

1

United States District Court  
Southern District of Texas  
FILED

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

JAN 11 2011

David J. Bradley, Clerk

<b>UNITED STATES OF AMERICA</b>	§	
	§	
v.	§	<b>Criminal No. M-10-1504-S1</b>
	§	
<b>JUAN MANUEL BARRIENTOS-LOPEZ</b>	§	
also known as "CARLOS"	§	
<b>ANDRES ALVAREZ</b>	§	
<b>ARMANDO BRAVO II</b>	§	
also known as "PEANUT"	§	
<b>ROMULO LONGORIA</b>	§	
<b>GREG PALACIOS</b>	§	
<b>ALAN RAMIREZ</b>	§	
<b>RUBEN RAMIREZ III</b>	§	
<b>MICHAEL/SALAZAR</b>	§	
ANTHONY (2/1/2011 cr)		

**SUPERSEDING INDICTMENT**

**THE GRAND JURY CHARGES:**

**Count One**

On or about October 4, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN MANUEL BARRIENTOS-LOPEZ**  
also known as "CARLOS"

did knowingly and intentionally conspire and agree with other person or persons known and unknown the Grand Jurors to knowingly make a false statement and representation with respect to information required to be kept in the records of Erick Ford Kruger, d/b/a The Armory, McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a IZHMASH, Model Saiga, 7.62x39mm rifle, serial number: L09126101; and a IZHMASH, Model Saiga, 7.62x39mm rifle, serial number: L09126543, in that Defendant, **JUAN MANUEL BARRIENTOS-LOPEZ, also known as "CARLOS"** directed Defendant, **ALAN RAMIREZ**, to falsely represent

on the Bureau of Alcohol, Tobacco and Firearms Form 4473, that Defendant, **ALAN RAMIREZ** was the actual buyer of the firearms described above, when in truth and in fact Defendant, **JUAN MANUEL BARRIENTOS-LOPEZ, also known as "CARLOS"**, knew those statements and representations to be false.

#### OVERT ACTS

1. On or about October 4, 2010, in connection with the acquisition of the aforementioned firearms, Defendant, **JUAN MANUEL BARRIENTOS-LOPEZ, also known as "CARLOS"**, provided Defendant, **ALAN RAMIREZ**, with United States currency to purchase firearms from Erick Ford Kruger, d/b/a The Armory, McAllen, Texas, a federally licensed firearms dealer for Unindicted Co-conspirator 1.
2. On or about October 4, 2010, upon completion of the purchase of the aforementioned firearms, Defendant, **ALAN RAMIREZ**, received the firearms from the federally licensed firearms dealer, for the purpose of delivery to the Defendant, **JUAN MANUEL BARRIENTOS-LOPEZ, also known as "CARLOS"**.
3. Once the aforementioned firearms were in the possession of Defendant, **JUAN MANUEL BARRIENTOS-LOPEZ, also known as "CARLOS"**, the aforementioned firearms were destined for shipment to other individuals in the United Mexican States.

In violation of Title 18, United States Code Sections 924(a)(1)(A) and 371.

#### Count Two

On or about June 5, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ANDRES ALVAREZ**  
and  
**ARMANDO BRAVO II**  
also known as "PEANUT",

knowingly made, aided and abetted, and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory, of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Bushmaster, Model XM-15, .223 caliber rifle, serial number: L525412; Bushmaster,

Model XM-15, .223 caliber rifle, serial number: L319766; Smith & Wesson, Model M&P15, .223 caliber rifle, serial number: 75863; Smith & Wesson, Model M&P15, .223 caliber rifle, serial number: 87699 in that Defendant, **ANDRES ALVAREZ**, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that Defendant who was the actual buyer of the firearm described above, when in truth and fact Defendants knew that those statements and representations were false and that Defendant, **ARMANDO BRAVO II, also known as "PEANUT"**, was the actual purchaser of the firearms.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**Count Three**

On or about June 3, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**RUBEN RAMIREZ III**  
**and**  
**ARMANDO BRAVO II**  
**also known as "PEANUT",**

knowingly made, aided and abetted, and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory, of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Stag Arms, Model Stag-15, 5.56x45mm rifle, serial number: 123104; a Stag Arms, Model Stag-15, 5.56x45mm rifle, serial number: 122657, in that Defendant, **RUBEN RAMIREZ III**, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that Defendant who was the actual buyer of the firearm described above, when in truth and fact Defendants knew that those statements and representations were false and that Defendant, **ARMANDO BRAVO II, also known as "PEANUT"**, was the actual purchaser of the firearm.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**Count Four**

