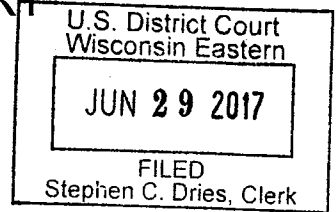


UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF WISCONSIN



UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

CASE NUMBER: 17-M- 659

JESUS SOLORIO ZEPEDA
(d.o.b. [REDACTED] 1988)

I, Ryan Arnold, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Count One: That on approximately December 28, 2013, in the State and Eastern District of Wisconsin, Jesus Solorio Zepeda did knowingly transfer a firearm to an out of state resident in violation of Title 18, United States Code, Section 922(a)(5);

Count Two: That on approximately February 7, 2014, in the State and Eastern District of Wisconsin, Jesus Solorio Zepeda did knowingly transfer a firearm to a prohibited person (felon), in violation of Title 18, United States Code, Section 922(d)(1);

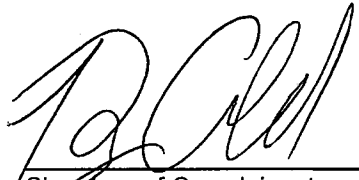
Count Three: That on approximately February 14, 2014, in the State and Eastern District of Wisconsin, Jesus Solorio Zepeda did knowingly transfer a firearm to a prohibited person (illegal alien), in violation of Title 18, United States Code, Section 922(d)(5)(A); and

Count Four: That on approximately February 18, 2014, in the State and Eastern District of Wisconsin, Jesus Solorio Zepeda did knowingly transfer a firearm to be used in a drug trafficking crime, in violation of Title 18, United States Code, Section 924(h).

I further state that I am a Special Agent with the United States Bureau of Alcohol, Tobacco, Firearms, and Explosives, and this complaint is based on the following facts:

Please see the attached affidavit.

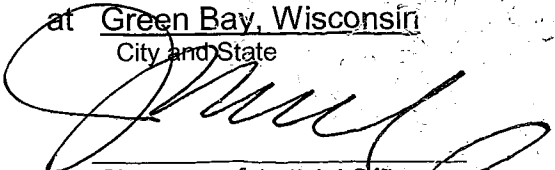
Continued on the attached sheet and made a part hereof: Yes No


Signature of Complainant
RYAN ARNOLD

Sworn to before me and subscribed in my presence,

June 29, 2017
Date

The Honorable James R. Sickel
United States Magistrate Judge
Name & Title of Judicial Officer

at Green Bay, Wisconsin
City and State

Signature of Judicial Officer

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

AFFADAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been since April 2015. As an ATF Special Agent, I have participated in numerous investigations regarding unlawful possession of firearms by convicted felons, unlawful use of firearms, firearms trafficking, and arson. Prior to my employment with ATF, I was a Special Agent with the United States Secret Service (USSS) for approximately 5 years. My duties included providing and planning dignitary protection, drafting and executing Federal search warrants, and investigating organized fraud networks, counterfeit currency operations, and other financial crimes. Previous to my tenure with the USSS, I served as a police officer with the Chicago, Illinois, Police Department (CPD). During part of my career as a CPD Officer, I was assigned to the Organized Crime Division-Gang Enforcement Unit. My responsibilities included the investigations of street gangs, narcotics distribution, firearms violations, robbery, and home invasions.

2. As a law enforcement officer for the United States, I am empowered by law to conduct investigations of, and to make arrests for, federal felony offenses.

3. This affidavit is being submitted for the limited purpose of a criminal complaint for Jesus Solorio Zepeda (DOB: [REDACTED]/1988) (hereinafter referred to as "Zepeda"). Because this affidavit is being submitted for the limited purpose of establishing probable cause for a criminal complaint, I have not included every detail of this investigation. Rather, I have set forth only those facts necessary to establish probable cause. The information contained in this Affidavit is based upon my personal knowledge, my review of documents and other evidence, and my conversations with other law enforcement officers.

4. I respectfully submit that there is probable cause to believe that Jesus Solorio Zepeda has committed the crimes of: 18 U.S.C. 922 (a)(5) - **Transfer Firearm to Out of State Resident**, 18 U.S.C. 922 (d)(1) - **Transfer of Firearm to Prohibited Person (Felon)**, 18 U.S.C. 922 (d)(5)(A) - **Transfer of Firearm to Prohibited Person (Illegal Alien)**; and 18 U.S.C. 924(h) - **Transfer of Firearm Knowing to be Used in Drug Trafficking Crime**.

