

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA v. ROBERT HUNTER BIDEN, Defendant. Criminal Action No. 23-00061-MN

REDACTED

INDICTMENT

FILED

SEP 14 2023

U.S. DISTRICT COURT DISTRICT OF DELAWARE

The Grand Jury for the District of Delaware charges that:

Introduction and Background

At times material to this Indictment:

- 1. Company 1, located in Wilmington, Delaware, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws. 2. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition. 3. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473 ("Form 4473"). Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on the Form 4473 are true and correct. 4. Question 11e. of the Form 4473 requires that the prospective purchaser