On or about June 4, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**GREG PALACIOS**  
**and**  
**ARMANDO BRAVO II**  
**also known as "PEANUT",**

knowingly made, aided and abetted, and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory, of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Bushmaster, Model XM-15, 5.56x45mm rifle, serial number: BFI648600; a Bushmaster, Model XM-15, 5.56x45mm rifle, serial number: BFI648409; a Bushmaster, Model XM-15, 5.56x45mm rifle, serial number: BFI650217; a Bushmaster, Model XM-15, 5.56x45mm rifle, serial number: L525427, in that Defendant, **GREG PALACIOS**, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that Defendant who was the actual buyer of the firearm described above, when in truth and fact Defendants knew that those statements and representations were false and that Defendant, **ARMANDO BRAVO II, also known as "PEANUT"**, was the actual purchaser of the firearm.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**Count Five**

On or about May 18, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ROMULO LONGORIA**  
**and**

**ARMANDO BRAVO II**  
**also known as "PEANUT",**

knowingly made, aided and abetted, and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory, of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Tennessee Guns Incorporated, Model NDS-1P, 7.62x39mm rifle, serial number: G000600, in that Defendant, **ROMULO LONGORIA**, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that Defendant who was the actual buyer of the firearm described above, when in truth and fact Defendants knew that those statements and representations were false and that Defendant, **ARMANDO BRAVO II, also known as "PEANUT"**, was the actual purchaser of the firearm.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**Count Six**

On or about May 18, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ROMULO LONGORIA**  
**and**  
**ARMANDO BRAVO II**  
**also known as "PEANUT",**

knowingly made, aided and abetted, and caused to be made a false statement and representation with respect to information required to be kept in the records of Southwest Hay & Feed, of Mission, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR-10, 7.62x39mm rifle, serial number:1985PZ1425, in that Defendant, **ROMULO LONGORIA**, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that Defendant, **ROMULO LONGORIA**, was the actual buyer of the firearm

described above, when in truth and fact the Defendants knew that those statements and representations were false and that Defendant, **ARMANDO BRAVO II, also known as "PEANUT"**, was the actual purchaser of the firearms.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**Count Seven**

On or about May 28, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ROMULO LONGORIA**  
**and**  
**ARMANDO BRAVO II**  
**also known as "PEANUT",**

knowingly made, aided and abetted, and caused to be made a false statement and representation with respect to information required to be kept in the records of Glick Twins, of Pharr, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Smith & Wesson, Model MP15OR, 5.56x45mm rifle, serial number: SM99887, in that Defendant, **ROMULO LONGORIA**, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that Defendant, **ROMULO LONGORIA**, was the actual buyer of the firearm described above, when in truth and fact the Defendants knew that those statements and representations were false and that Defendant, **ARMANDO BRAVO II, also known as "PEANUT"**, was the actual purchaser of the firearms.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**Count Eight**

On May 28, 2010 in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ROMULO LONGORIA**  
**and**  
**ARMANDO BRAVO II**  
**also known as "PEANUT",**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of RDS also known as South Texas Tactical, McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Bushmaster, Model XM15-E2S, .223 caliber rifle, serial number: BFI663516, in that Defendant, **ROMULO LONGORIA**, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that Defendant, **ROMULO LONGORIA**, was the actual buyer of the firearm described above, when in truth and fact the Defendants knew that those statements and representations were false and that Defendant, **ARMANDO BRAVO II**, was the actual purchaser of the firearms.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**Count Nine**

On July 29, 2010 in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ALAN RAMIREZ**  
**and**  
**JUAN MANUEL BARRIENTOS-LOPEZ**  
**also known as "CARLOS",**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Glick Twins, of Pharr, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR 10, 7.62x39mm rifle, serial number: 1965HI1478, in that Defendant, **ALAN RAMIREZ**, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that Defendant, **ALAN RAMIREZ**, was the actual buyer of the firearm described above, when in truth and fact the Defendants knew that those statements and

representations were false and that, Defendant, **JUAN MANUEL BARRIENTOS-LOPEZ, also known as "CARLOS"**, was the actual purchaser of the firearms.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**Count Ten**

