

**SEALED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

**FILED**

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CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY RLK  
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UNITED STATES OF AMERICA, )  
 Plaintiff, )  
 v. )  
 JESUS AURELIO TREVINO aka "Tito," (1), )  
 MARCO ANTONIO TREVINO, (2), )  
 ROCIO MARTINEZ-Olvera, (3), )  
 CYNTHIA ANN ENRIQUEZ, (4), )  
     aka Cynthia Alva aka Cindy Garcia )  
     aka "Flaca" )  
 JOSE ALFREDO SEGOVIA-Galvan, (5), )  
     aka "Gordo" )  
 CASSANDRA ALONZO, (6), )  
 ROWLAND JESSE CAMARILLO, (7), )  
     aka Roland Camarillo )  
 JOE GONZALES III, (8), )  
 JESSICA VASQUEZ, (9), )  
 and )  
 IRMA LETICIA YBARRA, (10), )  
 Defendants. )

CRIMINAL NO  
**SA 12CR 979**

INDICTMENT

[Violations: 18 U.S.C. § 371 and  
924(a)(1)(A) (Count 1)

Conspiracy to make false statements  
during purchase of a firearm;

18 U.S.C. § 2 and 924(a)(1)(A)  
(Counts 2-10) False statement on  
records of a licensed federal firearms  
dealer and aiding and abetting;

18 U.S.C. § 371 and 554(a)  
(Count 11) Conspiracy to smuggle  
goods from the United States

**FB**

**THE GRAND JURY CHARGES THAT:**

At all times relevant to the Indictment, the Defendants,

JESUS AURELIO TREVINO aka "Tito," (1),  
 MARCO ANTONIO TREVINO, (2),  
 ROCIO MARTINEZ-OLVERA, (3),  
 CYNTHIA ANN ENRIQUEZ, (4),  
 Aka Cynthia Alva aka Cindy Garcia aka "Flaca"  
 JOSE ALFREDO SEGOVIA-GALVAN aka "Gordo," (5),  
 CASSANDRA ALONZO, (6),  
 ROWLAND JESSE CAMARILLO, (7),  
     aka Roland Camarillo  
 JOE GONZALES III, (8),  
 JESSICA VASQUEZ, (9),  
 and  
 IRMA LETICIA YBARRA, (10),

and other persons both known and unknown to the Grand Jury, unlawfully and with intent to commit offenses against the United States, devised a scheme and artifice to make false statements during the acquisition of firearms.

### Introduction

1. When an individual purchases a firearm from a Federal Firearms Licensed Dealer, the purchaser is required by federal law to complete ATF Form 4473, Firearms Transaction Record, which requires the purchaser to answer the following question in Section A:

“Are you the actual transferee/buyer of the firearm(s) listed on this form?”

2. Federal Firearms Licensed Dealers are prohibited from transferring a firearm to someone who is buying on behalf of another individual. Such a transaction is commonly known as a “straw purchase.”

3. Individuals seeking to purchase firearms from Federal Firearms Licensed Dealers are also cautioned in Question Number 11.a:

**“Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you.”**

4. Individuals seeking to purchase firearms from Federal Firearms Licensed Dealers are informed and acknowledge the following:

**“I certify that my answers to Section A are true, correct, and complete. I have read and understand the Notices, Instructions, and Definitions on ATF Form 4473. I understand that answering “yes” to question 11.a. if I am not the actual buyer is a crime punishable as a felony under Federal law, and may also violate State and/or local law.”**

5. At all times relevant to this indictment, **JESUS AURELIO TREVINO aka "Tito," MARCO TREVINO, ROCIO MARTINEZ-OLVERA, CYNTHIA ANN ENRIQUEZ aka Cynthia Alva aka Cindy Garcia aka "Flaca" and JOSE ALFREDO SEGOVIA-GALVAN aka "Gordo"** sought to acquire semi-automatic rifles, handguns and magazines in the name of persons other than themselves. **JESUS AURELIO TREVINO aka "Tito," MARCO TREVINO, ROCIO MARTINEZ-OLVERA, CYNTHIA ANN ENRIQUEZ aka "Flaca" and JOSE ALFREDO SEGOVIA aka "Gordo"** sought to hide the fact that they were the actual purchasers because **JESUS AURELIO TREVINO aka "Tito," MARCO TREVINO, ROCIO MARTINEZ OLVERA, CYNTHIA ENRIQUEZ aka Cynthia Alva aka Cindy Garcia aka "Flaca" and JOSE ALFREDO SEGOVIA-GALVAN aka "Gordo"** knew that the firearms that were being purchased by their co-conspirators were going to be given to persons who are either prohibited from purchasing or receiving firearms or were intended to be smuggled illegally into the Republic of Mexico.

