

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

2014 SEP -03 PM 1:26

UNITED STATES OF AMERICA

v.

CASE NO. 6:14-cr-211-ORI-22TBS

NELSON CARTAGENA
JULIAN ROLAND
DAIRO CARTAGENA
KAREN CHAN

18 U.S.C. § 371
18 U.S.C. § 922(e)
18 U.S.C. § 554
18 U.S.C. § 922(a)(1)(A)
18 U.S.C. § 922(a)(6)
18 U.S.C. § 924(d) - Forfeiture
28 U.S.C. § 2461(c) - Forfeiture
18 U.S.C. § 981(a)(1)(C) - Forfeiture

INDICTMENT

The Grand Jury charges:

COUNT ONE
(Conspiracy)

A. Introduction

At all times material to this Indictment:

1. Saint Lucie Shooters Choice LLC was a Federal Firearms Licensee doing business in Brevard and St. Lucie Counties, Florida.
2. L & H Companies, Inc., doing business as Sporting & Tactical Supply was a Federal Firearms Licensee doing business in Seminole County, Florida.
3. Action Gun Outfitters, Inc., was a Federal Firearms Licensee doing business in Brevard County, Florida.
4. Action Gun and Archery LLC, doing business as Action Gun & Archery, was a Federal Firearms Licensee doing business in Brevard County,

Florida.

5. B&H Gun Rack, Inc., was a Federal Firearms Licensee doing business in Brevard County, Florida.

6. Brevard Ammo and Sporting Supply LLC was a Federal Firearms Licensee doing business in Brevard County, Florida.

7. EMCORP, Inc., doing business as Twin Rivers Gunworks, was a Federal Firearms Licensee doing business in Brevard County, Florida.

8. Affordable Pawn and Gun, Inc., was a Federal Firearms Licensee doing business in Brevard County, Florida.

9. BIZONTOP LLC, doing business as Guns & Camo, was a Federal Firearms Licensee doing business in Brevard County, Florida.

10. Outdoor Gun & Pawn LLC was a Federal Firearms Licensee doing business in Brevard County, Florida.

11. Via Al Exito (Via al Exito # 1 SEMORAN) was a contract carrier for transportation and shipment of goods in interstate and foreign commerce, doing business in Orange County, Florida.

12. Via Al Exito Envios (Via Al Exito # 2 KISSIMMEE) was a contract carrier for transportation and shipment of goods in interstate and foreign commerce, doing business in Osceola County, Florida.

13. Via Al Exito Envios Miami was a contract carrier for transportation and shipment of goods in interstate and foreign commerce, doing business in Dade County, Florida.

14. Vlady's Corporation (Vlady's Shoe Repair and Clothing Alteration) was a contract carrier for transportation and shipment of goods in interstate and foreign commerce, doing business in Orange County, Florida.

15. Colombian Products & Services Corp. was a contract carrier for transportation and shipment of goods in interstate and foreign commerce, doing business in Orange County, Florida.

16. Tienda Latina LLC was a contract carrier for transportation and shipment of goods in interstate and foreign commerce, doing business in Orange County, Florida.

17. A Tiempo Cargo, Inc., was a contract carrier for transportation and shipment of goods in interstate and foreign commerce, doing business in Orange, Osceola and Dade Counties, Florida.

18. Imperio Cargo Express, Inc., was a contract carrier for transportation and shipment of goods in interstate and foreign commerce, doing business in Orange and Dade Counties, Florida.

19. J&S Cargo International Corp. was a contract carrier for transportation and shipment of goods in interstate and foreign commerce, doing business in Orange and Dade Counties, Florida.

20. The United States Munitions List, Title 22, Code of Federal Regulations, Section 121, identifies all nonautomatic and semi-automatic firearms up to and including .50 caliber, as defense articles pursuant to §§ 38 and 47(7) of the Arms Export Control Act (22 U.S.C. 2778 and 2794(7)).

