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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

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CR 16 - 478 TUC Rm(LAB)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

(1) Edgar Vega-Barreras
Count 59;
(2) Rigoberto Padilla, Jr.,
Counts 14, 15, 16, 17, 18, 19, 20, 21, 22,
23, 24, 26, 27, 28, 30, 31, 33, 35, 36, 37,
39, 41, 43, 59;
(3) Isaac Leonardo Padilla
Counts 14, 17, 18, 20, 21, 37, 44, 59;
(4) Karen Lizbeth Padilla
Counts 25, 26, 59;
(5) Leslie Marlene Padilla
Counts 29, 30, 32, 33, 34, 35, 38, 39, 40,
41, 42, 43, 59;
(6) Christian Alexis Padilla
Counts 27, 31, 36, 37, 59;
(7) Briana E. Moreno-Aguilar
Counts 15, 19, 23, 24, 28, 59;
(8) Emilio Navarro
Counts 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 59;
(9) Erik Bartholomew Salazar
Count 1, 59;
(10) Gabriella Victoria Gonzalez
Counts 8, 59;
(11) Diana Marie Arreola
Counts 54, 55, 59;
(12) Melchor Enrique Urquides-Tapia
Counts 47, 48, 59;
(13) Javier David Bustamante-Gaytan
Counts 45, 48, 59;
(14) Abraham Bustamante
Counts 46, 48, 59;
(15) Luis Fidel Garcia
Counts 49, 50, 51, 59;

INDICTMENT

Violations:

18 U.S.C. § 2(a)
(Aiding and Abetting the Commission of
an Offense)

Counts 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 14,
15, 17, 18, 19, 20, 21, 23, 24, 26, 27, 28,
30, 31, 33, 35, 36, 37, 39, 41, 43

18 U.S.C. § 371
(Conspiracy)
Count 59

18 USC § 554(a); 22 USC § 2778; 22
CFR §§ 121.1 and 123.1
(Smuggling Goods From the United
States)
Counts 13, 48, 49, 52, 53, 55, 56, 57

18 U.S.C. §§ 922(a)(1)(A) &
924(a)(1)(D)
(Engaging in the Business of Dealing
Firearms Without a License)
Counts 12, 58

18 U.S.C. §§ 922(a)(6) and 924(a)(2)
(False Statements in Connection with
Acquisition of Firearm)
Counts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 14,
15, 17, 18, 19, 20, 21, 23, 24, 26, 27, 28,
30, 31, 33, 35, 36, 37, 39, 41, 43

18 U.S.C. §§ 922(d)(5)(A) and 924(a)(2)
(Sell or Disposition of Ammunition to
Illegal Alien)
Count 46

(16) Alvaro Rubio Beltran
 Counts 13, 59;
 (17) Andrei Rene Garcia
 Counts 49, 59;
 (18) Irvyng Mendoza-Gonzalez
 Counts 2, 3, 4, 5, 6, 7, 8, 10, 11, 12, 59;
 (19) Jessica Bridget Soto
 Counts 52, 53, 59;
 (20) Jose Alonso Verdugo-Bernal
 Count 59;
 (21) Jorge Acosta-Licerio
 Counts 56, 57, 58, 59;

Defendants.

18 U.S.C. §§ 922(g)(1) and 924(a)(2)
 (Possession of Firearms by Convicted
 Felon)
 Counts 16, 22, 54

18 U.S.C. §§ 922(g)(5)(A) and 924(a)(2)
 (Possession of Ammunition by Illegal
 Alien)
 Count 45

18 U.S.C. §§ 922(g)(5)(B) and 924(a)(2)
 (Possession of Ammunition by Non-
 Immigrant Alien)
 Count 47

18 U.S.C. § 924(a)(1)(A)
 (False Statement in Record of Federal
 Firearms Licensee)
 Count 25, 29, 32, 34, 38, 40, 42

18 U.S.C. § 1001(a)(2)
 (False Statements)
 Counts 44, 50, 51

18 U.S.C. § 924(d); 18 U.S.C. §
 981(a)(1)(C); and 28 U.S.C. § 2461(c)
 (Forfeiture Allegation)

THE GRAND JURY CHARGES:

COUNT 1

On or about March 21, 2015, at or near Glendale, in the District of Arizona, ERIK BARTHOLOMEW SALAZAR, in connection with the acquisition of a firearm, that is; one Romarm model Draco 7.62x39mm semiautomatic pistol, serial number DA258814; from J&G II Inc. dba J&G Sales Ltd., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious written statement to J&G II Inc. dba J&G Sales Ltd., which statement was intended to deceive J&G II Inc. dba J&G Sales Ltd. as to a fact material to the lawfulness of such sale of the said firearm to ERIK BARTHOLOMEW SALAZAR under Chapter 44, Title 18, United States Code; in that ERIK BARTHOLOMEW SALAZAR stated that he was the actual transferee/buyer of said firearm; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 2

On or about April 7, 2015, at or near Phoenix, in the District of Arizona, EMILIO NAVARRO and IRVYING MENDOZA-GONZALEZ, in connection with the acquisition of a firearm, that is; one Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-21076-14; from AZESB LLC dba Mo Money Pawn Shop, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious written statement to AZESB LLC dba Mo Money Pawn Shop, which statement was intended to deceive AZESB LLC dba Mo Money Pawn Shop as to a fact material to the lawfulness of such sale of the said firearm to EMILIO NAVARRO under Chapter 44, Title 18, United States Code; in that EMILIO NAVARRO stated that he was the actual transferee/buyer of said firearm; and IRVYING MENDOZA-GONZALEZ aided, abetted, counseled, commanded, induced, and procured such false and fictitious statement; in violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

COUNT 3

On or about May 7, 2015, at or near Phoenix, in the District of Arizona, EMILIO NAVARRO and IRVYING MENDOZA-GONZALEZ, in connection with the acquisition of firearms, that is; one Petronov Armament model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000482; and one Petronov Armament model AAM-47UF 7.62x39mm semiautomatic rifle, serial number AA000055; from Lancaster Armory LLC dba Petronov Armament/Phoenix Arsenal, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious written statement to Lancaster Armory LLC dba Petronov Armament/Phoenix Arsenal, which statement was intended to deceive Lancaster Armory LLC dba Petronov Armament/Phoenix Arsenal as to a fact material to the lawfulness of such sale of the said firearms to EMILIO NAVARRO under Chapter 44, Title 18, United States Code; in that EMILIO NAVARRO stated that he was the actual transferee/buyer of said firearms; and IRVYING MENDOZA-GONZALEZ aided, abetted, counseled,

1 commanded, induced, and procured such false and fictitious statement; in violation of
2 Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

3 **COUNT 4**

4 On or about May 7, 2015, at or near Phoenix, in the District of Arizona, EMILIO
5 NAVARRO and IRVYING MENDOZA-GONZALEZ, in connection with the
6 acquisition of a firearm, that is; one Century Arms model M70 AB2 7.62x39mm
7 semiautomatic rifle, serial number AB206970; from North Phoenix Lending Inc. dba
8 North Phoenix Pawn, a licensed dealer of firearms within the meaning of Chapter 44,
9 Title 18, United States Code; did knowingly make a false and fictitious written statement
10 to North Phoenix Lending Inc. dba North Phoenix Pawn, which statement was intended
11 to deceive North Phoenix Lending Inc. dba North Phoenix Pawn as to a fact material to
12 the lawfulness of such sale of the said firearm to EMILIO NAVARRO under Chapter 44,
13 Title 18, United States Code; in that EMILIO NAVARRO stated that he was the actual
14 transferee/buyer of said firearm; and IRVYING MENDOZA-GONZALEZ aided,
15 abetted, counseled, commanded, induced, and procured such false and fictitious
16 statement; in violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and
17 924(a)(2).

18 **COUNT 5**

19 On or about May 19, 2015, at or near Phoenix, in the District of Arizona, EMILIO
20 NAVARRO and IRVYING MENDOZA-GONZALEZ, in connection with the
21 acquisition of firearms, that is; one Romarm model WASR-10 7.62x39mm
22 semiautomatic rifle, serial number A1-6258-13; and one Romarm model WASR-10
23 7.62x39mm semiautomatic rifle, serial number 1-27919-2001; from Legendary Sales Inc.
24 dba Legendary Guns, a licensed dealer of firearms within the meaning of Chapter 44,
25 Title 18, United States Code; did knowingly make a false and fictitious written statement
26 to Legendary Sales Inc. dba Legendary Guns, which statement was intended to deceive
27 Legendary Sales Inc. dba Legendary Guns as to a fact material to the lawfulness of such
28 sale of the said firearms to EMILIO NAVARRO under Chapter 44, Title 18, United

1 States Code; in that EMILIO NAVARRO stated that he was the actual transferee/buyer
2 of said firearms; and IRVYING MENDOZA-GONZALEZ aided, abetted, counseled,
3 commanded, induced, and procured such false and fictitious statement; in violation of
4 Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

5 **COUNT 6**

6 On or about May 19, 2015, at or near Phoenix, in the District of Arizona, EMILIO
7 NAVARRO and IRVYING MENDOZA-GONZALEZ, in connection with the
8 acquisition of a firearm, that is; one Century Arms model Centurion 39 Sporter
9 7.62x39mm semiautomatic rifle, serial number C39WM-005198; from S.W.A.T.
10 Training Facilities LLC dba Shooter's World, a licensed dealer of firearms within the
11 meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and
12 fictitious written statement to S.W.A.T. Training Facilities LLC dba Shooter's World,
13 which statement was intended to deceive S.W.A.T. Training Facilities LLC dba Shooter's
14 World as to a fact material to the lawfulness of such sale of the said firearm to EMILIO
15 NAVARRO under Chapter 44, Title 18, United States Code; in that EMILIO NAVARRO
16 stated that he was the actual transferee/buyer of said firearm; and IRVYING
17 MENDOZA-GONZALEZ aided, abetted, counseled, commanded, induced, and procured
18 such false and fictitious statement; in violation of Title 18, United States Code, Sections
19 2(a), 922(a)(6) and 924(a)(2).