6. At all times relevant to this indictment, **JESUS AURELIO TREVINO aka "Tito," MARCO TREVINO, ROCIO MARTINEZ-OLVERA, CYNTHIA ANN ENRIQUEZ aka Cynthia Alva aka Cindy Garcia aka "Flaca" and JOSE ALFREDO SEGOVIA-GALVAN aka "Gordo"** used so-called "straw purchasers" of firearms, namely **CASSANDRA ALONZO, ROWLAND JESSE CAMARILLO, JOE GONZALES III, JESSICA VASQUEZ, and IRMA LETICIA YBARRA** and others both known and unknown to the Grand Jury.

**COUNT ONE**  
**[18 U.S.C. Sections 371 and 924(a)(1)(A)]**

7. The Introduction of this Indictment is re-alleged in its entirety and incorporated herein by reference.

8. Between June 12, 2012 and August 7, 2012, in the Western District of Texas, the Defendants,

**JESUS AURELIO TREVINO aka "Tito," (1),  
MARCO ANTONIO TREVINO, (2),  
ROCIO MARTINEZ-OLVERA, (3),  
CYNTHIA ANN ENRIQUEZ, (4),  
Aka Cynthia Alva aka Cindy Garcia aka "Flaca"  
JOSE ALFREDO SEGOVIA-GALVAN aka "Gordo," (5),  
CASSANDRA ALONZO, (6),  
ROWLAND JESSE CAMARILLO, (7),  
aka Roland Camarillo  
JOE GONZALES III, (8),  
JESSICA VASQUEZ, (9),  
and  
IRMA LETICIA YBARRA, (10),**

and others both known and unknown to the Grand Jury did knowingly and willfully conspire and agree together and with each other to violate the laws of the United States, to wit, Title 18, United States Code, Sections 371 and 924(a)(1)(A), making false statements during the purchase of firearms.

**The Object of the Conspiracy**

9. The object of the conspiracy was acquisition of firearms by persons who were not the actual buyers of the firearms identified herein, the completion of ATF Form 4473 in names other than the actual transferee/buyer of the firearms identified herein and the smuggling of firearms from the United States to the Republic of Mexico.

**Manner and Means**

10. It was part of this offense that **JESUS AURELIO TREVINO aka "Tito," MARCO TREVINO, ROCIO MARTINEZ-OLVERA, CYNTHIA ANN ENRIQUEZ aka Cynthia Alva aka Cindy Garcia aka "Flaca" and JOSE ALFREDO SEGOVIA-GALVAN aka "Gordo"** and others both known and unknown to the Grand Jury, enlisted the help of

**CASSANDRA ALONZO, ROWLAND JESSE CAMARILLO, JOE GONZALES III, JESSICA VASQUEZ, and IRMA LETICIA YBARRA** to purchase firearms from Federal Firearms Licensed Dealers in San Antonio, Texas.

**Overt Acts**

11. On or about June 12, 2012, Irma Leticia Ybarra purchased a Century International Arms Inc. 7.62x39 caliber, AKMS rifle, bearing serial number KMS06315 at Action Pawn #12, 5925 San Pedro Ave, San Antonio, Texas.

12. On or about June 22, 2012, Cassandra Alonzo purchased a Century International Arms Inc. 7.62x39 caliber, AKMS rifle, bearing serial number KMS06839 at Action Pawn #11, 2755 SW Military Dr., San Antonio, Texas.

