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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**SEAN REIDPATH SULLIVAN,  
LARRY ALLEN VICKERS,  
JAMES CHRISTOPHER TAFOYA,  
MATTHEW JEREMY HALL, and  
JAMES SAWYER,**

**Defendants.**

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**CRIMINAL NO.**

JRR 23cr257

**(Conspiracy, 18 U.S.C. § 371; Unlawful  
Importation of a Firearm, 18 U.S.C. §  
922(l); False Statement in Records  
Maintained by Federal Firearms  
Licensee, 18 U.S.C. §§ 924(a)(1)(A);  
False Statements, 18 U.S.C. § 1001;  
Unlawful Possession of Machineguns,  
18 U.S.C. § 922(o); Money Laundering,  
18 U.S.C. § 1957; Aiding & Abetting,  
18 U.S.C. § 2; and Forfeiture, 18 U.S.C.  
§ 924(d), 28 U.S.C. § 2461(c))**

**UNDER SEAL**

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**INDICTMENT**

The Grand Jury for the District of Maryland charges:

**COUNT ONE**

**(Conspiracy to Interfere with Government Functions and to Violate Federal Law  
Regulating Firearms)**

At all times relevant to this Indictment:

**Relevant Individuals and Entities**

1. Defendant Sean Reidpath Sullivan (“SULLIVAN”) was the principal owner and operator of Trident, LLC (“Trident”) (formerly Trident Rifles, LLC), located in Gambrills, Maryland. SULLIVAN was also affiliated with B&T USA LLC, located in Tampa, Florida. SULLIVAN and Trident were Federal Firearms Licensees (“FFLs”) and Special Occupational Taxpayers (“SOTs”), which allowed them, in certain circumstances, to possess, import, manufacture, and deal in fully automatic firearms (machineguns) and other firearms regulated by

the National Firearms Act (“NFA”), Title 26, United States Code, Section 5801 et seq., and the Gun Control Act (“GCA”), Title 18, United States Code, Section 921 et seq. **SULLIVAN** was also an Intelligence Analyst with the Department of Homeland Security, Homeland Security Investigations (“HSI”) while simultaneously operating Trident.

2. Defendant Larry Allen Vickers (“**VICKERS**”) was the owner of the firearms-related business VT Guns, Inc. (formerly Vickers Tactical, Inc.), located in North Carolina. **VICKERS** and his businesses were FFLs and SOTs, which were authorized, in certain circumstances, to possess, manufacture, and deal in machineguns and other NFA firearms. **VICKERS** was also an internet personality known for his extensive knowledge of firearms and related merchandise. **VICKERS** operated a YouTube channel with many subscribers, on which he reviewed firearms, including many very rare firearms. **VICKERS** also offered highly sought-after firearms training courses in various locations across the country. Most trainings were priced at over \$500, and some were priced at more than \$1,000.

3. Defendant James Christopher Tafoya (“**TAFOYA**”) was the owner of FFLs named JCT Firearms LLC (“JCT Firearms”) and JCT Manufacturing LLC (“JCT Manufacturing”), located in Albuquerque, New Mexico. **TAFOYA** also operated another firearms-related business, Woody’s Weapons, located in Albuquerque on the same property as JCT Manufacturing and JCT Firearms. Woody’s Weapons was an FFL that was owned by **TAFOYA**’s half-brother, T.W., but **TAFOYA** made all business decisions with respect to the company, to include purchases and sales of machineguns. JCT Firearms, JCT Manufacturing, and Woody’s Weapons were also SOTs and were authorized, in certain circumstances, to possess, manufacture, and deal in machineguns.

4. Defendant Matthew Jeremy Hall (“**HALL**”) was the Chief of Police of the Coats Police Department in Coats, North Carolina, from approximately 2012 to mid-2020, when he

retired. During **HALL**'s tenure as Chief of Police, the town of Coats had a population of under 2,200 residents and its police department had no more than seven full-time police officers at any one time. The Coats Police Department did not have a Special Weapons and Tactics ("SWAT") unit. Its annual operating budget was around \$1.2 million, and any expenditures over \$300 required permission of the town supervisor.

5. Defendant James Sawyer ("**SAWYER**") was the Chief of Police of the Ray Police Department in Ray, North Dakota, a position he held since at least 2015. During **SAWYER**'s tenure as Chief of Police, the city of Ray has had a population of under 1,000 residents and its police department has had only one sworn law enforcement officer, that being **SAWYER**. The Ray Police Department has never had a SWAT unit.

6. M.G. was the Sheriff of Bernalillo County, New Mexico from approximately 2015 until 2022. M.G. ran for Sheriff in 2014 and 2018, winning two four-year terms. He also made an unsuccessful bid for Mayor of Albuquerque in 2021. During M.G.'s tenure as Sheriff, the population of Bernalillo County was over 600,000, and the Bernalillo County Sheriff's Office ("**BCSO**") had over 300 sworn law enforcement officers. The BCSO had a SWAT unit, but it began phasing out the use of fully automatic firearms in approximately 2013. The purchase of any new firearms by the BCSO required the approval of the Bernalillo County Purchasing Administrator.

7. R.M. was the Police Chief of Pueblo Laguna, Albuquerque, New Mexico. R.M. had been the Undersheriff of BCSO.

8. C.F. was a resident of the Phoenix, Arizona area. He was not an FFL, nor had he ever been one, but he made his living selling firearms and real estate. C.F. was a collector of high-end firearms, especially those made by Heckler and Koch ("**H&K**") and Sig Sauer. C.F. conducted

numerous firearms transactions with SULLIVAN. C.F. frequently traveled to Europe to locate and source firearms that he knew would have significant resale value in the United States. C.F. was also an associate of VICKERS and it was the latter who put C.F. and SULLIVAN in contact with each other.

9. J.B. was the owner of an FFL, located outside of Houston, Texas. J.B. and his business were FFLs and SOTs which were authorized, in certain circumstances, to possess, manufacture, and deal in machineguns. J.B. also produced YouTube videos which have been widely viewed, in which he explained to viewers how to manage and navigate the National Firearm Act paperwork system with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). J.B.’s business model was based in large part on assisting other FFLs with their going-out-of-business proceedings, to include photographing the weapons, managing their listings on GunBroker (an eBay-type website for the sale of firearms, firearms parts, *etc.*, to include machineguns), collecting the proceeds of sales, and forwarding profits to the seller.

#### **Federal Regulation of Machineguns and Firearms**

10. The National Firearms Act of 1934 (“NFA”), Public Law 474, approved June 26, 1934, generally imposed a tax on the making and transfer of firearms defined by the Act, as well as a special (occupational) tax (“SOT”) on persons and entities engaged in the business of importing, manufacturing, and dealing in NFA weapons. Firearms subject to the 1934 NFA

included but were not limited to, rifles having barrels less than 16 inches in length, and machineguns.

11. The Gun Control Act of 1968 (“GCA”), Public Law 90-618, was approved October 22, 1968. The GCA imposed licensing and regulatory requirements on persons engaged in the business of importing, manufacturing, or dealing in firearms.

12. Federal law generally prohibits the transfer and possession of machineguns that were imported or manufactured after May 19, 1986, except to or by bona fide government agencies. Further, federal law generally prohibits the importation of machineguns except by or for bona fide government agencies.

13. Relevant to this Indictment, there are two exceptions to the general prohibition on the transfer, possession and importation of machineguns:

a. First, machineguns may be transferred to, possessed by, and/or imported by an FFL/SOT for use as a “sample” for demonstration to potential bona fide government agency purchasers. This exception is frequently referred to as the “dealer sales sample” exception. Pursuant to ATF regulations, the exception requires the government agency that is requesting a demonstration of the machinegun to submit a “law letter” to the ATF. A “law letter” is an industry term that refers to a letter signed by a government official expressing a need for a particular model of machinegun or interest in seeing a demonstration of that model of machinegun for potential future purchase by the government agency for its use in official duties. The dealer sales sample exemption requires the dealer to have a law letter, prior to purchase of the machinegun, to be submitted with the requisite ATF Form. The law letter is also known as a “demonstration letter” or “demo letter.”

b. Second, if an FFL/SOT that is lawfully in possession of a machinegun discontinues business and/or surrenders its status as an SOT – the FFL’s authorization to possess and deal in machineguns – the FFL may then transfer the machinegun to another FFL/SOT. This exception is frequently referred to as the “out of business” exception.

14. Federal law generally prohibits the importation of rifles with barrels less than 16” in length (“short-barreled rifles”). An exception to this general import prohibition allows an FFL/SOT to import such rifles for use as samples, employing the same method as outlined in paragraph 12a *above*.

15. The ATF was an agency within the Executive Branch of the U.S. government that, among other things, administered and enforced federal law concerning machineguns and other firearms. Any permanent importation of a machineguns and other firearms must first be approved by ATF’s Firearms and Explosives Imports Branch (“Imports Branch”).

16. To import a machinegun or short-barreled rifle from outside the United States as a dealer sales sample for use in a demonstration to a government agency, an FFL/SOT must provide Imports Branch with an application on an ATF Form 6 and a law letter which is submitted with the application. Except for narrow exceptions, Imports Branch would not approve an importation of a machinegun or short-barreled rifle for an FFL/SOT without a law letter.