20 **COUNT 7**

21 On or about May 19, 2015, at or near Phoenix, in the District of Arizona, EMILIO
22 NAVARRO and IRVYING MENDOZA-GONZALEZ, in connection with the
23 acquisition of a firearm, that is; one Childers Guns (Kalashnicohn) model CG-1
24 7.62x39mm semiautomatic rifle, serial number AM00426; from Illumi-Star LLC dba
25 Tracy Gun Sales, a licensed dealer of firearms within the meaning of Chapter 44, Title
26 18, United States Code; did knowingly make a false and fictitious written statement to
27 Illumi-Star LLC dba Tracy Gun Sales, which statement was intended to deceive Illumi-
28 Star LLC dba Tracy Gun Sales as to a fact material to the lawfulness of such sale of the

1 said firearm to EMILIO NAVARRO under Chapter 44, Title 18, United States Code; in
2 that EMILIO NAVARRO stated that he was the actual transferee/buyer of said firearm;
3 and IRVYING MENDOZA-GONZALEZ aided, abetted, counseled, commanded,
4 induced, and procured such false and fictitious statement; in violation of Title 18, United
5 States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

6 **COUNT 8**

7 On or about May 20, 2015, at or near Phoenix, in the District of Arizona,
8 GABRIELLA VICTORIA GONZALEZ, in connection with the acquisition of firearms,
9 that is; one Century Arms model VZ2008 Sporter 7.62x39mm semiautomatic rifle, serial
10 number VZ08PM-013585; and one Century Arms model VZ2008 Sporter 7.62x39mm
11 semiautomatic rifle, serial number VZ08PM-013998; from Murphy, Veerachart dba
12 Ammo AZ, a licensed dealer of firearms within the meaning of Chapter 44, Title 18,
13 United States Code; did knowingly make a false and fictitious written statement to
14 Murphy, Veerachart dba Ammo AZ, which statement was intended to deceive Murphy,
15 Veerachart dba Ammo AZ as to a fact material to the lawfulness of such sale of the said
16 firearms to GABRIELLA VICTORIA GONZALEZ under Chapter 44, Title 18, United
17 States Code; in that GABRIELLA VICTORIA GONZALEZ stated that she was the
18 actual transferee/buyer of said firearms; in violation of Title 18, United States Code,
19 Sections 922(a)(6) and 924(a)(2).

20 **COUNT 9**

21 On or about May 21, 2015, at or near Phoenix, in the District of Arizona, EMILIO
22 NAVARRO and IRVYING MENDOZA-GONZALEZ, in connection with the
23 acquisition of a firearm, that is; one Barrett model 82A1 .50 BMG semiautomatic rifle,
24 serial number AA003862; from Lancaster Armory LLC dba Petronov Armament/Phoenix
25 Arsenal, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United
26 States Code; did knowingly make a false and fictitious written statement to Lancaster
27 Armory LLC dba Petronov Armament/Phoenix Arsenal, which statement was intended to
28 deceive Lancaster Armory LLC dba Petronov Armament/Phoenix Arsenal as to a fact

1 material to the lawfulness of such sale of the said firearm to EMILIO NAVARRO under
2 Chapter 44, Title 18, United States Code; in that EMILIO NAVARRO stated that he was
3 the actual transferee/buyer of said firearm; and IRVYING MENDOZA-GONZALEZ
4 aided, abetted, counseled, commanded, induced, and procured such false and fictitious
5 statement; in violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and
6 924(a)(2).

7
8 **COUNT 10**

9 On or about June 2, 2015, at or near Phoenix, in the District of Arizona, EMILIO
10 NAVARRO and IRVYING MENDOZA-GONZALEZ, in connection with the
11 acquisition of firearms, that is; one Petronov Armament (Morrissey Inc.) model AAM-47
12 7.62x39mm semiautomatic rifle, serial number AA000175; one Petronov Armament
13 (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number
14 AA000355; and one Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm
15 semiautomatic rifle, serial number AA000491; from Lancaster Armory LLC dba
16 Petronov Armament/Phoenix Arsenal, a licensed dealer of firearms within the meaning of
17 Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious
18 written statement to Lancaster Armory LLC dba Petronov Armament/Phoenix Arsenal,
19 which statement was intended to deceive Lancaster Armory LLC dba Petronov
20 Armament/Phoenix Arsenal as to a fact material to the lawfulness of such sale of the said
21 firearms to EMILIO NAVARRO under Chapter 44, Title 18, United States Code; in that
22 EMILIO NAVARRO stated that he was the actual transferee/buyer of said firearms; and
23 IRVYING MENDOZA-GONZALEZ aided, abetted, counseled, commanded, induced,
24 and procured such false and fictitious statement; in violation of Title 18, United States
25 Code, Sections 2(a), 922(a)(6) and 924(a)(2).

26
27 **COUNT 11**

28 On or about June 3, 2015, at or near Phoenix, in the District of Arizona, EMILIO
NAVARRO and IRVYING MENDOZA-GONZALEZ, in connection with the
acquisition of firearms, that is; one Petronov Armament (Morrissey Inc.) model AAM-47

1 7.62x39mm semiautomatic rifle, serial number AA000170; one Petronov Armament
2 (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number
3 AA000177; and one Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm
4 semiautomatic rifle, serial number AA000178; from Lancaster Armory LLC dba
5 Petronov Armament/Phoenix Arsenal, a licensed dealer of firearms within the meaning of
6 Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious
7 written statement to Lancaster Armory LLC dba Petronov Armament/Phoenix Arsenal,
8 which statement was intended to deceive Lancaster Armory LLC dba Petronov
9 Armament/Phoenix Arsenal as to a fact material to the lawfulness of such sale of the said
10 firearms to EMILIO NAVARRO under Chapter 44, Title 18, United States Code; in that
11 EMILIO NAVARRO stated that he was the actual transferee/buyer of said firearms; and
12 IRVYING MENDOZA-GONZALEZ aided, abetted, counseled, commanded, induced,
13 and procured such false and fictitious statement; in violation of Title 18, United States
14 Code, Sections 2(a), 922(a)(6) and 924(a)(2).

15 **COUNT 12**

16 From on or about April 17, 2015, to on or about June 3, 2015, at or near Phoenix,
17 in the District of Arizona, EMILIO NAVARRO, not being a licensed dealer of firearms,
18 within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in
19 the business of dealing firearms; and IRVYING MENDOZA-GONZALEZ aided,
20 abetted, counseled, commanded, induced, and procured such dealing in firearms without
21 a license; in violation of Title 18, United States Code, Sections 2(a), 922(a)(1)(A) and
22 924(a)(1)(D).

23 **COUNT 13**

24 On or about June 3, 2015, at or near Mesa, in the District of Arizona, ALVARO
25 RUBIO BELTRAN knowingly attempted to export and send from the United States any
26 merchandise, article, or object contrary to any law or regulation of the United States, and
27 received, concealed, bought, sold, and in any manner facilitated the transportation,
28 concealment, and sale of such merchandise, article or object, to wit: one Spike's Tactical

1 model ST15 .223 REM semiautomatic rifle, serial number RM-20142; one Bushmaster
2 model Carbon 15 .223 REM semiautomatic rifle, serial number CBC011454; one
3 Bushmaster model Carbon 15 .223 REM semiautomatic rifle, serial number BK3008322;
4 one DPMS model A15 .223 REM semiautomatic rifle, serial number FH222682; one
5 Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-6258-13;
6 one Century Arms VZ2008 Sporter 7.62x39mm semiautomatic rifle, serial number
7 VZ08PM-013585; one Zastava model N-PAP DF 7.62x39mm semiautomatic rifle, serial
8 number NPDP000292; one Century Arms model Centurion 39 Sporter 7.62x39mm
9 semiautomatic rifle, serial number C39WM-005198; one Romarm model WASR-10
10 7.62x39mm semiautomatic rifle, serial number 1-27919-2001; one Century Arms model
11 VZ2008 Sporter 7.62x39mm semiautomatic rifle, serial number VZ08PM-013998; one
12 Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle,
13 serial number AA000170; one Petronov Armament (Morrissey Inc.) model AAM-47
14 7.62x39mm semiautomatic rifle, serial number AA000175; one Petronov Armament
15 (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number
16 AA000177; one Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm
17 semiautomatic rifle, serial number AA000178; one Petronov Armament (Morrissey Inc.)
18 model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000355; one Petronov
19 Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial
20 number AA000491; one Childers Guns (Kalashnicohn) model CG-1 7.62x39mm
21 semiautomatic rifle, serial number AM00426; and one Barrett model 82A1 .50 BMG
22 semiautomatic rifle, serial number AA003862; knowing the same to be intended for
23 exportation contrary to any law or regulation of the United States, to wit: Title 22, United
24 States Code, Section 2778; Title 22, Code of Federal Regulations, Part 121.1; and Title
25 22, Code of Federal Regulations, Part 123.1; in violation of Title 18, United States Code,
26 Section 554(a).

