UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

-FILED-
JAN 10 2024
At ____ M
Chanda J. Berta, Clerk
U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA

UNITED STATES OF AMERICA	)	**INDICTMENT**
	)	(Six Counts)
	)	
v.	)	Case No.: 3:24-cr-4
	)	
	)	
	)	18 U.S.C. § 922(a)(6)
JESSICA ROBINSON	)	18 U.S.C. § 924(a)(1)(A)

THE GRAND JURY CHARGES:

COUNT 1

On or about January 9, 2021, in the Northern District of Indiana,

JESSICA ROBINSON,

defendant herein, in connection with the acquisition of a firearm from Midwest Gun Exchange, a licensed firearms dealer, knowingly made a false and fictitious statement to Midwest Gun Exchange that was intended and likely to deceive Midwest Gun Exchange as to a fact material to the lawfulness of the acquisition of the firearm, in that the defendant executed a Department of Justice Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record to the effect that the defendant was not an unlawful user of, or addicted to, marijuana or other controlled substances when in fact she was an unlawful user.

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

THE GRAND JURY FURTHER CHARGES:

COUNT 2

On or about January 9, 2021, in the Northern District of Indiana,

JESSICA ROBINSON,

defendant herein, knowingly made a false statement and representation to Midwest Gun Exchange, a licensed firearms dealer, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Midwest Gun Exchange, in that the defendant executed a Department of Justice Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record to the effect that the defendant was not an unlawful user of, or addicted to, marijuana or other controlled substances when in fact she was an unlawful user.

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

THE GRAND JURY FURTHER CHARGES:

COUNT 3

On or about January 31, 2021, in the Northern District of Indiana,

JESSICA ROBINSON,

defendant herein, in connection with the acquisition of a firearm from Midwest Gun Exchange, a licensed firearms dealer, knowingly made a false and fictitious statement to Midwest Gun Exchange that was intended and likely to deceive Midwest Gun Exchange as to a fact material to the lawfulness of the acquisition of the firearm, in that the defendant executed a Department of Justice Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record to the effect that the defendant was not an unlawful user of, or addicted to, marijuana or other controlled substances when in fact she was an unlawful user.

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

THE GRAND JURY FURTHER CHARGES:

COUNT 4

On or about January 31, 2021, in the Northern District of Indiana,

JESSICA ROBINSON,

defendant herein, knowingly made a false statement and representation to Midwest Gun Exchange, a licensed firearms dealer, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Midwest Gun Exchange, in that the defendant executed a Department of Justice Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record to the effect that the defendant was not an unlawful user of, or addicted to, marijuana or other controlled substances when in fact she was an unlawful user.

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

THE GRAND JURY FURTHER CHARGES:

COUNT 5

On or about June 5, 2021, in the Northern District of Indiana,

JESSICA ROBINSON,

defendant herein, in connection with the acquisition of a firearm from Midwest Gun Exchange, a licensed firearms dealer, knowingly made a false and fictitious statement to Midwest Gun Exchange that was intended and likely to deceive Midwest Gun Exchange as to a fact material to the lawfulness of the acquisition of the firearm, in that the defendant executed a Department of Justice Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record to the effect that the defendant was the actual transferee/buyer of the firearm when in fact she was not the actual transferee/buyer, and to the effect that the defendant was not an unlawful user of, or addicted to, marijuana or other controlled substances when in fact she was an unlawful user.

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

THE GRAND JURY FURTHER CHARGES:

COUNT 6

On or about June 5, 2021, in the Northern District of Indiana,

JESSICA ROBINSON,

defendant herein, knowingly made a false statement and representation to Midwest Gun Exchange, a licensed firearms dealer, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Midwest Gun Exchange, in that the defendant executed a Department of Justice Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record to the effect that the defendant was the actual transferee/buyer of the firearm when in fact she was not the actual transferee/buyer, and to the effect that the defendant was not an unlawful user of, or addicted to, marijuana or other controlled substances when in fact she was an unlawful user.

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts 1-6 of the Indictment are hereby realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of any or all of Counts 1-6 of the Indictment, the defendant, **JESSICA ROBINSON**, shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any and all firearms, firearm magazines or clips, and ammunition involved in the commission of the offense.

Dated: January 10, 2024

A TRUE BILL:

s/ Grand Jury Foreperson
Grand Jury Foreperson

APPROVED BY:

CLIFFORD D. JOHNSON
UNITED STATES ATTORNEY

By: *s/ Katelan McKenzie Doyle*
Katelan McKenzie Doyle
Assistant United States Attorney