17. Federal law required FFLs/SOTs that purchased, sold, transferred, imported, or possessed machineguns and other firearms to keep and maintain records related to their acquisition and disposition of such firearms. It was a crime to make or include false statements in those records.

**The Conspiracy**

18. Beginning in or before June 2018, and continuing through in or about March 2021, in the District of Maryland and elsewhere, the defendants,

**SEAN REIDPATH SULLIVAN,  
LARRY ALLEN VICKERS,  
JAMES CHRISTOPHER TAFOYA,  
MATTHEW JEREMY HALL, and  
JAMES SAWYER,**

did knowingly combine, conspire, confederate, and agree with each other and other persons known and unknown to the Grand Jury to do the following:

a. to defraud the United States, namely the ATF, by interfering with and obstructing the lawful government functions of the ATF to restrict the transfer, possession and/or importation of machineguns and other firearms through the creation of law letters that contained material falsehoods and the submission of those letters to the ATF with applications and permits for the importation of firearms, on ATF Forms 6, in violation of 18 U.S.C. §371;

b. to unlawfully import and cause to be imported into the United States NFA and CGA regulated firearms using false and fraudulent writings submitted to the ATF, in violation of 18 U.S.C. § 922(l);

c. to knowingly make and cause to be made, and use and cause to be used, in a matter within the jurisdiction of a department or agency of the United States, namely the ATF, representations with respect to information, under Chapter 44 of Title 18 of the United States Code, relating to the acquisition of firearms, to wit: law letters that contained false representations that the machineguns and/or short-barreled rifles identified in the law letters were dealer sales samples for law enforcement demonstration purposes, which SULLIVAN used to make knowingly false representations in block 10 of ATF Form 6, an application and permit for importation of firearms,

and attached the same law letters to ATF Forms 6, forms that were required to be kept in the records of individuals licensed under Chapter 44, in violation of 18 U.S.C. § 924(a)(1)(A);

d. to knowingly make and cause to be made, and use and cause to be used, in a matter within the jurisdiction of a department or agency of the United States, namely the ATF, materially false, fictitious, and fraudulent statements and representations, namely law letters signed by defendants HALL, and SAWYER, M.G. and R.M, requesting the demonstration of machineguns and/or short-barreled rifles, in violation of 18 U.S.C. §1001(a)(2); and

e. to unlawfully possess machineguns, in violation of Title 18, United States Code, Section 922(o).

#### **Purpose of the Conspiracy**

19. It was the purpose of the conspiracy of the defendants to:

a. unlawfully acquire and facilitate the acquisition of machineguns and other firearms not permitted to be imported into the United States, by means of fraud and materially false statements and representations; and

b. to resell those machineguns and other firearms not permitted to be imported into the United States, for profit or to keep them for their own use and enjoyment.

#### **Manner and Means of the Conspiracy**

The manner and means by which the defendants sought to accomplish the purpose of the conspiracy included, but was not limited to, the following:

20. The defendants sought to and did acquire machineguns and/or other restricted firearms by falsely representing that the firearms would be used as dealer sales samples for demonstration to law enforcement offices, specifically the Coats Police Department, the Ray Police Department, and the BCSO and the Pueblo Laguna Police Department. These false



representations were contained in law letters on Coats Police Department letterhead, Ray Police Department Letterhead, BCSO and the Pueblo Laguna Police Department letterhead.

21. Defendant **SULLIVAN** would submit the law letters containing materially false information with ATF Forms 6, to obtain permits from the ATF to import the otherwise prohibited machineguns and other restricted weapons into the United States.

22. Defendant **SULLIVAN** would import into the United States the machineguns and restricted weapons from manufacturers and sources outside the United States, then transfer some of the weapons to defendants **VICKERS, TAFOYA, C.F.** and others.

23. Defendant **SULLIVAN** kept some of the machineguns and other restricted weapons he imported in the Trident inventory for later transfer and/or retention for his personal use.

24. Defendant **VICKERS** kept some of the machineguns and other restricted weapons that were transferred to him in his personal collection and transferred other machineguns and restricted weapons to other FFLs and third parties.

25. Defendants **HALL** and **SAWYER**, and M.G. and R.M signed law letters in which they typically requested demonstration of machineguns and firearms for possible future purchase for the use of officers in the performance of their official duties. The letters also stated that the weapons were particularly suitable for use as law enforcement weapons due to cost and availability. At the time that they signed the law letters, defendants **HALL** and **SAWYER**, and M.G. and R.M. had no expectation or understanding that such weapons would ever be demonstrated to their respective law enforcement agencies.

a. Between in or about July 2012, to in or about May, 2020, **HALL** signed and submitted approximately 53 law letters that requested demonstration of 92 firearms, of which number approximately 29 firearms were imported by **SULLIVAN**.

b. Between in or about August 2015, to in or about August 2020, **SAWYER** signed and submitted approximately 32 law letters that requested demonstration of approximately 73 firearms, of which number approximately 21 firearms weapons were imported by **SULLIVAN**.

c. Between in or about July 2015, to in or about September, 2020, **M.G.** submitted approximately 127 law letters to **TAFOYA** and/or Woody's Weapons, that requested demonstration of approximately 598 firearms, of which number approximately 7 firearms were imported by **SULLIVAN**.

d. Between in or about March 2020 to in or about March 2021, **R.M.** submitted approximately 17 law letters to **TAFOYA** and/or Woody's Weapons, that requested demonstration of approximately 414 firearms, of which number approximately 13 firearms were imported by **SULLIVAN**.

26. These letters were, in turn, provided either directly to defendant **SULLIVAN** or through defendant **VICKERS** and **TAFOYA**.

27. **SULLIVAN** submitted the law letters containing materially false facts to the ATF Imports Branch as attachments to ATF Forms 6.

#### Overt Acts

28. In furtherance of the conspiracy, and to effect the purposes thereof, the defendants and others known and unknown to the Grand Jury committed the following overt acts, among others, in the District of Maryland and elsewhere:

#### B&T Prototypes

a. On or about August 6, 2018, the following electronic communication took place between SULLIVAN and VICKERS and VICKERS and SAWYER:

**SULLIVAN to VICKERS:** Would you mind getting your chief to do a demo letter for me for a couple prototypes from Karl?

**VICKERS to SULLIVAN:** I'll certainly try Let's give it's shot

**VICKERS to SULLIVAN:** Also can you email me what exactly you want on your demo letter?

**SULLIVAN to VICKERS:** Just did.

**VICKERS to SULLIVAN:** Got it I'm pinging my LE guy now .....

**VICKERS to SAWYER:** Chief My importer- who is a great guy, former Marine and has really done me Solid- asked me to ask you if you could do a demo letter for him As a favor to me I'd like to ask you to do it- normally I'd never ask for Anyone else but he has went above and beyond for me If your good with it I sent the letter template he needs to your email

**SAWYER to VICKERS:** I never would either. However as a personal favor to you I'll make this one time exception. You are the only one I've ever done these for because I consider you a good friend brother.

**VICKERS to SAWYER:** Thanks I really appreciate it Consider this a one time occurrence One and Done

**SAWYER to VICKERS:** You got it brother.

**SAWYER to VICKERS:** He owes you one now!

**VICKERS to SAWYER:** Yep !! He has really went above and beyond for me or I would have never asked !!

**SAWYER to VICKERS:** Understood glad I can help bro

**VICKERS to SAWYER:** Thanks!!

**VICKERS to SULLIVAN:** Hey my guy says he will do it for you this once no problem

**SULLIVAN to VICKERS:** Thanks. And tell him it's much appreciated

**VICKERS to SULLIVAN:** Will do !

b. On or about August 8, 2018, SAWYER signed a law letter on Ray Police Department letterhead, addressed to Trident Rifles, LLC, in Odenton, Maryland, requesting demonstrations of a B&T AG APC9K, Cal. 9mm, "Submachinegun" [sic], a B&T AG APC9KSD, Cal. 9mm, Submachinegun [sic], a B&T AG APC40, Cal. 40 S&W, "Submachinegun" [sic], and a B&T AG GHM9K, Cal. 9mm, "Submachinegun" [sic], "for possible future purchase and use of our officer in the performance of his official duties"

c. On or about August 9, 2018, SULLIVAN attached SAWYER's August 8, 2018, law letter, to and in support of his request to ATF for an exemption to import a B&T AG

APC9K, Cal. 9mm, machinegun, a B&T AG APC9KSD, Cal. 9mm, machinegun, a B&T AG APC40, Cal. 40 S&W, machinegun, and a B&T AG GHM-Police, Cal. 9mm, machinegun APC40 machine.

d. On or about November 20, 2018, **SULLIVAN** filed an ATF Form 6A with ATF's Imports Branch indicating he had imported a APC9KSD machinegun having serial number US18-28612.

e. On or about March 14, 2020, **SULLIVAN** filed an ATF Form 6A with ATF's Imports Branch indicating he imported a B&T AG APC40 machinegun having serial number US19-33205.

