

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

May 19 20 22  
Ravi Subramanian, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT ~~SEATTLE~~ **TACOMA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
JOAO RICARDO DEBORBA,  
Defendant.

NO. **CR22-5139 DGE**  
INDICTMENT

The Grand Jury charges that:

COUNT 1

**(Unlawful Possession of Firearms and Ammunition)**

On or about May 6, 2022, in Clark County, within the Western District of Washington, JOAO RICARDO DEBORBA, knowing he was an alien illegally and unlawfully in the United States and admitted to the United States under a nonimmigrant visa, and subject to a court order meeting the requirements of Title 18, United States Code, Section 922(g)(8)(A)-(C), that is, the Domestic Violence No Contact Order issued on or about October 14, 2020, in the Superior Court of the State of Washington, County of Clark, case number 2020-1-01294-06, did knowingly possess, in and affecting interstate and foreign commerce, firearms and ammunition: a Ruger model LCP 9mm caliber handgun and numerous rounds of ammunition including Aguila .300 AAC

1 blackout and Blazer Brass .380 auto, which had been shipped and transported in interstate  
2 and foreign commerce.

3 All in violation of Title 18, United States Code, Sections 922(g)(5) and (8).

4 **COUNT 2**

5 **(Unlawful Possession of Firearms and Ammunition)**

6 On or about November 16, 2019, in Clark County, within the Western District of  
7 Washington, JOAO RICARDO DEBORBA, knowing he was an alien illegally and  
8 unlawfully in the United States and admitted to the United States under a nonimmigrant  
9 visa, and subject to a court order meeting the requirements of Title 18, United States  
10 Code, Section 922(g)(8)(A)-(C), that is, the Domestic Violence No Contact Order issued  
11 on or about November 14, 2019, in the District Court of the State of Washington, County  
12 of Clark, case number 9Z1074494, did knowingly possess, in and affecting interstate and  
13 foreign commerce, firearms and ammunition:

- 14 a Savage Arms model M11 .308 caliber rifle;
- 15 a Sig Sauer model 1911 STX .45 auto caliber handgun;
- 16 a KelTec model Sub-2000 .40 caliber rifle;
- 17 a Century Arms model RAS47 7.62 caliber rifle;
- 18 a Rock Island Armory model M200 .38 special caliber handgun;
- 19 a Tanfoglio model GT27 .25 ACP caliber handgun;
- 20 a Sig Sauer model P226 9mm caliber handgun;
- 21 a KelTec model P-32 .32 ACP caliber handgun;
- 22 a Taurus.357 magnum caliber handgun;
- 23 a Rock Island Armory model M1911 .380 caliber handgun;
- 24 a Ruger model Precision .17 HMR caliber rifle;
- 25 a Bear Creek Arsenal model BCA15 rifle;
- 26 a Savage Arms model 110 .338 caliber rifle;
- 27 a Fabrique Nationale Herstal model 1952 rifle;
- 28 a .308 caliber 1917 Enfield rifle;

1 a Deutsche Waffen model 1908 7mm caliber rifle;  
2 a Remington model 870 12-gauge shotgun;  
3 a Spike's Tactical model ST15 5.56mm caliber rifle;  
4 a Winchester model 94 .30-30 caliber rifle,  
5 20 rounds of CBC 9mm caliber ammunition; and  
6 7 rounds of Blazer Brass .380 caliber ammunition.

7 All in violation of Title 18, United States Code, Sections 922(g)(5), (8).

8 **COUNT 3**

9 **(Unlawful Possession of a Firearm)**

10 On or about April 14, 2019, in Clark County, within the Western District of  
11 Washington, JOAO RICARDO DEBORBA, knowing he was an alien illegally and  
12 unlawfully in the United States and admitted to the United States under a nonimmigrant  
13 visa, did knowingly possess, in and affecting interstate and foreign commerce, a firearm:  
14 a Glock model 26 9mm caliber handgun, that had been shipped or transported in  
15 interstate and foreign commerce.

