

1 **THE GRAND JURY CHARGES:**

2 **COUNT 1**

3 On or about May 31, 2025, in the District of Arizona, Defendant, LAURENCE
4 GRAY, knowingly attempted to provide material support and resources, as that term is
5 defined in Title 18, United States Code, Section 2339A(b)(1), to wit: firearms, to a foreign
6 terrorist organization, namely the Cartel de Jalisco Nueva Generacion (“CJNG”) which
7 was designated by the Secretary of State as a foreign terrorist organization pursuant to
8 Section 219 of the Immigration and Nationality Act on February 20, 2025, knowing that
9 CJNG was a designated foreign terrorist organization.

10 In violation of Title 18, United States Code, Section 2339B.

11 **COUNT 2**

12 Beginning on or about February 22, 2025, and continuing through on or about June
13 11, 2025, in the District of Arizona, Defendant, LAURENCE GRAY, together with other
14 persons known and unknown to the grand jury, did knowingly conspire and agree with
15 each other to provide material support or resources as that term is defined in Title 18,
16 United States Code, Section 2339A(b)(1), to wit: firearms, to foreign terrorist
17 organizations, namely the Cartel de Jalisco Nueva Generacion (“CJNG”) and Cartel de
18 Sinaloa (“CDS”), which were designated by the Secretary of State as foreign terrorist
19 organization pursuant to Section 219 of the Immigration and Nationality Act on February
20 20, 2025, knowing that CJNG and CDS were designated foreign terrorist organizations and
21 engages in and has engaged in terrorist activity.

22 In violation of Title 18, United States Code, Section 2339B.

23 **COUNT 3**

24 On or about February 15, 2025, in the District of Arizona, Defendant, BARRETT
25 WEINBERGER, did ship, transport, transfer, cause to be transported, and otherwise
26 dispose of a firearm, to wit: a Colt 1911 Model MKIV, a semi-automatic pistol chambered
27 in .38 Super, serial number AZT304, in or otherwise affecting interstate or foreign
28 commerce, to a person, who Defendant, BARRETT WEINBERGER, knew or had

1 reasonable cause to believe that the person's use, carrying, or possession of the firearm
2 would constitute a felony, to wit: United States Code, Section 922(g)(1), Felon in
3 Possession of a Firearm, and Arizona Revised Statute (A.R.S.) § 13-3102(A)(4),
4 Misconduct Involving Weapons.

5 In violation of Title 18, United States Code, Sections 933(a)(1), 933(a)(3) and
6 933(b).

7 **COUNT 4**

8 On or about February 15, 2025, in the District of Arizona, Defendant, BARRETT
9 WEINBERGER, aided and abetted a person, who knowingly purchased a firearm, to wit:
10 a Colt 1911, a semi-automatic pistol chambered in .38 Super, serial number AZT304, in or
11 otherwise affecting interstate or foreign commerce for, on behalf of, and at the request and
12 demand of another person, knowing or having reasonable cause to believe that the other
13 person had previously been convicted in any court of a crime punishable by imprisonment
14 for a term exceeding one year.

15 In violation of Title 18, United States Code, Sections 932(b)(1), 932(c)(1), and 2.

16 **COUNT 5**

17 On or about February 15, 2025, in the District of Arizona, Defendant, BARRETT
18 WEINBERGER, aided and abetted a person, who knowingly made a false statement and
19 representation in connection with the acquisition of a firearm(s) which was intended and
20 likely to deceive Grips by Larry, a federal firearms licensee licensed under the provisions
21 of Chapter 44 of Title 18, United States Code, as to a fact material to the lawfulness of a
22 sale of a firearm(s) by the business, with respect to information required by the provisions
23 of Chapter 44 of Title 18, United States Code, to be kept in the records of Grips by Larry,
24 in that this person did execute a Department of Justice, Bureau of Alcohol, Tobacco,
25 Firearms and Explosives Form 4473, Firearms Transaction Record, stating they were the
26 actual transferee/buyer, whereas in truth in fact, they were purchasing the firearm(s) on
27 behalf of another person.

28 In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

1 COUNT 6

2 On or about February 22, 2025, in the District of Arizona, Defendant, LAURENCE
3 GRAY, did ship, transport, transfer, cause to be transported, and otherwise dispose of a
4 firearm, to wit: a Colt 1911 Model MKIV, a semi-automatic pistol chambered in .38 Super,
5 serial number 44ECB, in or otherwise affecting interstate or foreign commerce, to a person,
6 who Defendant, LAURENCE GRAY, knew or had reasonable cause to believe that the
7 person's use, carrying, or possession of the firearm would constitute a felony, to wit: United
8 States Code, Section 922(g)(1), Felon in Possession of a Firearm, and Arizona Revised
9 Statute (A.R.S.) § 13-3102(A)(4), Misconduct Involving Weapons.

10 In violation of Title 18, United States Code, Sections 933(a)(1), 933(a)(3) and
11 933(b).

12 COUNT 7

13 On or about February 22, 2025, in the District of Arizona, Defendant, LAURENCE
14 GRAY, aided and abetted a person, who knowingly purchased a firearm, to wit: a Colt
15 1911 Model MKIV, a semi-automatic pistol chambered in .38 Super, serial number
16 44ECB, in or otherwise affecting interstate or foreign commerce for, on behalf of, and at
17 the request and demand of another person, knowing or having reasonable cause to believe
18 that the other person had previously been convicted in any court of a crime punishable by
19 imprisonment for a term exceeding one year.

