

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that Defendant, FRED FARHAT, would purchase a quantity of ammunition/ordnance, as defined by the United States Munitions List, at a store in Uvalde, Texas, which is located within the Western District of Texas.

It was further a part of the conspiracy that Defendant, FRED FARHAT, would subsequently transfer possession of the said quantity of ammunition/ordnance, as defined by the United States Munitions List, to Defendants, IVAN RAMOS-GONZALEZ and NOEMI CARREON-GONZALEZ, who would attempt to export or send from the United States the said quantity of ammunition/ordnance, as defined by the United States Munitions List.

OVERT ACTS

In furtherance of the aforesaid conspiracy and to affect and accomplish the objects thereof, the Defendants, either individually or together, performed the following overt acts:

1. On or about March 31, 2009, at about 12:06 p.m., Defendant, FRED FARHAT, purchased, with cash, boxes containing .223 Remington cartridges and boxes containing 5.56 x 45 mm cartridges at Oasis Outback L.L.C. in Uvalde, Texas, which is within the Western District of Texas.
2. On or about March 31, 2009, at about 1:18 p.m., Defendant, FRED FARHAT, purchased, with cash, boxes containing .223 Remington cartridges and boxes containing 5.56 x 45 mm cartridges at Oasis Outback L.L.C. in Uvalde, Texas, which is within the Western District of Texas.
3. On or about March 31, 2009, at about 3:01 p.m., Defendant, FRED FARHAT, purchased, with cash, boxes containing .223 Remington cartridges and boxes containing 5.56 x 45 mm cartridges at Oasis Outback L.L.C. in

Uvalde, Texas, which is within the Western District of Texas.

4. On or about March 31, 2009, Defendant, FRED FARHAT, drove from Uvalde, Texas to his place of business, Farhat's Boots and Jeans, in Eagle Pass, Texas, which is within the Western District of Texas, in a Dodge truck that contained the aforementioned boxes containing .223 Remington cartridges and 5.56 x 45 mm cartridges.

5. On or about March 31, 2009, Defendant, FRED FARHAT, removed the boxes containing .223 Remington cartridges and 5.56 x 45 mm cartridges from the Dodge truck and carried the boxes into Farhat's Boots and Jeans, which is within the Western District of Texas, through the rear entrance.

6. On or about March 31, 2009, in the Western District of Texas, Defendant, FRED FARHAT, removed the 5.56 x 45 mm cartridges from their original, outer boxes and placed these cartridges in other boxes. Defendant, FRED FARHAT, also placed the boxes containing .223 Remington cartridges in the other boxes.

7. On or about March 31, 2009, at about 9:23 p.m., Defendants, IVAN RAMOS-GONZALEZ and NOEMI CARREON-GONZALEZ, entered the United States through the Eagle Pass, Texas port-of-entry, Bridge #1, which is within the Western District of Texas, in a Ford truck and drove to the rear entrance of Farhat's Boots and Jeans.

8. On or about March 31, 2009, in the Western District of Texas, Defendants, FRED FARHAT and IVAN RAMOS-GONZALEZ, together removed the boxes containing .223 Remington cartridges and 5.56 x 45 mm

cartridges from the rear entrance of Farhat's Boots and Jeans and placed the boxes inside the Ford truck. Once Defendants, FRED FARHAT and IVAN RAMOS-GONZALEZ, finished placing the boxes inside the Ford truck, Defendants, IVAN RAMOS-GONZALEZ and NOEMI CARREON-GONZALEZ, departed Farhat's Boots and Jeans in the Ford truck. Defendant, NOEMI CARREON-GONZALEZ, drove the truck while Defendant, IVAN RAMOS-GONZALEZ, was the passenger.

9. On or about March 31, 2009, at about 9:51 p.m., Defendants, IVAN RAMOS-GONZALEZ and NOEMI CARREON-GONZALEZ, departed the United States for Mexico through the Eagle Pass, Texas port-of-entry, Bridge #1, which is within the Western District of Texas, in the Ford truck that was carrying boxes containing .223 Remington cartridges and 5.56 x 45 mm cartridges.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO
[18 U.S.C. § 554(a)]

On or about March 31, 2009, in the Western District of Texas, the Defendant,

FRED FARHAT,

knowingly received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of any merchandise, article, and object, to wit – ammunition/ordnance, as defined by the United States Munitions List, prior to exportation, knowing the same to be intended for exportation contrary to the laws and regulations of the United States requiring an export license, to wit – Title 22, United States Code, Section 2778(b)(IV)(B)(2) and Title 22 Code of Federal

Regulations, Part 123 *et seq.*, in violation of Title 18, United States Code, Section 554(a).