21. The Arms Export Control Act, 22 U.S.C. § 2778, requires that every person (other than an officer or employee of the United States Government acting in an official capacity) who engages in the business of exporting any defense article listed in the United States Munitions List, shall register with the United States State Department and pay a registration fee prescribed by regulation.

B. The Conspiracy

22. From a date unknown to the Grand Jury, but no later than on or about November 5, 2013, and continuing until on or about July 29, 2014, in Brevard, Seminole, and Orange Counties, Florida, in the Middle District of Florida, and elsewhere,

**NELSON CARTAGENA
JULIAN ROLAND
DAIRO CARTAGENA
KAREN CHAN**

the defendants herein, and others known and unknown to the Grand Jury, did knowingly and willfully conspire, combine, confederate, and agree with each other and persons both known and unknown to the Grand Jury to commit the following offenses against the United States:

A. To knowingly deliver and cause to be delivered to any common or contract carrier for transportation and shipment in interstate and foreign commerce, a package in which there were firearms, without written notice to the carrier that such firearms were being transported or shipped, in violation of Title 18, United States Code, Section 922(e);

B. To willfully and knowingly attempt to export and send firearms

and ammunition magazines from the United States, contrary to Title 18, United States Code, Section 922(e), Title 22, United States Code, Section 2778, and Title 22, Code of Federal Regulations, Section 121.1, each being a law and regulation of the United States, in violation of Title 18, United States Code Section 554; and

C. To willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 923(a).

C. Manner and Means of the Conspiracy

23. It was a part of the conspiracy that the defendants would and did buy and acquire firearms and high capacity ammunition magazines from Federal Firearms Licensees and from private sellers at area gun shows.

24. It was further part of the conspiracy that the defendants would and did use and acquire large exercise machines to conceal the firearms to ship to Colombia.

25. It was further part of the conspiracy that the defendants would and did conceal and attempt to conceal firearms and ammunition magazines within the motor housing of the exercise machines.

26. It was further part of the conspiracy that the defendants would and did transport the exercise machines in boxes for shipment by contract shippers to specific addresses in Colombia, South America.

27. It was further part of the conspiracy that the defendants would and did not provide written notice to the contract shippers that the boxes to be shipped contained firearms.

28. It was further part of the conspiracy that the defendants would and did receive funds from unknown persons in Colombia, South America, to pay for the purchase of firearms and high capacity magazines, and for shipping costs.

29. It was further part of the conspiracy that the defendants would and did perform acts and make statements to hide and conceal and cause to be hidden and concealed the purpose of the conspiracy and the acts committed in furtherance thereof.

D. Overt Acts

30. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the Middle District of Florida and elsewhere:

A. On or about November 5, 2013, Defendant KAREN CHAN (CHAN) purchased a Glock model 32 pistol, serial number DVV661US, from Affordable Pawn & Gun, Melbourne, Florida.

B. On or about December 9, 2013, Defendant JULIAN ROLAND (ROLAND) purchased a Remington model 870 Tactical shotgun, serial number RS86365G, from Outdoor Gun & Pawn, Melbourne, Florida.

C. On or about January 25, 2014, Defendant ROLAND (ROLAND) purchased a Zastava model M92PV pistol, serial number M92PV040356, from Action Gun and Archery, Melbourne, Florida.

D. On or about March 29, 2014, Defendant ROLAND purchased a FNH model Five-Seven pistol, serial number 386257446; a Glock model 17

pistol, serial number VKG348, and an Extar model EXP556 pistol, serial number EP02194, from Saint Lucie Shooters Choice's booth at a gun show in Melbourne, Florida.

E. On or about March 29, 2014, Defendant ROLAND purchased a Glock model 17 pistol, serial number VPU874, and a FNH model Five-Seven pistol, serial number 386247795, from Sporting & Tactical Supply, Sanford, Florida, under the name of "Julian Rolan."