COUNT 14

On or about August 17, 2015, at or near Tucson, in the District of Arizona, ISAAC LEONARDO PADILLA and RIGOBERTO PADILLA, JR., in connection with the acquisition of a firearm, that is; one Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-31069-14; from Second Amendment Sports Inc. dba Second Amendment Sports, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious written statement to Second Amendment Sports Inc. dba Second Amendment Sports, which statement was intended to deceive Second Amendment Sports Inc. dba Second Amendment Sports as to a fact material to the lawfulness of such sale of the said firearm to ISAAC LEONARDO PADILLA under Chapter 44, Title 18, United States Code; in that ISAAC LEONARDO PADILLA stated that he was the actual transferee/buyer of said firearm; and RIGOBERTO PADILLA, JR., aided, abetted, counseled, commanded, induced, and procured such false and fictitious statement; in violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

COUNT 15

On or about August 28, 2015, at or near Tucson, in the District of Arizona, BRIANA E. MORENO-AGUILAR and RIGOBERTO PADILLA, JR., in connection with the acquisition of firearms, that is; one Zastava model M70AB2 7.62x39mm semiautomatic rifle, serial number AB2-C105663; and one Inter Ordnance Inc. model Sportster AK47 7.62x39mm semiautomatic rifle, serial number S004305; from Semenko, Wayne Anthony dba Smoke & Glory/SNG Tactical/SNG Arms, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious written statement to Semenko, Wayne Anthony dba Smoke & Glory/SNG Tactical/SNG Arms, which statement was intended to deceive Semenko, Wayne Anthony dba Smoke & Glory/SNG Tactical/SNG Arms as to a fact material to the lawfulness of such sale of the said firearms to BRIANA E. MORENO-AGUILAR under Chapter 44, Title 18, United States Code; in that BRIANA E. MORENO-AGUILAR

1 stated that she was the actual transferee/buyer of said firearms; and RIGOBERTO
2 PADILLA, JR., aided, abetted, counseled, commanded, induced, and procured such false
3 and fictitious statement; in violation of Title 18, United States Code, Sections 2(a),
4 922(a)(6) and 924(a)(2).

5 **COUNT 16**

6 On or about August 28, 2015, at or near Tucson, in the District of Arizona,
7 RIGOBERTO PADILLA, JR., having been previously convicted of a crime punishable
8 by imprisonment for a term exceeding one year; that is, Facilitation (Unlawful Possession
9 of Marijuana for Sale), a felony offense, in Santa Cruz County Superior Court, Arizona,
10 case number CR-06-104, on February 26, 2007; did knowingly possess firearms, that is:
11 one Zastava model M70AB2 7.62x39mm semiautomatic rifle, serial number AB2-
12 C105663; and one Inter Ordnance Inc. model Sportster AK47 7.62x39mm semiautomatic
13 rifle, serial number S004305; said firearms being in and affecting commerce in that they
14 were previously transported into the state of Arizona from another state or foreign
15 country; in violation of Title 18, United States Code, Section 922(g)(1) and 924(a)(2).

16 **COUNT 17**

17 On or about September 8, 2015, at or near Apache Junction, in the District of
18 Arizona, ISAAC LEONARDO PADILLA and RIGOBERTO PADILLA, JR., in
19 connection with the acquisition of a firearm, that is; one Century Arms model VZ2008
20 7.62x39mm semiautomatic rifle, serial number VZ08PM-012335; from AJI Sports LLC
21 dba AJI Sports, a licensed dealer of firearms within the meaning of Chapter 44, Title 18,
22 United States Code; did knowingly make a false and fictitious written statement to AJI
23 Sports LLC dba AJI Sports, which statement was intended to deceive AJI Sports LLC
24 dba AJI Sports as to a fact material to the lawfulness of such sale of the said firearm to
25 ISAAC LEONARDO PADILLA under Chapter 44, Title 18, United States Code; in that
26 ISAAC LEONARDO PADILLA stated that he was the actual transferee/buyer of said
27 firearm; and RIGOBERTO PADILLA, JR., aided, abetted, counseled, commanded,
28

1 induced, and procured such false and fictitious statement; in violation of Title 18, United
2 States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

3 **COUNT 18**

4 On or about September 8, 2015, at or near Apache Junction, in the District of
5 Arizona, ISAAC LEONARDO PADILLA and RIGOBERTO PADILLA, JR., in
6 connection with the acquisition of firearms, that is; one Century Arms model M70AB2
7 7.62x39mm semiautomatic rifle, serial number AB2-C103864; and one Century Arms
8 model M70AB2 7.62x39mm semiautomatic rifle, serial number AB2-C105526; from
9 SCFS Enterprises LLC dba Sharky's Firearms, a licensed dealer of firearms within the
10 meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and
11 fictitious written statement to SCFS Enterprises LLC dba Sharky's Firearms, which
12 statement was intended to deceive SCFS Enterprises LLC dba Sharky's Firearms as to a
13 fact material to the lawfulness of such sale of the said firearms to ISAAC LEONARDO
14 PADILLA under Chapter 44, Title 18, United States Code; in that ISAAC LEONARDO
15 PADILLA stated that he was the actual transferee/buyer of said firearms; and
16 RIGOBERTO PADILLA, JR., aided, abetted, counseled, commanded, induced, and
17 procured such false and fictitious statement; in violation of Title 18, United States Code,
18 Sections 2(a), 922(a)(6) and 924(a)(2).

19 **COUNT 19**

20 On or about September 14, 2015, at or near Tucson, in the District of Arizona,
21 BRIANA E. MORENO-AGUILAR and RIGOBERTO PADILLA, JR., in connection
22 with the acquisition of firearms, that is; one Maadi Company model MISR 7.62x39mm
23 semiautomatic rifle, serial number CM11811; and one Romarm model M10-762
24 7.62x39mm semiautomatic rifle, serial number MA-20820-13; from EZPAWN Arizona
25 Inc. dba USA Pawn & Jewelry, a licensed dealer of firearms within the meaning of
26 Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious
27 written statement to EZPAWN Arizona Inc. dba USA Pawn & Jewelry, which statement
28 was intended to deceive EZPAWN Arizona Inc. dba USA Pawn & Jewelry as to a fact

1 material to the lawfulness of such sale of the said firearms to BRIANA E. MORENO-
2 AGUILAR under Chapter 44, Title 18, United States Code; in that BRIANA E.
3 MORENO-AGUILAR stated that she was the actual transferee/buyer of said firearms;
4 and RIGOBERTO PADILLA, JR., aided, abetted, counseled, commanded, induced, and
5 procured such false and fictitious statement; in violation of Title 18, United States Code,
6 Sections 2(a), 922(a)(6) and 924(a)(2).

7 **COUNT 20**

8 On or about September 19, 2015, at or near Apache Junction, in the District of
9 Arizona, ISAAC LEONARDO PADILLA and RIGOBERTO PADILLA, JR., in
10 connection with the acquisition of firearms, that is; one Century Arms model M70
11 7.62x39mm semiautomatic rifle, serial number AB2-C106543; and one Romarm model
12 GP WASR 7.62x39mm semiautomatic rifle, serial number 1974FD4559; from AJI Sports
13 LLC dba AJI Sports, a licensed dealer of firearms within the meaning of Chapter 44,
14 Title 18, United States Code; did knowingly make a false and fictitious written statement
15 to AJI Sports LLC dba AJI Sports, which statement was intended to deceive AJI Sports
16 LLC dba AJI Sports as to a fact material to the lawfulness of such sale of the said
17 firearms to ISAAC LEONARDO PADILLA under Chapter 44, Title 18, United States
18 Code; in that ISAAC LEONARDO PADILLA stated that he was the actual
19 transferee/buyer of said firearms; and RIGOBERTO PADILLA, JR., aided, abetted,
20 counseled, commanded, induced, and procured such false and fictitious statement; in
21 violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

22 **COUNT 21**

23 On or about September 23, 2015, at or near Apache Junction, in the District of
24 Arizona, ISAAC LEONARDO PADILLA and RIGOBERTO PADILLA, JR., in
25 connection with the acquisition of firearms, that is; one Romarm model SAR-1
26 7.62x39mm semiautomatic rifle, serial number S1-04976-99; and one Zastava model N-
27 PAP M70 7.62x39mm semiautomatic rifle, serial number N-PAP035945; from AJI
28 Sports LLC dba AJI Sports, a licensed dealer of firearms within the meaning of Chapter

1 44, Title 18, United States Code; did knowingly make a false and fictitious written
2 statement to AJI Sports LLC dba AJI Sports, which statement was intended to deceive
3 AJI Sports LLC dba AJI Sports as to a fact material to the lawfulness of such sale of the
4 said firearms to ISAAC LEONARDO PADILLA under Chapter 44, Title 18, United
5 States Code; in that ISAAC LEONARDO PADILLA stated that he was the actual
6 transferee/buyer of said firearms; and RIGOBERTO PADILLA, JR., aided, abetted,
7 counseled, commanded, induced, and procured such false and fictitious statement; in
8 violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

9 **COUNT 22**

10 On or about September 23, 2015, at or near Apache Junction, in the District of
11 Arizona, RIGOBERTO PADILLA, JR., having been previously convicted of a crime
12 punishable by imprisonment for a term exceeding one year; that is, Facilitation (Unlawful
13 Possession of Marijuana for Sale), a felony offense, in Santa Cruz County Superior
14 Court, Arizona, case number CR-06-104, on February 26, 2007; did knowingly possess
15 firearms, that is: one Romarm model SAR-1 7.62x39mm semiautomatic rifle, serial
16 number S1-04976-99; and one Zastava model N-PAP M70 7.62x39mm semiautomatic
17 rifle, serial number N-PAP035945; said firearms being in and affecting commerce in that
18 they were previously transported into the state of Arizona from another state or foreign
19 country; in violation of Title 18, United States Code, Section 922(g)(1) and 924(a)(2).