13. On or about July 5, 2012, Cassandra Alonzo purchased a Century International Arms Inc. 7.62x39 caliber, AKMS rifle bearing serial number KMS08793 at Action Pawn #12, 5925 San Pedro Ave., San Antonio, Texas.

14. On or about July 17, 2012, Irma Leticia Ybarra purchased a Century International Arms Inc. 7.62x39 caliber, WASR 10/63 rifle bearing serial number AG31141989 at A Place To Shoot, 13250 Pleasanton Road, San Antonio, Texas.

15. On or about July 24, 2012, Joe Gonzales III purchased a Romarm/Cugir/CAI, 7.62x39mm, GP/WASR-10/63 rifle bearing serial number AH80401989 at Action Pawn #11, 2755 SW Military Drive, San Antonio, Texas.

16. On or about July 30, 2012, Rowland Jesse Camarillo aka Roland Camarillo purchased a Century International Arms Inc. 7.62X39mm, AKMS rifle bearing serial number KMS06859 at Action Pawn #11, 2755 SW Military Drive, San Antonio, Texas.

17. On or about August 2, 2012, Irma Leticia Ybarra purchased a Century International Arms Inc. 7.62x39mm, WASR rifle bearing serial number 1988-ACU4657 at A Place To Shoot, 13250 Pleasanton Road, San Antonio, Texas.

18. On or about August 3, 2012, Rowland Jesse Camarillo aka Roland Camarillo purchased a Century International Arms Inc. 7.62X39mm, AKMS rifle bearing serial number KMS10736 at Nagel's Gun Shop, 6201 San Pedro Ave., San Antonio, Texas.

19. On or about August 3, 2012, Jessica Vasquez purchased a Century International Arms Inc. 7.62x39mm AKMS rifle bearing serial number KMS02690 at Action Pawn #12, 5925 San Pedro Ave., San Antonio, Texas.

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

**COUNT TWO**  
**[18 U.S.C. Sections 2 and 924(a)(1)(A)]**

On or about June 12, 2012, in the Western District of Texas, the Defendants,

**JESUS AURELIO TREVINO aka "Tito," (1),**  
**ROCIO MARTINEZ-Olvera, (3),**  
**And**  
**IRMA LETICIA YBARRA, (10),**

aided and abetted by each other, in connection with and during the purchase and acquisition of firearms, to-wit: one Century International Arms Inc. 7.62x39MM, AKMS, semi-automatic rifle bearing serial number KMS06315 from Action Pawn #12, located at 5925 San Pedro Ave., San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #12, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that Irma Leticia Ybarra did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the

firearms indicated on the Form 4473; whereas in truth and in fact **IRMA LETICIA YBARRA** was purchasing the firearms for **ROCIO MARTINEZ-Olvera** and **JESUS AURELIO TREVINO aka "Tito,"** in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A), contrary to the laws and regulations of the United States.

**COUNT THREE**  
**[18 U.S.C. Sections 2 and 924(a)(1)(A)]**

On or about June 22, 2012, in the Western District of Texas, the Defendants,

**CYNTHIA ANN ENRIQUEZ, (4),**  
**Aka Cynthia Alva aka Cindy Garcia aka "Flaca,"**  
**JOSE ALFREDO SEGOVIA-Galvan aka "Gordo," (5),**  
**and**  
**CASSANDRA ALONZO, (6),**

aided and abetted by each other, in connection with and during the purchase and acquisition of firearms, to-wit: one Century International Arms Inc. 7.62x39mm, AKMS, rifle bearing serial number KMS06839 from Action Pawn #11, located at 2755 SW Military Drive, San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #11, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that Cassandra Alonzo did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearms indicated on the Form 4473; whereas in truth and in fact **CASSANDRA ALONZO** was purchasing the firearm for **JOSE ALFREDO SEGOVIA-Galvan aka "Gordo"** and **CYNTHIA ANN ENRIQUEZ aka Cynthia Alva aka Cindy Garcia aka "Flaca,"** in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A), contrary to the laws and regulations of the United States.

