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BY: *KMT* DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

June 2008 Grand Jury

8	UNITED STATES OF AMERICA,	)	Criminal Case No. <u>09CR0371</u> <u>DMS</u>
9	Plaintiff,	)	<u>I N D I C T M E N T</u>
10	v.	)	Title 18, U.S.C., Secs. 922(g)(1)
11	MAURICIO MENDEZ (1),	)	and 924(a)(2) - Felon in
12	aka Psycho,	)	Possession of a Firearm
13	aka Cyco,	)	
14	DANIEL DURLAND (2),	)	
15	aka Stomper,	)	
	CYNTHIA MARQUEZ (3),	)	
	Defendants.	)	

The grand jury charges:

Count 1

On or about June 24, 2008, within the Southern District of California, defendant MAURICIO MENDEZ, aka Psycho, aka Cyco, being a person who had previously been convicted in courts, to wit:

- a) the Superior Court of California, County of San Diego, of a crime punishable by imprisonment for a term exceeding one year, that is, on or about November 6, 1991, second degree burglary, in violation of California Penal Code Sec. 459;
- b) the Superior Court of California, County of San Diego, of a crime punishable by imprisonment for a term exceeding one year, that is, on or about July 17, 1995, robbery, in violation of California Penal Code Sec. 211; and

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1 c) the Superior Court of California, County of Lassen, of a  
2 crime punishable by imprisonment for a term exceeding one  
3 year, that is, on or about April 1, 1998, battery by  
4 prisoner with prior felony conviction, in violation of  
5 California Penal Code Sec. 4501.5;

6 did knowingly and unlawfully possess in and affecting commerce  
7 firearms, to wit:

8 a) one 7.62 x 39 caliber Inter-Ordinance of America model  
9 SKS/M59-66 rifle, serial no. 299219;

10 b) one 7.62 x 39 caliber Yugoslavian/CAI model SKS rifle,  
11 serial no. I313879;

12 c) one 12-gauge Remington Arms Company model 870/Wingmaster  
13 shotgun, serial no. V396370V;

14 d) one 12-gauge caliber Remington Arms Company model 870  
15 Express Magnum shotgun, serial no. D643260M; and

16 e) one 30-06 caliber Remington Arms Company model 721 rifle,  
17 serial no. 76056;

18 all in violation of Title 18, United States Code, Sections 922(g)(1)  
19 and 924(a)(2).

20 Count 2

21 On or about June 24, 2008, within the Southern District of  
22 California, defendant DANIEL DURLAND, aka Stomper, being a person who  
23 had previously been convicted in courts, to wit:

24 a) the Superior Court of California, County of San Diego, of  
25 a crime punishable by imprisonment for a term exceeding one  
26 year, that is, on or about May 25, 2000, possession of a  
27 controlled substance, in violation of California Health and  
28 Safety Code, Section 11377(A); and

1 b) the Superior Court of California, County of San Diego, of  
2 a crime punishable by imprisonment for a term exceeding one  
3 year, that is, on or about October 16, 2001, vehicle theft,  
4 in violation of California Vehicle Code, Section 10851(A);  
5 did knowingly and unlawfully possess in and affecting commerce  
6 firearms, to wit:

- 7 a) one 7.62 x 39 caliber Inter-Ordinance of America model  
8 SKS/M59-66 rifle, serial no. 299219;
- 9 b) one 7.62 x 39 caliber Yugoslavian/CAI model SKS rifle,  
10 serial no. I313879;
- 11 c) one 12-gauge Remington Arms Company model 870/Wingmaster  
12 shotgun, serial no. V396370V;
- 13 d) one 12-gauge caliber Remington Arms Company model 870  
14 Express Magnum shotgun, serial no. D643260M; and
- 15 e) one 30-06 caliber Remington Arms Company model 721 rifle,  
16 serial no. 76056;

17 all in violation of Title 18, United States Code, Sections 922(g)(1)  
18 and 924(a)(2).

19 Count 3

20 On or about June 24, 2008, within the Southern District of  
21 California, defendant CYNTHIA MARQUEZ, being a person who had  
22 previously been convicted in courts, to wit:

- 23 a) the Superior Court of California, County of San Diego, of  
24 a crime punishable by imprisonment for a term exceeding one  
25 year, that is, on or about August 16, 2001, second degree  
26 burglary, in violation of California Penal Code, Section  
27 459; and

28 //

1 b) the Superior Court of California, County of San Diego, of  
2 a crime punishable by imprisonment for a term exceeding one  
3 year, that is, on or about March 22, 2006, felon in  
4 possession of a firearm, in violation of California Penal  
5 Code, Section 12021(A);

6 did knowingly and unlawfully possess in and affecting commerce  
7 firearms, to wit:

8 a) one 7.62 x 39 caliber Inter-Ordinance of America model  
9 SKS/M59-66 rifle, serial no. 299219;

10 b) one 7.62 x 39 caliber Yugoslavian/CAI model SKS rifle,  
11 serial no. I313879;

12 c) one 12-gauge Remington Arms Company model 870/Wingmaster  
13 shotgun, serial no. V396370V;

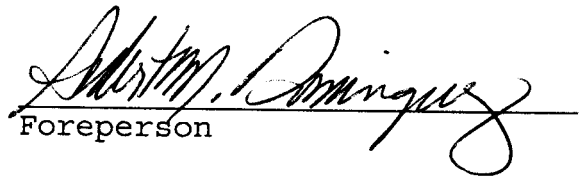
14 d) one 12-gauge caliber Remington Arms Company model 870  
15 Express Magnum shotgun, serial no. D643260M; and

16 e) one 30-06 caliber Remington Arms Company model 721 rifle,  
17 serial no. 76056;

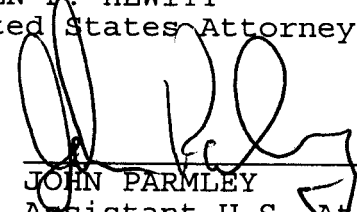
18 all in violation of Title 18, United States Code, Sections 922(g)(1)  
19 and 924(a)(2).

20 DATED: February 5, 2009.

21 A TRUE BILL:

22   
23 Foreperson

24 KAREN P. HEWITT  
25 United States Attorney

26   
27 By: \_\_\_\_\_  
28 JOHN PARMLEY  
Assistant U.S. Attorney