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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
February 2012 Grand Jury

UNITED STATES OF AMERICA,) CR No. 12-_____
)
Plaintiff,) I N D I C T M E N T
)
v.) [21 U.S.C. §§ 841(a)(1),
) (b)(1)(B)(viii): Distribution
SANDY SIMPRONIO,) of Methamphetamine; 21 U.S.C.
) § 860a: Distribution of
Defendant.) Methamphetamine on Premises
) Where Minor Resides or is
) Present; 18 U.S.C.
) § 922(a)(1)(A): Engaging in
) the Business of Dealing in
) Firearms without a License; 18
) U.S.C. § 922(g)(1): Felon in
) Possession of Firearms]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about February 5, 2010, in Los Angeles County, within the Central District of California, defendant SANDY SIMPRONIO knowingly and intentionally distributed at least five grams, that is, approximately 6.2 grams, of methamphetamine, a Schedule II controlled substance.

JYC:jyc

COUNT TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about February 10, 2010, in Los Angeles County, within the Central District of California, defendant SANDY SIMPRONIO knowingly and intentionally distributed at least five grams, that is, approximately 12.9 grams, of methamphetamine, a Schedule II controlled substance.

COUNT THREE

[21 U.S.C. § 860a]

On or about February 10, 2010, in Los Angeles County, within the Central District of California, defendant SANDY SIMPRONIO knowingly and intentionally distributed approximately 12.9 grams of methamphetamine on premises in which, at that time, an individual who was under the age of 18 years was present and resided.

COUNT FOUR

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about February 25, 2010, in Los Angeles County, within the Central District of California, defendant SANDY SIMPRONIO knowingly and intentionally distributed at least five grams, that is, approximately 27.0 grams, of methamphetamine, a Schedule II controlled substance.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about May 28, 2010, in Los Angeles County, within the Central District of California, defendant SANDY SIMPRONIO knowingly and intentionally distributed at least five grams, that is, approximately 18.9 grams, of methamphetamine, a Schedule II controlled substance.

COUNT SIX

[18 U.S.C. § 922(a)(1)(A)]

From on or about February 10, 2010, through on or about March 25, 2010, in Los Angeles County, within the Central District of California, defendant SANDY SIMPRONIO, not being a licensed importer, licensed manufacturer, and licensed dealer, knowingly and willfully engaged and attempted to engage in the business of dealing in firearms, including by selling the following firearms on or about the following dates:

<u>Date</u>	<u>Firearm</u>
February 10, 2010:	Mossberg model 500A 12-gauge pump-action shotgun, bearing serial number K093349.
February 25, 2010:	Mossberg model 500ATP8S 12-gauge pump-action shotgun, bearing serial number H186949.
March 25, 2010:	Auto Ordnance model 1927-A1 .45 Auto caliber semi-automatic rifle, bearing serial number 11267.

1 Court of the State of California, County of Los Angeles, case
2 number PA016567, on or about April 18, 1994;

3 6. Possession of Drug Paraphernalia, in violation of
4 California Health & Safety Code Section 11364, in the Superior
5 Court of the State of California, County of Los Angeles, case
6 number GA023424, on or about May 8, 1995;

7 7. Possession of Controlled Substance, in violation of
8 California Health & Safety Code Section 11377(A), in the Superior
9 Court of the State of California, County of Los Angeles, case
10 number GA023424, on or about May 8, 1995

11 8. Possession of Controlled Substance, in violation of
12 California Health & Safety Code Section 11377(A), in the Superior
13 Court of the State of California, County of Los Angeles, case
14 number GA030238, on or about December 16, 1996;

15 9. Possession of Controlled Substance for Sale, in
16 violation of California Health & Safety Code Section 11378, in
17 the Superior Court of the State of California, County of Los
18 Angeles, case number BA164037, on or about March 17, 1998.

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COUNT EIGHT

[18 U.S.C. § 922(g)(1)]

On or about February 25, 2010, in Los Angeles County, within the Central District of California, defendant SANDY SIMPRONIO ("SIMPRONIO") knowingly possessed a firearm, namely, a Mossberg model 500ATP8S 12-gauge pump-action shotgun, bearing serial number H186949, in and affecting interstate and foreign commerce.