**COUNT FOUR**  
**[18 U.S.C. Sections 2 and 924(a)(1)(A)]**

On or about July 5, 2012, in the Western District of Texas, the Defendants,

**CYNTHIA ANN ENRIQUEZ, (4),**  
**Aka Cynthia Alva aka Cindy Garcia aka "Flaca,"**  
**and**  
**JOSE ALFREDO SEGOVIA-Galvan, aka "Gordo," (5),**  
**CASSANDRA ALONZO, (6),**

aided and abetted by each other, in connection with the purchase and acquisition of a Century International Arms Inc. 7.62x39mm, AKMS rifle, bearing serial number KMS08793 from Action Pawn #12, located at 5925 San Pedro Ave., San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #12, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that Cassandra Alonzo did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearms indicated on the Form 4473; whereas in truth and in fact **CASSANDRA ALONZO** was purchasing the firearm for **JOSE ALFREDO SEGOVIA-Galvan aka Gordo** and **CYNTHIA ANN ENRIQUEZ aka Cynthia Alva aka Cindy Garcia aka "Flaca,"** in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A), contrary to the laws and regulations of the United States.

**COUNT FIVE**  
**[18 U.S.C. Sections 2 and 924(a)(1)(A)]**

On or about July 17, 2012, in the Western District of Texas, the Defendants,

**JESUS AURELIO TREVINO aka "Tito," (1),**  
**ROCIO MARTINEZ-OLVERA, (3),**  
**and**  
**IRMA LETICIA YBARRA, (10),**



aided and abetted by each other, in connection with the acquisition of a Century International Arms Inc. 7.62x39mm, WASR 10/63, rifle bearing serial number AG31141989 from A Place To Shoot, 13250 Pleasanton Road, San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of A Place To Shoot, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that Irma Leticia Ybarra did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearms indicated on the Form 4473; whereas in truth and in fact **LETICIA YBARRA** was purchasing the firearm for **ROCIO MARTINEZ-Olvera** and **JESUS AURELIO TREVINO aka Tito**, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A), contrary to the laws and regulations of the United States.

**COUNT SIX**  
**[18 U.S.C. Sections 2 and 924(a)(1)(A)]**

On or about July 24, 2012, in the Western District of Texas, the Defendants,

**CYNTHIA ANN ENRIQUEZ, (4),**  
**aka Cynthia Alva aka Cindy Garcia aka "Flaca,"**  
**JOSE ALFREDO SEGOVIA-Galvan aka "Gordo," (5),**  
**and**  
**JOE GONZALES III, (8),**

aided and abetted by each other, in connection with the acquisition of a Romarm/Cugir/CAI rifle, 7.62x39mm, GP/WASR-10/63 bearing serial number AH80401989, from Action Pawn #11, located at 2755 SW Military Drive, San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #11, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that **JOE GONZALES III** did

execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that he was the actual buyer of the firearms indicated on the Form 4473; whereas in truth and in fact Joe Gonzales III was purchasing the firearm for **JOSE ALFREDO SEGOVIA-Galvan aka "Gordo"** and **CYNTHIA ANN ENRIQUEZ aka Cynthia Alva aka Cindy Garcia aka "Flaca,"** in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A), contrary to the laws and regulations of the United States.

**COUNT SEVEN**  
**[18 U.S.C. Sections 2 and 924(a)(1)(A)]**

On or about July 30, 2012, in the Western District of Texas, the Defendants,

**JESUS AURELIO TREVINO aka "Tito," (1),**  
**MARCO ANTONIO TREVINO, (2),**  
**CYNTHIA ANN ENRIQUEZ, (4),**  
**aka Cynthia Alva aka Cindy Garcia aka "Flaca,"**  
**JOSE ALFREDO SEGOVIA-Galvan aka "Gordo," (5),**  
**and**  
**ROWLAND JESSE CAMARILLO, (7),**  
**Aka Roland Camarillo**

aided and abetted by each other, in connection with the acquisition of a Century International Arms Inc. 7.62x39mm, AKMS rifle bearing serial number KMS06859 from Action Pawn #11, located at 2755 SW Military Drive, San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #11, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that Rowland Jesse Camarillo did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that he was the actual buyer of the firearms indicated on the Form 4473; whereas in truth and in fact Rowland Jesse Camarillo was purchasing the firearm for **JESUS AURELIO TREVINO aka "Tito," MARCO ANTONIO TREVINO, CYNTHIA ANN ENRIQUEZ aka**

**Cynthia Alva aka Cindy Garcia aka “Flaca,” and JOSE ALFREDO SEGOVIA-Galvan aka “Gordo,”** in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A), contrary to the laws and regulations of the United States.