F. On or about April 5, 2014, Defendant ROLAND purchased one Extar model EXP556 pistol, serial number EP02186; a FNH model Five-Seven pistol, serial number 386257908, and an FNH model FNS-9 pistol, serial number GKU0029045, from Saint Lucie Shooters Choice, Port St. Lucie, Florida.

G. On or about April 5, 2014, Defendant ROLAND purchased two Glock model 17 pistols, serial numbers WZM073 and VPU787, from Action Gun Outfitters, Melbourne, Florida.

H. On or about April 14, 2014, Defendant ROLAND purchased a Zastava model PAPM92PV pistol, serial number M92PV031900 and a Smith & Wesson (S&W) model M&P 15 rifle, serial number SU43072, from Guns & Camo, Melbourne, Florida.

I. On or about April 27, 2014, Defendant ROLAND purchased an Extar model EXP556 pistol, serial number EP02188, from St. Lucie Shooters Choice, Port St. Lucie, Florida.

J. On or about April 29, 2014, Defendant CHAN purchased a Glock model 17 pistol, serial number VEA753, from Action Gun and Archery, Melbourne, Florida.

K. On or about May 4, 2014, Defendant CHAN purchased two Extar model EXP556 pistols, serial numbers EP02192 and EP02193, from Saint Lucie Shooters Choice, Port St. Lucie, Florida.

L. On or about May 4, 2014, Defendant CHAN purchased a Glock model 17 pistol, serial number PU121US, from Brevard Ammo and Sporting Supply, Titusville, Florida.

M. On or about May 28, 2014, Defendant ROLAND purchased a S&W model M&P15 Sport rifle, serial number SU68221, from Action Gun Outfitters, Melbourne, Florida.

N. On or about June 5, 2014, Defendant CHAN purchased a FNH model Five-Seven pistol, serial number 386265033, from Twin Rivers Gunworks, Rockledge, Florida.

O. On or about June 19, 2014, Defendant CHAN purchased a Keltec model PLR-16 pistol, serial number P9F34, from Affordable Pawn and Gun, Melbourne, Florida.

P. On or about July 7, 2014, Defendants CHAN and NELSON CARTAGENA transported or did cause to be transported a box from Brevard County, Florida, to Tienda Latina, a freight forwarder in Orlando, Florida. The box was addressed to be delivered to an address in Medellin, Colombia, South

America.

Q. On or about July 11, 2014, Defendant ROLAND purchased a S&W, model M&P15 rifle, serial number SU87132, from Action Gun and Archery, Melbourne, Florida.

R. On or about July 17, 2014, Defendant ROLAND purchased a magazine for an AR15 rifle from Action Gun and Archery, Melbourne, Florida.

S. On or about July 17, 2014, Defendant NELSON CARTAGENA purchased a Palmetto State Armory, Model M4 rifle, serial number LW091484, from Action Gun and Archery, Melbourne, Florida.

T. On or about July 21, 2014, Defendant NELSON CARTAGENA transported or did cause to be transported a box from Brevard County, Florida, to Via Al Exito # 1 Semoran, a freight forwarder in Orlando, Florida. Hidden inside the box were four firearms, that is, one Spike's Tactical 5.56 rifle, one Palmetto State Armory 5.56 rifle, one American Tactical Imports 5.56 rifle and one Zastava .223 pistol, along with other firearm parts. The box was addressed to be delivered to an address in Medellin, Colombia, South America. Defendant NELSON CARTAGENA declared or did cause to be declared that the box contained an exercise machine, and he executed or did cause to be executed a disclaimer that the box did not contain any firearms.

U. On or about July 21, 2014, Defendant NELSON CARTAGENA transported or did cause to be transported a box from Brevard County, Florida, to Tienda Latina, a freight forwarder in Orlando, Florida. The box

was addressed to be delivered to an address in Medellin, Colombia, South America.

V. On or about July 23, 2014, Defendant CHAN purchased a Keltec model PLR22 pistol, serial number 42220 from B&H Gun Rack, Merritt Island, Florida.

