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FILED IN UNITED STATES DISTRICT  
COURT, DISTRICT OF UTAH

AUG 14 2008

R. MARK JONES, CLERK  
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

COMPLAINT 2:08 mj 247

Plaintiff,

VIO. 18 U.S.C. § 922(a)(6), FALSE  
STATEMENT IN THE  
ACQUISITION OF A FIREARM

vs.

HEDTHEL MAURICIO CORLETO  
aka HEDTHEL MAURICIO  
CORLETO-PAZ,

Defendant.

Before a United States Magistrate Judge for the District of Utah comes the undersigned who, on oath deposes and says:

COUNT I  
(18 U.S.C. § 922(a)(6))

On or about , in the Central Division of the District of Utah,

HEDTHEL MAURICIO CORLETO,

the defendant herein, in connection with the acquisition of a firearm, to wit, one Glock Model 21 .45 caliber pistol and one Glock Model 35, .40 caliber pistol handgun, from Doug's Shoot 'N Sports, 4926 South Redwood Road, Taylorsville, Utah , a licensed

dealer, knowingly made a false and fictitious written statement intended and likely to deceive the dealer with respect to any fact material to the lawfulness of such attempted acquisition of said firearm under Chapter 44 of Title 18, in that the defendant wrote "yes" next to question 12a on ATF Form 4473 which asks, "Are you the actual buyer of the firearm(s) listed on this form?", when in fact the defendant was purchasing the gun for another person; all in violation of 18 U.S.C. §§ 922(a)(6).

Complainant states that this complaint is based on information consisting of the following:

1. I am a special agent with the Bureau of Alcohol, Tobacco and Firearms currently assigned to the Salt Lake City office. I have been a special agent with ATF for approximately 8 years.

2. Based on an investigation initiated from the Salt Lake ATF office, I have learned that in 2007, HEDTHEL MAURICIO CORLETO, also known as HEDTHEL MAURICIO CORLETO-PAZ, purchased (16) Glock pistols within a three-day period. Specifically, on 09/29/2007, CORLETO purchased (14) Glock pistols from federal firearms licensee Get Some Guns & Ammo, 6651 South State Street, Murray, Utah. On 10/01/2007, CORLETO purchased (2) Glock pistols from federal firearms licensee Doug's Shoot'N Sports, 4926 South Redwood Road, Taylorsville, Utah. I have reviewed the paperwork submitted by CORLETO in connection with those purchases and found that CORELTO indicated that he was the actual buyer of the guns.

3. The Glock pistols CORLETO purchased within the three-day span are comprised of (6) different Glock models and (4) different calibers. On 09/29/2007, CORLETO purchased (3) Glock Model 17 9mm pistols, (2) Glock Model 21 .45 caliber pistols, (7) Glock Model 22 .40 caliber pistols, (1) Glock Model 23 .40 caliber pistol, and (1) Glock Model 31 .357 caliber pistol. On 10/01/2007, CORLETO purchased (1) Glock Model 21 .45 caliber pistol and (1) Glock Model 35, .40 caliber pistol.

4. On 01/25/2008, I conducted a routine query of law enforcement databases for this investigation. Specifically, I queried for border crossings and found that CORLETO crossed the U.S. border the same day he purchased two Glock pistols from Doug's Shoot'N Sports'. On 10/01/2007, CORLETO flew from Los Angeles, California, to Guatemala City, Guatemala. On 10/14/2007, CORLETO flew from Guatemala City to Los Angeles.

5. I also found at least two other occasions in which CORLETO traveled to Guatemala in 2007. On 01/29/2007, CORLETO flew from Houston, Texas, to Guatemala City and returned on 02/24/2007. On 04/25/2007, CORLETO flew from Los Angeles to Guatemala City and returned on 05/12/2007.

6. According to ICE, CORLETO is a naturalized U.S. citizen born in Guatemala. A query of the Federal Licensing System, the ATF database for firearms licenses, revealed no records for CORLETO meaning he is not a licensed manufacturer, importer, or dealer of firearms in the United States.

7. I believe the international travel within three days of purchasing (16) Glock

pistols could be indicative of firearms trafficking. Additionally, I have learned through law enforcement contacts with the State of Utah that CORLETO reported earnings of approximately \$47,000 in 2007. Therefore, CORLETO spent approximately 15% of his annual salary in a three-day period on firearms purchases.

8. On 07/16/2008, your affiant received a voice message from ATF Intelligence Research Specialist (IRS) Gary Chicko from ATF Headquarters indicating that one of the Glocks purchased by CORLETO has been recovered by Guatemalan authorities.

9. Your affiant called and spoke with IRS Chicko. IRS Chicko indicated that he was part of an ATF contingency that recently traveled to Guatemala for the purpose of conducting firearms traces for the Guatemalan government on a large cache of seized weapons. Among thousands of seized weapons, the ATF contingency found that a Glock Model 23 purchased by CORLETO on 10/01/2007 was recovered in April 2008 in some type of shooting incident.

10. The time to crime [amount of time elapsed from retail purchase to recovery by law enforcement] for this firearm is approximately 7 months. ATF trace analysis has consistently shown that trafficked firearms usually have a time to crime less than 36 months.

11. Based on this information, as well as additional information obtained during this investigation, on August 12, 2008, I presented a search warrant to Magistrate Judge Paul M. Warner of the federal district court for the District of Utah for the search of CORLETO's home located at 9769 Tweed Road, South Jordan, Utah. The warrant was

authorized by Judge Warner on that date and executed on August 14, 2008 .

12. During the execution of the search warrant, none of the firearms described above were located. Following a waiver of his rights under *Miranda*, CORLETO told me that he had sold the guns.

13. Based on the above information, there is probable cause to believe that on September 29, 2007, CORLETO intended to sell the firearms purchased from Get Some Guns & Ammo, and therefore, provided false information when he indicated on the required documentation that he was the actual purchaser of the firearms.



Michael Minichino, Special Agent  
Bureau of Alcohol, Tobacco & Firearms

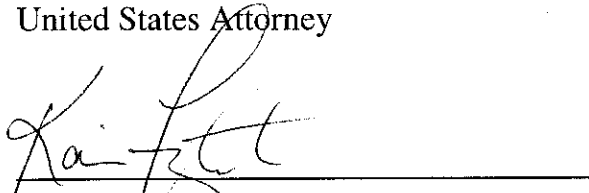
SUBSCRIBED AND SWORN TO BEFORE ME this 14<sup>th</sup> day of August, 2008.



PAUL M. WARNER  
United States Magistrate Judge

APPROVED:

BRETT L. TOLMAN  
United States Attorney



TRINA A. HIGGINS  
Assistant United States Attorney