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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case:2:16-cr-20098  
Judge: Steeh, George Caram  
MJ: Whalen, R. Steven  
Filed: 02-16-2016 At 04:57 PM  
INDI USA V. ABU-RAYYAN (NA)

v.

D-1 KHALIL ABU-RAYYAN,

VIO: 18 U.S.C. § 922(a)(6)  
18 U.S.C. § 922(g)(3)

Defendant.

\_\_\_\_\_ /

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT 1**

(18 U.S.C. § 922(a)(6) - False Statement to Acquire a Firearm)

On or about October 3, 2015, in the Eastern District of Michigan, Southern Division, KHALIL ABU-RAYYAN, the defendant herein, did in connection with the acquisition of a firearm, a .22 caliber revolver made by Heritage Manufacturing Incorporated (serial no. P18933) from a licensed firearms dealer within the

meaning of Chapter 44, Title 18, United States Code, knowingly make a false and fictitious written statement when he executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosive Form 4473, Firearms Transaction Record, to the effect that he was not an unlawful user of a controlled substance, when in fact he then knew he was an unlawful user of a controlled substance, to wit: marijuana, and the statement was intended and likely to deceive the firearms dealer, with respect to any fact material to the lawfulness of such sale; all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**COUNT 2**

(18 U.S.C. § 922(g)(3) - Possession of a Firearm by a Prohibited Person)

On or about October 5, 2015, in the Eastern District of Michigan, Southern Division, KHALIL ABU-RAYYAN, the defendant herein, then being an unlawful user of a controlled substance, as defined in 21 U.S.C. §802, and therefore, a prohibited person, did knowingly possess in and affecting interstate commerce a firearm, that is, a .22 caliber revolver made by Heritage Manufacturing Incorporated (serial no. P18933), said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

**FORFEITURE ALLEGATION**

(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) –  
Firearms and ammunition forfeiture)

1. The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of violating Title 18, United States Code, Section 922(a)(6) and/or 922(g) as set forth in this Indictment, the defendant KHALIL ABU-RAYYAN shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in or used in the knowing commission of the

offense, including, but not limited to, the following:

- a .22 caliber revolver made by Heritage Manufacturing Incorporated (serial no. P18933) and 6 rounds of .22 caliber ammunition.

THIS IS A TRUE BILL

*s/Grand Jury Foreperson*  
GRAND JURY FOREPERSON

BARBARA L. McQUADE  
United States Attorney

*s/Ronald W. Waterstreet*  
RONALD W. WATERSTREET  
Assistant U.S. Attorney  
211 W. Fort St., Ste. 2001  
Detroit, MI 48226  
Phone: (313) 226-9100

Date: February 16, 2016

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United States District Court  
 Eastern District of Michigan

**Criminal Case**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

**Reassignment/Recusal Information** This matter was opened in the USAO prior to August 15, 2008 [ ]

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials:</b> <i>[Signature]</i>

**Case Title:** USA v. KHALIL ABU-RAYYAN

**County where offense occurred :** Wayne County, Michigan

**Check One:**  **Felony**  **Misdemeanor**  **Petty**

Indictment/  Information --- no prior complaint.  
 Indictment/  Information --- based upon prior complaint [Case number: 16-mj-30039 ]  
 Indictment/  Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- Original case was terminated; no additional charges or defendants.
- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u><b>Defendant name</b></u>	<u><b>Charges</b></u>	<u><b>Prior Complaint (if applicable)</b></u>
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**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

2/16/2016  
 Date

*[Signature]*  
 Ronald W. Waterstreet  
 Assistant United States Attorney  
 211 W. Fort Street, Suite 2001  
 Detroit, MI 48226-3277  
 Phone: 313-226-9100  
 Fax: 313-226-4678  
 E-Mail address: ronald.waterstreet@usdoj.gov  
 Attorney Bar #:

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated. 04/13