STG90s

f. On or about May 22, 2018, **SULLIVAN** submitted an ATF Form 6 to ATF's Imports Branch requesting permission to import ten (10) San Swiss SG550P pistols, among other weapons.

g. On or about July 11, 2018, **VICKERS** sent the following text message to **SULLIVAN**, "Hey bro we have to stay on top of this Marc exporter guy in Switzerland. He isn't exactly a go getter. I've had 2 pistols to be exported out of Switzerland from him for months and he is dragging ass. These STG90's are far more important than the pistols so I want to stay on top of this guy."

h. On or about January 14, 2019, the following text message exchange took place between **VICKERS** and **SULLIVAN**:

**VICKERS**: "You get the rifles?"

**SULLIVAN**: "Yep" [Sends pictures]



**VICKERS:** “Having those in the USA is a big fucking deal! EX Swiss military STG90’s. A big fucking deal. Maybe the only ones in the USA. Very well done bro! Prime rib on me at SHOT!”

**VICKERS:** “Both rifles look to be in good shape. If you don’t mind could you send me the one on the bottom? The one with the standard Swiss Army sling on it?”

**SULLIVAN:** “No problem”

i. On or about January 27, 2019, **SULLIVAN** filed an ATF Form 6A with ATF’s Imports Branch indicating that he had imported two (2) San Swiss SG550P pistols having serial numbers 2268797 and 2116346.

CR223 & CR308

j. On or about June 27, 2018, **SAWYER** signed a law letter on Ray Police Department letterhead, addressed to Vickers Tactical, requesting demonstrations of a CG-Haenel CR 223 short-barreled rifle and a CG Haenel CR 308 short-barreled rifle, among other weapons.

k. On or about June 27, 2018, **VICKERS** signed a letter on Vickers Tactical Inc. letterhead, addressed to Trident Rifles LLC in Odenton, Maryland, stating the firearms enumerated in paragraph 28.j. *above* would be used in a demonstration to the Ray Police Department by Vickers Tactical Inc.

l. On or about July 6, 2018, **SULLIVAN** submitted an ATF Form 6 to ATF's Imports Branch requesting permission to import the firearms enumerated in paragraph 28.j. *above*. **SULLIVAN** represented in Block 10 of the ATF Form 6 that the purpose of the importation was "Dealer Sales Sample Letter" and attached **SAWYER**'s aforementioned June 27, 2018 law letter and **VICKER**'s aforementioned June 27, 2018, letter.

m. On or about June 5, 2019, the following electronic communication took place between **SULLIVAN** and **VICKERS**:

**SULLIVAN:** Do you want the haenel's?

**SULLIVAN:** Got 1x556 and 1x308 for you if you want

**VICKERS:** No I'll skip them You can have them if you want

**SULLIVAN:** Copy

n. On or about July 20, 2019, **SULLIVAN** filed an ATF Form 6A with ATF's Imports Branch indicating he had imported a CG-Haenel CR 223 short-barreled rifle having serial number CR004170 and a CG-Haenel CR 308 short-barreled rifle having serial number CR3-000597.

o. On or about August 25, 2019, username "Trident Rifles LLC" posted the following advertisement on sturmgewehr.com, an internet firearms marketing site:



**WTS: C.G. Haenel CR223 & CR308 SBRs**

Started by Trident Rifles LLC, 25 Aug 2019  
Location: Maryland

Sign in to follow this Followers 1

3 posts in this topic

**Trident Rifles LLC**  
Active Duty

Posted 25 Aug 2019

MR308

p. On or about June 20, 2018, **SAWYER** signed a law letter on Ray Police Department letterhead, addressed to **VICKERS** and Vickers Tactical, Inc., requesting demonstrations of weapons, including a Heckler & Koch MR308A3 short-barreled rifle and a Heckler & Koch G28 short-barreled rifle.

q. On or about June 27, 2018, **VICKERS** signed a letter on Vickers Tactical Inc. letterhead, addressed to Trident Rifles LLC in Odenton, Maryland, stating the firearms enumerated in paragraph 28.p. *above* would be used in a demonstration to the Ray Police Department by Vickers Tactical Inc.

r. On or about June 29, 2018, **SULLIVAN** submitted an ATF Form 6 to ATF's Imports Branch requesting permission to import firearms, including those enumerated in paragraph 28.p. *above*. **SULLIVAN** represented in Block 10 of the ATF Form 6 that the purpose of importation was "Dealer Sales Sample Letter" and attached **SAWYER**'s aforementioned June 20, 2018, law letter and the aforementioned June 27, 2018, Vickers Tactical Inc. letter.

s. On or about June 7, 2020, the following WhatsApp conversation took place between **SULLIVAN** and C.F.:

**SULLIVAN:** [Sends photo of a rifle having model designation MR 308]



**SULLIVAN:** Any interest?

C.F.: Of course. For myself

C.F.: What do you want for it? I need one for a host

**SULLIVAN:** Its in Switzerland right now

**SULLIVAN:** I'll confirm I can get it tomorrow

t. On or about July 19, 2020, **SULLIVAN** filed an ATF Form 6A with ATF's Imports Branch indicating he imported a Heckler & Koch G28 rifle having serial number 144-006259. **SULLIVAN** noted a discrepancy on the Form 6A indicating the rifle was a "standard rifle" and not a short-barreled rifle.

*FN (Herstal) FN/FAL*

u. On or about August 1, 2019, **HALL** signed a law letter on Coats Police Department letterhead, addressed to **SULLIVAN** and his business, Trident LLC, in Odenton, MD, requesting a demonstration of a FN (Herstal) FN/FAL machinegun.

v. On or about August 10, 2019, **SULLIVAN** submitted an ATF Form 6 to ATF's Imports Branch requesting permission to import a FN (Herstal) FN/FAL machinegun. **SULLIVAN** represented in Block 10 of the ATF Form 6 that the purpose of importation was "Dealer Sales Sample Letter" and attached **HALL**'s aforementioned August 1, 2019, law letter.

w. On or about February 15, 2020, **SULLIVAN** filed an ATF Form 6A with Imports Branch indicating he had imported a FN (Herstal) FN/FAL machinegun having serial number 63700. **SULLIVAN** noted a discrepancy on the Form 6A indicating the model of the machinegun was "FAL-BE."

*MAG 58*

x. On or about September 24, 2019, **HALL** signed a law letter on Coats Police Department letterhead, addressed to **VICKERS** and Vickers Tactical Inc., in Waxhaw, North Carolina, requesting a demonstration of a FN (Herstal) MAG58 machinegun for "possible future purchase and use by our officers in the performance of their official duties."

y. On or about September 24, 2019, **VICKERS** signed a letter on Vickers Tactical Inc. letterhead, addressed to Trident Rifles LLC in Odenton, Maryland, stating the FN



(Herstal) MAG58 would be used in a demonstration to the Coats Police Department by Vickers Tactical Inc.

z. On or about September 25, 2019, the following electronic communication took place between **VICKERS** and **HALL**:

**VICKERS:** Hey brother t shirts are on the way to you !

**HALL:** Thank you

aa. On or about October 07, 2019, **SULLIVAN** submitted an ATF Form 6 to ATF's Imports Branch requesting permission to import a FN (Herstal) MAG58 machinegun. **SULLIVAN** represented in Block 10 of the ATF Form 6 that the purpose of importation was "Dealer Sales Sample Letter" and attached **HALL**'s aforementioned September 24, 2019, law letter and **VICKERS**' aforementioned September 24, 2019, letter.

bb. On or about February 15, 2020, **SULLIVAN** filed an ATF Form 6A with ATF's Imports Branch indicating he had imported a FN (Herstal) MAG58 machinegun having serial number 20622.

FAMAS

cc. On or about October 17, 2019, M.G. signed a demonstration letter on BCSO letterhead addressed to T.W. and Woody's Weapons, Albuquerque, NM, requesting demonstrations of firearms, including a Giat Industries FAMAS machinegun, for "possible future purchase and use of our officers in the performance of their official duties."

dd. On or about October 17, 2019, T.W. signed a letter on Woody's Weapons letterhead, addressed to Trident LLC in Odenton, Maryland, stating the Giat Industries FAMAS machinegun would be used in a demonstration to the BCSO by Woody's Weapons.

ee. On or about November 30, 2019, **SULLIVAN** submitted an ATF Form 6 to ATF's Imports Branch requesting permission to import firearms, including the Giat Industries

FAMAS machinegun. SULLIVAN represented in Block 10 of the ATF Form 6 that the purpose of importation was “Dealer Sales Sample Letter” and attached M.G.’s aforementioned October 17, 2019, law letter and T.W.’s aforementioned October 17, 2019, Woody’s Weapons letter.

ff. On or about February 15, 2020, SULLIVAN filed an ATF Form 6A with ATF’s Imports Branch indicating he had imported a Giat Industries FAMAS machinegun having serial number 2215.

