UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

United States District Court Southern District of Texas

JUL 2 0 2010

Laredo Division

David J. Bradley, Clerk

LAREDO DIVISION

UNITED STATES OF AMERICA				
	§			
V.	§			

CRIMINAL NO.

MANUEL ZAMORA-MENDOZA

L-10-1716

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about July 3, 2010, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, Defendant,

MANUEL ZAMORA-MENDOZA,

did fraudulently and knowingly attempt to export and send from the United States to the Republic of Mexico, any merchandise, article, and object, that is: five (5) .22 caliber rifles, one (1) .243 caliber rifle, two (2) 9 millimeter handguns, six thousand one hundred nineteen (6,119) rounds .22 caliber ammunition, one hundred (100) rounds 9 millimeter ammunition, one hundred (100) rounds .45 caliber ammunition, two hundred fifty (250) rounds .40 caliber ammunition, sixty (60) rounds .243 caliber ammunition, and one (1) night vision goggles, contrary to the laws and regulations of the United States, to wit, Title 22, United States Code, Section 2778(b)(2) and Section 2778(c), and Title 22, Code of Federal Regulations, Sections 121.1, 123.1 and 127.1, and did facilitate the transportation and concealment of said ammunition prior to exportation, knowing the same to be intended for exportation contrary to said laws and regulations of the United States.

In violation of Title 18, United States Code, Sections 554 and 2.

COUNT TWO

On or about July 3, 2010, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendant**,

MANUEL ZAMORA-MENDOZA,

in a matter within the jurisdiction of the Department of Homeland Security, United States

Customs and Border Protection, a department of the United States, did knowingly and willfully

make a false, fictitious, and fraudulent material statement and representation; in that the

defendant falsely stated to United States Customs and Border Protection Officer Ricardo Gaona,

that he had no weapons or ammunition to declare.

In violation of Title 18, United States Code, Section 1001.

A TRUE BILL:

ORIGINAL SIGNATURE
ON FILE

JOSE ANGEL MORENO UNITED STATES ATTORNEY

THOMAS CALHOUN-LOPEZ
Assistant United States Attorney

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USA-74-24b (Rev. 6-1-71) LAREDO D FILE: 10-143 INDICTME UNITED STA	DIVISION 78 L-1	CRI 1 10-1755M	MINAL DO	CKET 2 0 2010 ATTORNE JOSE ANG	NO. Judge: YS: EL MORENO, USA CALHOUN-LOPEZ,		L6
	MORA-MENDOZA					Appt'd	Private
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CHARGE: (TOTAL) COUNTS: (2)	Ct. 1: Smuggling Ct. 2: False State		e United States Il Agency and Ag				
PENALTY:	18 USC 554				100 Spec Assessme ERVISED RELEAS		
	18 USC 1001	Not More Tha	an 5 Yrs. and/or \$	250,000, \$1	ERVISED RELEAS 00 Spec Assessmen ERVISED RELEAS	t each count	
In Jail:							
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