United States District Court Southern District of Texas FILED

OURT APR **2** 5 2017

David J. Bradlev. Glerk

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS MCALLEN DIVISION

INDICTMENT

THE GRAND JURY CHARGES:

Count One

On or about April 4, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JUAN ANGEL JAUREGUI and ALEXIS LOPEZ

knowingly made and aided and abetted the making, of a false statement and representation with respect to information required to be kept in the records of Dynamic Tactical Solutions, in McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Bushmaster, Model: BA50, .50 caliber rifle, in that the defendant ALEXIS LOPEZ aided and abetted defendant JUAN ANGEL JAUREGUI who, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant JUAN ANGEL JAUREGUI was the actual buyer of the firearm described above, when in truth and fact the defendants knew that those statements and representations were false and that defendant JUAN ANGEL JAUREGUI was not the actual buyer of the firearm.

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

NOTICE OF FORFEITURE 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the United States gives notice to defendants,

JUAN ANGEL JAUREGUI and ALEXIS LOPEZ

that upon conviction of a violation of Title 18, United States Code, Section 924(a)(1)(A), all firearms and ammunition involved in or used in said violation are subject to forfeiture, including but not limited to the following: Bushmaster, Model: BA50, .50 caliber rifle.

A TRUE BILL

FOREPERSON

ABE MARTINEZ

ACTING UNITED STATES ATTORNEY

AS\$ISTANT UNITED STATES ATTORNEY