**COUNT EIGHT**  
**[18 U.S.C. Sections 2 and 924(a)(1)(A)]**

On or about August 2, 2012, in the Western District of Texas, the Defendants,

**JESUS AURELIO TREVINO aka “Tito,” (1),**  
**ROCIO MARTINEZ-OLVERA, (3)**  
**and**  
**IRMA LETICIA YBARRA, (10),**

aided and abetted by each other, in connection with the acquisition of a CAI 7.62x39mm, WASR rifle bearing serial number 1988-ACU4657 from A Place To Shoot, 13250 Pleasanton Road, San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of A Place To Shoot, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that Irma Leticia Ybarra did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearms indicated on the Form 4473; whereas in truth and in fact **LETICIA YBARRA** was purchasing the firearm for **ROCIO MARTINEZ-Olvera** and **JESUS AURELIO TREVINO aka “Tito,”** in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A), contrary to the laws and regulations of the United States.

**COUNT NINE**

**[18 U.S.C. Sections 2 and 924(a)(1)(A)]**

On or about August 3, 2012, in the Western District of Texas, the Defendants,

**JESUS AURELIO TREVINO aka "Tito," (1),  
MARCO ANTONIO TREVINO, (2),  
CYNTHIA ANN ENRIQUEZ, (4)  
aka Cynthia Alva aka Cindy Garcia aka "Flaca,"  
JOSE ALFREDO SEGOVIA-Galvan aka "Gordo," (5)  
and  
ROWLAND JESSE CAMARILLO, (7)  
Aka Roland Camarillo**

aided and abetted by each other, in connection with the acquisition of a Century International Arm Inc. 7.62x39mm, AKMS rifle bearing serial number KMS10736 from Nagel's Gun Shop, 6201 San Pedro Ave., San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Nagel's Gun Shop, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that Rowland Jesse Camarillo did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that he was the actual buyer of the firearms indicated on the Form 4473; whereas in truth and in fact Rowland Jesse Camarillo was purchasing the firearm for **JOSE ALFREDO SEGOVIA-Galvan aka "Gordo," CYNTHIA ANN ENRIQUEZ aka Cynthia Alva aka Cindy Garcia aka "Flaca," MARCO ANTONIO TREVINO and JESUS AURELIO TREVINO aka "Tito,"** in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A), contrary to the laws and regulations of the United States.

**COUNT TEN**  
**[18 U.S.C. Sections 2 and 924(a)(1)(A)]**

On or about August 3, 2012, in the Western District of Texas, the Defendants,

**MARCO ANTONIO TREVINO, (2),**  
**and**  
**JESSICA VASQUEZ, (9),**

aided and abetted by each other, in connection with the acquisition of a Century International Arms Inc. 7.62x39mm, AKMS rifle bearing serial number KMS02690 from Action Pawn #12, located at 5925 San Pedro Ave, San Antonio, Texas, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #12, a firearms dealer licensed under the provisions of Chapter 44 of Title 18, United States Code, in that Jessica Vasquez did execute Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearm Transaction Record, certifying that she was the actual buyer of the firearms indicated on the Form 4473; whereas in truth and in fact **JESSICA VASQUEZ** was purchasing the firearm for **MARCO TREVINO**, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A), contrary to the laws and regulations of the United States.