20 **COUNT 23**

21 On or about September 23, 2015, at or near Tucson, in the District of Arizona,
22 BRIANA E. MORENO-AGUILAR and RIGOBERTO PADILLA, JR., in connection
23 with the acquisition of firearms, that is; one Smith and Wesson model M&P15
24 5.56x45mm semiautomatic rifle, serial number SX00684; and one Smith and Wesson
25 model M&P15 5.56x45mm semiautomatic rifle, serial number SX01000; from EZPAWN
26 Arizona Inc. dba USA Pawn & Jewelry, a licensed dealer of firearms within the meaning
27 of Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious
28 written statement to EZPAWN Arizona Inc. dba USA Pawn & Jewelry, which statement

1 was intended to deceive EZPAWN Arizona Inc. dba USA Pawn & Jewelry as to a fact
2 material to the lawfulness of such sale of the said firearms to BRIANA E. MORENO-
3 AGUILAR under Chapter 44, Title 18, United States Code; in that BRIANA E.
4 MORENO-AGUILAR stated that she was the actual transferee/buyer of said firearms;
5 and RIGOBERTO PADILLA, JR., aided, abetted, counseled, commanded, induced, and
6 procured such false and fictitious statement; in violation of Title 18, United States Code,
7 Sections 2(a), 922(a)(6) and 924(a)(2).

8 **COUNT 24**

9 On or about September 23, 2015, at or near Tucson, in the District of Arizona,
10 BRIANA E. MORENO-AGUILAR and RIGOBERTO PADILLA, JR., in connection
11 with the acquisition of a firearm, that is; one Romarm model WASR-10 7.62x39mm
12 semiautomatic rifle, serial number A1-40034-15; from Semenکو, Wayne Anthony dba
13 Smoke & Glory/SNG Tactical/SNG Arms, a licensed dealer of firearms within the
14 meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and
15 fictitious written statement to Semenکو, Wayne Anthony dba Smoke & Glory/SNG
16 Tactical/SNG Arms, which statement was intended to deceive Semenکو, Wayne Anthony
17 dba Smoke & Glory/SNG Tactical/SNG Arms as to a fact material to the lawfulness of
18 such sale of the said firearm to BRIANA E. MORENO-AGUILAR under Chapter 44,
19 Title 18, United States Code; in that BRIANA E. MORENO-AGUILAR stated that she
20 was the actual transferee/buyer of said firearm; and RIGOBERTO PADILLA, JR., aided,
21 abetted, counseled, commanded, induced, and procured such false and fictitious
22 statement; in violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and
23 924(a)(2).

24 **COUNT 25**

25 On or about September 25, 2015, at or near Apache Junction, in the District of
26 Arizona, KAREN LIZBETH PADILLA knowingly made a false statement and
27 representation to AJI Sports LLC dba AJI Sports, licensed under the provisions of
28 Chapter 44, Title 18, United States Code, with respect to information required by the

1 provisions of Chapter 44, Title 18, United States Code, to be kept in the records of AJI
2 Sports LLC dba AJI Sports; in that KAREN LIZBETH PADILLA, in connection with the
3 purchase of firearms, that is; one Inter Ordnance model AKM247 7.62x39mm
4 semiautomatic rifle, serial number S002816; and one Century Arms model Champion,
5 7.62x39mm semiautomatic pistol, serial number CN-0395-07; stated that her address was
6 174 Calle Pallenque, Rio Rico, Arizona, 85648; in violation of Title 18, United States
7 Code, Section 924(a)(1)(A).

8 **COUNT 26**

9 On or about September 25, 2015, at or near Apache Junction, in the District of
10 Arizona, KAREN LIZBETH PADILLA and RIGOBERTO PADILLA, JR., in
11 connection with the acquisition of firearms, that is; one Inter Ordnance model AKM247
12 7.62x39mm semiautomatic rifle, serial number S002816; and one Century Arms model
13 Champion 7.62x39mm semiautomatic pistol, serial number CN-0395-07; from AJI
14 Sports LLC dba AJI Sports, a licensed dealer of firearms within the meaning of Chapter
15 44, Title 18, United States Code; did knowingly make a false and fictitious written
16 statement to AJI Sports LLC dba AJI Sports, which statement was intended to deceive
17 AJI Sports LLC dba AJI Sports as to a fact material to the lawfulness of such sale of the
18 said firearms to KAREN LIZBETH PADILLA under Chapter 44, Title 18, United States
19 Code; in that KAREN LIZBETH PADILLA stated that she was the actual
20 transferee/buyer of said firearms; and RIGOBERTO PADILLA, JR., aided, abetted,
21 counseled, commanded, induced, and procured such false and fictitious statement; in
22 violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

23 **COUNT 27**

24 On or about September 25, 2015, at or near Apache Junction, in the District of
25 Arizona, CHRISTIAN ALEXIS PADILLA and RIGOBERTO PADILLA, JR., in
26 connection with the acquisition of firearms, that is; one Zastava model N-PAP
27 7.62x39mm semiautomatic rifle, serial number N-PAP021283; and one FEG model
28 AMD-63 7.62x39mm semiautomatic rifle, serial number CI005197; from AJI Sports

1 LLC dba AJI Sports, a licensed dealer of firearms within the meaning of Chapter 44,
2 Title 18, United States Code; did knowingly make a false and fictitious written statement
3 to AJI Sports LLC dba AJI Sports, which statement was intended to deceive AJI Sports
4 LLC dba AJI Sports as to a fact material to the lawfulness of such sale of the said
5 firearms to CHRISTIAN ALEXIS PADILLA under Chapter 44, Title 18, United States
6 Code; in that CHRISTIAN ALEXIS PADILLA stated that he was the actual
7 transferee/buyer of said firearms; and RIGOBERTO PADILLA, JR., aided, abetted,
8 counseled, commanded, induced, and procured such false and fictitious statement; in
9 violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

10 **COUNT 28**

11 On or about September 25, 2015, at or near Tucson, in the District of Arizona,
12 BRIANA E. MORENO-AGUILAR and RIGOBERTO PADILLA, JR., in connection
13 with the acquisition of a firearm, that is; one Smith and Wesson model M&P15
14 5.56x45mm semiautomatic rifle, serial number SX02287; from EZPAWN Arizona Inc.
15 dba USA Pawn & Jewelry, a licensed dealer of firearms within the meaning of Chapter
16 44, Title 18, United States Code; did knowingly make a false and fictitious written
17 statement to EZPAWN Arizona Inc. dba USA Pawn & Jewelry, which statement was
18 intended to deceive EZPAWN Arizona Inc. dba USA Pawn & Jewelry as to a fact
19 material to the lawfulness of such sale of the said firearm to BRIANA E. MORENO-
20 AGUILAR under Chapter 44, Title 18, United States Code; in that BRIANA E.
21 MORENO-AGUILAR stated that she was the actual transferee/buyer of said firearm; and
22 RIGOBERTO PADILLA, JR., aided, abetted, counseled, commanded, induced, and
23 procured such false and fictitious statement; in violation of Title 18, United States Code,
24 Sections 2(a), 922(a)(6) and 924(a)(2).

25 **COUNT 29**

26 On or about September 26, 2015, at or near Tucson, in the District of Arizona,
27 LESLIE MARLENE PADILLA knowingly made a false statement and representation to
28 BKM Guns Inc. dba Murphy's Gun Shop, licensed under the provisions of Chapter 44,

1 Title 18, United States Code, with respect to information required by the provisions of
2 Chapter 44, Title 18, United States Code, to be kept in the records of BKM Guns Inc. dba
3 Murphy's Gun Shop; in that LESLIE MARLENE PADILLA, in connection with the
4 purchase of a firearm, that is; one Romarm model WASR-10 7.62x39mm semiautomatic
5 rifle, serial number A1-21777-14; stated that her address was 1068 W. Paul Bond Dr.
6 Apt. #P102, Nogales, Arizona, 85621; in violation of Title 18, United States Code,
7 Section 924(a)(1)(A).