5. The above firearms relative to the above charges not only traveled across state borders, but also were manufactured outside the state of Wisconsin. Thus, these firearms traveled and effected interstate commerce.

CRIMES REFERENCED

6. I am aware that Transferring a Firearm to an Out of State Resident is prohibited by Title 18, United States Code, Section 922(a)(5), which states it is unlawful “for any person (other than a licensed importer, licensed manufacturer, licensed dealer, or licensed collector) to transfer, sell, trade, give, transport, or deliver any firearm to any person (other than a licensed importer, licensed manufacturer, licensed dealer, or licensed collector) who the transferor knows or has reasonable cause to believe does not reside in ... the State in which the transferor resides...” The penalty for this act is found in Title 18, United States Code, Section 924(a)(1)(D), with a maximum fine of \$250,000, up to five years in prison, or both.

7. I am aware that Transferring a Firearm to a Felon is prohibited by Title 18, United States Code, Section 922(d)(1), which states it is unlawful “for any person to sell or otherwise dispose of any firearm...to any person knowing or having reasonable cause to believe that such person...has been convicted in any court of a crime punishable by imprisonment for a term exceeding one year.” The penalty for this act is found in Title 18, United States Code, Section 924(a)(2), with a maximum fine of \$250,000, up to ten years in prison, or both.

8. I am aware that Transferring a Firearm to an Illegal Alien is prohibited by Title 18, United States Code, Section 922(d)(5)(A), which states it is unlawful “for any person to sell or otherwise dispose of any firearm...to any person knowing or having reasonable cause to believe that such person who, being an alien is illegally or unlawfully in the United States.” The penalty for this act is found in Title 18, United States Code, Section 924(a)(2), with a maximum fine of \$250,000, up to ten years in prison, or both.

9. I am aware that Transferring a Firearm That Will be Used to Commit a Drug Trafficking Crime is prohibited by Title 18, United States Code, Section 924(h), which states that “whoever knowingly transfers a firearm, knowing that such firearm will be used to commit a drug trafficking crime...shall be imprisoned not more than 10 years,” fined up to \$250,000, or both.

PROBABLE CAUSE

Case Background

10. On or about August 24, 2015, Customs and Border Patrol seized sixteen firearms secreted in a 2013 Toyota Tacoma displaying California license plate 32248J1 that was attempting to cross from the United States into Mexico at the Mariposa Port of Entry in Nogales, Arizona. The vehicle contained sixteen firearms purchased by at least ten other original firearm purchasers who were located in seven different states. Two of the firearms traced back to Gary Wolfgang Hancock of Shawano, WI. ATF’s Tucson Field Office therefore referred the matter to the Milwaukee Field Office for further investigation.

11. In addition, I learned that on August 8, 2014, Santa Rosa Police arrested Tep and two other individuals, Patrick Elias McMullen and Gunnar Dodge Smith after executing a probation search and then a search warrant at 147 Cherie Way in Santa Rosa, California. During the searches, Santa Rosa Police seized several items, including marijuana and an American

Tactical Imports (ATI), model GSG-5, .22 caliber rifle, and displaying serial number A277165, firearm provided by Hancock to Zepeda.

12. Further investigation also revealed that Hancock also gave the individuals one rifle that had been loaned to him by his step-father (yet to be recovered by ATF).

13. Interviews with Hancock revealed he was a “straw purchaser” who provided firearms to the drug and firearm trafficking organization in late 2013 and early 2014. As for the activity that occurred in Wisconsin, between December 2013 and February 2014, Jesus Zepeda of Shawano, WI, arranged for Hancock to purchase firearms for individuals from the San Francisco Bay Area. Hancock, who is not a felon or otherwise a prohibited person, bought three guns at the direction of, and with cash supplied by, the individuals from California, and then delivered them to Zepeda’s residence. Hancock also gave the individuals one rifle that had been loaned to him by his step-father. Hancock positively identified two of the men he understood to be from the Bay Area: Manuel Solorio-Fernandez (“Solorio-Fernandez”) (DOB [REDACTED]/1980), of Santa Rosa, CA and Parik Tep (a.k.a. “Pacquiao”) (DOB 04[REDACTED]/1993) also from Santa Rosa, CA. Hancock also recalls a Hispanic male (later identified as “George”) being part of the group from the Bay Area.