W. On or about July 23, 2014, Defendants NELSON CARTAGENA and CHAN transported a box from Brevard County, Florida, to Colombian Products, a freight forwarder in Orlando, Florida. Hidden inside the box were fifteen firearms, that is, nine Glock pistols, two FNH pistols, one Beretta 9mm pistol, one HS Products (IM METAL) 9mm pistol, and two Keltec 5.56 pistols, along with thirty-eight assorted ammunition magazines, and other firearm parts. The box was addressed to be delivered to an address in Itagui, Colombia, South America. Defendants NELSON CARTAGENA and CHAN declared that the box contained an exercise machine, and they executed a disclaimer that the box did not contain any firearms.

X. On or about July 29, 2014, Defendants NELSON CARTAGENA and DAIRO CARTAGENA hid fourteen firearms and twenty-five ammunition magazines inside an exercise machine in one box and sixteen firearms and twenty-four ammunition magazines inside an exercise machine in a second box, in preparation for shipping the boxes to Colombia, South America.

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

COUNT TWO

31. On or about July 23, 2014, in Orange County, Florida, in the Middle District of Florida,

**NELSON CARTAGENA
KAREN CHAN**

the defendants herein, aiding and abetting each other, did willfully and knowingly deliver and cause to be delivered to any common or contract carrier for transportation and shipment in interstate and foreign commerce, a package in which there were firearms as listed in the table below, without written notice to the carrier that such firearms were being transported or shipped:

Make and Model	Serial Number
Keltec 5.56 caliber pistol, Model PLR16	P9F34
Keltec 5.56 caliber pistol, Model PLR16	P5407
Glock 9 mm pistol, Model 19	WNL262
Glock 9 mm pistol, Model 19	XNK374
Glock 9 mm pistol, Model 19	WZS277
HS PRODUCTS (IM METAL), Model XD	MG905131
Glock 9 mm pistol, Model 17	RSV624
Glock 9 mm pistol, Model 19	WN532US
FN HERSTAL 57 Caliber, Model FIVE-SEVEN	386265033
Glock 9 mm pistol, Model 17	Uvc382
Glock 9 mm pistol, Model 19	AZW427US

Beretta 9 mm pistol, Model 92	L35793Z
Glock 9 mm pistol, Model 17	KCS679
FN HERSTAL 57 Caliber, Model FIVE-SEVEN	386265344
Glock 9 mm pistol, Model 26	UKW889

All in violation of Title 18, United States Code, Sections 922(e) and 2, and 924(a)(1)(D).

COUNT THREE

32. On or about July 23, 2014, in Orange County, Florida, in the Middle District of Florida, and elsewhere,

**NELSON CARTAGENA
KAREN CHAN**

the defendants herein, aiding and abetting each other, did willfully and knowingly attempt to export and send the firearms and ammunition magazines listed in the table below, from the United States, contrary to Title 18, United States Code, Section 922(e), Title 22, United States Code, Section 2778, and Title 22, Code of Federal Regulations, Section 121.1, a law and regulation of the United States.

Make and Model	Serial Number
Keltec 5.56 caliber pistol, Model PLR16	P9F34
Keltec 5.56 caliber pistol, Model PLR16	P5407
Glock 9 mm pistol, Model 19	WNL262
Glock 9 mm pistol, Model 19	XNK374

Glock 9 mm pistol, Model 19	WZS277
HS PRODUCTS (IM METAL), Model XD	MG905131
Glock 9 mm pistol, Model 17	RSV624
Glock 9 mm pistol, Model 19	WN532US
FN HERSTAL 57 Caliber, Model FIVE-SEVEN	386265033
Glock 9 mm pistol, Model 17	Uvc382
Glock 9 mm pistol, Model 19	AZW427US
Beretta 9 mm pistol, Model 92	L35793Z
Glock 9 mm pistol, Model 17	KCS679
FN HERSTAL 57 Caliber, Model FIVE-SEVEN	386265344
Glock 9 mm pistol, Model 26	UKW889

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

COUNT FOUR

33. Between on or about November 5, 2013, and continuing until on or about July 29, 2014, in Brevard and Seminole Counties, Florida, in the Middle District of Florida, and elsewhere,

**NELSON CARTAGENA
JULIAN ROLAND
DAIRO CARTAGENA
KAREN CHAN**

the defendants herein, aiding and abetting each other, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

All in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), 2, and 924(a)(1)(D).

