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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,)

2:09-mj-00002-LRL

Plaintiff,)

v.)

Violations:

UVALDO SALAZAR-LOPEZ,)

**18 U.S.C. § 922(g)(5) felon in
possession of a firearm; 922 (a)(1)(a)
dealing in firearms without a license**

Defendant.)

CRIMINAL COMPLAINT

BEFORE a United States Magistrate Judge presiding in Las Vegas, Nevada, the undersigned complainant, being first duly sworn, deposes and says:

COUNT ONE

(Illegal Alien in Possession of a Firearm)

On or about December 23, 2008, in the District of Nevada, Uvaldo SALAZAR-LOPEZ, the defendant, having illegally entered and resided in the United States, knowingly and intentionally possessed, in and affecting interstate commerce, the following firearms, that is:

A DPMS, Model A-15, .223 caliber rifles, serial number FH40299;

A DPMS, Model A-15, .223 caliber rifles, serial number FH36302;

A DPMS, Model A-15, .223 caliber rifles, serial number FH40287;

A DPMS, Model LR-308, .308 caliber rifle, serial number 27782.

1 All in violation of Title 18 United States Code, Section 922(g)(5).
2

3 **COUNT TWO**

4 (Dealing in Firearms without a License)
5

6 On or about December 23, 2008, in the District of Nevada, OSVALDO
7 SALAZAR-LOPEZ, the defendant, while engaged in the business of dealing in firearms
8 without a license, unlawfully received firearms in interstate commerce, the following
9 firearms, that is:

10 A DPMS, Model A-15, .223 caliber rifles, serial number FH40299;

11 A DPMS, Model A-15, .223 caliber rifles, serial number FH36302;

12 A DPMS, Model A-15, .223 caliber rifles, serial number FH40287;

13 A DPMS, Model LR-308, .308 caliber rifle, serial number 27782.

14 All in violation of Title 18 United States Code, Section 922(a)(1)(a).
15

16 **PROBABLE CAUSE AFFIDAVIT**

17 Complainant, as a Special Agent with the Bureau of Alcohol, Tobacco,
18 Firearms and Explosives, states the following as and for probable cause:

19 1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms
20 and Explosives currently assigned to the Las Vegas, Nevada field office. I have been
21 so employed since July of 2000.

22 2. The following is the result of my own investigation or was provided by
23 other law enforcement officers.

24 3. On or about October 14, 2008, four suspects and one Mexican military
25 soldier were killed in a shootout during a narcotics raid on a residence in Tijuana,
26 Mexico. Mexican authorities seized fourteen firearms a result of the raid. On October

1 22, ATF Special Agents examined the seized firearms, and subsequently traced the
2 firearms.

3 4. Trace information revealed that five of the firearms seized in Mexico were
4 purchased in Las Vegas by Juan VALDEZ. VALDEZ purchased three .308 caliber
5 assault rifles, one .223 caliber assault rifle and one .50 caliber sniper rifle that were
6 recovered in the residence in Mexico. All five firearms were purchased between July
7 25, 2008 and August 2, 2008.

8 5. Your complainant investigated the purchases made by VALDEZ and
9 discovered that VALDEZ had either purchased, or caused others to purchase, over
10 \$100,000 of firearms. Your complainant seized three firearms and \$3000 cash during
11 a federal search warrant at the VALDEZ residence on December 4, 2008. At this time,
12 VALDEZ told your complainant that he was approached by an individual named
13 "ZORRA" who asked VALDEZ to purchase firearms for him. VALDEZ stated that
14 ZORRA provided tens of thousands of dollars to VALDEZ in order to purchase
15 firearms. ZORRA would travel from Southern California to Las Vegas to either provide
16 VALDEZ the currency or to pick up firearms. VALDEZ stated that sometimes ZORRA
17 traveled with other persons or sent someone else to pick up the firearms.

18 6. Your complainant has confirmed through VALDEZ that VALDEZ
19 transferred approximately twenty-two firearms to ZORRA or those working with
20 ZORRA. ATF has seized an additional nine firearms during the investigation before
21 VALDEZ was able to transfer them.

22 7. On December 16, 2008, VALDEZ met with ZORRA at the Circus Circus
23 Casino in Las Vegas, Nevada. ZORRA asked VALDEZ when he could pick up the five
24 AR-15 rifles and the .308 rifle he had ordered. ZORRA also asked for the twelve AK-
25 47 drum magazines he had ordered. VALDEZ told ZORRA they would be ready
26 Friday, and ZORRA said he would go home to California and come back to Las Vegas

1 on Friday to pick up the firearms. ZORRA told VALDEZ that VALDEZ owed him \$750
2 back from the money he had previously given him.