**COUNT ELEVEN**  
**[18 U.S.C. Sections 371 and 554(a)]**

**THE CONSPIRACY AND ITS OBJECTS**

Between June 12, 2012 and August 7, 2012, the Defendants,

**JESUS AURELIO TREVINO aka "Tito," (1),**  
**MARCO ANTONIO TREVINO, (2),**  
**CYNTHIA ANN ENRIQUEZ, (4),**  
**aka Cynthia Alva aka Cindy Garcia aka "Flaca,"**  
**and**  
**JOSE ALFREDO SEGOVIA-Galvan aka "Gordo," (5),**

and other persons both known and unknown to the Grand Jury, unlawfully and with intent to commit an offense against the United States, devised a scheme and artifice to export and send from the United States merchandise, articles and objects, to-wit: firearms, contrary to laws and regulations of the United States.

#### **MANNER AND MEANS OF THE CONSPIRACY**

1. **JESUS AURELIO TREVINO** aka "Tito," **CYNTHIA ANN ENRIQUEZ**, **MARCO ANTONIO TREVINO** and **JOSE ALFREDO SEGOVIA** aka "Gordo" wanted to acquire firearms, including high powered, semi-automatic rifles in the United States and smuggle them into the Republic of Mexico.

2. Defendants **JESUS AURELIO TREVINO** aka "Tito," **MARCO ANTONIO TREVINO**, **CYNTHIA ANN ENRIQUEZ** aka Cynthia Alva aka Cindy Garcia aka "Flaca" and **JOSE ALFREDO SEGOVIA-Galvan** aka "Gordo" recruited **CASSANDRA ALONZO**, **ROWLAND JESSE CAMARILLO** aka Roland Camarillo, **JOE GONZALES III**, **JESSICA VASQUEZ**, and **IRMA LETICIA YBARRA** and others both known and unknown to the Grand Jury to purchase firearms. Defendant **JESUS AURELIO TREVINO** aka "Tito," **MARCO ANTONIO TREVINO**, **CYNTHIA ANN ENRIQUEZ** aka Cynthia Alva aka Cindy Garcia aka "Flaca" and **JOSE ALFREDO SEGOVIA-Galvan** aka "Gordo" knew that these firearms were intended to be shipped and smuggled into the Republic of Mexico.

3. Defendants **JESUS AURELIO TREVINO** aka "Tito," **MARCO ANTONIO TREVINO**, **CYNTHIA ANN ENRIQUEZ** aka Cynthia Alva aka Cindy Garcia aka "Flaca" and **JOSE ALFREDO SEGOVIA-Galvan** aka "Gordo" paid other persons to purchase firearms in names other than their own.

4. Defendants **JESUS AURELIO TREVINO** aka “Tito,” **MARCO ANTONIO TREVINO, CYNTHIA ANN ENRIQUEZ** aka Cynthia Alva aka Cindy Garcia aka “Flaca” and **JOSE ALFREDO SEGOVIA-Galvan** aka “Gordo” knew that when an individual purchases a firearm from a Federal Firearms Licensed Dealer, the purchaser is required by federal law to complete ATF Form 4473, Firearms Transaction Record, which requires the purchaser to answer the following question:

“Are you the actual transferee/buyer of the firearm(s) listed on this form?”

5. Federal Firearms Licensed Dealers are prohibited from transferring a firearm to someone who is buying on behalf on another individual. Such a transaction is commonly known as a “straw purchase.”

6. Individuals seeking to purchase firearms from Federal Firearms Licensed Dealers are also cautioned in Question Number 11.a:

“Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you.”

7. Individuals seeking to purchase firearms from Federal Firearms Licensed Dealers are also informed and acknowledge the following:

“I understand that answering “yes” to Question 11.a. if I am not the actual buyer is a crime punishable as a felony under Federal law, and may also violate State and/or local law.”

8. Defendants **JESUS AURELIO TREVINO** aka “Tito,” **MARCO ANTONIO TREVINO, CYNTHIA ANN ENRIQUEZ** aka Cynthia Alva aka Cindy Garcia aka “Flaca” and **JOSE ALFREDO SEGOVIA-Galvan** aka “Gordo” knew that their purchase of large numbers of firearms including semi-automatic rifles, in their own names would leave a “paper trail” and bring **JESUS AURELIO TREVINO** aka “Tito,” **MARCO ANTONIO TREVINO,**

**CYNTHIA ANN ENRIQUEZ** aka Cynthia Alva aka Cindy Garcia aka “Flaca” and **JOSE ALFREDO SEGOVIA-Galvan** aka “Gordo” to the attention of law enforcement authorities who are charged with the enforcement of the provisions of Title 18 including 18 U.S.C. Sections 924(a)(1)(A) and 18 U.S.C. Section 554(a).

