

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States District Court
Southern District of Texas
FILED

JUN - 5 2017

David J. Bradley, Clerk

United States of America)
v.)
Erika Vereniz RODRIGUEZ)
usc DOB: 1984)

Case No. M-17-0977-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 06/03/2017 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC 922(g)(1) possession of a firearm or ammunition, which has affected interstate commerce, by an individual having been convicted of a felony

This criminal complaint is based on these facts:

See Attachment A

Continued on the attached sheet.

Approved by AUSA D. PAXTON
DMP 6/5/17



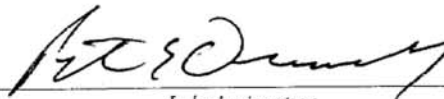
Complainant's signature

Steven Medrano - ATF Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: June 5, 2017 8:38 am



Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Peter E. Ormsby

Printed name and title

ATTACHMENT A

I, Special Agent Steven Medrano, affiant, do hereby depose and state the following:

I am a Special Agent of the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been a law enforcement officer since May 2010.

1. My duties include the investigation of violations of Federal firearms laws. I know it to be unlawful for any person who has been convicted of a crime punishable by more than one year in prison to possess a firearm.

2. On Saturday, June 3, 2017, a Texas Department of Public Safety Trooper conducted a traffic stop on a dark in color 2011 Ford Taurus displaying Texas license plate DHR-4342 on U.S. 281 Southbound in San Manuel, Texas for a traffic violation. Erika Vereniz RODRIGUEZ was the driver of the vehicle and was traveling with one passenger. During the traffic stop, the DPS trooper conducted a criminal history check on RODRIGUEZ and discovered RODRIGUEZ was a convicted felon. During the stop, RODRIGUEZ advised the trooper that she had firearms in the vehicle and granted the trooper consent to search the vehicle. Upon searching the vehicle, the DPS trooper discovered seven (7) AK-47 style rifles, one (1) AK-47 style pistol, and one (1) 50 caliber rifle in the trunk of the vehicle. The serial numbers to all nine (9) firearms were obliterated. The DPS trooper contacted ATF agents and advised them of the traffic stop resulting in the discovery of nine firearms with obliterated serial numbers located in the trunk of the vehicle driven by Erika Vereniz RODRIGUEZ.

3. During a post-Miranda interview, RODRIGUEZ stated all nine (9) firearms belonged to her and informed ATF agents the passenger who was with her had no knowledge of the firearms in the vehicle.

ATTACHMENT A

4. The firearms were found to be manufactured outside of Texas and affects interstate or foreign commerce. The firearms are involved in a violation of 18 USC § 922(g)(1). The firearms are subject to forfeiture under 18 USC § 924(d).

5. In 2015, RODRIGUEZ, was convicted of Possession of Marijuana a 2nd degree felony in the 155th District Court of Fayette County, Texas. RODRIGUEZ was sentenced to six (6) months to the custody of the Texas Department of Criminal Justice and ten (10) years probation. RODRIGUEZ is prohibited from possessing a firearm having been convicted of a criminal offense with a punishment greater than one year.

Steven Medrano - ATF Special Agent

Sworn to before me and subscribed in my presence,

U.S. Magistrate Peter E. Ormsby

Date