Sniper Rifle

gg. On or about August 21, 2018, SULLIVAN submitted an ATF Form 6 to Imports Branch requesting permission to import 500 San Swiss PE90P pistols.

hh. On or about June 3, 2020, a text message conversation took place between SULLIVAN and C.F. The following messages were exchanged:

SULLIVAN, “Do you know anyone looking for the real snipers”,  
C.F.: “Yeah, me. LOL. I have several other collectors, museum curators I could sell too. What are you asking for that sniper?”  
SULLIVAN, “I just got one for 7300CHF. For you I’ll just add my normal fee but if we’re selling it together, then lets get whatever we can.”

ii. On or about July 19, 2020, SULLIVAN filed an ATF Form 6A with ATF’s Imports Branch indicating he had imported fifteen (15) San Swiss PE90P pistols. SULLIVAN noted in the discrepancy box of the Form 6A that one of the firearms was marked SG551P having serial number 130171.

jj. On or about July 19, 2020, C.F. sent a text message to D.B. The message stated, “He just got 14x PE90s in and that 550 sniper. The mother load. I gotta do my homework on em. I guess they are rifles not pistols, no import markings, and are quite rare. The sniper looks unfired. One of the PE90 is unfired, the rest are in 90%+ condition. Standby for photos.”

kk. On or about July 29, 2020, Trident LLC sent a shipment of firearms to an FFL located in Phoenix, Arizona. The shipment contained multiple firearms to include a firearm having serial number 130171, which Magnum Mike's recorded in its acquisition and disposition book as a "Sig SG550 rifle."

ll. On or about August 4, 2020, the "Sig SG550 rifle" having serial number 130171, was transferred to C.F. from the FFL located in Phoenix, AZ.

Glock 18s

mm. On or about June 17, 2020, J.B. and SULLIVAN had the following text message communication:

SULLIVAN: "Glock letter reminder"

J.B.: "Working on them, Should have them by the end of the week."

SULLIVAN: "No rush. They are here in the FTZ now."

oo. On or about June 21, 2020, J.B. sent the following text messages to TAFOYA: "Need letters this week," "Glock, IWI, etc."

pp. On or about June 26, 2020, the following text message exchange occurred between J.B. and TAFOYA:

J.B.: "We need letters"

TAFOYA: "I'm working on them. [R.M.]'s been out of the office most of the week. He said he'll get em to me early next week. He said sorry for the delay."

qq. On or about June 29, 2020, R.M. signed a law letter on Pueblo of Laguna Police Department letterhead, addressed to T.W. and Woody's Weapons, in Albuquerque, NM, requesting a demonstration of multiple Glock 18 machineguns for "possible future purchase and use of our officers in the performance of their official duties."

rr. On or about June 20, 2020, [sic] T.W. signed a letter on Woody's Weapons letterhead, addressed to Trident LLC in Odenton, Maryland, stating the Glock 18

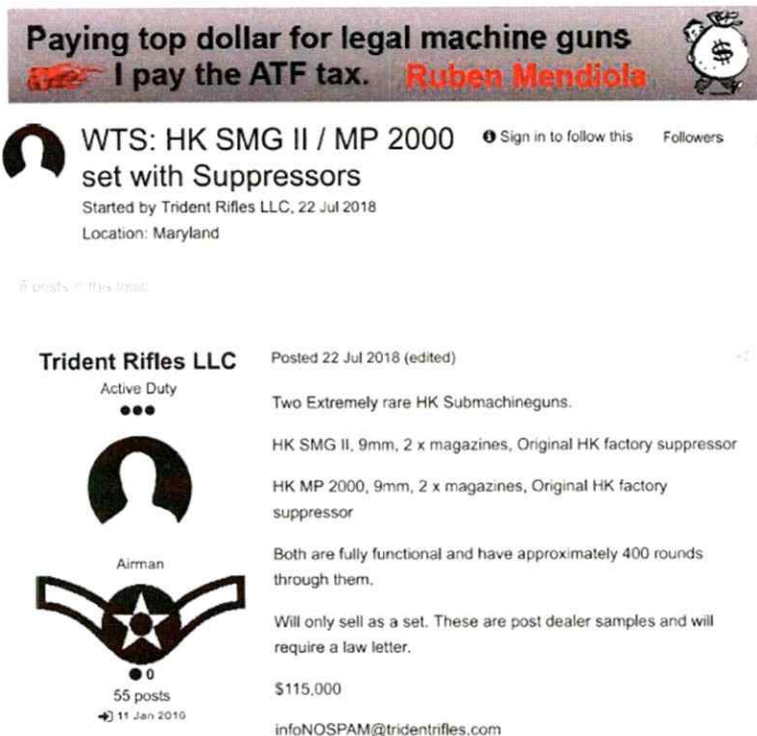
machineguns would be used in a demonstration to the Pueblo of Laguna Police Department by Woody's Weapons.

ss. On or about July 22, 2020, SULLIVAN submitted an ATF Form 6 to ATF's Imports Branch requesting permission to import the Glock 18 machineguns. SULLIVAN represented in Block 10 of the ATF Form 6 that the purpose of importation was "Dealer Sales Sample Letter" and attached R.M.'s aforementioned June 29, 2020, law letter and T.W.'s aforementioned June 20, 2020, Woody's Weapons letter.

tt. On or about February 17, 2021, SULLIVAN filed an ATF Form 6A with ATF's Imports Branch indicating he had imported one Glock 18 machinegun having serial number YYK020; one Glock 18C machinegun having serial number SSS847; one Glock G18 Gen 4 machinegun having serial number YYK022; one Glock G18 Gen 5 machinegun having serial number YYK023; and one Glock G18C Gen 5 machinegun having serial number BLWU990.

HK SMGs

uu. On or about July 22, 2018, username “Trident Rifles LLC” posted the following advertisement on sturmgewehr.com, an internet firearms marketing site:



The screenshot shows a Facebook post from Trident Rifles LLC. At the top, there is a banner with the text "Paying top dollar for legal machine guns" and "I pay the ATF tax. Ruben Mendiola" next to a money bag icon. Below the banner is the post title "WTS: HK SMG II / MP 2000 set with Suppressors" and the location "Maryland". The post content lists two HK Submachineguns: an HK SMG II and an HK MP 2000, both with original factory suppressors and 400 rounds. The price is listed as \$115,000. The post is from Trident Rifles LLC, an Airman, and includes contact information: infoNOSPAM@tridentrifles.com.

vv. On or about May 20, 2019, the following electronic communication took place between SULLIVAN and VICKERS:

**SULLIVAN:** Need a favor for Karl...he’s trying to get these HKs out of Switzerland with the new law change that’s coming there now.

You’ll get an Army SCW FOC. Just need these letters done.

**SULLIVAN:** [Sends letter templates]

**VICKERS:** Ok so the demo letters done ASAP ?

**VICKERS:** I just sent them on to my Chief of Police Buddies

ww. On or about May 21, 2019, the following electronic communications took place between VICKERS and HALL and VICKERS and SULLIVAN:

**VICKERS to HALL:** Hey bro I emailed a demo letter request for a good friend If you can help out

**HALL to VICKERS:** [Sends a scanned document]

**VICKERS to HALL:** Thanks brother!!

**VICKERS to SULLIVAN:** Check your email

**SULLIVAN to VICKERS:** Got it. Thank you

xx. On or about May 20, 2019, **HALL** signed a demonstration letter on Coats Police Department letterhead addressed to Trident Rifles, LLC, requesting demonstrations of weapons, including a Heckler & Koch MP2000 machinegun and a Heckler & Koch SMG II machinegun.

yy. On or about May 23, 2019, **SULLIVAN** signed a letter on Trident LLC letterhead, addressed to B&T USA, Tampa, FL, another federally licensed importer, indicating the firearms mentioned in paragraph 28.xx. *above*, would be used in a demonstration to the Coats Police Department by Trident LLC.

zz. On or about June 18, 2019, B&T USA submitted an ATF Form 6 to ATF's Import Branch requesting permission to import the firearms mentioned in paragraph 28.xx. *above*, and attached **HALL's** aforementioned May 20, 2019, law letter, and **SULLIVAN's** aforementioned May 23, 2019, letter, representing in Block 10 of the form that the weapon requested were to be used as "Other – For Demonstration Purposes."

18 U.S.C. § 371

**COUNTS TWO THROUGH ELEVEN**  
**(Unlawful Importation of a Firearm)**

1. The allegations in paragraphs one through seventeen and nineteen through twenty-eight of Count One are hereby realleged and incorporated by reference herein as though fully set forth in these Counts of the Indictment.

2. On or about the dates indicated below, in the District of Maryland and elsewhere, the defendants, as indicated, did knowingly and unlawfully import and cause to be imported into the United States NFA and CGA regulated firearms using false and fraudulent writings submitted to the ATF:

<b>Count</b>	<b>Date</b>	<b>Defendant(s)</b>	<b>Firearm(s)</b>	<b>False Document</b>
2	Nov 20, 2018	<b>SULLIVAN VICKERS</b>	B&T APC9KSD machinegun, serial number ("sn") US18-28612	ATF Form 6 with false law letter.
3	Jan 27, 2019	<b>SULLIVAN</b>	Two San Swiss Arms STG90 machineguns, sns 2268797 and 2116346	ATF Form 6A notifying the ATF that Trident had imported two San Swiss Arms SG 550P pistols, sns 2268797 and 2116346, when in fact Trident had imported two San Swiss Arms STG90s
4	Mar 14, 2020	<b>SULLIVAN VICKERS</b>	B&T APC40 machinegun, sn US19-33205	ATF Form 6 with false law letter.
5	July 19, 2020	<b>SULLIVAN VICKERS</b>	Heckler & Koch (H&K) MR308 rifle, serial number (sn) 144-006259	ATF Form 6 with false law letter; ATF Form 6A claiming rifle a G28
6	July 20, 2019	<b>SULLIVAN VICKERS</b>	one CR 223 Short Barreled Rifle, sn CR004170 and one CG Haenel CR 308 Short Barreled Rifle, sn CR3-000597	ATF Form 6 with false law letter.
7	Feb 15, 2020	<b>SULLIVAN VICKERS</b>	one FN (Herstal) FN/FAL machinegun, sn 63700	ATF Form 6 with false law letter.

