

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION

2017 AUG 2 PM 12:41  
CLERK, US DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 2:17-cr-88-FM-29CM

MIGUEL JIMINEZ BORDA and  
ALEJANDRA MARIA MAYO

INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about June 27, 2017, in the Middle District of Florida, the  
defendants,

MIGUEL JIMINEZ BORDA and  
ALEJANDRA MARIA MAYO,

knowingly exported, sent, and attempted to export and send firearms from the  
United States contrary to 22 U.S.C. § 2778(b)(2) and (c) and 22 C.F.R. Parts  
121, 123, and 127, and knowingly transported, concealed, and facilitated the  
transportation and concealment of such firearms knowing them to be intended  
for exportation contrary to such United States statutes and regulations.

In violation of 18 U.S.C. §§ 554(a) and 2.

**COUNT TWO**

On or about June 28, 2017, in the Middle District of Florida, the defendants,

MIGUEL JIMINEZ BORDA and  
ALEJANDRA MARIA MAYO,

knowingly exported, sent, and attempted to export and send firearms from the United States contrary to 22 U.S.C. § 2778(b)(2) and (c) and 22 C.F.R. Parts 121, 123, and 127, and knowingly transported, concealed, and facilitated the transportation and concealment of such firearms knowing them to be intended for exportation contrary to such United States statutes and regulations.

In violation of 18 U.S.C. §§ 554(a) and 2.

**FORFEITURE**

1. The allegations contained in Counts One and Two are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. §§ 924(d), 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of Counts One and Two, the defendants shall forfeit to the United States, U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm or ammunition involved in or used in the violations.

3. Upon conviction of a violation of Counts One and Two, the defendants shall forfeit to the United States, U.S.C. § 981(a)(1)(C) and 28

U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations.

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

<b>Manufacturer</b>	<b>Model #</b>	<b>Caliber</b>
Romar/Cugir	RH 10	7.62X39mm
Zastava	OPAPM70	7.62X39mm
Palmetto State Armory	PSAK47	7.62X39mm
Romar/Cugir	GP WASR 10/63	7.62X39mm
Century International Arms, Inc	M70AB2	7.62X39mm
Izimash	SAIGA	7.62X39mm
Romar/Cugir	75 Sporter	7.62X39mm
Zastava	NPAPDF	7.62X39mm
I.O. Inc	Sporter	7.62X39mm
Zastava	NPAPM70	7.62X39mm
I.O. Inc	Sporter	7.62X39mm

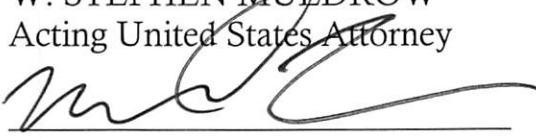
I.O. Inc	Sporter	7.62x39mm
FEG	SA 2000	.223
Barrett	98B	.308
Ruger	Precision	.308

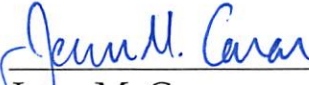
4. If any of the property described above, as a result of any act or omission of the defendants:
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,

  
\_\_\_\_\_  
Foreperson

W. STEPHEN MULDROW  
Acting United States Attorney  
By:   
\_\_\_\_\_  
Michael V. Leeman  
Assistant United States Attorney

By:   
\_\_\_\_\_  
Jesus M. Casas  
Assistant United States Attorney  
Chief, Fort Myers Division

FORM OBD-34  
August 17

No.

**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Fort Myers Division

THE UNITED STATES OF AMERICA

vs.

MIGUEL JIMINEZ BORDA, and  
ALEJANDRA MARIA MAYO

**INDICTMENT**

Violations: 18 U.S.C. §§ 554(a) and 2.

A true bill,

  
Foreperson

Filed in open court this 2nd day  
of August 2017.

\_\_\_\_\_  
Clerk

Bail \$ \_\_\_\_\_