3 8. On December 23, 2008, ZORRA contacted VALDEZ and stated he was
4 sending someone to Las Vegas to pick up the firearms. ZORRA instructed VALDEZ to
5 meet with "COMPA" at the Circus Circus Casino parking lot. VALDEZ drove to the
6 parking lot where he met with "COMPA", later identified as Uvaldo SALAZAR-LOPEZ.
7 Another individual (later identified as Christian SILLAS) stood watch approximately
8 twenty feet away. SALAZAR-LOPEZ gave VALDEZ the keys to SILLAS' Jeep
9 Cherokee and told him to put the firearms inside and return the vehicle. VALDEZ drove
10 the vehicle to meet your complainant and the vehicle was brought to the ATF Field
11 Office.

12 9. Your complainant placed four assault rifles twelve AK-47 drum
13 magazines into the Jeep Cherokee. The following firearms were placed in the
14 Cherokee:

15 A DPMS, Model A-15, .223 caliber rifles, serial number FH40299;

16 A DPMS, Model A-15, .223 caliber rifles, serial number FH36302;

17 A DPMS, Model A-15, .223 caliber rifles, serial number FH40287;

18 A DPMS, Model LR-308, .308 caliber rifle, serial number 27782.

19
20 10. VALDEZ drove the Cherokee back to the Circus Circus parking lot.
21 ZORRA contacted VALDEZ and asked where VALDEZ was on the way. VALDEZ
22 stated he would be there soon. VALDEZ met up with SALAZAR-LOPEZ and gave the
23 keys back to him. SALAZAR-LOPEZ asked VALDEZ where the money was and
24 VALDEZ told him it was in one of the rifle cases. SALAZAR-LOPEZ gave the keys to
25
26

1 SILLAS and got in the passenger seat of the Cherokee. SILLAS got in the driver's
2 seat. ATF agents then moved in to detain SALAZAR-LOPEZ and SILLAS.

3 11. The following firearms were located in the back to the Cherokee:

4 A DPMS, Model A-15, .223 caliber rifles, serial number FH40299;

5
6 A DPMS, Model A-15, .223 caliber rifles, serial number FH36302;

7 A DPMS, Model A-15, .223 caliber rifles, serial number FH40287;

8 A DPMS, Model LR-308, .308 caliber rifle, serial number 27782.

9
10 12. Your complainant and ICE Special Agent Fulmer interviewed
11 SALAZAR-LOPEZ. SALAZAR-LOPEZ provided the following information:

12 a) He has been living in Anaheim, California for the last two years illegally. His
13 address is 2045 Haster #N3, Anaheim, California 92802. He crossed the
14 border around Tecate, California. He lives with his wife and two children.

15 b) He was sent to Las Vegas to pick up five firearms for his friend Arturo. Arturo
16 also goes by the name ZORRA. He did not know what kind of firearms he
17 was sent to pick up. ZORRA said he would pay him \$800 for picking up the
18 guns.

19
20 c) He met ZORRA at a park three months ago and they play volleyball together.
21 ZORRA drives a red Nissan Sentra and lives in Paramount, CA.

22
23 d) Two or three months ago he came to Las Vegas by himself to meet
24 ZORRA'S contact and pick up two firearms. He picked up a .308 rifle and
25 a .223 caliber rifle. He borrowed a blue Thunderbird from ZORRA to drive
26

1 to Las Vegas. He returned to Anaheim, California with the firearms and
2 gave the Thunderbird keys back to ZORRA at a park near Orangewood
3 Avenue. ZORRA paid him \$400 for picking up the guns.
4

5 13. Your complainant has learned that UVALDO SALAZAR-LOPEZ has never
6 been licensed by ATF as a Federal Firearms Licensee (FFL) through a search
7 through the Federal Licensing System.

8 14. Your complainant contacted ATF Special Agent Chad Key, an agent with
9 specialized training in the interstate nexus of firearms, and Special Agent Key
10 confirmed that the firearms described in this complaint were not manufactured in the
11 State of Nevada and therefore have moved in interstate and foreign commerce.
12

13 **CONCLUSION**

14 Based upon the above information, there is probable cause to believe that
15 Uvaldo Salazar-Lopez has violated 18 U.S.C. §§ 922(g)(5) and 922 (a)(1)(a).
16

17 

18 DOAK DYER, Special Agent
19 Bureau of Alcohol, Tobacco, Firearms
20 and Explosives

21 SUBSCRIBED and SWORN
22 to before me on January 5, 2009.

23 

24 UNITED STATES MAGISTRATE JUDGE
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