<b>Count</b>	<b>Date</b>	<b>Defendant(s)</b>	<b>Firearm(s)</b>	<b>False Document</b>
8	Feb 15, 2020	<b>SULLIVAN VICKERS</b>	one FN Herstal MAG58, sn 20622	ATF Form 6 with false law letter.
9	Feb 15, 2020	<b>SULLIVAN TAFOYA</b>	One Giat Industries FAMAS machinegun, sn 2215	ATF Form 6 with false law letter.
10	July 19, 2020	<b>SULLIVAN</b>	One San Swiss Arms SG 550-1 Sniper rifle, sn 130171	ATF Forms 6 and 6A, in which <b>SULLIVAN</b> notified the ATF that he had imported one San Swiss Arms SG 551P pistol, when in fact he had imported one San Swiss Arms SG 550-1 Sniper rifle
11	Feb 17, 2021	<b>SULLIVAN TAFOYA</b>	one Glock 18 machinegun, sn YYK020; one Glock 18C machinegun, sn SSS847; one Glock G18 Gen 4 machinegun, sn YYK022; one Glock G18 Gen 5 machinegun, sn YYK023; and one Glock G18C Gen 5 machinegun, sn BLWU990	ATF Form 6 with false law letter.

18 U.S.C. § 922(l)

18 U.S.C. § 2



**COUNTS TWELVE THROUGH NINETEEN**  
**(False Statements in Records Maintained by Federal Firearms Licensee)**

1. The allegations in paragraphs one through seventeen and nineteen through twenty-eight of Count One are hereby realleged and incorporated by reference herein as though fully set forth in these Counts of the Indictment.

2. On or about the dates indicated below, in the District of Maryland and elsewhere, the defendants, as indicated, did knowingly make and cause to be made false statements with respect to information required to be kept in the records of individuals and businesses licensed under Title 18, Chapter 44, relating to the acquisition of regulated NFA and CGA firearms:

<b>Count</b>	<b>Date</b>	<b>Defendant(s)</b>	<b>Document</b>	<b>Material Falsehood</b>
12	August 9, 2018	<b>SULLIVAN VICKERS</b>	ATF Form 6	Submitted to ATF with false law letter relating to an APC40 machinegun and an APC9KSD machinegun.
13	January 27, 2019	<b>SULLIVAN</b>	ATF Form 6A	Submitted to ATF with false statement indicating two (2) San-Swiss SG550P pistols were imported when in fact the firearms were STG90 machineguns.
14	Aug 10, 2019	<b>SULLIVAN VICKERS</b>	ATF Form 6	Submitted to ATF with false law letter relating to one FN (Herstal) FN/FAL machinegun.
15	October 7, 2019	<b>SULLIVAN VICKERS</b>	ATF Form 6	Submitted to ATF with false dealer sales sample (demonstration) letter relating an FN (Herstal) MAG58 machinegun.
16	July 19, 2020	<b>SULLIVAN</b>	ATF Form 6A	Submitted to ATF with statement indicating a H&K G28 "standard length" rifle was imported when in fact the firearm was a H&K MR308 rifle
17	Nov 30, 2019	<b>SULLIVAN TAFOYA</b>	ATF Form 6	Submitted to ATF with false dealer sales sample (demonstration) letter relating a GIAT Industries FAMAS machinegun.
18	July 19, 2020	<b>SULLIVAN</b>	ATF Form 6A	Submitted to ATF with false statement indicating that fifteen (15) San Swiss PE90P pistols were imported, with the one having sn 130171 marked as an SG551P when it was actually an SIG 550-1 Sniper Rifle

<b>Count</b>	<b>Date</b>	<b>Defendant(s)</b>	<b>Document</b>	<b>Material Falsehood</b>
19	July 22, 2020	<b>SULLIVAN TAFOYA</b>	ATF Form 6	Submitted to ATF with false dealer sales sample (demonstration) letter relating to two, Glock 18 "Submachineguns", Cal. 9mm; two Glock 18C "Submachineguns", Cal. 9mm; two Glock, G18C Gen 4, "Submachineguns", Cal. 9mm; two Glock, G18 Gen 4, "Submachineguns", Cal. 9mm; two Glock, G18C Gen 5, "Submachineguns", Cal. 9mm; and two Glock, G18 Gen 5, "Submachineguns", Cal. 9mm.

18 U.S.C. § 924(a)(1)(A)

18 U.S.C. § 2

**COUNTS TWENTY THROUGH TWENTY-FOUR**  
**(False Statements)**

1. The allegations in paragraphs one through seventeen and nineteen through twenty-eight of Count One are hereby realleged and incorporated by reference herein as though fully set forth in these Counts of the Indictment.

2. On or about the dates indicated below, in the District of Maryland and elsewhere, the defendants, as indicated, did knowingly and willfully make and cause to be made, and used and caused to be used, in a matter within the jurisdiction of the ATF, false writings and documents, relating to the acquisition of regulated NFA and CGA firearms:

<b>Count</b>	<b>Date</b>	<b>Defendant(s)</b>	<b>Document</b>	<b>Material Falsehood</b>
20	August 9, 2019	<b>SULLIVAN VICKERS &amp; SAWYER</b>	ATF Form 6 with attachment	Submitted to ATF with false law letter relating to an APC40 machinegun and an APC9KSD machinegun.
21	Oct 7, 2019	<b>SULLIVAN VICKERS &amp; HALL</b>	ATF Form 6 with attachment	Submitted to ATF with false law letter relating FN (Herstal) MAG58 machinegun.
22	Nov 30, 2019	<b>SULLIVAN TAFOYA</b>	ATF Form 6 with attachments	Submitted to ATF with false law letters relating to Giat Industries FAMAS machinegun.
23	July 22, 2020	<b>SULLIVAN TAFOYA</b>	ATF Form 6 with attachments	Submitted to ATF with false law letters relating to two Glock 18 "Submachineguns", Cal. 9mm; two Glock 18C "Submachineguns", Cal. 9mm; two Glock, G18C Gen 4, "Submachineguns", Cal. 9mm; two Glock, G18 Gen 4, "Submachineguns", Cal. 9mm; two Glock, G18C Gen 5, "Submachineguns", Cal. 9mm; and two Glock, G18 Gen 5, "Submachineguns", Cal. 9mm.
24	Aug 10, 2019	<b>SULLIVAN VICKERS &amp; HALL</b>	ATF Form 6 with attachment	Submitted to ATF with false law letters relating to one FN (Herstal) FN/FAL machinegun.

18 U.S.C. § 1001  
18 U.S.C. § 2

**COUNT TWENTY-FIVE**  
**(Unlawful Possession of Unregistered Machineguns)**

1. The allegations in paragraphs one through seventeen and nineteen through twenty-eight of Count One are hereby realleged and incorporated by reference herein as though fully set forth in this Count of the Indictment.

2. On or about March 30, 2021, in the District of Maryland, the defendant,

**SEAN REIDPATH SULLIVAN,**

did knowingly and unlawfully possess machineguns, to wit:

- a. one San Swiss Arms STG90 (Sturmgewehr 90) machinegun, serial number A2116346;
- b. one Heckler & Koch MP5SD 9mm machinegun, serial number 5235;
- c. one B&T APC9 9mm machinegun, serial number US 16-20859; and
- d. one B&T APC9-SD 9mm machinegun, serial number US 18-25032.

18 U.S.C. § 922(o)

**COUNT TWENTY-SIX**  
**(Conducting Transactions in Criminally Derived Proceeds)**

1. The allegations in paragraphs one through seventeen and nineteen through twenty-eight of Count One are hereby realleged and incorporated by reference herein as though fully set forth in this Count of the Indictment.

2. On or about July 24, 2020, in the District of Maryland and elsewhere, the defendant,

**SEAN REIDPATH SULLIVAN,**

did knowingly engage and attempt to engage in a monetary transaction, by, through and to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, that is the transfer of \$128,667.39 from the Trident Rifles, LLC, Wells Fargo Account ending in 6051, Portland, Oregon, to the Trident LLC/Sean R. Sullivan American Express Account ending 9-11001, Newark, New Jersey, such property being derived from a specified unlawful activity, that is, unlawful importation of firearms in violation of 18 U.S.C. § 922(l).

18 U.S.C. § 1957

**FORFEITURE**

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 924(d), 981(a)(1)(C) and 982, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of a defendant's conviction of any of the offenses charged in Counts One through Twenty-Six of the Indictment.

**Firearms Forfeiture**

2. Upon conviction of any of the offenses charged in Counts One through Twenty-Six, the defendants,

**SEAN REIDPATH SULLIVAN,  
LARRY ALLEN VICKERS,  
JAMES CHRISTOPHER TAFOYA,  
MATTHEW JEREMY HALL, and  
JAMES SAWYER,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms or ammunition involved in the offenses.

