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CENTRAL U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES
BY: _____

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2019 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

MELINDA ROMINES and
SEAIRA BENSON,
aka "Relli,"

Defendants.

CR No. 20CR00069 -CJC

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy;
26 U.S.C. § 5861(d): Possession of
an Unregistered Firearm; 21 U.S.C.
§§ 841(a)(1), (b)(1)(A)(viii):
Distribution of Methamphetamine]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 371]

[DEFENDANT ROMINES]

A. INTRODUCTORY ALLEGATION

At times relevant to this Indictment, neither defendant MELINDA ROMINES, nor any other co-conspirator, had a federal firearms license issued by the United States Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"), and thus, no participant was licensed to import, manufacture, or deal in firearms.

1 B. OBJECT OF THE CONSPIRACY

2 Beginning on a date unknown to the Grand Jury, but no later than
3 on or about May 16, 2018, and continuing through at least November
4 11, 2018, in Los Angeles County, within the Central District of
5 California, and elsewhere, defendant ROMINES and with others known
6 and unknown to the Grand Jury, conspired with each other to willfully
7 engage in the business of dealing in firearms without a license, in
8 violation of Title 18, United States Code, Section 922(a)(1)(A).

9 C. MANNER AND MEANS OF THE CONSPIRACY

10 The object of the conspiracy was to be accomplished, in
11 substance, as follows:

12 1. Defendant ROMINES would find firearms available for
13 purchase from co-conspirator black market firearms dealers.

14 2. Defendant ROMINES would offer to broker firearms sales
15 between co-conspirator black market firearms dealers and customers.

16 3. Defendant ROMINES would obtain and purchase firearms from
17 co-conspirator black market firearms dealers.

18 4. Defendant ROMINES would re-sell firearms from co-
19 conspirator black market firearms dealers to customers.

20 D. OVERT ACTS

21 In furtherance of the conspiracy and to accomplish its object,
22 on or about the following dates, defendant ROMINES and others known
23 and unknown to the Grand Jury, committed various overt acts within
24 the Central District of California, and elsewhere, including, but not
25 limited to, the following:

26 Overt Act No. 1: Between on or about May 16, 2018 and on or
27 about May 17, 2018, in telephone calls, defendant ROMINES arranged to
28 sell firearms for \$2,600 on May 17, 2018, to a person she believed to

1 be a firearms customer, but who was, in fact, a confidential source
2 (the "Confidential Source") working with the ATF.

3 Overt Act No. 2: On or about May 17, 2018, in a parking lot
4 in Los Angeles, California, defendant ROMINES sold the following to
5 the Confidential Source: (1) a .40 caliber pistol, bearing no serial
6 number; (2) an AR-15 .556 x .45 caliber rifle, bearing no serial
7 number; (3) a firearms silencer; and (4) a high-capacity magazine
8 with approximately 20 rounds of ammunition inside.

9 Overt Act No. 3: Between on or about October 3, 2018, and
10 October 10, 2018, defendant ROMINES arranged to sell firearms on
11 October 10, 2018 to the Confidential Source and a person that
12 defendant ROMINES believed was another firearms customer, but who
13 was, in fact, an undercover ATF agent (the "Undercover Agent").

14 Overt Act No. 4: On or about October 10, 2018, at a parking
15 lot in Los Angeles, California, defendant ROMINES and Seaira Benson,
16 also known as "Relli," met with the Confidential Source and the
17 Undercover Agent for the purpose of defendant ROMINES selling
18 firearms to the Confidential Source and the Undercover Agent.

19 Overt Act No. 5: On or about October 10, 2018, defendant
20 ROMINES told the Confidential Source and the Undercover Agent that
21 her firearms source, whom she later referred to as "D," was on his
22 way, but that her source of supply for the silencer that she sold to
23 the Confidential Source on or about May 17, 2018 was not "D," and
24 that the silencers were homemade.

25 Overt Act No. 6: On or about October 10, 2018, using coded
26 language, defendant ROMINES called "D," asked him when he was going
27 to arrive at the parking lot with the firearms, and told him that if
28

1 he came through with the firearms, they would "make some paper" and
2 "build a mansion."

3 Overt Act No. 7: On or about October 22, 2018, in text
4 messages using coded language, defendant ROMINES sent a photograph of
5 a firearm to the Undercover Agent and said that she had to front the
6 money to pay her supplier and pick it up if the Undercover Agent
7 wanted to buy it.

8 Overt Act No. 8: On or about October 22, 2018, in a parking
9 lot in Los Angeles, California, defendant ROMINES and Benson sold a
10 Sig Sauer model P220 .45 Auto caliber pistol, bearing serial number
11 G223857, and ammunition to the Undercover Agent for \$900.

12 Overt Act No. 9: On or about October 23, 2018, in a telephone
13 call, defendant ROMINES told the Undercover Agent that she went to
14 Watts the previous day, found a good firearms source with "[a] lot of
15 stock," and that she was "waiting on a list with pricing."

16 Overt Act No. 10: On or about October 25, 2018, in text
17 messages in coded language, defendant ROMINES sent photographs of
18 three firearms available for sale to the Undercover Agent, and said
19 she was working on obtaining a fourth firearm to sell to the
20 Undercover Agent.

21 Overt Act No. 11: On or about October 28, 2018, in text
22 messages using coded language, defendant ROMINES sent descriptions
23 and prices for three firearms to the UC and offered to sell the
24 firearms, said that she had to pay her supplier first before
25 obtaining the firearms to sell to the Undercover Agent, and referred
26 to one of her firearms sources as "underground."

27 Overt Act No. 12: On or about October 29, 2018, defendant
28 ROMINES sent text messages to the Undercover Agent offering to sell

1 firearms, asking, "How many hardware?" "What type do you want?" and
2 "Big or hand?"

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COUNT TWO

[26 U.S.C. § 5861(d)]

[DEFENDANT ROMINES]

On or about May 17, 2018, in Los Angeles County, within the Central District of California, defendant MELINDA ROMINES knowingly possessed a firearm, which defendant ROMINES knew to be a firearm and silencer, as defined in Title 26, United States Code, Section 5845(a)(7) and Title 18, United States Code, Section 921(a)(24), and which had not been registered to defendant ROMINES in the National Firearms Registration and Transfer Record, as required by Title 26, United States Code, Chapter 53.

COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

[ALL DEFENDANTS]

On or about October 23, 2018, in Los Angeles County, within the Central District of California, defendants MELINDA ROMINES and SEAIRA BENSON, also known as "Relli," each aiding and abetting the other, knowingly and intentionally distributed at least 50 grams, that is, approximately 111 grams, of methamphetamine, a Schedule II controlled substance.

COUNT FOUR

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

[DEFENDANT ROMINES]

On or about November 7, 2018, in Los Angeles County, within the Central District of California, defendant MELINDA ROMINES knowingly and intentionally distributed at least 50 grams, that is, approximately 109 grams, of methamphetamine, a Schedule II controlled substance.

A TRUE BILL

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Foreperson

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