FILED

#### UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

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CLERK US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY

UNITED STATES OF AMERICA,	)	CRIMINAL NO.
	)	A11CR 131 LY
i Maria y Company de la co La company de la company d	)	
Plaintiff,	)	INDICTMENT
	)	USAO #2011R00852
<b>v.</b>	)	
	)	
	)	
JUAN CARLOS RAMIREZ ZUNIGA,	(1))	
AURELIA OCHOA HERNANDEZ,	(2))	
JOSE "JOEY" LIRA,	(3))	
GIOVANNA ALBERTA RIVERA,	(4))	
JORDAN BREANN McCOY,	(5))	•
NICHOLAS DANIEL TOVAR,	(6))	
BLANCA PAEZ TOVAR,	(7))	[Violations:
PEDRO DANIEL TOVAR,	(8))	18 U.S.C. § 371- Conspiracy;
TRACEY MARIE CASTILLO,	(9))	18 U.S.C. § 554- Smuggling of Firearms
SCOTT PATRICK DAVIS,	(10)	18 U.S.C. § 924(a)(1)(A)- False Statements
ELVA MARIE HERNANDES, '	(11)	in Firearm Records;
LANCE MITCHELL COLL,	(12)	18 U.S.C. § 922(g)(1)- Felon in Possession
LYDIA CASTANEDA,	(13)	of a Firearm;
MONICA BELTRAN PASTOR,	(14)	18 U.S.C. § 1956(h)- Conspiracy to
ANNA CECILIA PEREZ,	(15)	Commit Money Laundering;
MICHELLE LEE ALANIS,	(16)	18 U.S.C. § 1956(a)(2)- Money
ISELA ESMERALDA GUARDADO,	(17)	Laundering]
KRYSTAL RENEE AYALA,	(18)	
CHRISTINA TREJO,	(19)	
JUSTIN ALLEN CAUDLE,	(20)	
and	(	
VIDALIA LETICIA SUNIGA,	(21)	
	)	
Defendants.	)	

#### THE GRAND JURY CHARGES:

## COUNT ONE [18 U.S.C. § 371] Conspiracy

The Grand Jury re-alleges and incorporates the Scheme (numbered paragraphs 1-9) of this Indictment as if fully set forth herein.

From in or about October of 2010 and continuing until January 25, 2011, in the Western District of Texas and elsewhere, the Defendant,

JUAN CARLOS RAMIREZ ZUNIGA, AURELIA OCHOA HERNANDEZ, JOSE "JOEY" LIRA, GIOVANNA ALBERTA RIVERA, JORDAN BREANN McCOY, NICHOLAS DANIEL TOVAR, **BLANCA PAEZ TOVAR,** PEDRO DANIEL TOVAR, TRACEY MARIE CASTILLO, SCOTT PATRICK DAVIS, ELVA MARIE HERNANDES, LANCE MITCHELL COLL, LYDIA CASTANEDA, MONICA BELTRAN PASTOR, ANNA CECILIA PEREZ, MICHELLE LEE ALANIS, ISELA ESMERALDA GUARDADO, KRYSTAL RENEE AYALA, CHRISTINA TREJO, JUSTIN ALLEN CAUDLE, and VIDALIA LETICIA SUNIGA,

did knowingly and willfully combine, conspire, confederate and agree:

- to knowingly make false statements and representations with respect to the information required to be kept in the records of a licensed dealer under Chapter 44 of Title 18, United States Code; in violation of Title 18, United States Code § Section 924(a)(1)(A).
- (b) to fraudulently and knowingly export and send from the United States merchandise, articles and objects contrary to the laws and regulations of the United States; in violation of Title 18, United States Code § 554.
- to receive, conceal, buy, sell and facilitated the transportation, concealment and sale of merchandise, articles and objects, prior to exportation, knowing the same to be intended for exportation contrary to the laws and regulations of the United States; in violation of Title 18, United States Code § 554

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

### Manner and Means of the Conspiracy

- 1. It was the purpose of the conspiracy to acquire firearms in the State of Texas and transport those firearms to the Republic of Mexico. Specifically, the firearms were delivered to **Defendant Juan Carlos Ramirez Zuniga** in the Republic of Mexico.
- 2. It was part of the conspiracy that Defendant Jose "Joey" Lira and **Defendant Aurelia**Ochoa Hernandez were prohibited from owning, purchasing or possessing firearms because both had been convicted of a crime punishable by imprisonment for term greater than one year.
- 3. It was part of the conspiracy that, **Defendant Jose "Joey" Lira** enlisted and directed others to purchase firearms in the State of Texas.

- 4. It was part of the conspiracy that Defendant Jose "Joey" Lira enlisted and directed others to recruit additional persons to purchase firearms in the State of Texas. As part of the conspiracy, that Defendant Jose "Joey" Lira recruited Defendants Lance Mitchell Coll, Jordan Breann McCoy, Isela Esmeralda Guardado, Daniel Pedro Tovar, Nicholas Daniel Tovar and Giovanna Alberta Rivera to purchase firearm(s). While Defendant Daniel Pedro Tovar did not actually purchase a firearm he aided and abetted the firearm purchases of others.
- 5. It was part of the conspiracy that **Defendant Jordan Breann McCoy** recruited **Defendant Michelle Lee Alanis** to purchase firearms.
- 6. It was part of the conspiracy that **Defendant Nicholas Daniel Tovar** recruited **Defendants Lydia Castaneda, Krystal Renee Ayala and Justin Caudle** to purchase firearms.
- 7. It was part of the conspiracy that Defendant Giovanna Alberta Rivera recruited Defendant Scott Patrick Davis, Christina Trejo and Tracey Castillo to purchase firearms.
- 8. It was part of the conspiracy that **Defendants Blanca Paez Tovar and Daniel Pedro Tovar** recruited **Defendants Anna Cecilia Perez, Monica Beltran Perez, Elva Marie Hernandes and Vidalia Leticia Suniga** to purchase firearms.
- 9. It was part of the conspiracy that Defendants Giovanna Alberta Rivera, Jordan Breann McCoy, Nicholas Daniel Tovar, Blanca Paez Tovar, Tracey Marie Castillo, Scott Patrick Davis Elva Marie Hernandes, Lance Mitchell Coll, Lydia Castaneda, Monica Beltran Pastor, Anna Cecilia Perez, Michelle Lee Alanis, Isela Esmeralda Guardado, Krystal Renee Ayala, Christina Trejo, Justin Caudle and Vidalia Leticia Suniga purchased firearms. These defendants are collectively referred to as the "straw buyers."

- 10. It was part of the conspiracy that each of the "straw buyers" answered "Yes" to the following question posed on the Form 4473 related to their specific firearm's purchase(s) knowing that they were not the actual buyer:
  - 11.a. Are you the actual transferee, buyer of the firearm(s) listed on this form? 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. [bold font is used on the Form 4473]
- 11. It was part of the conspiracy that each of the "straw buyers" signed the Form 4473 related to their specific firearm purchase(s) in a signature block immediately below the following written certification:

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.....I also understand that making any false oral or written statement....is a crime punishable as a felony under Federal law, and may also violate State and/or local law. [bold font is used on the Form 4473]

- 12. It was part of the conspiracy that, the majority of "straw buyers" were paid a fee for purchasing the firearm(s) and delivering those firearms ultimately to **Defendant Jose "Joey" Lira.**
- 13. It was part of the conspiracy that the purchased firearms would be prepared for transportation to Mexico by Defendants Jose "Joey" Lira, Nicholas Daniel Tovar, and Giovanna Alberta Rivera.
- 14. It was part of the conspiracy, that **Defendant Aurelia Ochoa Hernandez** transported the firearms from the State of Texas to the Republic of Mexico.

15. It was part of the conspiracy, that Defendants Aurelia Ochoa Hernandez, Giovanna Alberta Rivera, Jordan Breann McCoy, Scott Patrick Davis and Tracey Marie Castillo traveled to the Republic of Mexico and returned with cash from Defendant Juan Carlos Ramirez Zuniga for the firearms that had been transported to Mexico and for the purchase of additional firearms.

### **OVERT ACTS**

In furtherance of the conspiracy and to effect the purposes and objects thereof, numerous overt acts were committed by the conspirators in the Western District of Texas and elsewhere. These acts include but are not limited to the purchases of the firearms described in Counts Three through Forty-Four of the indictment.

## COUNT TWO [18 U.S.C. § 554] Smuggling Firearms

The Grand Jury re-alleges and incorporates the Manner and Means of the Conspiracy and the firearm purchases described in Counts Three through Forty-Four of this Indictment as if fully set forth herein.