**Unlawful Importation Forfeiture**

3. Upon conviction of any of the offenses charged in Counts One through Eleven, the defendants,

**SEAN REIDPATH SULLIVAN,  
LARRY ALLEN VICKERS, and  
JAMES TAFOYA**

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense(s) of conviction.

**Money Laundering Forfeiture**

4. Upon conviction of the offense alleged in Count Twenty-Six, the defendant,

**SEAN REIDPATH SULLIVAN,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.

**Property Subject to Forfeiture**

5. The property to be forfeited includes, but is not limited to, the following:

1. Heckler & Koch MR308 rifle sn 144-006259;
2. B&T AP9KSD machinegun, sn US18-28612;
3. B&T APC40 machinegun sn US19-33205;
4. CG-Haenel CR 223 Short Barrel Rifle sn CR004170;
5. CG-Haenel CR 308 Short Barrel Rifle sn CR3-000597;
6. FN (Herstal) MAG58 sn 20622;
7. Glock 18 machinegun sn YYK020;
8. Glock 18C machinegun sn SSS847;
9. Glock G18 Gen 4 machinegun sn YYK022;
10. Glock G18 Gen 5 machinegun sn YYK023;
11. Glock G18C Gen 5 machinegun sn BLWU990;
12. FN/FAL machinegun sn 63700;
13. Zastava firearm, 7.62cal, sn B74515;
14. Zastava Firearm, 7.62cal, sn 10800;
15. Del-Ton Inc DTI-15 Firearm, 5.56cal, sn DTI-S013569;
16. POF USA model P-416 Firearm, .223cal, sn 09-12190;
17. DNT Arms Firearm, unknown cal., sn 1105;
18. Colt M16 A2 Commando Firearm, 5.56cal, sn A0156342;
19. DMPS M-160 Firearm, unknown cal., sn M002417;
20. Sig Sauer MPX Firearm, cal. 9mm, sn 62B056200;
21. FN P90 Firearm, cal. 5.7mm, sn FN026190;
22. Springfield M14 Firearm, unknown cal., sn 62026298;
23. Springfield M14 Firearm (receiver), unknown cal., sn 64008204;
24. SN Romarn SAR 1 Firearm, 7.62cal, sn S1-26860-2000;
25. Rockriver LAR 15 Firearm, unknown cal., sn CM75742;
26. CMMG Banshee Firearm, cal. 5.7mm, sn BFT00575;
27. Magva Industries Mini-Beryl Firearm, unknown cal., sn JA00030;
28. Auto-Ordnance 1928 A1 Thompson Firearm, .45cal., sn A0-65971;
29. PLF SF70 Firearm, unknown cal., sn 042279;
30. FN SCAR 17 Firearm, 7.62cal., sn H011941;
31. H&K, MP5 Firearm, cal. 9mm., sn 337831;

32. H&K MP5 Firearm, cal. 9mm., sn 62-378766;
33. Steyr Firearm, unknown cal., sn 41638;
34. Springfield Armory Uzi, cal. 9mm, sn 8143803;
35. Colt SMG, Cal. 9mm, sn HT008693;
36. Sig Sauer model SG551 firearm, .223cal., sn 411024;
37. H&K UMP Firearm, unknown cal., sn 162-002576;
38. Kriss Vector FIREARM, sn 455000380;
39. H&K UMP Firearm, unknown cal., sn 162-004123;
40. H&K MP5 Firearm, cal. 9mm, sn 62-410318;
41. Importer Collectors Corner Steyr model MG74, cal. 7.62, sn 125379;
42. H&K MP5 Firearm, cal. 9mm., sn 62-410317;
43. Stag Arms, Stag 16 Firearm, unknown cal., sn 44590;
44. Unknown Manufacturer, M72 AB-1 Firearm, unknown cal., sn 15058;
45. Taylor Mark 2 Firearm, unknown cal., sn BT14;
46. Colt M16A2 Firearm, 5.56cal., sn A0141619;
47. Bushmaster, XM15 Firearm, .223 cal., sn L418424;
48. Bushmaster, XM15 Firearm, .223cal., sn L229989;
49. Century Arms, Cetme Firearm, unknown cal., sn 222460;
50. Century Arms, Cetme Firearm, unknown cal., sn 222459;
51. Vector Arms, Uzi, unknown cal., sn 500127;
52. IMI, Uzi, unknown cal., sn 114106;
53. IMI, Uzi, cal. 9mm, sn 114105;
54. PKM Firearm, unknown cal., sn 10839;
55. Unknown Manufacturer, M60 Firearm, unknown cal., sn 7269203;
56. H&K, G36C Firearm, cal. 5.56mm, sn 85-000279;
57. Vulcan Arms, Model V47, cal. 7.62, sn K002578;
58. Stag Arms, Stag 16 Firearm, unknown cal., sn 44589;
59. H&K G36K, cal. 5.56mm, sn 84-1017;
60. Unknown Manufacturer, AK-style Firearm, unknown cal., sn LZ3842;
61. H&K, G36K Firearm, cal. 5.56mm, sn 84-1425;
62. FN, SCAR 17 Firearm, cal. 7.62, sn H011937;
63. Unknown Manufacturer, MG42 Firearm, unknown cal., sn 0-46947;
64. Wise Little Arms, RPDS Firearm, cal. 7.62, sn WLA29-D00125;
65. Unknown Manufacturer, MG42 Firearm, unknown cal., sn 2153D;
66. Unknown Manufacturer, MG42 Firearm, unknown cal., sn RAA9848;
67. SWD Inc, M11/9 Firearm, cal. 9mm, sn 89-0006317;
68. Browning, M1919 A4 Firearm, unknown cal., sn 00001;
69. Night Hawk FA, Mac 10 FIREARM, unknown cal., sn NF00649;
70. Night Hawk FA, Mac 10 FIREARM, unknown cal., sn NF00650;
71. Military Armament Corp Cobray, M11 Firearm, cal. 9mm, sn 94-0055080;
72. FN, P90 FIREARM, cal. 5.7mm, sn FN028991;
73. Famae Chile, SAF200 Firearm, unknown cal., sn 00094;
74. Famae Chile, MiniSAF, unknown cal., sn 01561;



75. CZ USA, Bren 2 Firearm, unknown cal., sn D089387;
76. American Spirit Arms, ASA15 Firearm, unknown cal., sn AS14310;
77. Glock, Model 18 pistol, cal. 9mm, sn YYK020;
78. B&T AG, TP9 Firearm, cal. 9mm, sn 07-10944;
79. Beretta, 12S Firearm, unknown cal., sn F38194;
80. B&T AG, APC-G, cal. 9mm, sn 20-35623;
81. Famae Chile, SG543-10 Firearm, unknown cal., sn 06707;
82. Famae Chile, SG542-17 Firearm, unknown cal., sn 09508;
83. Defiance, HPS4GSK Silencer, .45cal, sn ACPD13A000332;
84. Famae Chile, SG540 Firearm, unknown cal., sn 06584;
85. Famae Chile, SG542 Firearm, unknown cal., sn 09523;
86. Famae Chile, SG540 Firearm, unknown cal., sn 06592;
87. CZ USA, Scorpion Firearm, unknown cal., sn B482229;
88. Kriss USA, Kriss Vector Firearm, .45cal., sn 455000893;
89. CZ USA, 805 Bren Firearm, unknown cal., sn B441552;
90. CZ USA, 805 Bren Firearm, unknown cal., sn B151953;
91. Ohio Ordnance, M249 Firearm, cal. 5.56mm, sn 251061;
92. Ohio Ordnance, M240 Firearm, cal. 7.62mm, sn 707938;
93. H&K, SDMP7 Silencer, cal. 4.6mm, sn 984697;
94. H&K, Silencer, unknown cal., sn 001146;
95. H&K MP5 SD Silencer, cal. 9mm, Silencer, 001060;
96. Advanced Armament, UMP 4500 Defender Silencer, .45cal., sn UMP-4500;
97. H&K MP7 SD Rotex-II Silencer, cal. 4.6mm, sn 984697;
98. SCRC, MK25 Silencer, Cal. 9mm, sn S-0643;
99. BGW, GBC Silencer, unknown cal., sn S5858;
100. Glock 35 Firearm, .40cal., sn DDE512US;
101. Glock, 18 Pistol, cal. 9mm, sn DU186US;
102. Double Star Corp, Star 16 Firearm, unknown cal., sn DSCM1301;
103. Silencer Co, Salvo 12 Silencer, cal. 12-gauge, sn SAL12-8834;
104. Silencer Co, Omega 45K Silencer, .45ACP cal., sn OMG45K-1100;
105. Hunteertown ArmsKestrel Silencer, cal. 7.62mm, sn K7AK440;
106. Silencer Co, 22 Sparrow Silencer, .22cal., sn SP536210;
107. Silencer Co, Omega Silencer, .300cal., sn OMG61549;
108. German Sports Gun, GSG-5 Firearm, .22cal., sn A285187;
109. Silencer Co, Omega Silencer, unknown cal., sn OMG9K14231;
110. Maadi, AK-style Firearm, unknown cal., sn ES21215;
111. L&L Machineguns, PPSH Firearm, unknown cal., sn 0016;
112. DSA, SA 58 Firearm, .308cal., sn DSA20787;
113. CZ, VZ58 Firearm, cal. 7.62mm, sn T63659;
114. CMMG, MOD4SA Firearm, .223cal., sn SA0663;
115. FMP, H&K G3 Firearm, cal. 7.62mm, sn 397205;
116. Miltech, FAL L1A1 Firearm, unknown cal., sn 11509;
117. DPMS, A15 Firearm, unknown cal., sn F038936K;

