

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

JUN 05 2016

Clerk of Court

United States of America)
v.)
Luis Solis-Zuniga)
YOB: 1995)
Citizenship: Mexico)

Case No. M-16-1083-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 3, 2016 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
22 U.S.C. § 2778	Attempted Illegal Exportation of Defense Articles

This criminal complaint is based on these facts:

The defendant did knowingly and willfully attempt to export and cause to be exported into the United Mexican States from the United States of America a defense article, that is, to wit: 19 firearms; 32 magazines; and 4,000 rounds of ammunition, which were designated as defense articles on the United States Munitions List, without first having obtained from the Department of State a license for such export or written authorization for such export.

Continued on the attached sheet.

Sean T. Greene

Complainant's signature

Sean T. Greene, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/05/2016

Dorina Ramos

Judge's signature

City and state: McAllen, Texas

Dorina Ramos, U.S. Magistrate Judge

Printed name and title

Attachment A

On June 3, 2016, at approximately 9:40 p.m., Luis Alfonso SOLIS-Zuniga arrived at the Anzalduas port of entry in Mission, Texas driving a black GMC Canyon pickup. SOLIS was traveling in the southbound lanes leading to Mexico. U.S. Customs and Border Protection (CBP) officers contacted SOLIS prior to exiting the United States and asked the subject if he was transporting firearms, ammunition, or monetary instruments exceeding \$10,000 (USD). SOLIS provided a negative oral declaration to that effect.

The CBP officers performed a thorough inspection of the vehicle and discovered four (4) Beretta 9mm handguns (serial numbers obliterated); (15) Romarm 7.62x39mm AK-47 type rifles (serial numbers obliterated); 4,000 rounds of 7.62x39mm ammunition; 32 firearms magazines; and (1) M-134G Power Supply. The aforementioned defense articles were located in the rear passenger compartment the vehicle.

Homeland Security Investigations and Bureau of Alcohol, Tobacco, Firearms, and Explosives special agents (SAs) advised SOLIS of his Miranda Rights. SOLIS provided a written waiver of his right to counsel and agreed to answer the SAs' questions. During the course of the interview, SOLIS stated that he did not possess a license from the United States government to export defense articles, nor had he ever applied for such a license. SOLIS stated that he was aware that it was illegal to smuggle firearms and ammunition out of the United States. SOLIS stated that he had smuggled weapons to Mexico on five previous occasions. SOLIS further stated that he expected to be paid approximately \$600 (USD) after successfully delivering the firearms and ammunition to individual(s) in Mexico.