Interview with Gary Hancock

14. In the winter of 2013, Hancock met Manuel Solorio-Fernandez and “George” at a party at Zepeda’s home, in Shawano, Wisconsin.. Hancock overheard Solorio-Fernandez and “George” talking and heard them say they lived in the Bay Area of California. Solorio-Fernandez and “George” were also interacting with Parik Tep at the party, speaking to Tep in Spanish and calling him “Pacquiao.” The residence in Shawano is in the State and Eastern District of Wisconsin.

A. First Straw Purchase

15. On December 28, 2013, Zepeda drove Hancock to a gun show in Green Bay, Wisconsin. At the gun show, Hancock completed an ATF Form 4473 and then a Federal Firearms Licensee (FFL) transferred to him an American Tactical Imports (ATI), model GSG-5, .22 caliber rifle, displaying serial number A277165 (herein referred to as the GSG-5 rifle). Following the purchase, Zepeda and Hancock returned to Zepeda's residence. Upon arrival, Zepeda took possession of the firearm. Hancock observed Solorio-Fernandez and "George" waiting inside the residence. Per the terms of a prior conversation, Zepeda provided Hancock approximately \$50 for procuring the firearm, and Hancock departed the residence.

B. Second Straw Purchase

16. On February 7, 2014, Zepeda contacted Hancock by phone and asked him to come to his house. At Zepeda's residence, Solorio-Fernandez and "George" provided Hancock currency to purchase a SCAR17s rifle. These subjects were specific about the types of firearms they desired. Additionally, Hancock believed that Zepeda was working with or under the aforementioned subjects from the Bay Area. Hancock proceeded to Green Bay, Wisconsin, where he completed an ATF Form 4473 and then and purchased from an FFL, one FNH USA/FN Herstal Belgium, model SCAR17s, 7.62x51 caliber rifle, displaying serial number HC32472 ("SCAR17s rifle"). After the purchase of the firearm, Hancock returned to Zepeda's residence and relinquished possession of the firearm.

C. Third Straw Purchase

17. The pattern continued on February 14, 2014. That day, Zepeda contacted Hancock by phone and asked him to come to his house. At Zepeda's residence, Solorio-Fernandez and

“George” provided Hancock currency to purchase a 9mm pistol. Hancock proceeded to Green Bay, Wisconsin, where he completed an ATF Form 4473 and then purchased from an FFL, one Heckler and Koch (H&K) model USP, 9mm pistol, displaying serial number 24-127397 (herein referred to as the H&K pistol). After the purchase of the firearm, Hancock returned to Zepeda’s residence and relinquished possession of the firearm. Hancock was approximately paid \$400 to \$500 for the above transactions.

D. Fourth Firearm

18. Around the time of the above firearms purchases, Hancock also provided a Remington 710 rifle (“Remington rifle”) to Zepeda. Zepeda promised to pay Hancock \$200 for the firearm, but Hancock never received the money. The Remington rifle was not purchased by Hancock. Instead, his step-father had loaned it to him for the deer hunting season. Hancock is unaware of the current disposition and possessor of this firearm. To date, ATF has not been successful in tracing this firearm.

19. On 02/24/2016, SA Arnold reviewed U.S. Customs and Border Protection TECS Record ID No. P5363289700B13 and P3051703100CSI for Manuel Solorio-Fernandez. The following is a summarization of the information:

- Deported to Mexico on 11/21/2012
- Final Charge Code: I6 Alien Present without Admission of P Class of Entry

Interview of Parik Tep

20. On November 29, 2016, Parik Tep was interviewed by the United States Bureau of Alcohol, Tobacco, Firearms, and Explosives and the Sonoma County, California, Probation Department in Santa Rosa, California. Tep identified a photograph of Jesus Zepeda as a subject he also knew as “Chuy”. Tep indicated he stayed at his house while he was in Shawano, Wisconsin. Additionally, Tep told law enforcement that he traveled to Shawano, WI, with two

subjects: “Canijo,” who was later identified by Tep as Manuel Solorio-Fernandez, and someone referred to as “Chuy” from California.

21. Tep stated that the GSG-5 rifle displaying serial number A277165 was given to him by Solorio-Fernandez in California. Tep believed this firearm came from Gary Hancock because he observed Hancock with it inside Zepeda’s home. Tep advised he made two trips to Shawano, WI, and received the firearm after the second trip. Tep confirmed his nickname was “Pacquiao”.