**OVERT ACTS**

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Western District of Texas:

9. On or about June 12, 2012, Irma Leticia Ybarra purchased a Century International Arms Inc. 7.62X39 caliber, AKMS rifle, bearing serial number KMS06315 at Action Pawn #12, 5925 San Pedro Ave, San Antonio, Texas.

10. On or about June 22, 2012, Cassandra Alonzo purchased a Century International Arms, Inc. 7.62X39 caliber, AKMS rifle, bearing serial number KMS06839 at Action Pawn #11, 2755 SW Military Dr., San Antonio, Texas.

11. On or about July 5, 2012, Cassandra Alonzo purchased a Century International Arms Inc. 7.62X39 caliber, AKMS rifle bearing serial number KMS08793 at Action Pawn #12, 5925 San Pedro Ave., San Antonio, Texas.

12. On or about July 17, 2012, Irma Leticia Ybarra purchased a Century International Arms Inc. 7.62X39 caliber, WASR 10/63 rifle bearing serial number AG31141989 at A Place To Shoot, 13250 Pleasanton Road, San Antonio, Texas.

13. On or about July 24, 2012, Joe Gonzales III purchased a Romarm/Cugir/CAI, 7.62X39mm, GP/WASR-10/63 rifle bearing serial number AH80401989 at Action Pawn #11, 2755 SW Military Drive, San Antonio, Texas.



14. On or about July 30, 2012, Rowland Jesse Camarillo aka Roland Camarillo purchased a Century International Arms Inc. 7.62X39mm, AKMS rifle bearing serial number KMS06859 at Action Pawn #11, 2755 SW Military Drive, San Antonio, Texas.

15. On or about August 2, 2012, Irma Leticia Ybarra purchased a Century International Arms Inc. 7.62X39mm, WASR rifle bearing serial number 1988-ACU4657 at A Place To Shoot, 13250 Pleasanton Road, San Antonio, Texas.

16. On or about August 3, 2012, Rowland Jesse Camarillo aka Roland Camarillo purchased a Century International Arms Inc. 7.62X39mm, AKMS rifle bearing serial number KMS10736 at Nagel's Gun Shop, 6201 San Pedro Ave., San Antonio, Texas.

17. On or about August 3, 2012, Jessica Vasquez purchased a Century International Arms Inc. 7.62X39mm AKMS rifle bearing serial number KMS02690 at Action Pawn #12, 5925 San Pedro Ave., San Antonio, Texas.

All in violation of Title 18, United States Code, Sections 371 and 554(a).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**  
**[See Fed. R. Crim. P. 32.2]**

**I.**

**Firearms Violations and Forfeiture Statutes**

**[Title 18 U.S.C. §§ 371 and 924(a)(1)(A), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461]**

As a result of the foregoing criminal violations set forth in Counts One through Ten, which are punishable by imprisonment for more than one year, the Defendants charged in said counts shall forfeit any and all right, title, and interest in the property described in paragraph III to the United States pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states the following:

**Title 18 U.S.C. § 924. Penalties**

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of . . . section 924 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter . . . .

This Notice of Demand for Forfeiture includes but is not limited to the properties described in paragraph III.

**II.**

**Smuggling Violations and Forfeiture Statutes**

**[Title 18 U.S.C. §§ 371 and 554(a), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1) and Title 22 U.S.C. § 401(a), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461]**

As a result of the foregoing criminal violations set forth in Count Eleven, which are punishable by imprisonment for more than one year, the Defendants charged in said count shall forfeit any and all right, title, and interest in the property described in paragraph III to the United States pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which state the following:

**Title 18 U.S.C. § 924. Penalties**

(d)(1) Any firearm or ammunition involved in or used in . . . any violation of any other criminal law of the United States . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter . . . .

