastern Division,

JUSTIN GARCIA,

defendant herein, in connection with the acquisition of a firearm, namely, a Taurus G2C 9-millimeter pistol, bearing serial number TMS61140, from Borderline Shooting Sports, located in Crete, Illinois, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, did knowingly make a false and fictitious written statement to Borderline Shooting Sports, which statement was intended and likely to deceive Borderline Shooting Sports 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 then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Section 922(a)(6).

COUNT TWO

The SPECIAL NOVEMBER 2020 GRAND JURY charges:

On or about August 29, 2020, at Crete, in the Northern District of Illinois,  
Eastern Division,

JUSTIN GARCIA,

defendant herein, in connection with the acquisition of a firearm, namely, a Glock 45 9-millimeter pistol, bearing serial number BPPZ520, from Borderline Shooting Sports, located in Crete, Illinois, a licensed dealer of firearms within the meaning of Title 18, United States Code, Chapter 44, did knowingly make a false and fictitious written statement to Borderline Shooting Sports, which statement was intended and likely to deceive Borderline Shooting Sports 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 then knew, he was not the actual buyer of the firearm;

In violation of Title 18, United States Code, Section 922(a)(6).

**FORFEITURE ALLEGATION**

The SPECIAL NOVEMBER 2020 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(a)(6), as set forth in this Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited is a Taurus G2C 9-millimeter pistol, bearing serial number TMS61140, magazine, and associated ammunition.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
Signed by Matthew F. Madden for the  
UNITED STATES ATTORNEY