8 **COUNT 30**

9 On or about September 26, 2015, at or near Tucson, in the District of Arizona,
10 LESLIE MARLENE PADILLA and RIGOBERTO PADILLA, JR., in connection with
11 the acquisition of a firearm, that is; one Romarm model WASR-10 7.62x39mm
12 semiautomatic rifle, serial number A1-21777-14; from BKM Guns Inc. dba Murphy's
13 Gun Shop, a licensed dealer of firearms within the meaning of Chapter 44, Title 18,
14 United States Code; did knowingly make a false and fictitious written statement to BKM
15 Guns Inc. dba Murphy's Gun Shop, which statement was intended to deceive BKM Guns
16 Inc. dba Murphy's Gun Shop as to a fact material to the lawfulness of such sale of the
17 said firearm to LESLIE MARLENE PADILLA under Chapter 44, Title 18, United States
18 Code; in that LESLIE MARLENE PADILLA stated that she was the actual
19 transferee/buyer of said firearm; and RIGOBERTO PADILLA, JR., aided, abetted,
20 counseled, commanded, induced, and procured such false and fictitious statement; in
21 violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

22 **COUNT 31**

23 On or about September 26, 2015, at or near Tucson, in the District of Arizona,
24 CHRISTIAN ALEXIS PADILLA and RIGOBERTO PADILLA, JR., in connection with
25 the acquisition of a firearm, that is; one Izmash model Saiga Sporter 7.62x39mm
26 semiautomatic rifle, serial number H06108829; from BKM Guns Inc. dba Murphy's Gun
27 Shop, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United
28 States Code; did knowingly make a false and fictitious written statement to BKM Guns

1 Inc. dba Murphy's Gun Shop, which statement was intended to deceive BKM Guns Inc.
2 dba Murphy's Gun Shop as to a fact material to the lawfulness of such sale of the said
3 firearm to CHRISTIAN ALEXIS PADILLA under Chapter 44, Title 18, United States
4 Code; in that CHRISTIAN ALEXIS PADILLA stated that he was the actual
5 transferee/buyer of said firearm; and RIGOBERTO PADILLA, JR., aided, abetted,
6 counseled, commanded, induced, and procured such false and fictitious statement; in
7 violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

8 **COUNT 32**

9 On or about September 30, 2015, at or near Tucson, in the District of Arizona,
10 LESLIE MARLENE PADILLA knowingly made a false statement and representation to
11 Schuyler Arms LLC, licensed under the provisions of Chapter 44, Title 18, United States
12 Code, with respect to information required by the provisions of Chapter 44, Title 18,
13 United States Code, to be kept in the records of Schuyler Arms LLC; in that LESLIE
14 MARLENE PADILLA, in connection with the purchase of a firearm, that is; one Zastava
15 model O-Pap 7.62x39mm semiautomatic rifle, serial number O-PAP011422; stated that
16 her address was 1068 W. Paul Bond Dr. Apt. #P102, Nogales, Arizona, 85621; in
17 violation of Title 18, United States Code, Section 924(a)(1)(A).

18 **COUNT 33**

19 On or about September 30, 2015, at or near Tucson, in the District of Arizona,
20 LESLIE MARLENE PADILLA and RIGOBERTO PADILLA, JR., in connection with
21 the acquisition of a firearm, that is; one Zastava model O-Pap 7.62x39mm semiautomatic
22 rifle, serial number O-PAP011422; from Schuyler Arms LLC, a licensed dealer of
23 firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly
24 make a false and fictitious written statement to Schuyler Arms LLC, which statement was
25 intended to deceive Schuyler Arms LLC as to a fact material to the lawfulness of such
26 sale of the said firearm to LESLIE MARLENE PADILLA under Chapter 44, Title 18,
27 United States Code; in that LESLIE MARLENE PADILLA stated that she was the actual
28 transferee/buyer of said firearm; and RIGOBERTO PADILLA, JR., aided, abetted,

1 counseled, commanded, induced, and procured such false and fictitious statement; in
2 violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

3 **COUNT 34**

4 On or about September 30, 2015, at or near Tucson, in the District of Arizona,
5 LESLIE MARLENE PADILLA knowingly made a false statement and representation to
6 Liberty Pawn Shop Inc., licensed under the provisions of Chapter 44, Title 18, United
7 States Code, with respect to information required by the provisions of Chapter 44, Title
8 18, United States Code, to be kept in the records of Liberty Pawn Shop Inc.; in that
9 LESLIE MARLENE PADILLA, in connection with the purchase of a firearm, that is;
10 one Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-
11 12909-13; stated that her address was 1068 W. Paul Bond Dr. Apt. #P102, Nogales,
12 Arizona, 85621; in violation of Title 18, United States Code, Section 924(a)(1)(A).

13 **COUNT 35**

14 On or about September 30, 2015, at or near Tucson, in the District of Arizona,
15 LESLIE MARLENE PADILLA and RIGOBERTO PADILLA, JR., in connection with
16 the acquisition of a firearm, that is; one Romarm model WASR-10 7.62x39mm
17 semiautomatic rifle, serial number A1-12909-13; from Liberty Pawn Shop Inc., a
18 licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States
19 Code; did knowingly make a false and fictitious written statement to Liberty Pawn Shop
20 Inc., which statement was intended to deceive Liberty Pawn Shop Inc. as to a fact
21 material to the lawfulness of such sale of the said firearm to LESLIE MARLENE
22 PADILLA under Chapter 44, Title 18, United States Code; in that LESLIE MARLENE
23 PADILLA stated that she was the actual transferee/buyer of said firearm; and
24 RIGOBERTO PADILLA, JR., aided, abetted, counseled, commanded, induced, and
25 procured such false and fictitious statement; in violation of Title 18, United States Code,
26 Sections 2(a), 922(a)(6) and 924(a)(2).

COUNT 36

On or about September 30, 2015, at or near Tucson, in the District of Arizona, CHRISTIAN ALEXIS PADILLA and RIGOBERTO PADILLA, JR., in connection with the acquisition of a firearm, that is; one Inter Ordnance model M214 7.62x39mm semiautomatic rifle, serial number S008790; from Schuyler Arms LLC, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious written statement to Schuyler Arms LLC, which statement was intended to deceive Schuyler Arms LLC as to a fact material to the lawfulness of such sale of the said firearm to CHRISTIAN ALEXIS PADILLA under Chapter 44, Title 18, United States Code; in that CHRISTIAN ALEXIS PADILLA stated that he was the actual transferee/buyer of said firearm; and RIGOBERTO PADILLA, JR., aided, abetted, counseled, commanded, induced, and procured such false and fictitious statement; in violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

COUNT 37

On or about September 30, 2015, at or near Tucson, in the District of Arizona, CHRISTIAN ALEXIS PADILLA, ISAAC LEONARDO PADILLA, and RIGOBERTO PADILLA, JR., in connection with the acquisition of a firearm, that is; one Romarm model SAR 3 5.56x45mm semiautomatic rifle, serial number S3004901999; from Liberty Pawn Shop Inc., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious written statement to Liberty Pawn Shop Inc., which statement was intended to deceive Liberty Pawn Shop Inc. as to a fact material to the lawfulness of such sale of the said firearm to CHRISTIAN ALEXIS PADILLA under Chapter 44, Title 18, United States Code; in that CHRISTIAN ALEXIS PADILLA stated that he was the actual transferee/buyer of said firearm; and ISAAC LEONARDO PADILLA and RIGOBERTO PADILLA, JR., aided, abetted, counseled, commanded, induced, and procured such false and fictitious statement; in violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

COUNT 38

On or about October 3, 2015, at or near Glendale, in the District of Arizona, LESLIE MARLENE PADILLA knowingly made a false statement and representation to Lone Wolf Trading Company LLC, licensed under the provisions of Chapter 44, Title 18, United States Code, with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the records of Lone Wolf Trading Company LLC; in that LESLIE MARLENE PADILLA, in connection with the purchase of a firearm, that is; one Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-37193-15; stated that her address was 1068 W. Paul Bond Dr. Apt. #P102, Nogales, Arizona, 85621; in violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT 39

On or about October 3, 2015, at or near Glendale, in the District of Arizona, LESLIE MARLENE PADILLA and RIGOBERTO PADILLA, JR., in connection with the acquisition of a firearm, that is; one Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-37193-15; from Lone Wolf Trading Company LLC, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious written statement to Lone Wolf Trading Company LLC, which statement was intended to deceive Lone Wolf Trading Company LLC as to a fact material to the lawfulness of such sale of the said firearm to LESLIE MARLENE PADILLA under Chapter 44, Title 18, United States Code; in that LESLIE MARLENE PADILLA stated that she was the actual transferee/buyer of said firearm; and RIGOBERTO PADILLA, JR., aided, abetted, counseled, commanded, induced, and procured such false and fictitious statement; in violation of Title 18, United States Code, Sections 2(a), 922(a)(6) and 924(a)(2).

COUNT 40

On or about October 3, 2015, at or near Apache Junction, in the District of Arizona, LESLIE MARLENE PADILLA knowingly made a false statement and

1 representation to AJI Sports LLC dba AJI Sports, licensed under the provisions of
2 Chapter 44, Title 18, United States Code, with respect to information required by the
3 provisions of Chapter 44, Title 18, United States Code, to be kept in the records of AJI
4 Sports LLC dba AJI Sports; in that LESLIE MARLENE PADILLA, in connection with
5 the purchase of a firearm, that is; one Inter Ordnance model Sporter 7.62x39mm
6 semiautomatic rifle, serial number 035842; stated that her address was 1068 W. Paul
7 Bond Dr. Apt. #P102, Nogales, Arizona, 85621; in violation of Title 18, United States
8 Code, Section 924(a)(1)(A).

9 **COUNT 41**

10 On or about October 3, 2015, at or near Apache Junction, in the District of
11 Arizona, LESLIE MARLENE PADILLA, ISAAC LEONARDO PADILLA, and
12 RIGOBERTO PADILLA, JR., in connection with the acquisition of a firearm, that is; one
13 Inter Ordnance model Sporter 7.62x39mm semiautomatic rifle, serial number 035842;
14 from AJI Sports LLC dba AJI Sports, a licensed dealer of firearms within the meaning of
15 Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious
16 written statement to AJI Sports LLC dba AJI Sports, which statement was intended to
17 deceive AJI Sports LLC dba AJI Sports as to a fact material to the lawfulness of such sale
18 of the said firearm to LESLIE MARLENE PADILLA under Chapter 44, Title 18, United
19 States Code; in that LESLIE MARLENE PADILLA stated that she was the actual
20 transferee/buyer of said firearm; and ISAAC LEONARDO PADILLA and RIGOBERTO
21 PADILLA, JR., aided, abetted, counseled, commanded, induced, and procured such false
22 and fictitious statement; in violation of Title 18, United States Code, Sections 2(a),
23 922(a)(6) and 924(a)(2).