From in or about October of 2010 and continuing until January 25, 2011, in the Western District of Texas and elsewhere, the Defendants,

JUAN CARLOS RAMIREZ ZUNIGA, AURELIA OCHOA HERNANDEZ, JOSE "JOEY" LIRA, GIOVANNA ALBERTA RIVERA, JORDAN BREANN McCOY, NICHOLAS DANIEL TOVAR, **BLANCA PAEZ TOVAR,** PEDRO DANIEL TOVAR, TRACEY MARIE CASTILLO, SCOTT PATRICK DAVIS, ELVA MARIE HERNANDES, LANCE MITCHELL COLL, LYDIA CASTANEDA, MONICA BELTRAN PASTOR, ANNA CECILIA PEREZ, MICHELLE LEE ALANIS, ISELA ESMERALDA GUARDADO, KRYSTAL RENEE AYALA, CHRISTINA TREJO, JUSTIN ALLEN CAUDLE, and VIDALIA LETICIA SUNIGA

aided and abetted by each other, did fraudulently and knowingly export and send from the United States merchandise, articles and objects (namely firearms) contrary to the laws and regulations of the United States, and did receive, conceal, buy, sell and facilitate the transportation, concealment and sale of said merchandise, articles and objects, prior to exportation, knowing the same to be intended for exportation contrary to the laws and regulations of the United States

All in violation of Title 18, United States Code §§ 554 and 2.

# COUNTS THREE through FORTY-FOUR 18 U.S.C. § 924(a)(1)(A) Making False Statement in Firearm Records

The Grand Jury re-alleges and incorporates the Manner and Means of the Conspiracy of this Indictment as if fully set forth herein.

On or about the following dates, in the Western District of Texas, the Defendants,

#### JUAN CARLOS RAMIREZ ZUNIGA, AURELIA OCHOA HERNANDEZ, and JOSE LIRA,

aided and abetted the defendant named below who 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 person licensed under the provisions of Chapter 44 of Title 18, United States Code, in that the defendants, did execute a United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that said defendant was the actual buyer of a firearm, when in truth and in fact, the defendant was acquiring the firearms on behalf of another person.

Count	Additional Defendant(s)	Date	Federal Firearms Licensee	Firearm Description on the Form 4473
3	Michelle Lee Alanis	October 22, 2010	The Gun Store in Cedar Park, Texas	(1) one Century Arms International, Model GP1975, 7.62 x 39mm caliber rifle; (2) one Century Arms International, Model WASR10, 7.62 x 39mm caliber rifle

4	Michelle Lee Alanis	October 28, 2010	Heritage Firearms in Austin, Texas	Century Arms International, Model WASR10, 7.62 x 39mm caliber rifle
5	Krystal Ayalya	December 18, 2010	Guns Galore in Killeen, Texas	(1) one CAI, Model WASR 10/63, 7.62 x 39mm rifle; (2) one CAI, Model WASR 10/63, 7.62 x 39mm rifle
6	Lydia Castaneda	December 9, 2010	Austin Gun Liquidators in Round Rock, Texas	(1) one Century Arms International, Model WASR10, 7.62 x 39mm caliber rifle; (2) one CAI, Model WASR 10, 7.62 x 39mm caliber rifle
7	Lydia Castaneda	November 27, 2010	R/T Rifle Shop in Buda, Texas	Three DPMS, Model A-15, .223 or 5.56 caliber rifles
8	Tracey Marie Castillo	December 22, 2010	The Gun Store in Cedar Park, Texas	(1) one Century Arms, Model GP- 1975, 7.62 x 39mm rifle; (2) one Century Arms, Model WASR-10/63 UF, 7.62 x 39mm rifle
9	Tracey Marie Castillo	January 20, 2011	Guns Galore in Killeen, Texas	Kel Tec, Model PLR- 16, .223 pistol
10	Justin Allen Caudle (Attempt only)	January 15, 2011	The Gun Store in Cedar Park, Texas	Century Arms, Model Draco-C, 7.62 x 39mm pistol
11	Justin Allen Caudle	January 15, 2011	Cabelas in Buda, Texas	GP WASR, Model FLOR WASR 10, 7.62 x 39mm rifle

12	Lance Mitchell Coll	November 13, 2010	Ray Sparks @ gun show in Austin, Texas	Stag Arms, Model Stag-15, 5.56mm rifle
13	Lance Mitchell Coll	November 6, 2010	Heritage Firearms in Austin, Texas	(1) one Bushmaster, Model XM15-E2S; (2) one Rock River Arms, Model LAR
14	Lance Mitchell Coll	November 30, 2010	Tex Guns in Austin, Texas	I.O. Inc., ModelAK47C, 7.62 x 39mm rifle
15	Lance Mitchell Coll	December 13, 2010	Guns Galore in Killeen, Texas	(1) one IO Inc., Model AK-47, 7.62 x 39mm rifle; (2) one CAI, Model GPWASR10/63, 7.62 x 39mm rifle
16	Scott Patrick Davis	December 23, 2010	Guns Galore in Killeen, Texas	(1) one CAI, Model GPWASR10/63, 7.62 x 39mm rifle; (2) one CAI, Model GPWASR10/63, 7.62 x 39mm rifle
17	Scott Patrick Davis	January 17, 2011	Guns Galore in Killeen, Texas	Keltec, Model PLR16, .223 pistol
18	Scott Patrick Davis	January 20, 2011	Guns Galore in Killeen, Texas	CAI, Model Draco, 7.62 x 39mm pistol
19	Isela Esmeralda Guardado	October 23, 2010	The Gun Store in Cedar Park, Texas	(1) one Century International Arms, Model Draco, 7.62 x 39mm pistol; (2) one DPMS, Model A-15, .223 rifle

20	Elva Marie Hernandes, aided and abetted by, Pedro Daniel Tovar	October 29, 2010	Heritage Firearms in Austin, Texas	(1) one Bushmaster, Model XM15E2S, 5.56mm rifle; (2) one CMMG, Model USA, 5.56mm rifle
21	Elva Marie Hernandes	November 3, 2010	The Gun Store in Cedar Park, Texas	(1) one Century International Arms, Model M70AB2T, 7.62 x 39mm rifle; (2) one Century International Arms, Model WASR 10/63, 7.62 x 39mm rifle (3) one Century International Arms, Model WASR 10/63, 7.62 x 39mm rifle
22	Elva Marie Hernandes	December 15, 2010	Austin Gun Liquidators in Round Rock, Texas	Century International Arms, Model WASR-10, 7.62 x 39mm rifle
23	Elva Marie Hernandes	January 25, 2011	Guns Galore in Austin, Texas	(1) one Keltec, Model, PLR-16, .223 caliber pistol; (2) one CAI, Model M70AB2, 7.62 x 39mm rifle; (3) one CAI, Model Draco, 7.62 x 39mm pistol
24	Jordan Breann McCoy	October 26, 2010	Tex Guns in Austin, Texas	DPMS, Model Panther Oracle, .223 caliber rifle
25	Jordan Breann McCoy	November 11, 2010	Guns Galore in Killeen, Texas	(1) one CAI, Model WASR-10, 7.62 x 39mm rifle; (2) one DPMS, Model A-15, .223 caliber rifle

26	Jordan Breann McCoy	December 22, 2010	Tactical Advantage in Round Rock, Texas	(1) one Keltec, Model PLR-16, .223 caliber pistol; (2) one Keltec, Model PLR-16, .223 caliber pistol
27	Monica Beltran Pastor	December 1, 2010	The Gun Store in Cedar Park, Texas	Century Arms, Model WASR-10, 7.62 x 39mm rifle
28	Monica Beltran Pastor	December 6, 2010	Guns Galore in Killeen, Texas	CAI, Model GP WASR 10/63, 7.62 x 39mm rifle
29	Monica Beltran Pastor	December 6, 2010	Guns Galore in Killeen, Texas	IO Inc., Model AK47-C, 7.62 x 39mm rifle
30	Monica Beltran Pastor	December 14, 2010	Guns Galore in Killeen, Texas	(1) one CAI, Model GP WASR 10/63, 7.62 x 39mm rifle; (2) one IO Inc., Model 10K47-C, 7.62 x 39mm rifle
31	Anna Cecilia Perez	November 12, 2010	Heritage Firearms in Austin, Texas	Bushmaster, Model XM-15, 5.56mm caliber rifle
32	Anna Cecilia Perez	November 13, 2010	Ray Sparks @ gun show in Austin, Texas	Stag Arms, Model Stag15, 5.56mm caliber rifle
33	Anna Cecilia Perez	December 1, 2010	The Gun Store in Cedar Park, Texas	Century International Arms, Model WASR10, 7.62 x 39mm rifle
34	Anna Cecilia Perez	December 6, 2010	Guns Galore in Killeen, Texas	Century International Arms, Model GPWASR10/63, 7.62 x 39mm rifle