20 In violation of Title 18, United States Code, Sections 932(b)(1), 932(c)(1), and 2.

21 COUNT 8

22 On or about February 22, 2025, in the District of Arizona, Defendant,
23 LAURENCE GRAY, aided and abetted a person, who knowingly made a false statement
24 and representation in connection with the acquisition of a firearm(s) which was intended
25 and likely to deceive Grips by Larry, a federal firearms licensee licensed under the
26 provisions of Chapter 44 of Title 18, United States Code, as to a fact material to the
27 lawfulness of a sale of a firearm(s) by the business, with respect to information required by
28 the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of

1 Grips by Larry, in that this person did execute a Department of Justice, Bureau of Alcohol,
2 Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating they
3 were the actual transferee/buyer, whereas in truth in fact, they were purchasing the
4 firearm(s) on behalf of another person.

5 In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

6 **COUNT 9**

7 On or about April 14, 2025, in the District of Arizona, Defendants, BARRETT
8 WEINBERGER and LAURENCE GRAY, did ship, transport, transfer, cause to be
9 transported, and otherwise dispose of firearms, and did conspire to do so, to wit: a Barrett
10 Model M82A1, .50 caliber, semi-automatic rifle, serial number AA018928, an FNH
11 M249S Para, 5.56x45mm belt-fed rifle, serial number M249SA08708, and an FNH
12 M249S, 5.56x45mm belt-fed rifle, serial number M249SA10884, in or otherwise affecting
13 interstate or foreign commerce, to a person, who Defendants, BARRETT WEINBERGER
14 and LAURENCE GRAY, knew or had reasonable cause to believe that the person's use,
15 carrying, or possession of the firearm would constitute a felony, to wit: United States Code,
16 Section 922(g)(1), Felon in Possession of a Firearm, and Arizona Revised Statute (A.R.S.)
17 § 13-3102(A)(4), Misconduct Involving Weapons.

18 In violation of Title 18, United States Code, Sections 933(a)(1), 933(a)(3), and
19 933(b).

20 **COUNT 10**

21 On or about April 14, 2025, in the District of Arizona, Defendants, BARRETT
22 WEINBERGER and LAURENCE GRAY, aided and abetted a person, who knowingly
23 purchased firearms, to wit: a Barrett Model M82A1, .50 caliber, semi-automatic rifle, serial
24 number AA018928, an FNH M249S Para, 5.56x45mm belt-fed rifle, serial number
25 M249SA08708, and an FNH M249S, 5.56x45mm belt-fed rifle, serial number
26 M249SA10884, in or otherwise affecting interstate or foreign commerce for, on behalf of,
27 and at the request and demand of another person, knowing or having reasonable cause to
28 believe that the other person had previously been convicted in any court of a crime

1 punishable by imprisonment for a term exceeding one year.

2 In violation of Title 18, United States Code, Sections 932(b)(1), 932(c)(1), and 2.

3 **COUNT 11**

4 On or about April 14, 2025, in the District of Arizona, Defendants, BARRETT
5 WEINBERGER and LAURENCE GRAY, aided and abetted a person, who knowingly
6 made a false statement and representation in connection with the acquisition of a firearm(s)
7 which was intended and likely to deceive Grips by Larry, a federal firearms licensee
8 licensed under the provisions of Chapter 44 of Title 18, United States Code, as to a fact
9 material to the lawfulness of a sale of a firearm(s) by the business, with respect to
10 information required by the provisions of Chapter 44 of Title 18, United States Code, to be
11 kept in the records of Grips by Larry, in that this person did execute a Department of
12 Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms
13 Transaction Record, stating they were the actual transferee/buyer, whereas in truth in fact,
14 they were purchasing the firearm(s) on behalf of another person.

15 In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

16 **COUNT 12**

17 On or about May 31, 2025, in the District of Arizona, Defendant, LAURENCE
18 GRAY, did ship, transport, transfer, cause to be transported, and otherwise dispose of
19 firearms, to wit: an Ohio Ordnance M-2-SLR .50 caliber rifle, and a Colt 1911 semi-
20 automatic pistol, chambered in .38 Super, in or otherwise affecting interstate or foreign
21 commerce, to a person, who Defendant, LAURENCE GRAY, knew or had reasonable
22 cause to believe that the person's use, carrying, or possession of the firearm would
23 constitute a felony, to wit: United States Code, Section 922(g)(1), Felon in Possession of a
24 Firearm, and Arizona Revised Statute (A.R.S.) § 13-3102(A)(4), Misconduct Involving
25 Weapons.

26 In violation of Title 18, United States Code, Sections 933(a)(1), 933(a)(3) and
27 933(b).

28

1 (a) any property constituting, or derived from, any proceeds the persons obtained, directly
2 or indirectly, as the result of the offense, and (b) any of the defendants' property used, or
3 intended to be used, in any manner or part, to commit, or to facilitate the commission of,
4 such offense as to which property the defendants are liable. If any forfeitable property, as
5 a result of any act or omission of the defendants:

6 (1) cannot be located upon the exercise of due diligence,

7 (2) has been transferred or sold to, or deposited with, a third party,

8 (3) has been placed beyond the jurisdiction of the court,

9 (4) has been substantially diminished in value, or

10 (5) has been commingled with other property which cannot be divided
11 without difficulty,

12 it is the intent of the United States to seek forfeiture of any other property of said defendant
13 up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

14 All in accordance with Title 18, United States Code, Sections 924(d) and 981, Title
15 21, United States Code, Sections 853 and 881, Title 28, United States Code,
16 Section 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

17
18 A TRUE BILL

19 s/
20 FOREPERSON OF THE GRAND JURY
Date: March 17, 2026

21 TIMOTHY COURHCAINE
22 United States Attorney
District of Arizona

23
24 s/
MARCUS SHAND
25 Assistant U.S. Attorney