24 **COUNT 42**

25 On or about October 17, 2015, at or near Tucson, in the District of Arizona,
26 LESLIE MARLENE PADILLA knowingly made a false statement and representation to
27 Schuyler Arms LLC, licensed under the provisions of Chapter 44, Title 18, United States
28 Code, with respect to information required by the provisions of Chapter 44, Title 18,

1 United States Code, to be kept in the records of Schuyler Arms LLC; in that LESLIE
2 MARLENE PADILLA, in connection with the purchase of firearms, that is; one Inter
3 Ordnance model M247C 7.62x39mm semiautomatic rifle, serial number S007187; one
4 Inter Ordnance model M247C 7.62x39mm semiautomatic rifle, serial number S008966;
5 and one Inter Ordnance model M247C 7.62x39mm semiautomatic rifle, serial number
6 S007049; stated that her address was 1068 W. Paul Bond Dr. Apt. #P102, Nogales,
7 Arizona, 85621; in violation of Title 18, United States Code, Section 924(a)(1)(A).

8 **COUNT 43**

9 On or about October 17, 2015, at or near Tucson, in the District of Arizona,
10 LESLIE MARLENE PADILLA and RIGOBERTO PADILLA, JR., in connection with
11 the acquisition of firearms, that is; one Inter Ordnance model M247C 7.62x39mm
12 semiautomatic rifle, serial number S007187; one Inter Ordnance model M247C
13 7.62x39mm semiautomatic rifle, serial number S008966; and one Inter Ordnance model
14 M247C 7.62x39mm semiautomatic rifle, serial number S007049; from Schuyler Arms
15 LLC, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United
16 States Code; did knowingly make a false and fictitious written statement to Schuyler
17 Arms LLC, which statement was intended to deceive Schuyler Arms LLC as to a fact
18 material to the lawfulness of such sale of the said firearms to LESLIE MARLENE
19 PADILLA under Chapter 44, Title 18, United States Code; in that LESLIE MARLENE
20 PADILLA stated that she was the actual transferee/buyer of said firearms; and
21 RIGOBERTO PADILLA, JR., aided, abetted, counseled, commanded, induced, and
22 procured such false and fictitious statement; in violation of Title 18, United States Code,
23 Sections 2(a), 922(a)(6) and 924(a)(2).

24 **COUNT 44**

25 On or about October 21, 2015, at or near Rio Rico, in the District of Arizona,
26 ISAAC LEONARDO PADILLA knowingly and willfully made any materially false,
27 fictitious, and fraudulent statement and misrepresentation in any matter within the
28 jurisdiction of the Government of the United States; to wit, in the course of an

1 investigation by the United States Department of Justice, Bureau of Alcohol, Tobacco,
2 Firearms and Explosives, and the United States Department of Homeland Security,
3 Homeland Security Investigations, ISAAC LEONARDO PADILLA stated to law
4 enforcement agents that eight firearms were stolen from him after October 3, 2015, when
5 in fact such firearms were not stolen from ISAAC LEONARDO PADILLA; instead
6 ISAAC LEONARDO PADILLA transferred the firearms to his brother, Rigoberto
7 Padilla, Jr., and three of the firearms were recovered in the Republic of Mexico on
8 September 26, 2015; in violation of Title 18, United States Code, Section 1001(a)(2).

9 **COUNT 45**

10 On or about November 24, 2015, at or near Phoenix, in the District of Arizona,
11 JAVIER DAVID BUSTAMANTE-GAYTAN, an alien and citizen of the Republic of
12 Mexico illegally present in the United States, did knowingly possess ammunition, that is
13 10,080 rounds of Yugoslavian 7.62x39mm ammunition and 300 rounds of Magtech .380
14 ACP ammunition, said ammunition being in and affecting commerce in that it was
15 previously transported into the state of Arizona from another state or foreign country; in
16 violation of Title 18, United States Code, Section 922(g)(5)(A) and 924(a)(2).

17 **COUNT 46**

18 On or about November 24, 2015, at or near Phoenix, in the District of Arizona,
19 ABRAHAM BUSTAMANTE did sell and otherwise dispose of ammunition, that is
20 10,080 rounds of Yugoslavian 7.62x39mm ammunition and 300 rounds of Magtech .380
21 ACP ammunition, to Javier David Bustamante-Gaytan, knowing and having reasonable
22 cause to believe that Javier David Bustamante-Gaytan was an alien and citizen of the
23 Republic of Mexico illegally present in the United States; in violation of Title 18, United
24 States Code, Section 922(d)(5)(A) and 924(a)(2).

25 **COUNT 47**

26 On or about November 25, 2015, at or near Nogales, in the District of Arizona,
27 MELCHOR ENRIQUE URQUIDES-TAPIA, an alien and citizen of the Republic of
28 Mexico present in the United States pursuant to a non-immigrant visa, did knowingly

1 possess ammunition, that is 10,080 rounds of Yugoslavian 7.62x39mm ammunition and
2 300 rounds of Magtech .380 ACP ammunition, said ammunition being in and affecting
3 commerce in that it was previously transported into the state of Arizona from another
4 state or foreign country; in violation of Title 18, United States Code, Section
5 922(g)(5)(B) and 924(a)(2).

6 **COUNT 48**

7 On or about November 24, 2015, and November 25, 2015, at or near Phoenix,
8 Nogales, and other locations within the District of Arizona, MELCHOR ENRIQUE
9 URQUIDES-TAPIA, JAVIER DAVID BUSTAMANTE-GAYTAN, and ABRAHAM
10 BUSTAMANTE knowingly attempted to export and send from the United States any
11 merchandise, article, or object contrary to any law or regulation of the United States, and
12 received, concealed, bought, sold, and in any manner facilitated the transportation,
13 concealment, and sale of such merchandise, article or object, that is 10,080 rounds of
14 Yugoslavian 7.62x39mm ammunition and 300 rounds of Magtech .380 ACP ammunition,
15 knowing the same to be intended for exportation contrary to any law or regulation of the
16 United States, to wit: Title 22, United States Code, Section 2778; Title 22, Code of
17 Federal Regulations, Part 121.1; and Title 22, Code of Federal Regulations, Part 123.1; in
18 violation of Title 18, United States Code, Section 554(a).

19 **COUNT 49**

20 From on or about December 23, 2015, through December 28, 2015, at or near
21 Phoenix, Tucson, and other locations within the District of Arizona, ANDREI RENE
22 GARCIA and LUIS FIDEL GARCIA knowingly attempted to export and send from the
23 United States any merchandise, article, or object contrary to any law or regulation of the
24 United States, and received, concealed, bought, sold, and in any manner facilitated the
25 transportation, concealment, and sale of such merchandise, article or object, that is; one
26 Century Arms model Centurion 39 Sporter 7.62x39mm semiautomatic rifle, serial
27 number C39WM-000196; and one Petronov Armament (Morrissey Inc.) model AAM47
28 7.62x39mm semiautomatic rifle, serial number AA000245; knowing the same to be

1 intended for exportation contrary to any law or regulation of the United States, to wit:
2 Title 22, United States Code, Section 2778; Title 22, Code of Federal Regulations, Part
3 121.1; and Title 22, Code of Federal Regulations, Part 123.1; in violation of Title 18,
4 United States Code, Section 554(a).

5 **COUNT 50**

6 On or about December 29, 2015, at or near Rio Rico, in the District of Arizona,
7 LUIS FIDEL GARCIA knowingly and willfully made any materially false, fictitious, and
8 fraudulent statement and misrepresentation in any matter within the jurisdiction of the
9 Government of the United States; to wit, in the course of an investigation by the United
10 States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives, and
11 the United States Department of Homeland Security, Homeland Security Investigations,
12 LUIS FIDEL GARCIA stated to law enforcement agents that he did not purchase a
13 firearm in Phoenix, Arizona, on December 23, 2015, when in fact LUIS FIDEL GARCIA
14 did purchase a firearm; a Century Arms model Centurion 39 Sporter 7.62x39mm
15 semiautomatic rifle, serial number C39WM-000196; in Phoenix, Arizona, on December
16 23, 2015; in violation of Title 18, United States Code, Section 1001(a)(2).

17 **COUNT 51**

18 On or about December 29, 2015, at or near Rio Rico, in the District of Arizona,
19 LUIS FIDEL GARCIA knowingly and willfully made any materially false, fictitious, and
20 fraudulent statement and misrepresentation in any matter within the jurisdiction of the
21 Government of the United States; to wit, in the course of an investigation by the United
22 States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives, and
23 the United States Department of Homeland Security, Homeland Security Investigations,
24 LUIS FIDEL GARCIA stated to law enforcement agents that on December 23, 2015, he
25 transferred two firearms to a relative at the corner of South Park Avenue and East 36th
26 Street in Tucson, Arizona, when in fact LUIS FIDEL GARCIA instead transferred three
27 firearms to his parents' residence at 2342 South Campbell Avenue in Tucson, Arizona; in
28 violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 52

On or about December 29, 2015, at or near Phoenix, in the District of Arizona, JESSICA BRIDGET SOTO knowingly attempted to export and send from the United States any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is 2,000 rounds of Wolf Gold .223 REM ammunition, 500 rounds of Armscor .22 Magnum ammunition, 2,000 rounds of Magtech 9mm Luger ammunition, 2,000 rounds of WPA .223 REM ammunition, 1,000 rounds of Russian 7.62x39mm ammunition, and 21,000 rounds of WPA 7.62x39mm ammunition, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 22, United States Code, Section 2778; Title 22, Code of Federal Regulations, Part 121.1; and Title 22, Code of Federal Regulations, Part 123.1; in violation of Title 18, United States Code, Section 554(a).

