

CRIMINAL COMPLAINT

<p>United States District Court</p> <p>United States of America</p> <p>v.</p> <p>Joe Santiago Valles, xx/xx/1982 Timothy Veninga, xx/xx/1960</p> <p>U.S. Citizens</p>	<p>DISTRICT of ARIZONA</p> <p>DOCKET NO.</p> <hr/> <p>MAGISTRATE'S CASE NO.</p> <p style="font-size: 1.5em;">16-08572MJ</p>
<p>Complaint for violation 18 U.S.C. 924(a)(1)(A), 371 Conspiracy to Falsify FFL Records</p>	
<p>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</p> <p>From on or about October 2015 and continuing thereafter until on or about March 31, 2016, in Tucson, in the District of Arizona, the defendants Timothy VENINGA and Joe S. VALLES knowingly and willfully conspired and agreed together and with each other and with other persons both known or unknown, to knowingly make false statements and representations with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of VENINGA, a Federal Firearms Licensee, in that the defendants knew that certain persons listed as buyers/transferees of the firearms on Department of Treasury, Bureau of Alcohol, Tobacco, Firearms and Explosives Forms 4473, Firearms Transactions Records, were not the actual buyers/transferees of the firearms and the information pertaining to some of these persons listed as buyers/transferees on the Form 4473s was false, all in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 371.</p>	
<p>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</p> <p>At all times, Timothy VENINGA was a federally licensed firearms (FFL) dealer operating and maintaining a firearms business known as Ballistic Firearms at 3452 West Marlene Street, Tucson, in the District of Arizona. Joe S. VALLES was a business partner of VENINGA'S. ATF Form 4473 ("the Firearms Transaction Record") is required to be completed by the federally licensed firearms dealer and the buyer before the dealer can transfer or sell a firearm. During that process the dealer is required to, among other things, determine that the person signing his/her name in the box entitled "Transferee's (Buyer's) Signature" was the actual buyer of the firearm.</p> <p>Continued on reverse</p>	
<p>MATERIAL WITNESS(ES) IN RELATION TO THE CHARGE:</p>	
<p>DETENTION REQUESTED <i>Serra M. Tsethlikai</i></p> <p>COMPLAINT REVIEWED by AUSAs Serra M. Tsethlikai</p> <p><i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i></p>	<p>SIGNATURE OF COMPLAINANT</p> <p><i>Christopher Bort</i></p> <p>OFFICIAL TITLE & NAME: Special Agent Christopher Bort</p>
<p>Sworn to before me and subscribed in my presence.</p>	
<p>SIGNATURE OF MAGISTRATE JUDGE¹⁾</p> <p><i>[Signature]</i></p>	<p>DATE</p> <p>May 18, 2016</p>

1) See Federal rules of Criminal Procedure rules 5 and 54