35	Giovanna Alberta Rivera	December 17, 2010	The Gun Store in Cedar Park, Texas	(1) one Century Arms, Model Draco, 7.62 x 39mm pistol; (2) one Century Arms, Model WASR 10/63 6F, 7.62 x 39mm rifle
36	Giovanna Alberta Rivera	January 3, 2011	Tactical Advantage Firearms in Round Rock, Texas	(1) one Kel-Tec, model PLR-16, .223 pistol; (2) one Century International Arms, model DRACO, 7.62 x 39mm pistol
37	Viadalia Leticia Suniga	November 12, 2010	Austin Gun Liquidators in Austin, Texas	Century Arms, Model WASR10, 7.62 x 39mm rifle
38	Blanca Paez Tovar, aided and abetted by, Pedro Daniel Tovar	October 28, 2010	The Gun Store in Cedar Park, Texas	Two Century International Arms, Model GP1975, 7.62 x 39mm rifles
39	Blanca Paez Tovar, aided and abetted by, Pedro Daniel Tovar	November 10, 2010	Heritage Firearms in Austin, Texas	Two Century International Arms, Model WASR-10, 7.62 x 39mm rifles
40	Nicholas Daniel Tovar	October 26, 2010	Tex Guns in Austin, Texas	(1) one Romanina, Model WASR-10, 7.62 x 39mm rifle; (2) one Armalite, Model M-15, .223 caliber rifle
41	Nicholas Daniel Tovar	October 27, 2010	Heritage Firearms in Austin, Texas	(1) one Bushmaster, Model XM15, 5.56mm rifle; (2) one DPMS, Model A15, 5.56mm rifle

42	Nicholas Daniel Tovar	November 29, 2010	Guns Galore in Killeen, Texas	Two CAI, Model GP WASR10/63, 7.62 x 39mm rifles
43	Nicholas Daniel Tovar	January 14, 2011	The Gun Store in Cedar Park, Texas	Century Arms, Model GPWASR- 10/63, 7.62 x 39mm rifle
44	Christina Trejo	December 30, 2010	Guns Galore in Killeen, Texas	(1) one CAI, Model Tantal Sporter, 5.45 x 39mm rifle; (2) one Keltec, Model PLR-16, .223 caliber pistol

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

### COUNT FORTY-FIVE [18 U.S.C. § 922(g)(1)] Felon in Possession of a Firearm

The Grand Jury re-alleges and incorporates the Manner and Means of the Conspiracy and the firearm purchases described in Counts Three through Forty-Four of this Indictment as if fully set forth herein.

From in or about October of 2010 and continuing until January 25, 2011, in the Western District of Texas and elsewhere, the Defendants,

#### AURELIA OCHOA HERNANDEZ, and JOSE LIRA,

aided and abetted by each other, each of whom having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess in and affecting interstate and foreign commerce firearms, namely: the firearms described in Counts Three through Forty-Four of this indictment and one Aero Precision Inc., Model AP15, .223 caliber rifle.

All in violation of Title 18, United States Code Sections 922(g)(1) and 2.

# COUNT FORTY-SIX [18 U.S.C. § 1956(h)] Conspiracy to Commit Money Laundering

The Grand Jury re-alleges and incorporates the Manner and Means of the Conspiracy of this Indictment as if fully set forth herein.

From in or about October of 2010 and continuing until January 25, 2011, in the Western District of Texas and elsewhere, the Defendant,

#### JUAN CARLOS RAMIREZ ZUNIGA, AURELIA OCHOA HERNANDEZ, JOSE "JOEY" LIRA,

Laundering, that is, to transport, transmit, transfer and attempt to transport, transmit and transfer monetary instruments and funds from and through a place outside the United States, namely the Republic of Mexico, to a place in the United States, namely the State of Texas and said monetary instruments did in fact involve the proceeds of specified unlawful activities, namely: Title 18, United States Code § 554 as described in Count Two of the Indictment:

- (a) with the intent to promote the carrying on of a specified unlawful activity; and
- (b) knowing the transactions are designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of said specified unlawful activity

In violation of Title 18, United States Code §§ 1956(a)(2)(A) and 1956(a)(2)(B)(i) and (A)(i).

All in violation of Title 18, United States Code Section 1956(h).

## COUNT FORTY-SEVEN [18 U.S.C. § 1956(a)(2)(A) and 1956(a)(2)(B)(i) and (A)(i)] Money Laundering

The Grand Jury re-alleges and incorporates the Manner and Means of the Conspiracy of this Indictment as if fully set forth herein.

On or about December 4, 2010, in the Western District of Texas and elsewhere, the Defendant,

#### AURELIA OCHOA HERNANDEZ,

aided and abetted by,

#### JUAN CARLOS RAMIREZ ZUNIGA,

did transport, transmit, transfer and attempt to transport, transmit and transfer monetary instruments and funds from and through a place outside the United States, namely the Republic of Mexico, to a place in the United States, namely the State of Texas and said monetary instruments did in fact involve the proceeds of specified unlawful activities, namely: Title 18, United States Code § 554 as described in Count Two of the Indictment:

- (a) with the intent to promote the carrying on of a specified unlawful activity; and
- (b) knowing the transactions are designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of said specified unlawful activity.

In violation of Title 18, United States Code §§ 1956(a)(2)(A) and 1956(a)(2)(B)(i) and (A)(i).

I.

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE [18 U.S.C. §§ 371, 922(g)(1), 924(a)(1)(A), 1956(a), & 1956(h) and subject to forfeiture pursuant to 18 U.S.C. §§ 924(d)(1) & 982(a)(1) ]

Forfeiture Statutes Relating to Firearms
[18 U.S.C. §§ 371, 922(g)(1), 924(a)(1)(A) and subject to forfeiture pursuant to 18 U.S.C. § 924(d)(1), made applicable by 28 U.S.C. § 2461]

As a result of the criminal violation as set forth in Counts One (1), Twenty-Three (23), and Forty-Five (45) of the indictment, which are punishable by imprisonment for more than one year, the United States gives notice that it intends to forfeit, but is not limited to, the below listed properties from **Defendants Juan Carlos Ramirez Zuniga (1)**, **Aurelia Ochoa Hernandez (2)**, and **Jose "Joey" Lira (3)** and **Elva Marie Hernandez (11)**. Said Defendants shall forfeit all right, title and interest in said properties to the United States pursuant to Fed. R. Crim. P. 32.2 and 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture pursuant to 28 U.S.C. § 2461, which states the following:

#### Title 18 U.S.C. § 924.

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection (a)(4), (a)(6), (f), (g), (h), (i), (j), or (k) of section 922... or knowing violation of section 924... shall be subject to seizure and forfeiture....

This Notice of Demand for Forfeiture includes but is not limited to the following:

- a. One Century Arms International, Model M70AB2, 7.62 X 39 mm rifle, serial number M70AB18494;
- b. One Keltec, Model PLR-16, .223 caliber pistol, serial number P6X95;
- c. One Century Arms International, Model Draco, 7.62 X 39 mm rifle, serial number DC-6614-10; and
- d. One Aero Precision Inc., Model AP15, .223 caliber rifle, serial number US27830.

together with any ammunition and firearm accessories.

#### II.

## Forfeiture Statutes Related to Money Laundering [18 U.S.C. §§ 371, 1956(a), 1956(h) and subject to forfeiture pursuant to 18 U.S.C. § 982(a)(1)]

As a result of the foregoing criminal violations as set forth in Counts One (1), Forty-Six (46), and Forty-Seven (47), which are punishable by imprisonment for more than one year, the United States gives notice that it intends to forfeit, but is not limited to, the below listed properties from **Defendants Juan Carlos Ramirez Zuniga (1), Aurelia Ochoa Hernandez (2), and Jose "Joey" Lira (3).** Said Defendants shall forfeit all right, title and interest in said properties to the United States pursuant to 18 U.S.C. § 982(a), which states the following:

#### Title 18 U.S.C. § 982. Criminal forfeiture

(a)(1) The court, in imposing sentence on a person convicted of an offense in violation of section 1956, 1957, or 1960 of this title, shall order that the person forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

This Notice of Demand for Forfeiture includes but is not limited to the following:

- e. \$11,170, more or less, in United States Currency seized from **Defendant Aurelia Ochoa Hernandez** at the Port of Entry in Eagle Pass, Texas on or about December 4, 2010;
- f. \$5,882, more or less, in United States Currency seized from **Defendant Joey "Jose" Lira** on or about January 25, 2011.