COUNT 53

On or about January 5, 2016, at or near Phoenix, in the District of Arizona, JESSICA BRIDGET SOTO knowingly attempted to export and send from the United States any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is 19,000 rounds of WPA 7.62x39mm ammunition, 1,000 rounds of WPA .223 REM ammunition, 2,000 rounds of Aguila .38 Super ammunition, 2,000 rounds of Sellier and Bellot 9mm Luger ammunition, and 2,000 rounds of Sellier and Bellot .45 ACP ammunition, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 22, United States Code, Section 2778; Title 22, Code of Federal Regulations, Part 121.1; and Title 22, Code of Federal Regulations, Part 123.1; in violation of Title 18, United States Code, Section 554(a).

COUNT 54

On or about January 7, 2016, at or near Phoenix, in the District of Arizona, DIANA MARIE ARREOLA, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year; that is, Possession of Narcotic Drugs, in Maricopa County Superior Court, Arizona, case number CR96-06021, on January 10, 1997; and Theft, in Maricopa County Superior Court, Arizona, case number CR96-10534, on April 7, 1998; did knowingly possesses ammunition, that is: 10,000 rounds of WPA 7.62x39mm ammunition; said ammunition not being manufactured in Arizona and thus affecting commerce in that it was previously transported into the state of Arizona from another state or foreign country; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 55

On or about January 7, 2016, at or near Phoenix, in the District of Arizona, DIANA MARIE ARREOLA knowingly attempted to export and send from the United States any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is 10,000 rounds of WPA 7.62x39mm ammunition, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 22, United States Code, Section 2778; Title 22, Code of Federal Regulations, Part 121.1; and Title 22, Code of Federal Regulations, Part 123.1; in violation of Title 18, United States Code, Section 554(a).

COUNT 56

From a time unknown to on or about January 8, 2016, at or near Phoenix and other locations within the District of Arizona, JORGE ACOSTA-LICERIO knowingly attempted to export and send from the United States any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such

merchandise, article or object, that is one Norinco model MAK-90 Sporter 7.62x39mm semiautomatic rifle, serial number 94114075; one Romarm model GP WASR 10/63 7.62x39mm semiautomatic rifle, serial number CL-1990-76; one Romarm model M10-762 7.62x39mm semiautomatic rifle, serial number MA-10220-12; one Maadi model ARM 7.62x39mm semiautomatic rifle, serial number AC0063829; one Century Arms model RAS47 7.62x39mm semiautomatic rifle, serial number RAS47007535; one Romarm model Romak 991 7.62x39mm semiautomatic rifle, serial number 1-04022-99; one Century Arms model Centurion 39 Sporter 7.62x39mm semi-automatic rifle, serial number 39NC13454; one Romarm model GP WASR 10/63 7.62x39mm semi-automatic rifle, serial number 1981MK0602; one Romarm model WASR 10 7.62x39mm semiautomatic rifle, serial number A1-22854-14; and one Century Arms model GP1975 7.62x39mm semiautomatic rifle (bull pup), serial number GP7501588; knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 22, United States Code, Section 2778; Title 22, Code of Federal Regulations, Part 121.1; and Title 22, Code of Federal Regulations, Part 123.1; in violation of Title 18, United States Code, Section 554(a).

COUNT 57

On or about February 4, 2016, at or near Phoenix and other locations within the District of Arizona, JORGE ACOSTA-LICERIO knowingly attempted to export and send from the United States any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is; one ITM Arms (Wise Lite Arms) model MK-99 7.62x39mm semiautomatic pistol, serial number 0016600; one Nodak Spud model NDS-3 7.62x39mm semiautomatic rifle, serial number M006145; one Romarm model Romak 991 7.62x39mm semiautomatic rifle, serial number 1-00551-99; and one Zastava model N-PAP M70 7.62x39mm semiautomatic rifle, serial number N-PAP006970; knowing the same to be intended for exportation contrary to any law or regulation of the United States,

1 to wit: Title 22, United States Code, Section 2778; Title 22, Code of Federal Regulations,
2 Part 121.1; and Title 22, Code of Federal Regulations, Part 123.1; in violation of Title 18,
3 United States Code, Section 554(a).

4 **COUNT 58**

5 From on or about August 2015 to February 4, 2016, at or near Phoenix and other
6 locations within the District of Arizona, JORGE ACOSTA-LICERIO, not being a
7 licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States
8 Code, did willfully engage in the business of dealing firearms; in violation of Title 18,
9 United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

10 **COUNT 59**

11 From a time unknown to on or about February 4, 2016, at or near Tucson,
12 Nogales, Phoenix, Apache Junction, Glendale, Rio Rico, and elsewhere within the
13 District of Arizona, the defendants, EDGAR VEGA-BARRERAS, RIGOBERTO
14 PADILLA, JR., ISAAC LEONARDO PADILLA, KAREN LIZBETH PADILLA,
15 LESLIE MARLENE PADILLA, CHRISTIAN ALEXIS PADILLA, BRIANA E.
16 MORENO-AGUILAR, EMILIO NAVARRO, ERIK BARTHOLOMEW SALAZAR,
17 GABRIELLA VICTORIA GONZALEZ, DIANA MARIE ARREOLA, MELCHOR
18 ENRIQUE URQUIDES-TAPIA, JAVIER DAVID BUSTAMANTE-GAYTAN,
19 ABRAHAM BUSTAMANTE, LUIS FIDEL GARCIA, ALVARO RUBIO BELTRAN,
20 ANDREI RENE GARCIA, IRVYING MENDOZA-GONZALEZ, JESSICA BRIDGET
21 SOTO, JOSE ALONSO VERDUGO-BERNAL, and JORGE ACOSTA-LICERIO, did
22 knowingly and intentionally combine, conspire, confederate, and agree together and with
23 persons known and unknown to the grand jury, to commit offenses against the United
24 States, that is: the knowing attempt to export and send from the United States any
25 merchandise, article, or object contrary to any law or regulation of the United States, and
26 received, concealed, bought, sold, and in any manner facilitated the transportation,
27 concealment, and sale of such merchandise, article or object, prior to exportation,
28 knowing the same to be intended for exportation contrary to any law or regulation of the

United States, to wit: Title 22, United States Code, Section 2778; Title 22, Code of Federal Regulations, Part 121.1; and Title 22, Code of Federal Regulations, Part 123.1; in violation of Title 18, United States Code, Section 554(a).

Purpose of the Conspiracy

The purpose of this conspiracy was to commit, and assist in the commission of, the unlawful export of firearms and ammunition, including:

- Romarm model Draco 7.62x39mm semiautomatic pistol, serial number DA258814
- Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-21076-14
- Petronov Armament model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000482
- Petronov Armament model AAM-47UF 7.62x39mm semiautomatic rifle, serial number AA000055
- Century Arms model M70 AB2 7.62x39mm semiautomatic rifle, serial number AB206970
- Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-6258-13
- Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number 1-27919-2001
- Century Arms model Centurion 39 Sporter 7.62x39mm semiautomatic rifle, serial number C39WM-005198
- Childers Guns (Kalashnicohn) model CG-1 7.62x39mm semiautomatic rifle, serial number AM00426
- Century Arms model VZ2008 Sporter 7.62x39mm semiautomatic rifle, serial number VZ08PM-013585
- Century Arms model VZ2008 Sporter 7.62x39mm semiautomatic rifle, serial number VZ08PM-013998
- Barrett model 82A1 .50 BMG semiautomatic rifle, serial number AA003862
- Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000175
- Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000355
- Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000491
- Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000170
- Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000177
- Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000178
- Spike's Tactical model ST15 .223 REM semiautomatic rifle, serial number RM-20142
- Bushmaster model Carbon 15 .223 REM semiautomatic rifle, serial number CBC011454
- Bushmaster model Carbon 15 .223 REM semiautomatic rifle, serial number BK3008322
- DPMS model A15 .223 REM semiautomatic rifle, serial number FH222682
- Zastava model N-PAP DF 7.62x39mm semiautomatic rifle, serial number NPDP000292

- Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-31069-14
- Zastava model M70AB2 7.62x39mm semiautomatic rifle, serial number AB2-C105663
- Inter Ordnance Inc. model Sportster AK47 7.62x39mm semiautomatic rifle, serial number S004305
- Century Arms model VZ2008 7.62x39mm semiautomatic rifle, serial number VZ08PM-012335
- Century Arms model M70AB2 7.62x39mm semiautomatic rifle, serial number AB2-C103864
- Century Arms model M70AB2 7.62x39mm semiautomatic rifle, serial number AB2-C105526
- Maadi Company model MISR 7.62x39mm semiautomatic rifle, serial number CM11811
- Romarm model M10-762 7.62x39mm semiautomatic rifle, serial number MA-20820-13
- Century Arms model M70 7.62x39mm semiautomatic rifle, serial number AB2-C106543
- Romarm model GP WASR 7.62x39mm semiautomatic rifle, serial number 1974FD4559
- Romarm model SAR-1 7.62x39mm semiautomatic rifle, serial number S1-04976-99
- Zastava model N-PAP M70 7.62x39mm semiautomatic rifle, serial number N-PAP035945
- Smith and Wesson model M&P15 5.56x45mm semiautomatic rifle, serial number SX00684
- Smith and Wesson model M&P15 5.56x45mm semiautomatic rifle, serial number SX01000
- Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-40034-15
- Inter Ordnance model AKM247 7.62x39mm semiautomatic rifle, serial number S002816
- Century Arms model Champion 7.62x39mm semiautomatic pistol, serial number CN-0395-07
- Zastava model N-PAP 7.62x39mm semiautomatic rifle, serial number N-PAP021283
- FEG model AMD-63 7.62x39mm semiautomatic rifle, serial number CI005197
- Smith and Wesson model M&P15 5.56x45mm semiautomatic rifle, serial number SX02287
- Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-21777-14
- Izmash model Saiga Sporter 7.62x39mm semiautomatic rifle, serial number H06108829
- Zastava model O-Pap 7.62x39mm semiautomatic rifle, serial number O-PAP011422
- Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-12909-13
- Inter Ordnance model M214 7.62x39mm semiautomatic rifle, serial number S008790
- Romarm model SAR 3 5.56x45mm semiautomatic rifle, serial number S3004901999
- Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-37193-15
- Inter Ordnance model Sporter 7.62x39mm semiautomatic rifle, serial number 035842