Such possession occurred after defendant SIMPRONIO had been convicted of at least one of the following felony crimes, each punishable by a term of imprisonment exceeding one year:

1. Sale of Marijuana, in violation of California Health & Safety Code Section 11360(A), in the Superior Court of the State of California, County of Los Angeles, case number A590422, on or about April 24, 1984;

2. Second Degree Burglary, in violation of California Penal Code Section 459, in the Superior Court of the State of California, County of Los Angeles, case number A705153, on or about April 15, 1986;

3. Second Degree Burglary, in violation of California Penal Code Section 459, in the Superior Court of the State of California, County of Los Angeles, case number A592966, on or about October 29, 1987;

4. Menacing, in violation of Colorado Revised Statute Section 18-3-206, F5, in the Superior Court of the State of Colorado, County of Arapahoe, case number 1990CR1021, on or about December 12, 1990;

5. Possession of Controlled Substance, in violation of California Health & Safety Code Section 11377(A), in the Superior

1 Court of the State of California, County of Los Angeles, case
2 number PA016567, on or about April 18, 1994;

3 6. Possession of Drug Paraphernalia, in violation of
4 California Health & Safety Code Section 11364, in the Superior
5 Court of the State of California, County of Los Angeles, case
6 number GA023424, on or about May 8, 1995;

7 7. Possession of Controlled Substance, in violation of
8 California Health & Safety Code Section 11377(A), in the Superior
9 Court of the State of California, County of Los Angeles, case
10 number GA023424, on or about May 8, 1995

11 8. Possession of Controlled Substance, in violation of
12 California Health & Safety Code Section 11377(A), in the Superior
13 Court of the State of California, County of Los Angeles, case
14 number GA030238, on or about December 16, 1996;

15 9. Possession of Controlled Substance for Sale, in
16 violation of California Health & Safety Code Section 11378, in
17 the Superior Court of the State of California, County of Los
18 Angeles, case number BA164037, on or about March 17, 1998.

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1 COUNT NINE

2 [18 U.S.C. § 922(g)(1)]

3 On or about March 25, 2010, in Los Angeles County, within
4 the Central District of California, defendant SANDY SIMPRONIO
5 ("SIMPRONIO") knowingly possessed a firearm, namely, an Auto
6 Ordnance model 1927-A1 .45 Auto caliber semi-automatic rifle,
7 bearing serial number 11267, in and affecting interstate and
8 foreign commerce.

9 Such possession occurred after defendant SIMPRONIO had been
10 convicted of at least one of the following felony crimes, each
11 punishable by a term of imprisonment exceeding one year:

12 1. Sale of Marijuana, in violation of California Health &
13 Safety Code Section 11360(A), in the Superior Court of the State
14 of California, County of Los Angeles, case number A590422, on or
15 about April 24, 1984;

16 2. Second Degree Burglary, in violation of California
17 Penal Code Section 459, in the Superior Court of the State of
18 California, County of Los Angeles, case number A705153, on or
19 about April 15, 1986;

20 3. Second Degree Burglary, in violation of California
21 Penal Code Section 459, in the Superior Court of the State of
22 California, County of Los Angeles, case number A592966, on or
23 about October 29, 1987;

24 4. Menacing, in violation of Colorado Revised Statute
25 Section 18-3-206, F5, in the Superior Court of the State of
26 Colorado, County of Arapahoe, case number 1990CR1021, on or about
27 December 12, 1990;

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1 5. Possession of Controlled Substance, in violation of
2 California Health & Safety Code Section 11377(A), in the Superior
3 Court of the State of California, County of Los Angeles, case
4 number PA016567, on or about April 18, 1994;

5 6. Possession of Drug Paraphernalia, in violation of
6 California Health & Safety Code Section 11364, in the Superior
7 Court of the State of California, County of Los Angeles, case
8 number GA023424, on or about May 8, 1995;

9 7. Possession of Controlled Substance, in violation of
10 California Health & Safety Code Section 11377(A), in the Superior
11 Court of the State of California, County of Los Angeles, case
12 number GA023424, on or about May 8, 1995

13 8. Possession of Controlled Substance, in violation of
14 California Health & Safety Code Section 11377(A), in the Superior
15 Court of the State of California, County of Los Angeles, case
16 number GA030238, on or about December 16, 1996;

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1 9. Possession of Controlled Substance for Sale, in
2 violation of California Health & Safety Code Section 11378, in
3 the Superior Court of the State of California, County of Los
4 Angeles, case number BA164037, on or about March 17, 1998.

5
6 A TRUE BILL

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8 _____
9 Foreperson

10 ANDRÉ BIROTTE JR.
11 United States Attorney

12
13 ROBERT E. DUGDALE
14 Assistant United States Attorney
15 Chief, Criminal Division

16 ELIZABETH R. YANG
17 Assistant United States Attorney
18 Chief, Violent & Organized Crime Section

19 JOEY L. BLANCH
20 Assistant United States Attorney
21 Deputy Chief, Violent & Organized Crime Section

22 JENNIFER Y. CHOU
23 Assistant United States Attorney
24 Violent & Organized Crime Section
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