22. Tep confirmed he had two interactions with law enforcement when he was present in Shawano, WI.

Interview of Jesus Zepeda

23. On March 8, 2017, Zepeda was interviewed by law enforcement and reviewed photos of the German Sports Guns (GSG), .22 Caliber pistol displaying serial number A277165. Zepeda identified the firearm as the one purchased by Gary Hancock. Zepeda stated that he was present for the purchase at a gun show at a recreation center and he drove Hancock to the transaction site. Zepeda advised that Hancock originally bought the GSG .22 caliber pistol displaying serial number A277165 for himself, however, Hancock showed it to Solorio-Fernandez, Tep, and “George”. Zepeda believed that this initiated the scheme for Hancock to purchase firearms on behalf of Solorio-Fernandez, Tep, and “George”. Zepeda stated that “they” (Solorio-Fernandez, Tep, and “George”) asked Zepeda if Hancock would purchase firearms for them. Subsequently, Zepeda asked Hancock if he would purchase the firearms as they requested. Hancock agreed to conduct the transactions. Zepeda said that they agreed to pay Hancock additional funds after the completion of the purchase. Zepeda believed that they provided Hancock a separate payment after each firearms transaction. Zepeda agreed that Solorio-Fernandez was

from Mexico and assumed that he could not purchase firearms. Zepeda believed that Hancock knew the subjects for whom he purchased the firearms could not possess them.

24. Zepeda reviewed photos of a Heckler and Koch (H&K), model USP, 9mm pistol displaying serial number 24-127397. ZEPEDA also recognized this firearm (purchased by Gary Hancock). ZEPEDA did not remember where this firearm was purchased.

25. Zepeda reviewed photos of a FN Herstal SCAR, Model 17s, 7 .62x5 1 caliber rifle displaying serial number HC32472. Zepeda recognized this as a rifle purchased by Gary Hancock at Gander Mountain.

26. Zepeda advised that he was a middleman (in reference to the firearm transactions) due to language barriers and being the homeowner. He further explained the he did handle the money provided by the subjects from California and Hancock. Zepeda told agents that Hancock provided the above firearms to Tep, Solorio-Fernandez, and "George" who then took them west (California). Zepeda stated that Tep, Solorio-Fernandez, and "George" were in a truck owned by Danie Maya.

27. Zepeda also stated that he had visited Santa Rosa, California, previously to see the Solorio side of his family.

Interview with Joshua Natzke

28. On March 23, 2017, Bureau of Alcohol, Tobacco, Firearms and Explosives Special Agents traveled to Shawano County, Wisconsin, Sheriff's Office to interview Joshua Natzke. Agents were advised by Natzke that Zepeda asked Natzke if he would sell marijuana. Natzke agreed and shortly after Parik Tep, Solorio-Fernandez, "George", and an unknown, Hispanic female arrived in Shawano, WI. These subjects came from California to traffic large amounts of marijuana with Zepeda's knowledge.

29. Eventually, Zepeda directed Natzke to the attic of Zepeda's residence where Natzke observed approximately 200 pounds of marijuana stored in large duffle bags. Natzke was instructed to sell the marijuana quickly to make money. Subsequently, Natzke sold the marijuana by taking a pound of the marijuana, dividing it into ounces, and then selling it for \$175 per ounce locally.

30. Natzke explained to agents that the subjects from California, Zepeda, and Hancock were taking portions of the marijuana in the attic and distributing it regionally to places such as Chicago, Illinois, and Ohio. Natzke described the residence of Zepeda as a "hub thing". Zepeda participated in some of these trips yet not all.

31. After this initial supply of marijuana was depleted the subjects returned to California, only to return to Shawano, WI, with a smaller but still a large amount of marijuana. The marijuana was again distributed locally by Natzke and regionally by the subjects from California.

32. Natzke informed law enforcement that on one occasion, Zepeda and Hancock traveled to California to transport 200 pounds of marijuana back to Shawano, WI. Natzke stated he was approached to participate in this operation but refused the offer. Natzke further explained that Zepeda and Hancock were paid \$10,000 each for transporting the marijuana.

33. Natzke indicated to agents that he was aware of the scheme to obtain firearms by the subjects from California. Gary Hancock told Natzke that they wanted AR-15s and other firearms they could not obtain in California. Hancock further explained they were giving him approximately \$500 extra per firearm. Natzke told agents that he purchased an AR-15 style rifle and a .22 caliber rifle for the them. Natzke stated he received approximately \$200 above the purchase price of the firearms. Natzke stated this was the only time he ever bought firearms in his

life, and that he knew the firearms were being provided to Solorio-Fernandez and “George” to further drug trafficking activity in the United States and Mexico.

