

1546

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

RENAISSANCE ELECTRIC, LLC
A/K/A PITTSBURGH TACTICAL FIREARMS

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Criminal No. 17-80
(18 U.S.C. § 922(b)(5))

FILED

MAR 21 2017

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

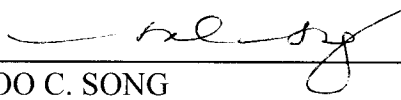
INFORMATION

COUNT 1

The United States Attorney charges that:

From in and around early 2014, and continuing until on or about January 19, 2016, in the Western District of Pennsylvania, the defendant, RENAISSANCE ELECTRIC, LLC a/k/a PITTSBURGH TACTICAL FIREARMS, a licensed dealer of firearms, sold and delivered firearms to persons, without noting in the required records, the name, age and place of residence of the buyer; that is, the defendant sold over 100 firearms without completion of any of the required paperwork for such a sale and delivery.

In violation of Title 18, United States Code, Section 922(b)(5).



SOO C. SONG
Acting United States Attorney
DC Bar ID: 457268

AO 455 (Rev. 01/09) Waiver of an Indictment

UNITED STATES DISTRICT COURT

for the

Western District of Pennsylvania

United States of America
v.
RENAISSANCE ELECTRIC, LLC A/K/A
PITTSBURGH TACTICAL FIREARMS

Defendant

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Case No. 17-80

WAIVER OF AN INDICTMENT

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: _____

Signature

Title

Signature of defendant's attorney

Printed name of defendant's attorney

Judge's signature

Judge's printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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v.

Criminal No. 17-80

RENAISSANCE ELECTRIC, LLC
A/K/A PITTSBURGH TACTICAL
FIREARMS

ARRAIGNMENT PLEA

Defendant Renaissance Electric, LLC a/k/a
Pittsburgh Tactical Firearms

being arraigned, pleads _____

in open Court this _____ day of

_____, 20 _____

(Signature/Title)

(Attorney for Defendant)

17-80

CRIMINAL CASE INFORMATION SHEET

Pittsburgh Erie _____ Johnstown _____

Related to No. _____ Judge _____
(All criminal prosecutions arising out of the same criminal transaction or series of transactions are deemed related).

- CATEGORY: 1. _____ Narcotics and Other Controlled Substances
- 1a. _____ Narcotics and Other Controlled Substances
(3 or more Defendants)
2. _____ Fraud and Property Offenses
- 2a. _____ Fraud and Property Offenses
(3 or more Defendants)
3. _____ Crimes of Violence
4. _____ Sex Offenses
5. Firearms and Explosives
6. _____ Immigration
7. _____ All Others

Defendant's name: Renaissance Electric, LLC a/k/a Pittsburgh Tactical Firearms

Is Indictment waived: Yes No

Pretrial Diversion: _____ Yes No

Juvenile proceeding: _____ Yes No

Defendant is: _____ Male Female

Superseding Indictment or Information _____ Yes No

Previous case number: _____

If superseding, previous case was/will be:

- _____ Dismissed on defendant's motion
- _____ Dismissed on governments' motion
- _____ After appellate action
- _____ Other (explain)

County in which first offense cited occurred: Allegheny County

Previous proceedings before Magistrate Judge: _____

Case No.: _____

Date arrested or date continuous U.S. custody began:

Defendant:

___ is in custody X is not in custody

Name of Institution:

Custody is on:

___ this charge ___ another charge

___ another conviction

___ State ___ Federal

Detainer filed:

___ yes ___ no

Date detainer filed:

Total defendants:

 1

Total counts:

 1

Data below applies to defendant No.:

 1

Defendant's name:

Renaissance Electric, LLC a/k/a Pittsburgh Tactical Firearms

<u>COUNT</u>	<u>U.S. CODE</u>	<u>OFFENSE</u>	<u>FELONY</u>
1	18 U.S.C. § 922(b)(5)	Failure by Federally Licensed Dealer to Keep Proper Records	X

I certify that to the best of my knowledge the above entries are true and correct.

DATE: _____



ROSS E. LENHARDT
Assistant U.S. Attorney
PA ID No. 53627

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INFORMATION MEMORANDUM

AND NOW comes the United States of America, by its attorneys, Soo C. Song, Acting United States Attorney for the Western District of Pennsylvania, and Ross E. Lenhardt, Assistant United States Attorney for said District, and submits this Information Memorandum to the Court:

I. THE INFORMATION

A one-count Information was filed against the above-named defendant for an alleged violation of federal law:

<u>COUNT</u>	<u>OFFENSE/DATE</u>	<u>TITLE/SECTION</u>
1	Failure by Federally Licensed Dealer to Keep Proper Records Early 2014 through January 19, 2016	18 U.S.C. § 922(b)(5)

II. ELEMENTS OF THE OFFENSE

As to Count 1:

In order for the crime of Failure by Federally Licensed Dealer to Keep Proper Records, in violation of 18 U.S.C. § 922(b)(5), to be established, the government must prove all of the following essential elements beyond a reasonable doubt:

1. That the defendant is a licensed dealer;
2. That the defendant sold a firearm to a person;
3. Without noting in the required records the name, age and place of residence of the person; and
4. That the defendant did so willfully.

18 U.S.C. 922(b)(5); 18 U.S.C. 924(a)(1)(D); United States v. McCullough, 348 F.3d 620, 623 (7th Cir. 2003).

III. PENALTIES

As to Count 1: Failure by Federally Licensed Dealer to Keep Proper Records (18 U.S.C. § 922(b)(5)):

1. A fine of not more than \$500,000.00 (18 U.S.C. § 3571(c));
2. A term of probation of not less than one and not more than five (5) years (18 U.S.C. § 3561(c)(1)).

IV. MANDATORY SPECIAL ASSESSMENT

A mandatory special assessment of \$400.00 must be imposed upon conviction, pursuant to 18 U.S.C. § 3013(a)(2)(B).

V. RESTITUTION

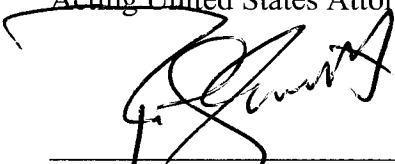
Not applicable in this case.

VI. FORFEITURE

Not applicable in this case.

Respectfully submitted,

SOO C. SONG
Acting United States Attorney



ROSS E. LENHARDT
Assistant U.S. Attorney
PA ID No. 53627