A TRUE BILL:

ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

JOHN E. MURPHY

UNITED STATES ATTORNEY

By:

Mark Lane

Assistant United States Attorney

Sealed			AI.	CR 1311
Unsealed X	F	Personal Data S	Sheet USAG	O# 2011R00852
	<del>-</del>	RN DISTRIC'	*	YES X_NO
County: TRAVIS	AUST	rin Div	ision Jud	ge:
Date: 3/1/11	Mag Ct.#		SSN:	FBI#:
Case No.:		Assistant U	nited States Attorney:	Mark Lane
Defendant: JUAN	CARLOS RAMII	REZ ZUNIGA (1)	Date of Birth:	Redacted
Address:				
Citizenship:	United Sta	tes	Mexican	Other
Interpreter Needed:	Yes	No	Language	
Defense Attorney:			Employed	
Address of Attorney:				Appointed
Defendant is:	In Jail	Where:		
	On Bond	Amt. of Bond	Whe	ere:
Date of Arrest:			Bench '	Warrant Needed
Prosecution By:		Int	formation	Indictment X
Offense (Code & Descr	M §5 Sn a l §1 18	ake False Statemen 54 - Conspiracy to nuggling Firearms; False Statement in 956(h) Conspirac U.S.C. 1956(a)(2)(	t in Firearm Records Smuggle Firearms; C Counts 3-4418 U.S. Firearm Records; Co cy to Commit Money A) and (a)(2)(B)(i) & ort Money into the U	Laundering; Count 47 (A)(i) - Money
Offense Is:		Felony X	Misdemeanor	-

Maximum Sentence:	3 yrs; (b) Up to 5 yrs impriso yrs; Count 2 - Up to 10 yrs in than 3 yrs; Counts 3-44 Up more than 3 yrs; Count 46	nment; a \$250,000 nprisonment, a \$25 to 5 yrs imprison Up to 20 yrs impri y involved), TSR o ; a \$500, 000 fine (	50,000 fine; TSR of not more ment, a \$250,000 fine, TSR of no sonment, a \$500,000 fine (or of not more than 3 yrs; Count 4 or twice the value of the	ot
Penalty is Mandatory:	Yes	X As to special assessment	No	
Damarke:				

Sealed	_			WII	CR 131 [
Unsealed X		Personal D	ata Sheet	USAC	0# 2011R00852
<del></del>	- UNITEI	STATES I	DISTRICT (	COURT	*
	WEST	ERN DIST	RICT OF TE	EXAS	
			RELATEI CASE NO	_	YES X_NO
County: TRAV	IS AU	STIN	Division	Judg	ge:
Date: 3/1/11	Mag Ct.#	A-11-M-058	SSN:		FBI#:
Case No.:	· · · · · · · · · · · · · · · · · · ·	Assis	tant United States	Attorney:	Mark Lane
Defendant: AUI	RELIA OCHOA H	ERNANDEZ (2	Dat	e of Birth:	Redacted
Address:					
Citizenship:	United S	tates X	Mexica	n	Other
Interpreter Needed:	Yes	No X	L	anguage	
Defense Attorney:	Tamra B. Nee	dles		Employed	
Address of Attorney:					Appointed
Defendant is:	In Jail	Where:			
	On Bond	Amt. of l	Bond	When	re:
Date of Arrest:				Bench V	Varrant Needed
			· · · · · · · · · · · · · · · · · · ·		,
	_				
Prosecution By:			Information		Indictment X
Offense (Code & De		Make False Star §554 - Conspira Smuggling Fire a False Stateme §922(g)(1) Fe §1956(h) Con 18 U.S.C. 1956(	tement in Firear acy to Smuggle F arms; Counts 3- nt in Firearm Ro lon in Possession	m Records; lirearms; Co 4418 U.S. ecords; Cou n of a Firean nit Money I (2)(B)(i) & (	· · · · · · · · · · · · · · · · · · ·
Offense Is:		Felony	X Mise	demeanor	<del></del>

Maximum Sentence:

Remarks:

Count 1 -- (a) Up to 5 yrs imprisonment; a \$250,000 fine; TSR of not more than

3 yrs; (b) Up to 5 yrs imprisonment; a \$250,000 fine; TSR of not more than 3 yrs; Count 2 - Up to 10 yrs imprisonment, a \$250,000 fine; TSR of not more

Penalty is Mandatory:	than 3 yrs; Counts 3-44 Up to 5 yrs imprisonment, a \$250,000 fine, TSR of not more than 3 yrs; Count 45 Up to 10 yrs imprisonment, a \$250,000 fine, 3 yrs TSR; Count 46 Up to 20 yrs imprisonment, a \$500,000 fine (or twice the value of the property involved), TSR of not more than 3 yrs; Count 47 Up to 20 yrs imprisonment; a \$500,000 fine (or twice the value of the property involved), TSR of not more than 3 yrs; \$100 mandatory VCA each count				
		Yes	X As to special assessment	No	

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Unsealed X		Personal D	ata Sheet	t USAC	O# 2011R00852
	– UNITE	D STATES 1	DISTRIC	T COURT	<del></del>
	WEST	TERN DIST	RICT OF	TEXAS	
			RELA CASE	TED CASE_	YESX_NO
			CASE	NO	- Company and Company and Company
County: TRAV	IS AU	JSTIN	Division	Jud	ge:
Date: 3/1/11	Mag Ct.#	# A-11-M-048	SSN:		FBI#:
Case No.:		Assis	tant United S	States Attorney:	Mark Lane
	SE "JOEY"LIRA A George Hernan	• •		Date of Birth:	Redacted
Address:		·			
Citizenship:	United	States	. M	exican	Other
Interpreter Needed:	Yes	No		Language	
Defense Attorney:	William H. II	botson		Employed	
Address of Attorney	•				Appointed
Defendant is:	In Jail	Where:			
	On Bond	Amt. of	Bond	Whe	re:
Date of Arrest:				Bench V	Warrant Needed
			•		
Prosecution By:			Informat	ion	Indictment X
Offense (Code & De	escription):	Make False Sta §554 - Conspira Smuggling Fire a False Stateme §922(g)(1) Fe §1956(h) Cor 18 U.S.C. 1956(	tement in Fi acy to Smug arms; Coun ent in Firear clon in Posse aspiracy to C (a)(2)(A) and	irearm Records gle Firearms; C ts 3-4418 U.S. m Records; Conssion of a Firea	
Offense Is:		Felony _	X	Misdemeanor	

Maximum Sentence:	Count 1 (a) Up to 5 yrs imprisonment; a \$250,000 fine; TSR of not more than 3 yrs; (b) Up to 5 yrs imprisonment; a \$250,000 fine; TSR of not more than 3 yrs; Count 2 - Up to 10 yrs imprisonment, a \$250,000 fine; TSR of not more than 3 yrs; Counts 3-44 Up to 5 yrs imprisonment, a \$250,000 fine, TSR of not more than 3 yrs; Count 45 Up to 10 yrs imprisonment, a \$250,000 fine, 3 yrs TSR; Count 46 Up to 20 yrs imprisonment, a \$500,000 fine (or twice the value of the property involved), TSR of not more than 3 yrs; Count 47 Up to 20 yrs imprisonment; a \$500,000 fine (or twice the value of the property involved), TSR of not more than 3 yrs; \$100 mandatory VCA each count					
Penalty is Mandatory:	Yes	X As to special assessment	No			
Damarke:			,			