COUNT FIVE

34. On or about January 25, 2014, in Brevard County, Florida, in the Middle District of Florida,

JULIAN ROLAND

the defendant herein, in connection with the acquisition of a firearm, that is, a Zastava pistol, model M92PV, serial number M92PV040356, from Action Gun and Archery, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Action Gun and Archery, which statement was intended and likely to deceive Action Gun and Archery as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that that he was the actual buyer of the firearms indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearms.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SIX

35. On or about March 29, 2014, in Brevard County, Florida, in the Middle District of Florida,

JULIAN ROLAND

the defendant herein, in connection with the acquisition of a firearm, that is, a FNH Five-Seven pistol, serial number 386257446, a Glock 17, serial number VKG348, and an Extar pistol, serial number EP02194, from St. Lucie Shooters Choice, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to St. Lucie Shooters Choice, which statement was intended and likely to deceive St. Lucie Shooters Choice as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that that he was the actual buyer of the firearms indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearms.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SEVEN

36. On or about March 29, 2014, in Seminole County, Florida, in the Middle District of Florida,

JULIAN ROLAND

the defendant herein, in connection with the acquisition of a firearm, that is, a FNH Five-Seven pistol, a Glock Model 17 pistol, serial number VPU874, and a FNH Five-Seven pistol, serial number 386247795, from Sporting & Tactical Supply, a

licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Sporting & Tactical, which statement was intended and likely to deceive Sporting & Tactical as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that that he was the actual buyer of the firearms indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearms.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT EIGHT

37. On or about April 5, 2014, in Brevard County, Florida, in the Middle District of Florida,

JULIAN ROLAND

the defendant herein, in connection with the acquisition of a firearm, that is, two Glock Model 17 pistols, serial number WZM073 and VPU787, from Action Gun Outfitters, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Action Gun Outfitters, which statement was intended and likely to deceive Action Gun Outfitters as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did

execute a Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that that he was the actual buyer of the firearms indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearms.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT NINE

38. On or about May 28, 2014, in Brevard County, Florida, in the Middle District of Florida,

JULIAN ROLAND

the defendant herein, in connection with the acquisition of a firearm, that is, a S&W, model M&P15 Sport rifle, serial number SU68221, from Action Gun Outfitters, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Action Gun Outfitters, which statement was intended and likely to deceive Action Gun Outfitters as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that that he was the actual buyer of the firearms indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearms.

All in violation of Title 18, United States Code, Sections 922(a)(6)

and 924(a)(2).

COUNT TEN

39. On or about July 11, 2014, in Brevard County, Florida, in the Middle District of Florida,

JULIAN ROLAND

the defendant herein, in connection with the acquisition of a firearm, that is, a S&W, model M&P15 Sport rifle, serial number SU68221, from Action Gun & Archery, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Action Gun Outfitters, which statement was intended and likely to deceive Action Gun Outfitters as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that that he was the actual buyer of the firearms indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearms.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT ELEVEN

40. On or about July 11, 2014, in Brevard County, Florida, in the Middle District of Florida,

NELSON CARTAGENA

the defendant herein, in connection with the acquisition of a firearm, that is, a Model M4, Palmetto State Armory rifle, serial number LW091484, from Action Gun & Archery, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Action Gun Outfitters, which statement was intended and likely to deceive Action Gun Outfitters as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant did execute a Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that that he was the actual buyer of the firearms indicated on the Form 4473, when in fact as the defendant then knew, he was not the actual buyer of the firearms.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE

1. The allegations contained in Counts One through Eleven of this Indictment are incorporated by reference for the purpose of alleging forfeitures under Title 18, United States Code, Sections 924(d) and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. Upon their conviction of the violation alleged in Counts Two and Three of this Indictment, the defendants, **NELSON CARTAGENA** and **KAREN CHAN**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section

2461(c), all of their interest in any property constituting or derived from proceeds obtained directly or indirectly as a result of the said violations.