118. Bushmaster, XM15 Firearm, .223cal., sn L147341;
119. DSA, RPDS Firearm, unknown cal., sn 10227;
120. Colt, AR15A4 Firearm, sn CAR018390 / Remington 870, cal. 12-gauge, sn AB021186M;
121. Sound Tech, Cobra Silencer, cal. 9mm, SN C9-1023;
122. Sig Sauer, P556 Firearm, cal. 5.56mm, sn TP004533;
123. Daewoo, USAS12 Shotgun, 12-gauge, sn 1000054;
124. CZ, Scorpion Firearm, cal. 9mm, sn C871477;
125. H&K, MP5 Firearm, cal. 9mm., sn 62-410307;
126. Unknown Manufacturer, Galil Firearm, unknown cal., sn 226851;
127. Zastava, AK-style Firearm, unknown cal., sn B26112;
128. Charter Industry, Mark 2 Firearm, unknown cal., sn 0040;
129. Famae Chile, SG540 Firearm, unknown cal., sn 06583;
130. Trident Arms, AK-type Firearm, unknown cal., sn 87053017;
131. Ohio Ordnance, M249 Firearm, cal. 5.56mm, sn 251062;
132. Glock, 18C pistol, cal. 9mm, sn BLWV990;
133. Cobray, M11 Firearm, unknown cal., sn 89-0005252;
134. Kriss USA, Kriss Vector Firearm, .45cal., sn 45S000229;
135. H&K, MP5SD FIREARM, cal. 9mm., sn 63101762;
136. Colt, M16A2 Firearm, cal. 5.56mm, sn 8091262;
137. Sig Sauer, MPX Firearm, cal. 9mm, sn 62B056198;
138. H&K, UMP Firearm, unknown cal., sn 163001395;
139. Famae Chile, MiniSAF Firearm, unknown cal., sn 01647;
140. Famae Chile, SAF200, unknown cal., sn 00093;
141. Double Star Corp, Star 16 Firearm, .223cal, DSCM1304;
142. Colt SMG Firearm, cal. 9mm, sn HT008045;
143. H&K, MP5 Firearm, cal. 9mm., sn 69-1713;
144. Sig Sauer, SG553 Firearm, cal. 5.56mm, sn 162792;
145. Ruger, Mini-14 Firearm, .223cal., sn 19201259;
146. Famae Chile, SG542 Firearm, unknown cal., sn 09513;
147. Ruger, Uzi-style Firearm, unknown cal., sn 45000507;
148. Ohio Ordnance, M249 Firearm, cal. 5.56mm, sn 251084;
149. H&K, MP5 Firearm, cal. 9mm., sn 62410315;
150. Famae Chile, SG540 Firearm, unknown cal., sn 06582;
151. H&K, G41 Firearm, cal. 5.56mm, sn 11141;
152. Famae Chile, SG542, unknown cal., sn 09522;
153. CZ, 805 Bren Firearm, unknown cal., sn B441037;
154. Famae Chile, SG543 Firearm, unknown cal., sn 06703;
155. Sig Sauer, MPX Firearm, cal. 9mm, sn 62B056199;
156. FN, M249 Firearm, cal. 5.56mm, sn 127;
157. Famae Chile, SG540 Firearm, unknown cal., sn 06595;
158. Beretta, Pietro SPA, Cal. 9mm, sn F38231;
159. CZ, VZ61 Skorpion Firearm, unknown cal., sn 21506;

160. FEG, AK-style Firearm, unknown cal., sn A184067;
161. BCI Defense, SQ515 Firearm, multi-cal., sn BCI09274;
162. H&K, MP5 Firearm, cal. 9mm., sn 62410306;
163. DSA, SA 58 Firearm, cal. 7.62mm, sn D525798;
164. EBR, Chassis Stock Firearm, Springfield M1A, unknown cal., sn 283772;
165. Silencer Co, OSPM Silencer, unknown cal., sn OSPM9636;
166. Silencer CO, Specwar Silencer, cal. 7.62mm, sn SW762-8072;
167. Ruger, Silent SR. Silencer, unknown cal., sn 90004299;
168. WHM, Nitro Silencer, .30cal., sn N-01331;
169. Dead Air, Wolverine PBS-1 Silencer, unknown cal., sn AK-00213;
170. GemTech, Outback 2 Silencer, .22LR cal., sn S10-38299;
171. GemTech, Trek Silencer, unknown cal., sn S10-39034;
172. Tactical Solutions, Cascade Silencer, unknown cal., sn TSS12-05002;
173. Silencer Co, Osprey Micro Silencer, .22LR cal., sn OSPM-9635;
174. B&T, MP5/APC Firearm, cal. 9mm, sn SD988100-US;
175. GemTech, HVT2 Silencer, cal. 7.62mm, sn S08-28261;
176. GemTech, Quicksand Silencer, unknown cal., sn S10-39211;
177. Xcalibur Firearms, Genesis Silencer, .22LR cal., sn 101101Micro;
178. GemTech, Halo Silencer, unknown cal., sn S10-38722;
179. Surefire, SF Ryder 9TI Silencer, unknown cal., sn A56N02959;
180. Erector Silencer, .22LR cal., sn FA0765;
181. Elite Iron, Bravo Silencer, .30cal., sn B0526;
182. YHM, Nitro Silencer, .30cal., sn N00157;
183. Landry Guns, Sten2 Firearm, unknown cal., sn 005;
184. Colt, M4 Firearm, cal. 5.56mm, sn LE025864;
185. B&T, APC9 Firearm, cal. 9mm, sn 2035621;
186. Famae Chile, SAF200 Firearm, unknown cal., sn 00086;
187. LMT, Grenade Launcher, cal. 40mm, sn LM500744;
188. FN, FAL L1A1 Firearm, cal. 7.62mm, sn A109539;
189. LMT, LT15 Firearm, sn E1181 / LMT 40mm Grenade Launcher, sn LM100806;
190. CZ, VZ 58A1 Firearm, cal. 7.62mm, sn 66370;
191. FN, SCAR 16 Firearm, cal. 5.56mm, sn L013727;
192. FN, P90 Firearm, cal. 5.7mm, sn FN098106;
193. Colt, M16A2 Commando Firearm, cal. 5.56mm, sn A0156370;
194. Colt, AR15A4 Firearm, cal. 5.56mm, sn CAR018508;
195. FN, SCAR 17 Firearm, cal. 7.62, sn H011938;
196. Colt SMG Firearm, cal. 9mm, sn HT009913;
197. LaFrance, Colt Silencer, cal. 9mm, 0615RC;
198. H&K, MP5 Firearm, cal. 9mm., sn 62410314;
199. Daewoo, USAS12 shotgun, cal. 12-gauge, sn 1000095FA;
200. Unknown Manufacturer, AK-style Firearm, unknown cal., sn EG1918;
201. Famae Chile, SG542 Firearm, unknown cal., sn 09516;
202. Cobray, M11 Firearm, unknown cal., sn 940051288;

203. H&K, UMP Firearm, unknown cal., sn 162001047;
204. Colt, M4/M16A2, cal. 5.56mm, sn A0103321;
205. H&K, MP5/40 Firearm, .40cal., sn 691969;
206. Zastava, M70A8 Firearm, cal. 7.62mm, sn B114936;
207. Glock, 18C Pistol, cal. 9mm, sn YYK023;
208. CZ, Bren 2 Firearm, unknown cal., sn C9265574;
209. Famae Chile, SG540 Firearm, unknown cal., sn 06589;
210. Zastava, RPK Firearm, unknown cal., sn C43711;
211. PWS, MK1 Firearm, multi-cal., sn MK1-M100274;
212. Sig Sauer, MPX Firearm, cal. 9mm, sn 62B056166;
213. Ohio Ordnance, M249 Firearm, cal. 5.56mm, sn 251063 &  
2<sup>nd</sup> barreled, sn 251063-2;
214. RIA, M60 Firearm, .308cal., sn 7269203;
215. CZ, VZ58 Firearm, cal. 7.62mm, sn 52074;
216. H&K, MP5/40 Firearm, .40cal., sn 691970;
217. POF USA, P416 Firearm, .223cal., sn 13BC10027;
218. H&K, G36 Firearm, cal. 5.56mm, sn 831032;
219. DSA, FN FAL Firearm, unknown cal., sn 12556955;
220. H&K, G36 Firearm, cal. 5.56mm, sn 84-003149;
221. Colt, M4 Firearm, .223cal., sn A0103320;
222. Springfield Armory, M14 Firearm, unknown cal., sn 63001837;
223. CZ, 805 Bren Firearm, unknown cal., sn B278874;
224. H&K, MP5 Firearm, cal. 9mm., sn 6421884;
225. Kriss USA, Kriss Vector Firearm, .45cal., sn 45S000239;
226. H&K, UMP Firearm, unknown cal., sn 162000441;
227. Springfield Armory, M3 Firearm, unknown cal., sn 642822;
228. Ohio Ordnance, M240 Firearm, cal. 7.62mm, sn 707937 &  
2<sup>nd</sup> Barrel, sn 707937-2;
229. Mag USA, Beryl Firearm, unknown cal., sn SK14604;
230. Unknown Manufacturer, MG42 Firearm, unknown cal., sn 8140;
231. H&K, MP7 Firearm, cal. 4.6mm, sn 164013785;
232. Sig Arms, SG551, .223cal., sn 411025;
233. IMI Israel, U71 Firearm, cal. 9mm, sn 114104;
234. Spike's Tactical, ST15 Firearm, multi-cal., sn 080276;
235. Arsenal, SLR107 UR Firearm, cal. 7.62mm, K0551650;
236. H&K, UMP Firearm, .40cal., sn 162002577;
237. CZ, Scorpion Firearm, cal. 9mm, sn D174824;
238. H&K, MP7 Firearm, cal. 4.6mm, sn 164013788;
239. H&K, MP5 Firearm, cal. 9mm., sn MP5/40, sn 69139;
240. IMI Israel, U71 Firearm, cal. 9mm, sn 111883;
241. H&K, G3 Firearm, cal. 7.62mm, sn 002423;
242. H&K, MP5 Firearm, cal. 9mm., sn 69967;
243. IMI Israel, U71 Firearm, cal. 9mm, sn 8857098;