16 All in violation of Title 18, United States Code, Section 922(g)(5).

17 **COUNT 4**

18 **(False Statement During Purchase of Firearm)**

19 On or about May 8, 2019, in Clark County, within the Western District of  
20 Washington, JOAO RICARDO DEBORBA, in connection with the acquisition of a  
21 firearm from a licensed dealer of firearms, that is, the acquisition of a Rock Island  
22 Armory model M200 .38 special caliber handgun, from Brass Tacks Munitions in  
23 Vancouver, Washington, knowingly made false and fictitious written statements, which  
24 statements were intended to and likely to deceive such dealer with respect to a fact  
25 material to the lawfulness of the sale the firearm under Chapter 44 of Title 18, United  
26 States Code, in that defendant executed and submitted to the licensed dealer a Bureau of  
27 Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, in  
28 which defendant falsely represented himself to be a citizen of the United States of

1 | America, and falsely represented himself not to be an alien illegally or unlawfully in the  
2 | United States, and falsely represented himself not to be an alien who has been admitted to  
3 | the United States under a nonimmigrant visa.

4 | All in violation of Title 18, United States Code, Section 922(a)(6).

5 | **COUNT 5**

6 | **(False Statement During Purchase of Firearm)**

7 | On or about April 4, 2019, in Clark County, within the Western District of  
8 | Washington, JOAO RICARDO DEBORBA, in connection with the acquisition of a  
9 | firearm from a licensed dealer of firearms, that is, the acquisition of Sig Sauer  
10 | model 1911 STX .45 auto caliber handgun, from a Cabela's store in Lacey, Washington,  
11 | knowingly made false and fictitious written statements, which statements were intended  
12 | to and likely to deceive such dealer with respect to a fact material to the lawfulness of the  
13 | sale the firearm under Chapter 44 of Title 18, United States Code, in that defendant  
14 | executed and submitted to the licensed dealer a Bureau of Alcohol, Tobacco, Firearms  
15 | and Explosives Form 4473 Firearms Transaction Record, in which defendant falsely  
16 | represented himself to be a citizen of the United States of America, and falsely  
17 | represented himself not to be an alien illegally or unlawfully in the United States, and  
18 | falsely represented himself not to be an alien who has been admitted to the United States  
19 | under a nonimmigrant visa.

20 | All in violation of Title 18, United States Code, Section 922(a)(6).

21 | **COUNT 6**

22 | **(False Claim to United States Citizenship)**

23 | On or about February 25, 2019, within the Western District of Washington, JOAO  
24 | RICARDO DEBORBA, a citizen of Brazil and therefore an alien in the United States,  
25 | falsely and willfully represented himself to be a citizen of the United States in a  
26 | Concealed Pistol License Application to the Washington State Department of Licensing,  
27 | an entity having good reason to inquire into defendant's citizenship.

28 | All in violation of Title 18, United States Code, Section 911.



1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
2 any act or omission of the defendants,

- 3 a. cannot be located upon the exercise of due diligence;
- 4 b. has been transferred or sold to, or deposited with a third party;
- 5 c. has been placed beyond the jurisdiction of the Court;
- 6 d. has been substantially diminished in value; or,
- 7 e. has been commingled with other property which cannot be divided  
8 without difficulty;

9 it is the intent of the United States to seek the forfeiture of any other property of the  
10 defendant, up to the value of the above-described forfeitable property, pursuant to  
11 Title 21, United States Code, Section 853(p).

12 A TRUE BILL:

13 DATED: 19 May 2022

14 *Signature of Foreperson redacted pursuant*  
15 *to the policy of the Judicial Conference of*  
16 *the United States.*

17 \_\_\_\_\_  
18 FOREPERSON

19   
20 \_\_\_\_\_  
21 NICHOLAS W. BROWN  
22 United States Attorney

23   
24 \_\_\_\_\_  
25 VINCENT T. LOMBARDI  
26 Assistant United States Attorney

27   
28 \_\_\_\_\_  
29 MAX B. SHINER  
30 Assistant United States Attorney