34. Follow up efforts by the ATF revealed on February 18, 2014, Natzke did purchase a Black Rain Ordinance, Model Fallout 15, 5.56 caliber rifle displaying serial number BRO29924 and a Walther, model Heckler & Koch 416, .22LR caliber displaying serial number WHO11296. ATF has yet to recover either firearm.

35. Prior to their departure from Wisconsin, Natzke observed the subjects from California disassemble the firearms and vacuum seal them by using a “food processing” style machine. Natzke believed they were then hidden within the vehicle in a manner similar to how the marijuana was concealed in the vehicle. This correlated with the disposition of the firearms that were recovered by the United States Customs and Border Patrol at the Mariposa Port of Entry, Nogales, Arizona, on August 24, 2015.

36. Natzke also told law enforcement that Parik Tep accidentally dialed 911 while at N6438 Oak Ridge Court, Shawano, WI, the residence of Zepeda. Tep informed police it was an accidental “pocket dial”.

Correlation of the 2013 Toyota Tacoma displaying CA license plate 32248J1

37. On February 21, 2014, Parik Tep was cited by the Shawano County, Wisconsin, Sheriff’s Office for a moving violation after driving into a ditch. During the incident, TEP was driving a 2013 Toyota truck displaying California license plate number 32248J1, and registered to Maya DANIE of 990 Piner Road, Santa Rosa, California, 95403.

38. I reviewed ATF Report of Investigation (ROI) No. 1 under ATF Case Number 785065-15-0051 (Tucson Field Office) authored by ATF Special Agent Brett Adler of the Tucson Field Office which stated the following:

It was learned that the seizure occurred on Monday, August 24, 2015 at approximately 1405 hours. The firearms were found to be contained in a 2012 Toyota Tacoma bearing California license plate number 32248J1 driven by a single occupant. The firearms were found to be broken down into various parts, wrapped in cellophane wrapping, and secreted throughout the vehicle in an assumed attempt to pass through inspection.

39. On July 24, 2016, I received documents from the United States Customs and Border Protection (CBP), Tucson Field Office, regarding an attempted border crossing of a 2013 Toyota Tacoma displaying California license plate number 32248J1 on August 24, 2015, at the Mariposa Border Crossing in Nogales, Arizona. These documents included photographs of the aforementioned vehicle. Around the time of these photographs a seizure of sixteen (16) firearms were recovered inside this vehicle. The seized firearms included one (1) FNH USA/FN Herstal Belgium, 7.62x51 caliber, model SCAR 17s rifle displaying serial number HC32472 transferred to Gary Wolfgang HANCOCK on 02/07/2014 and one (1) H&K/German, 9mm, USP Model pistol displaying serial number 24-127397 transferred to Gary Wolfgang HANCOCK on 02/14/2014. A subsequent query of the license plate revealed this vehicle was registered to Danie Maya of 990 Piner Road, Santa Rosa, California, 95403.

Misdialed 911 Call by Parik Tep

40. On February 13, 2013, a 911 call was placed to the Shawano County, Wisconsin, Sheriff's Office and was classified as a misdial. The report states the following information in summary:

- NATURE: 911 Call
- ADDRESS: 6438 N Oak Ridge Court, Shawano, WI (Address of Jesus ZEPEDA)
- LOCATION: Settle Inn, 104 N Airport Drive Shawano
- PHONE OWNER: Parik Tep

• ACTION TAKEN: Everything is OK, He returned home and I met him there (in reference to Parik Tep)

41. Based on the foregoing, I submit that there is probable cause to issue a criminal complaint and arrest warrant for **Jesus Solorio Zepeda**, charging him with violations of 18 U.S.C. 922 (a)(5) - **Transfer Firearm to Out of State Resident**, 18 U.S.C. 922 (d)(1) - **Transfer of Firearm to Prohibited Person (Felon)**, 18 U.S.C. 922 (d)(5)(A) - **Transfer of Firearm to Prohibited Person (Illegal Alien)**; and 18 U.S.C. 924(h) - **Transfer of Firearm Knowing to be Used in Drug Trafficking Crime**.



RYAN ARNOLD
Special Agent
Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed and sworn before me this 29th day of June, 2017 in Green Bay, Wisconsin



HON. JAMES R. SICKEL
United States Magistrate Judge