244. FN, P90 Firearm, cal. 5.7mm, sn FN020112;
245. 50 rounds of M781 ammunition;
246. 4 rounds of M583A1 ammunition;
247. Swiss Arms, SG 553 Firearm, sn 424807, Cal. 5.56;
248. Swiss Arms, SG 553 Firearm, sn 424801, Cal. 5.56;
249. H&K, MP5 Firearm, sn 271-005527, Cal. 9mm;
250. Swiss Arms, SG 553 Firearm, sn 424797, Cal. 5.56;
251. Swiss Arms, SG 553 Firearm, sn 424800, Cal. 5.56;
252. Swiss Arms, SG 553 Firearm, sn 424799, Cal. 5.56;
253. Swiss Arms, SG 553 Firearm, sn 424802, Cal. 5.56;
254. Swiss Arms, SG 553 Firearm, sn 424805, Cal. 5.56;
255. Swiss Arms, SG 553 Firearm, sn 424808, Cal. 5.56;
256. Swiss Arms, SG 553 Firearm, sn 424798, Cal. 5.56;
257. Swiss Arms, SG 553 Firearm, sn 424804, Cal. 5.56;
258. Swiss Arms, SG 553 Firearm, sn 424803, Cal. 5.56;
259. Swiss Arms, SG 553 Firearm, sn 424806, Cal. 5.56;
260. H&K, USC 45 Firearm, sn 47-018563, Cal. .45 ACP;
261. H&K, USC 45 Firearm, sn 47-018559, Cal. .45 ACP;
262. H&K, USC 45 Firearm, sn 47-018561, Cal. .45 ACP;
263. H&K, USC 45 Firearm, sn 47-018553, Cal. .45 ACP;
264. H&K, USC 45 Firearm, sn 47-08555, Cal. .45 ACP;
265. H&K, USC 45 Firearm, sn 47-018579, Cal. .45 ACP;
266. H&K, USC 45 Firearm, sn 47-018560, Cal. .45 ACP;
267. H&K, USC 45 Firearm, sn 47-018556, Cal. .45 ACP;
268. H&K, USC 45 Firearm, sn 47-018558, Cal. .45 ACP;
269. H&K, USC 45 Firearm, sn 47-018554, Cal. .45 ACP;
270. Colt, M16A1 Firearm, sn 9384295, Cal. 5.56;
271. H&K, USC 45 Firearm, sn 47-018562, Cal. .45 ACP;
272. Zastava, AK-47 Firearm, sn C-43697, Cal. 7.62;
273. H&K, MR308 Firearm, sn 89-001391, Cal. .308;
274. Colt, AR15 Firearm, sn 728293 (CDS), Cal. .223;
275. Colt, M16A2 Firearm, sn 8192205, Cal. 5.56;
276. Colt, AR15 Firearm, sn 4954363, Cal. .223;
277. Colt, M16 Firearm, sn 10030193, Cal. 5.56;
278. Beretta, AR70 Firearm, sn A01114G, Cal. 5.56;
279. H&K, 33 Firearm, sn 0104, Cal. 5.56;
280. H&K, UMP45 Firearm, sn 163-001598, Cal .45 ACP;
281. Colt, M16A1 Firearm, sn 5205000, Cal. 5.56;
282. H&K, 243 Firearm, sn 247-001101, Cal. .223;
283. H&K, 417 Firearm, sn 89-001687, Cal. 7.62;
284. H&K, 417 Firearm, sn 89-002478, Cal. 7.62;
285. FN, FAL Firearm, sn 704074, Cal. 7.62;
286. H&K, MR308 Firearm, sn 144-007735, Cal. .308;

287. H&K, 417 Firearm, sn 89-001324, Cal. 7.62;
288. FN, FAL Firearm, sn 113452, Cal. 7.62;
289. H&K, 417 Firearm, sn 89-001710, Cal. 7.62;
290. FN, FS2000 Firearm, sn 49843, Cal. 5.56;
291. FN, 40mm grenade launcher, sn 005504, 4;
292. B&T, APC9 Firearm, sn US20-1702, Cal. 9mm;
293. B&T, APC9 Firearm, sn US20-1703, Cal. 9mm;
294. B&T, APC9 Firearm, sn US20-1704, Cal. 9mm;
295. B&T, APC9K Firearm, sn US20-1724, Cal. 9mm;
296. B&T, APC9K Pro Firearm, sn US20-1723, Cal. 9mm;
297. Steyr Arms, AUG/A3 M1 Firearm, sn 3083849, Cal. 5.56;
298. Steyr Arms, AUG/A3 M1 Firearm, sn 3066999, Cal. 5.56;
299. Glock, 18C Firearm, sn BMRU962, Cal. 9mm;
300. Glock, 18C Firearm, sn BMRU965, Cal. 9mm;
301. Century Arms Firearm, RAS47, sn RB11455, Cal. 7.62;
302. International Ordnance Group, Sporter Firearm, sn F42458, Cal. 7.62;
303. Swiss Arms, 751P SAPR Firearm, sn R00870, Cal. 7.62;
304. Glock, G18 Firearm, sn YYK029, Cal. 9mm;
305. Glock, 18C Firearm, sn BLWU989, Cal. 9mm;
306. Glock, G18 Firearm, sn YYK028, Cal. 9mm;
307. Glock, G18 Firearm, sn YYK021, Cal. 9mm;
308. Glock, 18C Firearm, sn BLWU988, Cal. 9mm;
309. Glock, 18C Firearm, sn YFV819, Cal. 9mm;
310. CZ, 61A1 Firearm, sn B1898, Cal. .380 ACP;
311. T. Barker, Unknown Model Firearm, unknown cal., sn 920;
312. B&T, TP380 Firearm, sn SS09041985, Cal. .380 auto;
313. H&K, MP5 Firearm, sn 5235, Cal. 9mm;
314. Sig Sauer, PE Firearm, sn 9652, Cal. 5.56;
315. Sig Sauer, 550-1 Firearm, sn 183531, Cal. 5.56;
316. H&K, MR308 Firearm, sn 144-007633, Cal. .308;
317. B&T, APC9 Firearm, sn US19-28054, Cal. 9mm;
318. Sig Sauer, STG90 Firearm, sn A2116346, Cal. 5.56;
319. B&T, APC9 Firearm, sn US20-10358A, Cal. 9mm;
320. B&T, APC45 Firearm, sn US18-21393, Cal. .45 auto;
321. B&T, APC9K Firearm, sn US20-10359A, Cal. 9mm;
322. B&T, APC45 Firearm, sn US18-22139, Cal. .45 auto;
323. H&K, MP5K Firearm, sn 64-33626, Cal. 9mm;
324. B&T, APC9K Firearm, sn US20-10360A, Cal. 9mm;
325. B&T, APC9 Firearm, sn US20-10356A, Cal. 9mm;
326. H&K, 417 Firearm, sn 89-001392, Cal. 7.62;
327. B&T, APC9K Firearm, sn US20-10357A, Cal. 9mm;
328. B&T, APC9 Firearm, sn US18-25032, Cal. 9mm;
329. B&T, APC9 Firearm, sn US16-20859, Cal. 9mm;

- 330. B&T, GL-06 grenade launcher, sn US18-28655X;
- 331. B&T, Silencer, sn 18-53374;
- 332. B&T, Silencer, sn 18-53376;
- 333. B&T, Silencer, sn 18-53375;
- 334. B&T, Silencer, sn 18-53377;
- 335. B&T, Silencer, sn US18-28045.


**Substitute Assets**

6. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants,

- a. cannot be located upon the exercise of diligence;
- b. has been transferred, or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 924(d)  
18 U.S.C. § 981(a)(1)(C)  
18 U.S.C. § 982  
21 U.S.C. § 853(p)  
28 U.S.C. § 2461(c)

  
Erik L. Barron  
United States Attorney

A TRUE BILL

**SIGNATURE REDACTED**

Foreperson

Date: 7/27/23