3. Upon their conviction of the violations alleged in Counts One and Four of this Indictment, the defendants, **NELSON CARTAGENA, JULIAN ROLAND, DARIO CARTAGENA, and KAREN CHAN**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offenses.

4. Upon his conviction of the violations alleged in Counts Five through Ten of this Indictment, the defendant, **JULIAN ROLAND**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section, 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offenses.

5. Upon his conviction of the violation alleged in Count Eleven of this Indictment, the defendant, **NELSON CARTAGENA**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense.

6. The property to be forfeited includes, but is not limited to, the following:

Make and Model	Serial Number
Keltec 5.56 caliber pistol, Model PLR16	P9F34
Keltec 5.56 caliber pistol, Model PLR16	P5407
Glock 9 mm pistol, Model 19	WNL262
Glock 9 mm pistol, Model 19	XNK374
Glock 9 mm pistol, Model 19	WZS277
HS PRODUCTS (IM METAL), Model XD	MG905131
Glock 9 mm pistol, Model 17	RSV624
Glock 9 mm pistol, Model 19	WN532US
FN HERSTAL 57 Caliber, Model FIVE-SEVEN	386265033
Glock 9 mm pistol, Model 17	Uvc382
Glock 9 mm pistol, Model 19	AZW427US
Beretta 9 mm pistol, Model 92	L35793Z
Glock 9 mm pistol, Model 17	KCS679
FN HERSTAL 57 Caliber, Model FIVE-SEVEN	386265344
Glock 9 mm pistol, Model 26	UKW889

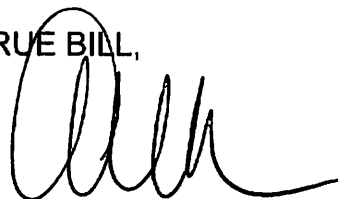
7. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

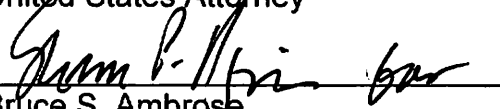
A TRUE BILL,



Foreperson

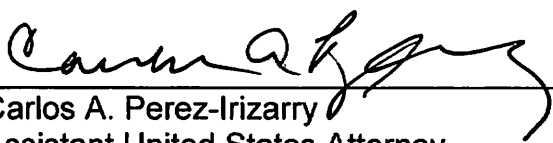
A. LEE BENTLEY, III
United States Attorney

By:



Bruce S. Ambrose
Assistant United States Attorney

By:



Carlos A. Perez-Irizarry
Assistant United States Attorney
Chief, Orlando Division

UNITED STATES DISTRICT COURT
Middle District of Florida
Orlando Division

THE UNITED STATES OF AMERICA

vs.

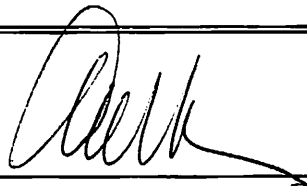
NELSON CARTAGENA
JULIAN ROLAND
DAIRO CARTAGENA
KAREN CHAN

INDICTMENT

Violations:

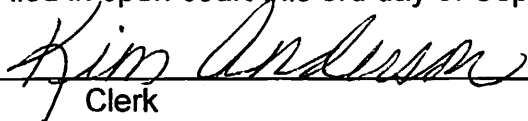
- 18 U.S.C. § 371
- 18 U.S.C. § 922(e)
- 18 U.S.C. § 554
- 18 U.S.C. § 922(a)(1)(A)
- 18 U.S.C. § 922(a)(6)

A true bill,



Foreperson

Filed in open court this 3rd day of September, 2014.



Clerk

Bail \$ _____