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Unsealed X		Personal D	ata Sheet A	I USK	2011R00852LY
			DISTRICT (		
	WEST	ERN DISTI	RICT OF TE	· · · · · · · · · · · · · · · · · · ·	TIPO TE NO
			RELATEI CASE NO	-	
			CHOLING		·
County: TRAVIS	AU	STIN	Division	Jud	ge:
Date: 3/1/11	Mag Ct.#	A-11-M-051	SSN:		FBI#:
Case No.:		Assist	ant United States	Attorney:	Mark Lane
Defendant: GIOV	ANNA ALBERT	TA RIVERA (4)	Dat	e of Birth:	Redacted
Address:			· · · · · · · · · · · · · · · · · · ·		
Citizenship:	United S	tates	Mexica	n	Other
Interpreter Needed:	Yes	No	L	anguage _	
Defense Attorney:	Arthur Gollwi	itzer, III	· 	Employed	
Address of Attorney:					Appointed
Defendant is:	In Jail	Where:			
	On Bond	Amt. of E	Bond	Whe	re:
Date of Arrest:				Su	mmons Needed
Prosecution By:			Information		Indictment X
Offense (Code & Descr	• '	• • •		• • • • • • • • • • • • • • • • • • • •	1)(A) - Conspiracy to
		§554 - Conspira	cy to Smuggle F	irearms; C	; (b) 18 U.S.C. §371 and ount 2 18 U.S.C. § 554 -
		~~~	arms; Counts 35 Statement in Fi		S.C. §924(a)(1)(A) - ords;
Offense Is:	****	Felony		demeanor	· · · · · · · · · · · · · · · · · · ·
Maximum Sentence:	•	· • •	•		ne; TSR of not more than
					SR of not more than 3 fine; TSR of not more
	than 3 yrs;	Counts 35-36	Up to 5 yrs impi	risonment,	a \$250,000 fine, TSR of
Danalty is Mandatame	not more th		nandatory VCA		
Penalty is Mandatory:		Yes	As to special	Γ	<b>Л</b> о
			assessment		

Remarks:	
A COLUMN TO 1	

				WIT	CR 13	(1   \
Sealed				- 1,	ON ID	TI
Unsealed X	Per	sonal D	ata Sheet	USAC	)# <b>2011R0</b>	0852
	UNITED ST	ATES I	DISTRICT (	COURT		
	WESTER	اTSID ۱	RICT OF T	EXAS		
				D CASE_		X_NO
			CASE NO	)		<del></del>
County: TRAVIS	AUSTIN		Division	Judg	ge:	· 
Date: 3/1/11	Mag Ct.#		SSN:		FBI#:	
Case No.:		Assist	ant United State	s Attorney:	Mark Lane	
Defendant: JORD	AN BREANN McCO	Y (5)	Da	ate of Birth:	Redacted	
Address:						
Citizenship:	United States	<u>X</u>	Mexic	an	Other	
Interpreter Needed:	Yes	No X	I	Language		
Defense Attorney:				Employed		
Address of Attorney:		,			Appointe	ed
Defendant is:	In Jail	Where:				
	On Bond	Amt. of E	Bond	When	·e:	
Date of Arrest:				Bench W	arrant Needed	•••
· · · · · · · · · · · · · · · · · · ·						
	-	<del> </del>				
Prosecution By:			Information		Indictme	ent X
Offense (Code & Descr	Make §554 · Smug	False Stat Conspira gling Firea	B U.S.C. § 371 a tement in Firea cy to Smuggle l arms; Counts 2 Statement in Fi	rm Records; Firearms; C 4-2618 U.S	(b) 18 U.S.C. § ount 2 18 U.S S.C. §924(a)(1)(	§371 and 5.C. § 554 -
Offense Is:		Felony	X Mis	sdemeanor		
Maximum Sentence:	Count 1 (a) Up 3 yrs; (b) Up to 5 yrs; Count 2 - Up than 3 yrs; Count not more than 3 y	yrs impris to 10 yrs i ts 24-26	conment; a \$250 imprisonment, a Up to 5 yrs imp	0,000 fine; T a \$250,000 f prisonment, a	SR of not more ine; TSR of not a \$250,000 fine	than 3 more
Penalty is Mandatory:		Yes	X As to specia assessment		lo .	

Case 1:11-cr-00131-LY Document 15-1 Filed 03/01/11 Page 10 of 28

Remarks:		
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Sealed			ı	111	Ж 131 LY
Unsealed X		Personal D	ata Sheet	USAC	# 2011R00852
	UNITEL	STATES I	DISTRICT (	COURT	
	WEST	ERN DIST	RICT OF T	EXAS	
					YESX_NO
			CASE NO	)	
County: TRAVIS	AU	STIN	Division	Judg	ge:
Date: 3/1/11	Mag Ct.#	A-11-M-052	SSN:		FBI#:
Case No.:		Assist	ant United State	s Attorney:	Mark Lane
Defendant: NICH	IOLAS DANIEL	TOVAR (6)	Da	te of Birth:	Redacted
Address:			· · · · · · · · · · · · · · · · · · ·		
Citizenship:	United S	tates	Mexic	an	Other
Interpreter Needed:	Yes	No	1	anguage	
Defense Attorney:	Watson M. Ho	well, Jr.		Employed	
Address of Attorney:					Appointed
Defendant is:	In Jail	Where:	· · · · · · · · · · · · · · · · · · ·		
	On Bond	Amt. of I	Bond	When	e:
Date of Arrest:	, in the second second			Sur	nmons Needed
	milder		·		
Prosecution By:			Information		Indictment X
Offense (Code & Description):		Make False Stat	tement in Firea	rm Records;	1)(A) - Conspiracy to (b) 18 U.S.C. §371 and ount 2 18 U.S.C. § 554 -
		Smuggling Firea Making a False			S.C. §924(a)(1)(A) - rds;
Offense Is:		Felony	X Mis	demeanor	
Maximum Sentence:	3 yrs; (b) U <sub>1</sub> yrs; Count 2	o to 5 yrs impris 2 - Up to 10 yrs	sonment; a \$250 imprisonment, a	),000 fine; T a \$250,000 f	re; TSR of not more than SR of not more than 3 ine; TSR of not more
		Counts 40-43 an 3 yrs; \$100 n			a \$250,000 fine, TSR of
Penalty is Mandatory:		Yes	X As to special		Io
			assessment		

Remarks:		

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Unsealed X	Per	sonal Da	ta Sheet	USAC	O# 2011R00852
	UNITED ST	TATES D	ISTRICT	COURT	
	WESTER	N DISTR			
				ED CASE_ O	
County: TRAVIS	AUSTIN	[]	Division	Judį	ge:
Date: 3/1/11	Mag Ct.#		SSN:		FBI#:
Case No.:		Assistar	nt United Sta	tes Attorney:	Mark Lane
Defendant: BLANC	CA PAEZ TOVAR (	7)	Г	Date of Birth:	Redacted
Address:					
Citizenship:	United States	X	Mexi	ican	Other
Interpreter Needed:	Yes	No X	<del></del>	Language	
Defense Attorney:				Employed	
Address of Attorney:					Appointed
Defendant is:	In Jail	Where:	· · · · · ·		
	On Bond	Amt. of Bo	ond	When	re:
Date of Arrest:				Bench W	Varrant Needed
· -					
Prosecution By:			Information	<u> </u>	Indictment X
Offense (Code & Descri	Make §554 Smug	e False State - Conspiracy ggling Firear	ment in Fire y to Smuggle ms; Counts	arm Records Firearms; C 38-3918 U.	(1)(A) - Conspiracy to ; (b) 18 U.S.C. §371 and count 2 18 U.S.C. § 554 - S.C. §924(a)(1)(A) -
000 1	Mak			Firearm Reco	ords;
Offense Is:		Felony		lisdemeanor	
Maximum Sentence:	3 yrs; (b) Up to 5 yrs; Count 2 - U	yrs impriso to 10 yrs in ts 38-39 U	nment; a \$2: nprisonment p to 5 yrs in	50,000 fine; T , a \$250,000 f iprisonment,	ne; TSR of not more than 3 fine; TSR of not more than 3 fine; TSR of not more a \$250,000 fine, TSR of
Penalty is Mandatory:		Yes	X As to speci	ial	No

Case 1:11-cr-00131-LY Document 15-1 Filed 03/01/11 Page 14 of 28

Remarks:			

Sealed					A11	CR	131 LY
Unsealed X		Perso	nal Da	ta Shee	t USA	AO#	2011R00852
	UNITED	STA'	TES D	ISTRIC	T COUR	Γ	
	WEST	ERN I	DISTR		TEXAS		
					TED CASI NO		_YES <u>X</u> NO
				CASE	NO		
County: TRAVIS	AU	STIN	]	Division	Jı	ıdge:	
Date: 3/1/11	Mag Ct.#			SSN:			FBI#:
Case No.:			Assista	nt United S	States Attorney	y: <u>M</u>	ark Lane
Defendant: PEDR	O TOVAR (8)				Date of Birth	1: <u>R</u>	edacted
Address:							