**Title 22 U.S.C. § 401 Illegal exportation of war materials**

**(a) Seizure and forfeiture of materials and carriers**

Whenever an attempt is made to export or ship from or take out of the United States any arms or munitions of war or other articles in violation of law, or whenever it is known or there shall be probable cause to believe that any arms or munitions of war or other articles are intended to be or are being or have been exported or removed from the United States in violation of law, . . . any person duly authorized for the purpose . . . may seize and detain such arms or munitions of war or other articles . . . . All arms or munitions of war and other articles . . . seized pursuant to this subsection shall be forfeited.

This Notice of Demand for Forfeiture includes but is not limited to the properties described in paragraph III.

III.

Personal Properties

- One Century International Arms Inc. 7.62x39 caliber, AKMS semi-automatic rifle, bearing serial number KMS06315, valued at \$650.00;
- One Century International Arms Inc. 7.62x39 caliber, AKMS semi-automatic rifle, bearing serial number KMS06839, valued at \$650.00;
- One Century International Arms Inc. 7.62x39 caliber, AKMS semi-automatic rifle, bearing serial number KMS08793, valued at \$650.00;
- One Century International Arms Inc. 7.62x39 caliber, WASR 10/63 semi-automatic rifle, bearing serial number AG31141989, valued at \$650.00;
- One Romarm/Cugir/CAI 7.62x39 caliber, GP/WASR-10/63 semi-automatic rifle, bearing serial number AH80401989, valued at \$650.00;
- One Century International Arms Inc. 7.62x39 caliber, AKMS semi-automatic rifle, bearing serial number KMS06859, valued at \$650.00;
- One Century International Arms Inc. 7.62x39 caliber, WASR semi-automatic rifle, bearing serial number 1988-ACU4657, valued at \$650.00;
- One Century International Arms Inc. 7.62x39 caliber, AKMS semi-automatic rifle, bearing serial number KMS10736, valued at \$650.00;
- One Century International Arms Inc. 7.62x39 caliber AKMS semi-automatic rifle, bearing serial number KMS02690, valued at \$650.00.

IV.

Money Judgment

As a result of the foregoing criminal violations as set forth in Counts One through Eleven, the Defendants charged in said counts shall forfeit to the United States the following described Money Judgment:

**Money Judgment** - A sum of money equal to Five Thousand, Eight Hundred Fifty Dollars and no cents (\$5,850.00), which represents the total value of the firearms described in paragraph III, for which DEFENDANTS JESUS AURELIO TREVINO aka "Tito," MARCO ANTONIO TREVINO, ROCIO MARTINEZ-Olvera, CYNTHIA ANN ENRIQUEZ aka Cynthia Alva aka Cindy Garcia aka "Flaca," JOSE ALFREDO SEGOVIA-Galvan aka "Gordo," CASSANDRA ALONZO, ROWLAND JESSE CAMARILLO aka Roland Camarillo, JOE GONZALES III, JESSICA VASQUEZ, and IRMA LETICIA YBARRA are liable.

V.

Substitute Assets

If any of the properties described in paragraph III, as being subject to forfeiture for violations of Title 18 U.S.C. §§ 371, 924(a)(1)(A), and 554(a), as a result of any act or omission of

DEFENDANTS JESUS AURELIO TREVINO aka "Tito," MARCO ANTONIO TREVINO, ROCIO MARTINEZ-Olvera, CYNTHIA ANN ENRIQUEZ aka Cynthia Alva aka Cindy Garcia aka "Flaca," JOSE ALFREDO SEGOVIA-Galvan aka "Gordo," CASSANDRA ALONZO, ROWLAND JESSE CAMARILLO aka Roland Camarillo, JOE GONZALES III, JESSICA VASQUEZ, and IRMA LETICIA YBARRA.

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States of America to seek forfeiture of any other property up to the value of said forfeitable property and money judgment described above as substitute assets pursuant to Title 21 U.S.C. § 853(p) and Fed. R. Crim. P. 32.2(e)(1).

A TRUE BILL.

  
FOREPERSON OF THE GRAND JURY

ROBERT PITMAN  
UNITED STATES ATTORNEY

By:

  
BILL BAUMANN  
Assistant United States Attorney