COUNT THREE
[18 U.S.C. §§ 554(a) & 2]

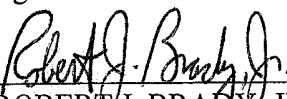
On or about March 31, 2009, in the Western District of Texas, the Defendants,

FRED FARHAT,
IVAN RAMOS-GONZALEZ,
NOEMI CARREON-GONZALEZ,

aided and abetted by each other, did knowingly export and send from the United States, and attempt to export and send from the United States, any merchandise, article, or object, to wit – ammunition/ordnance, as defined by the United States Munitions List, contrary to the laws and regulations of the United States requiring an export license, to wit – Title 22, United States Code, Section 2778(b)(IV)(B)(2) and Title 22 Code of Federal Regulations, Part 123 *et seq.*, in violation of Title 18, United States Code, Sections 554(a) and 2.

A TRUE BILL.

JOHN E. MURPHY
Acting United States Attorney

By: 
ROBERT J. BRADY, JR.
Assistant United States Attorney

DR09CR0474

SEALED:
UNSEALED: XX

PERSONAL DATA SHEET
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

COUNTY: Maverick CASE# /JUDGE: _____

DATE: April 29, 2009 MAG. CT. #: DR09-3526M-01

AUSA: Robert J. Brady, Jr.

DEFENDANT: FRED FARHAT

CITIZENSHIP: United States

INTERPRETER NEEDED: No Language: N/A

DEFENSE ATTORNEY: Chris Gober

ADDRESS OF ATTORNEY: 424 E. Nueva, San Antonio, Texas 78205

DEFENDANT IS: DETAINED DATE OF ARREST: March 31, 2009

BENCH WARRANT NEEDED: NO

PROBATION OFFICER: N/A

NAME AND ADDRESS OF SURETY: N/A

YOUTH CORRECTIONS ACT APPLICABLE: NO

PROSECUTION BY: INDICTMENT.

OFFENSE: (Code & Description) COUNT 1: 18 U.S.C. § 371 - Conspiracy; COUNTS 2&3: 18 U.S.C. § 554 - Smuggling Goods from the United States.

OFFENSE IS A: FELONY.

MAXIMUM SENTENCE: COUNT 1 - 5 years imprisonment; a \$250,000 fine; 3 years of supervised release; and a \$100 special assessment; COUNTS 2&3 - 10 years imprisonment; a \$250,000 fine; 3 years of supervised release; and a \$100 special assessment.

PENALTY IS MANDATORY: Yes XX No XX

REMARKS: See above WDTX-Cr

DR09CRO474

SEALED:
UNSEALED: XX

PERSONAL DATA SHEET
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

COUNTY: Maverick CASE# /JUDGE: _____

DATE: April 29, 2009 MAG. CT. #: _____

AUSA: Robert J. Brady, Jr.

DEFENDANT: IVAN RAMOS-GONZALEZ

CITIZENSHIP: Mexican

INTERPRETER NEEDED: Yes Language: Spanish

DEFENSE ATTORNEY: _____

ADDRESS OF ATTORNEY: _____

DEFENDANT IS: _____ DATE OF ARREST: _____

BENCH WARRANT NEEDED: _____

PROBATION OFFICER: N/A

NAME AND ADDRESS OF SURETY: N/A

YOUTH CORRECTIONS ACT APPLICABLE: NO

PROSECUTION BY: INDICTMENT

OFFENSE: (Code & Description) COUNT 1: 18 U.S.C. § 371 - Conspiracy; COUNT 3: 18 U.S.C. § 554 - Smuggling Goods from the United States.

OFFENSE IS A: FELONY

MAXIMUM SENTENCE: COUNT 1 - 5 years imprisonment; a \$250,000 fine; 3 years of supervised release; and a \$100 special assessment; COUNT 3 - 10 years imprisonment; a \$250,000 fine; 3 years of supervised release; and a \$100 special assessment.

PENALTY IS MANDATORY: Yes XX No XX

REMARKS: See above WDTX-Cr

DR09CR0474

SEALED:
UNSEALED: XX

**PERSONAL DATA SHEET
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

COUNTY: Maverick CASE# /JUDGE: _____

DATE: April 29, 2009 MAG. CT. #: DR09-3547M-01

AUSA: Robert J. Brady, Jr.

DEFENDANT: NOEMI CARREON-GONZALEZ

CITIZENSHIP: Mexican

INTERPRETER NEEDED: Yes Language: Spanish

DEFENSE ATTORNEY: Roberto Rodriguez

ADDRESS OF ATTORNEY: 429 N. Ceylon Street, Eagle Pass, Texas 78852

DEFENDANT IS: DETAINED DATE OF ARREST: April 1, 2009

BENCH WARRANT NEEDED: NO

PROBATION OFFICER: N/A

NAME AND ADDRESS OF SURETY: N/A

YOUTH CORRECTIONS ACT APPLICABLE: NO

PROSECUTION BY: INDICTMENT.

OFFENSE: (Code & Description) COUNT 1: 18 U.S.C. § 371 - Conspiracy; COUNT 3: 18 U.S.C. § 554 - Smuggling Goods from the United States.

OFFENSE IS A: FELONY.

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PENALTY IS MANDATORY: Yes XX No XX

REMARKS: See above WDTX-Cr