Citizenship:	United S	tates X		M	exican		Other
Interpreter Needed:	Yes	N	o <b>X</b>	_	Language		
Defense Attorney:					Employe	d	
Address of Attorney:							Appointed
Defendant is:	In Jail	W	here:				
	On Bond	A	mt. of Bo	ond	W	here:	
Date of Arrest:					Bench	n Warr	ant Needed
_							
			,				
Prosecution By:		•		Informat	ion		Indictment X
M §5 Si			Count 1 (a) 18 U.S.C. § 371 and §924(a)(1)(A) - Conspiracy to Make False Statement in Firearm Records; (b) 18 U.S.C. §371 and §554 - Conspiracy to Smuggle Firearms; Count 2 18 U.S.C. § 554 - Smuggling Firearms; Counts 20, 38-39 18 U.S.C. §924(a)(1)(A) - Making a False Statement in Firearm Records;				
Offense Is:		Fel	ony	X	Misdemeano	r	
Maximum Sentence:	3 yrs; (b) U <sub>l</sub> yrs; Count 2 than 3 yrs; (	to 5 yrs 2 - Up to Counts 2	s impriso 10 yrs in 0, 38-39	nment; a S nprisonme Up to 5	\$250,000 fine ent, a \$250,00	; TSR 0 fine; ment,	TSR of not more than of not more than 3; TSR of not more a \$250,000 fine, TSR
Penalty is Mandatory:			Yes	X As to spassessmo		No	
Remarks:				_		<u> </u>	

Sealed			A	TIC	H 131 LY				
Unsealed X	Per	Personal Data Sheet USAO# 2011R00852							
	UNITED ST WESTERI		ISTRICT CO ICT OF TEX RELATED CASE NO.	XAS CASE_	YESX_NO				
County: TRAVIS	AUSTIN	<u> </u>	Division	Judg	e:				
Date: 3/1/11	Mag Ct.#		SSN:		FBI#:				
Case No.:		Assista	nt United States A	Attorney:	Mark Lane				
Defendant: TRAC	EY MARIE CASTIL	LO (9)	Date	of Birth:	Redacted				
Address:									
Citizenship:	United States	X	Mexican		Other				
Interpreter Needed:	Yes	No X	Lan	nguage					
Defense Attorney:			E	mployed _					
Address of Attorney:					Appointed				
Defendant is:	In Jail	Where:							
	On Bond	Amt. of Bo	ond	Where	):				
Date of Arrest:				Bench Wa	arrant Needed				
Prosecution By:			Information		Indictment X				
Make False Sta §554 - Conspir Smuggling Fire			ment in Firearm y to Smuggle Fir	Records; rearms; Co 18 U.S.C.	(A) - Conspiracy to (b) 18 U.S.C. §371 and unt 2 18 U.S.C. § 554 - . §924(a)(1)(A) - Making				
Offense Is:		Felony	X Misde	emeanor					
Maximum Sentence:	3 yrs; (b) Up to 5 yrs; Count 2 - Up	yrs impriso to 10 yrs in ts 8-9 Up t	nment; a \$250,0 nprisonment, a \$ to 5 yrs imprison	00 fine; TS 8250,000 fii 1ment, a \$2	e; TSR of not more than SR of not more than 3 ne; TSR of not more 250,000 fine, TSR of not				
Penalty is Mandatory:		Yes	X As to special assessment	No.	0				
Remarks:		•							

Sealed			•	A11	CR 131 L
Unsealed X		Personal I	Data Sheet	USAC	O# <b>2011R00852</b>
	UNITED		DISTRICT C	OURT	·
			TRICT OF TE		
					YES X NO
			CASE NO.	•	
County: TRAVIS	S AU	STIN	Division	Jud	ge:
Date: 3/1/11	Mag Ct.#		SSN:		FBI#:
Case No.:		Assi	istant United States	Attorney:	Mark Lane
Defendant: SCO	TT PATRICK DA	VIS (10)	Date	of Birth:	Redacted
Address:			· · · · · · · · · · · · · · · · · · ·		
Citizenship:	United S	tates X	Mexicar	n	Other
Interpreter Needed:	Yes	No X	La	nguage _	
Defense Attorney:			I	Employed	
Address of Attorney:	· · · · · · · · · · · · · · · · · · ·				Appointed
Defendant is:	In Jail	Where:		·	
	On Bond	Amt. of	f Bond	Whe	re:
Date of Arrest:			<del></del> .	Bench V	Varrant Needed
				<u> </u>	
					·
Prosecution By:			Information		Indictment X
Offense (Code & Desc		Make False St §554 - Conspir Smuggling Fir	atement in Firearr racy to Smuggle Fi	n Records rearms; C 1818 U.	(1)(A) - Conspiracy to ; (b) 18 U.S.C. §371 and Count 2 18 U.S.C. § 554 S.C. §924(a)(1)(A) ords;
Offense Is:		Felony _	X Misd	lemeanor	
Maximum Sentence:	3 yrs; (b) Upyrs; Count 2 than 3 yrs;	o to 5 yrs impr 2 - Up to 10 yr Counts 16-18 -	risonment; a \$250,0 s imprisonment, a	000 fine; T \$250,000 f isonment,	ne; TSR of not more than TSR of not more than 3 fine; TSR of not more a \$250,000 fine, TSR of t
Penalty is Mandatory:		Y	es X As to special assessment	1	No
Remarks:					

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Unsealed X		Personal Dat	ta Sheet	USAO#	2011R00852
	UNITED	STATES D	ISTRICT C	OURT	
	WEST	ERN DISTR	ICT OF TE	XAS	
				CASE	
			CASE NO.		
County: TRAVIS	AUS	STIN [	Division	Judge:	
Date: 3/1/11	Mag Ct.#		SSN:		FBI#:
Case No.:		Assistar	nt United States	Attorney: M	ark Lane
Defendant: ELVA	MARIE HERNA	ANDES (11)	Date	of Birth: R	edacted
Address:					
Citizenship:	United St	ates X	Mexicar	1	Other
Interpreter Needed:	Yes	No X	La	nguage	
Defense Attorney:			I	Employed	
Address of Attorney:	·				Appointed
Defendant is:	In Jail	Where:			
	On Bond	Amt. of Bo	ond	Where:	
Date of Arrest:				Bench Warra	ant Needed
Prosecution By:	•		Information _	· · · · · · · · · · · · · · · · · · ·	Indictment X
Offense (Code & Descri		Make False State	ment in Firearr to Smuggle Fi ms; Counts 20-	n Records; (b) rearms; Coun 2318 U.S.C.	
Offense Is:		Felony	X Misd	lemeanor	
Maximum Sentence:	3 yrs; (b) Up yrs; Count 2 than 3 yrs; (	to 5 yrs impriso - Up to 10 yrs in	nment; a \$250,0 iprisonment, a p to 5 yrs impr	000 fine; TSR \$250,000 fine; isonment, a \$2	TSR of not more than of not more than 3 TSR of not more 250,000 fine, TSR of
Penalty is Mandatory:		Yes	X As to special assessment	No	
Remarks:				<del></del>	

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Unsealed X	Per	sonal Dat	a Sheet	USAC	0# <b>2011R00852</b>	
<del></del>	UNITED ST	TATES D	ISTRICT (	COURT		
	WESTER:	N DISTR	ICT OF TE	EXAS		
			RELATE:			
County: TRAVIS	AUSTIN	ı I	Division	Judg	ie:	
Date: 3/1/11	Mag Ct.#		SSN:		FBI#:	
Case No.:		Assistar	t United States	Attorney:	Mark Lane	
	E MITCHELL COL	-		e of Birth:	Redacted	
Address:			<del></del>			
Citizenship:	United States	X	Mexica	n	Other	
Interpreter Needed:	Yes	No X	L	anguage		
Defense Attorney:				Employed		
Address of Attorney:					Appointed	
Defendant is:	In Jail	Where:			the state of the s	
	On Bond	Amt. of Bo	nd	When	re:	
Date of Arrest:				Bench W	Varrant Needed	
-			_			
Prosecution By:			Information .		Indictment X	
Offense (Code & Descr	Mak §554 Smuş	Count 1 (a) 18 U.S.C. § 371 and §924(a)(1)(A) - Conspiracy to Make False Statement in Firearm Records; (b) 18 U.S.C. §371 ar §554 - Conspiracy to Smuggle Firearms; Count 2 18 U.S.C. § 5 Smuggling Firearms; Counts 12-15 18 U.S.C. §924(a)(1)(A) - Making a False Statement in Firearm Records;				
Offense Is:		Felony	X Mis	demeanor		
Maximum Sentence:	3 yrs; (b) Up to 5 yrs; Count 2 - U	5 yrs impriso p to 10 yrs in its 12-15 U	nment; a \$250 prisonment, a p to 5 yrs imp	,000 fine; T \$250,000 f risonment,	ne; TSR of not more than TSR of not more than 3 Tine; TSR of not more a \$250,000 fine, TSR of	
