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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE DISTRICT OF ARIZONA

9 United States of America,
10 Plaintiff,

CR 17-159 TUC Rm(BPV)
INDICTMENT

11 vs.

12 Jose Jesus Campos-Flores,
13 Defendant.

Violations:

22 U.S.C. §§ 2778(b)(2) and 2778(c) &
Title 22, Code of Federal Regulations §§
121.1, 123.1, and 127.1
(Attempted Exportation of Munitions)
Count 1

18 U.S.C. §§ 924(d) and 981(a)(1)(C), 21
U.S.C. § 853, 22 U.S.C. 401, 28 U.S.C. §
2461(c)
(Forfeiture Allegation)

14 THE GRAND JURY CHARGES:

15 COUNT 1

16 On or about January 9, 2017, at or near Nogales, in the District of Arizona, the
17 defendant, JOSE JESUS CAMPOS-FLORES, did intentionally attempt to willfully and
18 knowingly export and cause to be exported from the United States to the country of United
19 Mexican States, defense articles, that are:

- 20 a. One (1) Smith and Wesson M&P 15 model, 5.56 mm rifle, bearing serial
21 number ST38011;
- 22 b. One (1) Colt M4 Carbine model, 5.56 mm rifle, bearing serial number
23 LE557357;
- 24 c. One (1) Colt M4 Carbine model, 5.56 mm rifle, bearing serial number
25 LE558162;
- 26 d. One (1) Colt M4 Carbine model, 5.56 mm rifle, bearing serial number
27 LE554714;

- e. One (1) Morrissey M4 AAM-47SF model, 7.62x39 mm rifle, bearing serial number AA2-000900;
- f. One (1) GP/WASR 10/63 model, 7.62x39 mm rifle, bearing serial number 1966TU0598;
- g. One (1) Century Arms Golani Sporter model, .223 (5.56 mm) rifle, bearing serial number GAL04134;
- h. One (1) Taurus model PT1911, .45 ACP semi-automatic pistol, bearing serial number NAS20765;
- i. Sixteen (16) 7.62x39 mm magazines;
- j. Six (6) 5.56 mm magazines;
- k. One (1) .45 ACP semi-automatic pistol magazine;
- l. One hundred forty-five (145) rounds of 7.62x39 mm ammunition; and
- m. Forty-two (42) rounds of .45 ACP ammunition;

which are designated as defense articles on the United States Munitions List, without having first obtained from the Department of State a license for such export or written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2) and 2778(c), and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1.

FORFEITURE ALLEGATION

Upon conviction of Count One of this Indictment, the defendant, JOSE JESUS CAMPOS-FLORES, shall forfeit to the United States:

1) pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 22, United States Code, Section 2778; and

2) pursuant to Title 22, United States Code, Section 401 and Title 28, United States Code, Section 2461(c), any arms or munitions of war or other articles in violation of law which were exported, or intended to be exported, out of the United States in violation of Title 22, United States Code, Section 2778, including, but not limited to:

- a. One (1) Smith and Wesson M&P 15 model, 5.56 mm rifle, bearing serial number ST38011;
- b. One (1) Colt M4 Carbine model, 5.56 mm rifle, bearing serial number LE557357;
- c. One (1) Colt M4 Carbine model, 5.56 mm rifle, bearing serial number LE558162;
- d. One (1) Colt M4 Carbine model, 5.56 mm rifle, bearing serial number LE554714;

- e. One (1) Morrissey M4 AAM-47SF model, 7.62x39 mm rifle, bearing serial number AA2-000900;
- f. One (1) GP/WASR 10/63 model, 7.62x39 mm rifle, bearing serial number 1966TU0598;
- g. One (1) Century Arms Golani Sporter model, .223 (5.56 mm) rifle, bearing serial number GAL04134;
- h. One (1) Taurus model PT1911, .45 ACP semi-automatic pistol, bearing serial number NAS20765;
- i. Sixteen (16) 7.62x39 mm magazines;
- j. Six (6) 5.56 mm magazines;
- k. One (1) .45 ACP semi-automatic pistol magazine;
- l. One hundred forty-five (145) rounds of 7.62x39 mm ammunition; and
- m. Forty-two (42) rounds of .45 ACP ammunition;

If any of the property described above, as a result of any act or omission of the defendant: 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, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendant.

All pursuant to Title 18, United States Code, Sections 924(d) and 981(a)(1)(C), Title 21, United States Code, Section 853, Title 22, United States Code, Section 401, Title 28, United States Code, Section 2461(c) and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

/ S /

Presiding Juror

ELIZABETH A. STRANGE
Acting United States Attorney
District of Arizona

/ S /

Assistant U.S. Attorney

Dated: February 1, 2017

**REDACTED FOR
PUBLIC DISCLOSURE**