

FILED

OCT 16 2025

**CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IOWA**

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,

V.

IAN ANDRE ROBERTS,

Defendant.

Criminal No. 4:25-cr-124

INDICTMENT

T. 18 U.S.C. § 922(g)(5)(A)

T. 18 U.S.C. § 924(a)(8)

T. 18 U.S.C. § 924(d)

T. 18 U.S.C. § 1546(b)(3)

T. 28 U.S.C. § 2461(c)

THE GRAND JURY CHARGES:

COUNT 1

(False Statement for Employment)

On or about June 5, 2023, in the Southern District of Iowa, the defendant, IAN ANDRE ROBERTS, for the purposes of satisfying a requirement of the employment verification system set forth in Section 1324a(b) of Title 8 of the United States Code, used a false attestation on the U.S. Citizenship and Immigration Services Employment Eligibility Verification Form I-9, knowing that the said attestation was false, in that he attested he was a United States citizen, knowing he was not in fact a United States citizen.

This is a violation of Title 18, United States Code, Section 1546(b)(3).

THE GRAND JURY FURTHER CHARGES:

COUNT 2
(Illegal Alien in Possession of a Firearm)

On or about September 26, 2025, in the Southern District of Iowa, the defendant, IAN ANDRE ROBERTS, in and affecting commerce, knowingly possessed a firearm, namely one or more of the following:

1. a loaded Glock, Model 19, nine-millimeter pistol, with serial number BKZU214;
2. a loaded and chambered Sig Sauer, Model P320, nine-millimeter pistol, with serial number 58A131036;
3. a loaded Remington, Model 783, .270 WIN caliber rifle, with serial number RM56791F; and
4. a Remington, Model 870, 20-gauge shotgun, with serial number AB762485U.

At the time of the offense, the defendant knew he was an alien illegally and unlawfully in the United States.

This is a violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(8).

THE GRAND JURY FINDS:

NOTICE OF FORFEITURE

Upon conviction for the offense alleged in Count 2 of this Indictment, the defendant, IAN ANDRE ROBERTS, 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), all firearms, magazines, and ammunition involved in the commission of said offense, including, but not limited to, the firearm and ammunition identified in Count 2 of this Indictment.

This is pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

A TRUE BILL.

FOREPERSON

David C. Waterman
United States Attorney

By:

MacKenzie Benson Tubbs
MacKenzie Benson Tubbs
Assistant United States Attorney