Penalty is Mandatory:		Yes	X As to special assessment		Йo	
Remarks:						

#### A11CR 131 LY Sealed Unsealed Personal Data Sheet USAO# 2011R00852 X UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS RELATED CASE YES X NO CASE NO.\_\_\_\_ **TRAVIS AUSTIN** Division Judge: County: SSN: FBI#: Mag Ct.# Date: 3/1/11 Case No .: Assistant United States Attorney: Mark Lane Defendant: LYDIA CASTANEDA (13) Date of Birth: Redacted Address: Other United States X Mexican Citizenship: Interpreter Needed: Yes No X Language Defense Attorney: Employed Appointed Address of Attorney: Where: Defendant is: In Jail Where: On Bond Amt. of Bond Bench Warrant Needed Date of Arrest: Indictment X Information Prosecution By: Count 1 -- (a) 18 U.S.C. § 371 and §924(a)(1)(A) - Conspiracy to Offense (Code & Description):

Make False Statement in Firearm Records; (b) 18 U.S.C. § 371 and §554 - Conspiracy to Smuggle Firearms; Count 2 -- 18 U.S.C. § 554 - Smuggling Firearms; Counts 6-7 -- 18 U.S.C. § 924(a)(1)(A) - Making

a False Statement in Firearm Records;

Maximum Sentence:

Offense Is:

Felony X Misdemeanor

Count 1 -- (a) Up to 5 yrs imprisonment; a \$250,000 fine; TSR of not more than 3 yrs; (b) Up to 5 yrs imprisonment; a \$250,000 fine; TSR of not more than 3 yrs; Count 2 - Up to 10 yrs imprisonment, a \$250,000 fine; TSR of not more than 3 yrs; Counts 6-7 -- Up to 5 yrs imprisonment, a \$250,000 fine, TSR of not

more than 3 yrs; \$100 mandatory VCA each count

Penalty is Mandatory:

Yes X

No

As to special

assessment

Remarks:

Sealed			·	AT T	CR 131
Unsealed X		Personal Da	ata Sheet	USAO#	<sup>‡</sup> 2011R00852
		D STATES D TERN DISTF		XAS CASE_	YESX_NO
County: TRAVIS	A	USTIN	Division	Judge	o:
Date: 3/1/11	Mag Ct.	#	SSN:		FBI#:
Case No.:		Assista	ant United States	Attorney:	Mark Lane
Defendant: MONI	CA BELTRA	N PASTOR (14)	Date	of Birth:	Redacted
Address:					
Citizenship:	United	States X	Mexican		Other
Interpreter Needed:	Yes	No X	La	nguage	
Defense Attorney:			E	imployed _	
Address of Attorney:			, , , , , , , , , , , , , , , , , , ,		Appointed
Defendant is:	In Jail	Where:			·
	On Bond	Amt. of B	ond	Where	* ************************************
Date of Arrest:			······································	Bench Wa	rrant Needed
Prosecution By:	<u>-</u>		Information		Indictment X
Make False S §554 - Conspi Smuggling Fi			ement in Firearn cy to Smuggle Fi	Records; ( rearms; Cou 3018 U.S.	o(A) - Conspiracy to (b) 18 U.S.C. §371 and unt 2 18 U.S.C. § 554 C. §924(a)(1)(A) - ds;
Offense Is:	•	Felony	X Misde	emeanor	
Maximum Sentence:	3 yrs; (b) yrs; Coun than 3 yrs	Up to 5 yrs imprise t 2 - Up to 10 yrs i	onment; a \$250,0 mprisonment, a \$ Jp to 5 yrs impri	000 fine; TS \$250,000 fin sonment, a	r; TSR of not more than R of not more than 3 ae; TSR of not more \$250,000 fine, TSR of
Penalty is Mandatory:		Yes	X As to special assessment	No	
Remarks:					

Sealed						
Unsealed X	• • • • • • • • • • • • • • • • • • • •		DISTRICT RICT OF	TEXAS ED CASE_	AND	
County: TRAVIS	AU	STIN	Division	Jud	ge:	
Date: 3/1/11	Mag Ct.#		SSN:		FBI#:	
Case No.:	<del></del>	Assi	stant United Sta	ites Attorney:	Mark Lane	
Defendant: ANNA	CECILIA PER	EZ (15)		Date of Birth:	Redacted	
Address:						
Citizenship:	United S	tates X	Mex	ican	Other	
Interpreter Needed:	Yes	No X		Language _	,	
Defense Attorney:	<b></b>			Employed		
Address of Attorney:					Appointed	
Defendant is:	In Jail	Where:				
	On Bond	Amt. of	Bond	Whe	re:	
Date of Arrest:			• •	Bench V	Varrant Needed	
Prosecution By:	*********		Information	n	Indictment X	
Offense (Code & Descri		Count 1 (a) 18 U.S.C. § 371 and §924(a)(1)(A) - Conspiracy Make False Statement in Firearm Records; (b) 18 U.S.C. §37 §554 - Conspiracy to Smuggle Firearms; Count 2 18 U.S.C Smuggling Firearms; Counts 31-3418 U.S.C. §924(a)(1)(A) Making a False Statement in Firearm Records;				
Offense Is:		Felony	X N	1isdemeanor		
Maximum Sentence:	3 yrs; (b) U <sub>l</sub> yrs; Count 2 than 3 yrs;	o to 5 yrs impr 2 - Up to 10 yr: Counts 31-34 -	isonment; a \$2 s imprisonment	50,000 fine; T t, a \$250,000 f nprisonment,	re; TSR of not more than SSR of not more than 3 fine; TSR of not more a \$250,000 fine, TSR of	
Penalty is Mandatory:	· <del></del>	Y	es X As to spec assessmen	ial	No	
Remarks:						

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Unsealed X		Personal	Data Sheet	USAC	0# <b>2011R00852</b>
	UNITED	STATES	S DISTRICT	COURT	
	WEST	ERN DIS	TRICT OF	-	
				TED CASE_ NO.	YESX_NO
County: TRAVIS	AU	STIN	_ Division	Jud	ge:
Date: 3/1/11	_ Mag Ct.#		SSN:		FBI#:
Case No.:		As	sistant United St	ates Attorney:	Mark Lane
Defendant: MICHI	ELLE LEE ALA	ANIS (16)		Date of Birth:	Redacted
Address:					
Citizenship:	United S	ates X	Mex	kican	Other
Interpreter Needed:	Yes	No	X	Language	
Defense Attorney:				Employed	
Address of Attorney:					Appointed
Defendant is:	In Jail	Where:			
	On Bond	Amt.	of Bond	Whe	re:
Date of Arrest:				Bench V	Varrant Needed
· 	····				
Prosecution By:			Informatio	on	Indictment X
Make I §554 - ( Smugg			Statement in Fir iracy to Smugg	earm Records le Firearms; C s 3-418 U.S.G	1)(A) - Conspiracy to ; (b) 18 U.S.C. §371 and ount 2 18 U.S.C. § 554 - C. §924(a)(1)(A) - Making
Offense Is:		Felony	X	Misdemeanor	
Maximum Sentence:	3 yrs; (b) Up yrs; Count 2 than 3 yrs;	o to 5 yrs imp 2 - Up to 10 y Counts 3-4	orisonment; a \$2 rs imprisonmen	250,000 fine; T at, a \$250,000 f orisonment, a \$	ne; TSR of not more than SR of not more than 3 line; TSR of not more \$250,000 fine, TSR of not
Penalty is Mandatory:			Yes X As to spec	cial	No
Remarks:					

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Unsealed X	•	Personal D D STATES I FERN DIST	DISTRIC RICT OF RELA	T COURT TEXAS FED CASE_	··········
County: TRAVIS	AU	USTIN	Division	Jud	ge:
Date: 3/1/11	Mag Ct.#	#	SSN:		FBI#:
Case No.:		Assis	tant United St	tates Attorney:	Mark Lane
Defendant: ISELA	ESMERALDA	A GUARDADO	(17)	Date of Birth:	Redacted
Address:					
Citizenship:	United	States X	Me	xican	Other
Interpreter Needed:	Yes	No X	· 	Language _	- -
Defense Attorney:				Employed	
Address of Attorney:					Appointed
Defendant is:	In Jail	Where:			
	On Bond	Amt. of	Bond	Whe	re:
Date of Arrest:				Bench V	Varrant Needed
_		·			