From on or about July 27, 2010, to on or about September 21, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ALAN RAMIREZ  
and  
JUAN MANUEL BARRIENTOS-LOPEZ  
also known as "CARLOS",**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory, of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR 10/63, 7.62x39mm rifle, serial number: 1973EP2649; a Century International Arms, Model WASR 10/63, 7.62x39mm rifle, serial number: 1965EP2649; a Century International Arms, Model WASR 10/63, 7.62x39mm rifle, serial number: 1970DA2056; a Century International Arms, Model WASR 10/63, 7.62x39mm rifle, serial number: 1982ZM4405; a Century International Arms, Model WASR 10/63, 7.62x39mm rifle, serial number: 1977ZA4354; a Century International Arms, Model WASR 10/63, 7.62x39mm rifle, serial number: 1973ET0364; a Century International Arms, Model M70AB2T, 7.62x39mm rifle, serial number: AB2T-N101331; a Century International Arms, Model M70AB2T, 7.62x39mm rifle, serial number: AB2T-N101503; an Arsenal, Model Legion, 7.62x39mm rifle, serial number: LO9126623; an Arsenal, Model Legion, 7.62x39mm rifle, serial number: LO9126874; an Arsenal, Model Legion, 7.62x39mm rifle, serial number: LO8105631; an Arsenal, Model Legion, 7.62x39mm rifle, serial number: LO8106063; an Arsenal, Model Legion, 7.62x39mm rifle, serial number: LO9126887; an



Arsenal, Model Legion, 7.62x39mm rifle, serial number: LO9127375; an Arsenal, Model Legion, 7.62x39mm rifle, serial number: LO9127485; an Arsenal, Model Legion, 7.62x39mm rifle, serial number: LO9127372; a Century International Arms, Model M70AB, 7.62x39mm rifle, serial number: AB2T-N102900; an Arsenal, Model Legion, 7.62x39mm rifle, serial number: LO9127566; an Arsenal, Model SLR-107CR, 7.62x39mm rifle, serial number: BA47-0721, in that Defendant, **ALAN RAMIREZ**, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that Defendant, **ALAN RAMIREZ**, was the actual buyer of the firearm described above, when in truth and fact the Defendants knew that those statements and representations were false and that Defendant, **JUAN MANUEL BARRIENTOS-LOPEZ, also known as "CARLOS"**, was the actual purchaser of the firearms.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**Count Eleven**

On July 29, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ANTHONY  
MICHAEL/SALAZAR  
and  
ALAN RAMIREZ,**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory, of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Colt, Model 6721, 5.56x45mm rifle, serial number: LBDO34949, in that Defendant, **ANTHONY MICHAEL/SALAZAR**, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms **ANTHONY** Form 4473, that Defendant, **MICHAEL/SALAZAR**, was the actual buyer of the firearm described

above, when in truth and fact the Defendants knew that those statements and representations were false and that Defendant, **ALAN RAMIREZ**, was the actual purchaser of the firearms.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**Count Twelve**

On May 4, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ANTHONY  
MICHAEL/SALAZAR  
and  
ALAN RAMIREZ,**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of RDS also known as South Texas Tactical, McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a CMMG, Inc., Model MOD4SA, 5.56x45mm rifle, serial number: A-6695, in that Defendant, **ANTHONY MICHAEL/SALAZAR**, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that Defendant, **ANTHONY MICHAEL/SALAZAR**, was the actual buyer of the firearm described above, when in truth and fact the Defendants knew that those statements and representations were false and that Defendant, **ALAN RAMIREZ**, was the actual purchaser of the firearms.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**Count Thirteen**

On May 5, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ANTHONY  
MICHAEL/SALAZAR  
and  
ALAN RAMIREZ,**

knowingly made, and aided and abetted and willfully caused to be made a false statement and representation with respect to information required to be kept in the records of Southwest Hay &

Feed Co., Mission, Texas, a federally licensed firearms dealer, in connection with the acquisition of a DPMS, Model AP4, 5.56x45mm rifle, serial number: FH77098, in that Defendant, **MICHAEL ANTHONY SALAZAR**, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that Defendant, **MICHAEL SALAZAR**, was the actual buyer of the firearm described above, when in truth and fact the Defendants knew that those statements and representations were false and that Defendant, **ALAN RAMIREZ**, was the actual purchaser of the firearms.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**Count Fourteen**

On or about October 4, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**JUAN MANUEL BARRIENTOS-LOPEZ**  
also known as "CARLOS",

an alien who had previously been denied admission, excluded, deported and removed, knowingly and unlawfully was present in the United States having been found near McAllen, Texas, said defendant not having obtained the consent to reapply for admission into the United States from the Attorney General of the United States and Secretary of Homeland Security, the successor, pursuant to Title 6, United States Code, Sections 202(3), 202(4), and 557.

In violation of Title 8, United States Code, Sections 1326(a) and 1326(b).

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

JOSE ANGEL MORENO  
UNITED STATES ATTORNEY

  
ASSISTANT UNITED STATES ATTORNEY