Prosecution By:	·	A., Miller, , .	Informati	on	Indictment X
Offense (Code & Descri	ption):	Make False Sta §554 - Conspira	tement in Fin acy to Smugg arms; Count	rearm Records de Firearms; C 1918 U.S.C.	(1)(A) - Conspiracy to ; (b) 18 U.S.C. §371 and Count 2 18 U.S.C. § 554 - §924(a)(1)(A) - Making a
Offense Is:		Felony	<u> </u>	Misdemeanor	
Maximum Sentence:	3 yrs; (b) U yrs; Count than 3 yrs;	Jp to 5 yrs impri 2 - Up to 10 yrs	sonment; a \$ imprisonme to 5 yrs impi	250,000 fine; T nt, a \$250,000 f risonment, a \$2	ne; TSR of not more than TSR of not more than 3 fine; TSR of not more 50,000 fine, TSR of not
Penalty is Mandatory:		Ye	S X As to spe	cial	No
Remarks:					

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Unsealed X		Personal Da D STATES D TERN DISTR	ISTRICT C ICT OF TE RELATEI	XAS CASE_	YESX_NO
County: TRAV	VIS A	USTIN ]	Division	Judg	ge:
Date: 3/1/11	Mag Ct.	#	SSN:		FBI#:
Case No.:	<del> </del>	Assista	nt United States	Attorney:	Mark Lane
Defendant: KF	RYSTAL RENEE	AYALA (18)	Date	of Birth:	Redacted
Address:				,	
Citizenship:	United	States X	Mexica	1	Other
Interpreter Needed:	Yes	No <b>X</b>	La	inguage	
Defense Attorney:			]	Employed	
Address of Attorney	<i>.</i>				Appointed
Defendant is:	In Jail	Where:			
	On Bond	Amt. of Be	ond	When	·e:
Date of Arrest:				Bench W	Varrant Needed
		20.000			
	·				
Prosecution By:			Information _		Indictment X
Offense (Code & D	escription):	Make False State §554 - Conspirac	ment in Fireari y to Smuggle Fi rms; Count 5	n Records; rearms; C 18 U.S.C. §	1)(A) - Conspiracy to (b) 18 U.S.C. §371 and ount 2 18 U.S.C. § 554 924(a)(1)(A) - Making a
Offense Is:		Felony	X Misc	lemeanor	
Maximum Sentence	3 yrs; (b) l yrs; Coun than 3 yrs	Up to 5 yrs impriso t 2 - Up to 10 yrs ir	onment; a \$250, nprisonment, a 5 yrs imprisonn	000 fine; T \$250,000 f tent, a \$25	re; TSR of not more than SR of not more than 3 ine; TSR of not more 0,000 fine, TSR of not
Penalty is Mandator	y:	Yes	X As to special assessment	N	lo
Remarks:					

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Unsealed X		Personal I	Data Sheet	USAO	)# <b>2011R008</b>	52
	UNITEI	O STATES	DISTRICT	COURT		
	WEST	TERN DIST			T/DO T	NO
•				TED CASE_ NO.		_NO
County: TRAVIS	AU	USTIN	Division	Judg	ge:	
Date: 3/1/11	Mag Ct.#	A-11-M-076	SSN:		FBI#:	
Case No.:	4.700	Assi	stant United Sta	ates Attorney:	Mark Lane	
Defendant: CHRIS	TINA TREJO	(19)		Date of Birth:	Redacted	
Address:						
Citizenship:	United S	States X	Mex	kican	Other _	
Interpreter Needed:	Yes	No X	-	Language		
Defense Attorney:	Viktor Olavso	on		Employed	***************************************	
Address of Attorney:					Appointed	
Defendant is:	In Jail	Where:	***************************************			
	On Bond	Amt. of	Bond	When	re:	· · · · · · · · · · · · · · · · · · ·
Date of Arrest:			<del>-</del>	Su	mmons Needed _	Y
· 				· · · · · · · · · · · · · · · · · · ·		
Prosecution By:			Informatio	n	Indictmen	t <u>X</u>
Offense (Code & Description):  Count 1 (a) 18 U Make False State  §554 - Conspiracy Smuggling Firear False Statement in			atement in Fir- acy to Smuggl earms; Count	earm Records; le Firearms; C 4418 U.S.C.	; (b) 18 U.S.C. §3 ount 2 18 U.S.C	71 and C. § 554 -
Offense Is:		Felony _	X	Misdemeanor		
Maximum Sentence:	3 yrs; (b) U yrs; Count than 3 yrs;	p to 5 yrs impr 2 - Up to 10 yrs	isonment; a \$2 s imprisonmen to 5 yrs impri	250,000 fine; T it, a \$250,000 f isonment, a \$2	ne; TSR of not m 'SR of not more t line; TSR of not n 50,000 fine, TSR	han 3 nore
Penalty is Mandatory:		Y	As to spec	cial	vo	
Remarks:						

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Unsealed X		Personal Da	ta Sheet	USAC	)# <b>2011R</b> (	00852
	UNITED	STATES D	ISTRICT	COURT		
	WESTI	ERN DISTR				
					YES _	
			CASE IV	U•		<del> </del>
County: TRAVIS	AUS	TIN I	Division	Judį	ge:	······································
Date: 3/1/11	Mag Ct.#	A-11-M-076	SSN:		FBI#:	
Case No.:		Assistar	nt United State	es Attorney:	Mark Lane	
Defendant: JUSTI	N ALLEN CAUI	DLE (20)	Da	ate of Birth:	Redacted	:
Address:			· · ·			
Citizenship:	United Sta	ates X	Mexic	can	Othe	r
Interpreter Needed:	Yes	No X		Language		
Defense Attorney:				Employed		
Address of Attorney:					Appoin	ted
Defendant is:	In Jail	Where:				
	On Bond	Amt. of Bo	ond	When	re:	
Date of Arrest:				Bench W	Varrant Neede	d
Prosecution By:			Information		Indicti	ment X
Offense (Code & Descr		Count 1 (a) 18				
		1ake False State 554 - Conspiracy				•
	S	muggling Firear Iaking a False S	ms; Counts 1	l0-1118 U.	S.C. §924(a)(1	
Offense Is:		Felony		isdemeanor	, i us,	
Maximum Sentence:	Count 1 (a	Up to 5 yrs imp			TSD of no	_ .t mara than
Maximum Schenec.	3 yrs; (b) Up	to 5 yrs impriso	nment; a \$25	0,000 fine; T	SR of not mo	re than 3
	· ·	- Up to 10 yrs in ounts 10-11 U			•	
	•	n 3 yrs; \$100 ma				
Penalty is Mandatory:		Yes	X As to specia		No	
			assessment	**		
Remarks:						

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Unsealed X		Personal I	Data Sheet	USAC	O# <b>2011R00852</b>	
	UNITE	O STATES	DISTRIC	T COURT		
	WEST	TERN DIST				
			RELA CASE	TED CASE_	YESX_NO	
			CASE	110		
County: TRAVIS	Al	JSTIN	Division	Jud	ge:	
Date: 3/1/11	Mag Ct.#	A-11-M-07	6 SSN:		FBI#:	
Case No.:		Assi	stant United S	states Attorney:	Mark Lane	
Defendant: VIDAL	LIA LETICIA S	SUNIGA (21)		Date of Birth:	Redacted	
Address:						
Citizenship:	United S	States X	M	exican	Other	
Interpreter Needed:	Yes	No X		Language		
Defense Attorney:				Employed		
Address of Attorney:		-			Appointed	
Defendant is:	In Jail	Where:		· 		
	On Bond	Amt. of	f Bond	Whe	re:	
Date of Arrest:			_	Bench V	Varrant Needed	
-						
Prosecution By:	_		Informat	on	Indictment X	
Offense (Code & Descri	ription): Count 1 (a) 18 U.S.C. § 371 and §924(a)(1)(A) - Conspiracy to Make False Statement in Firearm Records; (b) 18 U.S.C. §371 and §554 - Conspiracy to Smuggle Firearms; Count 2 18 U.S.C. § 554 Smuggling Firearms; Count 3718 U.S.C. §924(a)(1)(A) - Making a False Statement in Firearm Records;					
Offense Is:		Felony	X	Misdemeanor		
Maximum Sentence:	3 yrs; (b) U yrs; Count than 3 yrs;	p to 5 yrs impi 2 - Up to 10 yr	risonment; a S s imprisonme o to 5 yrs imp	\$250,000 fine; 1 ent, a \$250,000 f risonment, a \$2	ne; TSR of not more than TSR of not more than 3 fine; TSR of not more 250,000 fine, TSR of not	
Penalty is Mandatory:		Y	es X As to sp assessme	ecial	No	
Remarks:						