- Inter Ordnance model M247C 7.62x39mm semiautomatic rifle, serial number S007187
- Inter Ordnance model M247C 7.62x39mm semiautomatic rifle, serial number S008966
- Inter Ordnance model M247C 7.62x39mm semiautomatic rifle, serial number S007049
- Century Arms model Centurion 39 Sporter 7.62x39mm semiautomatic rifle, serial number C39WM-000196
- Petronov Armament (Morrissey Inc.) model AAM47 7.62x39mm semiautomatic rifle, serial number AA000245
- Norinco model MAK-90 Sporter 7.62x39mm semiautomatic rifle, serial number 94114075
- Romarm model GP WASR 10/63 7.62x39mm semiautomatic rifle, serial number CL-1990-76
- Romarm model M10-762 7.62x39mm semiautomatic rifle, serial number MA-10220-12
- Maadi model ARM 7.62x39mm semiautomatic rifle, serial number AC006382
- Century Arms model RAS47 7.62x39mm semiautomatic rifle, serial number RAS47007535
- Romarm model Romak 991 7.62x39mm semiautomatic rifle, serial number 1-04022-99
- Century Arms model Centurion 39 Sporter 7.62x39mm semi-automatic rifle, serial number 39NC13454
- Romarm model GP WASR 10/63 7.62x39mm semi-automatic rifle, serial number 1981MK0602
- Romarm model WASR 10 7.62x39mm semiautomatic rifle, serial number A1-22854-14
- Century Arms model GP1975 7.62x39mm semiautomatic rifle (bull pup), serial number GP7501588
- ITM Arms (Wise Lite Arms) model MK-99 7.62x39mm semiautomatic pistol, serial number 0016600
- Nodak Spud model NDS-3 7.62x39mm semiautomatic rifle, serial number M006145
- Romarm model Romak 991 7.62x39mm semiautomatic rifle, serial number 1-00551-99
- Zastava model N-PAP M70 7.62x39mm semiautomatic rifle, serial number N-PAP006970
- 10,080 rounds of Yugoslavian 7.62x39mm ammunition
- 300 rounds of Magtech .380 ACP ammunition
- 2,000 rounds of Wolf Gold .223 REM ammunition
- 500 rounds of Armscor .22 Magnum ammunition
- 2,000 rounds of Magtech 9mm Luger ammunition
- 2,000 rounds of WPA .223 REM ammunition
- 1,000 rounds of Russian 7.62x39mm ammunition
- 21,000 rounds of WPA 7.62x39mm ammunition
- 19,000 rounds of WPA 7.62x39mm ammunition
- 1,000 rounds of WPA .223 REM ammunition
- 2,000 rounds of Aguila .38 Super ammunition
- 2,000 rounds of Sellier and Bellot 9mm Luger ammunition
- 2,000 rounds of Sellier and Bellot .45 ACP ammunition
- 10,000 rounds of WPA 7.62x39mm ammunition

from the United States to the Republic of Mexico.

The Means and Methods of the Conspiracy

The means and methods employed by the defendants and their co-conspirators to carry out the conspiracy and effect its unlawful objects are as follows:

It was part of the conspiracy that the defendants and/or their co-conspirators would purchase firearms and ammunition in the District of Arizona.

It was a further part of the conspiracy that the defendants and/or their co-conspirators would provide the funds, instructions, and means of transportation and concealment to facilitate the purchase of these firearms and ammunition.

It was a further part of the conspiracy that the defendants and/or their co-conspirators would transport these firearms and ammunition within the District of Arizona with the knowledge that the weapon components were intended to ultimately be transported from the United States into the Republic of Mexico, and/or transport the firearms and ammunition from the United States into the Republic of Mexico.

It was a further part of the conspiracy that the defendants and/or their co-conspirators did not have any valid license or other authority to export the weapon components from the United States into the Republic of Mexico.

Overt Acts

In furtherance of the conspiracy, one or more of the co-conspirators committed, or caused to be committed, the overt acts described below:

On March 21, 2015, in Glendale, Arizona, Erik Bartholomew Salazar purchased a firearm; a Romarm model Draco 7.62x39mm semiautomatic pistol, serial number DA258814; from J&G II Inc. dba J&G Sales Ltd. Erik Bartholomew Salazar stated that he was the actual buyer of this firearm but instead purchased the firearm on behalf of an unnamed co-conspirator. This firearm was intended for unlawful exportation from the United States into the Republic of Mexico.

On April 7, 2015, in Phoenix, Arizona, Emilio Navarro purchased a firearm; a Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-21076-14; from AZESB LLC dba Mo Money Pawn Shop. Emilio Navarro stated that he was the

1 actual buyer of this firearm but instead purchased it on behalf of Irvying Mendoza-
2 Gonzalez. Irvying Mendoza-Gonzalez directed Emilio Navarro to purchase the firearm,
3 provided the funds with which Emilio Navarro purchased the firearm, and took
4 possession of the firearm after Emilio Navarro purchased it. This firearm was intended
5 for unlawful exportation from the United States into the Republic of Mexico.

6 On April 26, 2015, at the Nogales, Arizona, Port of Entry, Alvaro Rubio
7 Beltran exited the United States and entered the Republic of Mexico as the driver and
8 sole occupant of a Dodge Ram (Arizona license plate CHXSIN). Edgar Vega-Barrerras
9 followed in tandem as the driver and sole occupant of a Chevrolet Silverado (Mexico
10 license plate VC81600). Hours later the same day, Alvaro Rubio Beltran and Edgar
11 Vega-Barreras entered the United States from the Republic of Mexico in the Dodge Ram.
12 Approximately five minutes later Alvaro Rubio Beltran exited the United States and
13 entered the Republic of Mexico in the Dodge Ram and Edgar Vega-Barreras followed in
14 tandem in a white Chevrolet Aveo (Arizona license plate BHK1108).

15 On May 7, 2015, in Phoenix, Arizona, Emilio Navarro purchased firearms; a
16 Petronov Armament model AAM-47 7.62x39mm semiautomatic rifle, serial number
17 AA000482; and a Petronov Armament model AAM-47UF 7.62x39mm semiautomatic
18 rifle, serial number AA000055; from Lancaster Armory LLC dba Petronov
19 Armament/Phoenix Arsenal; and a Century Arms model M70 AB2 7.62x39mm
20 semiautomatic rifle, serial number AB206970; from North Phoenix Lending Inc. dba
21 North Phoenix Pawn. Emilio Navarro stated that he was the actual buyer of these
22 firearms but instead purchased them on behalf of Irvying Mendoza-Gonzalez. Irvying
23 Mendoza-Gonzalez directed Emilio Navarro to purchase the firearms, provided the funds
24 with which Emilio Navarro purchased the firearms, and took possession of the firearms
25 after Emilio Navarro purchased them. These firearms were intended for unlawful
26 exportation from the United States into the Republic of Mexico.

27 On May 19, 2015, in Phoenix, Arizona, Emilio Navarro purchased firearms; a
28 Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-6258-13;

1 and a Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number 1-
2 27919-2001; from Legendary Sales Inc. dba Legendary Guns; a Century Arms model
3 Centurion 39 Sporter 7.62x39mm semiautomatic rifle, serial number C39WM-005198;
4 from S.W.A.T. Training Facilities LLC dba Shooter's World; and a Childers Guns
5 (Kalashnicohn) model CG-1 7.62x39mm semiautomatic rifle, serial number AM00426;
6 from Illumi-Star LLC dba Tracy Gun Sales. Emilio Navarro stated that he was the actual
7 buyer of these firearms but instead purchased them on behalf of Irvying Mendoza-
8 Gonzalez. Irvying Mendoza-Gonzalez directed Emilio Navarro to purchase the firearms,
9 provided the funds with which Emilio Navarro purchased the firearms, and took
10 possession of the firearms after Emilio Navarro purchased them. These firearms were
11 intended for unlawful exportation from the United States into the Republic of Mexico.

12 On May 20, 2015, in Phoenix, Arizona, Gabriella Victoria Gonzalez
13 purchased firearms; a Century Arms model VZ2008 Sporter 7.62x39mm semiautomatic
14 rifle, serial number VZ08PM-013585; and a Century Arms model VZ2008 Sporter
15 7.62x39mm semiautomatic rifle, serial number VZ08PM-013998; from Murphy,
16 Veerachart dba Ammo AZ. Gabriella Victoria Gonzalez stated that she was the actual
17 buyer of these firearms but instead purchased them on behalf of an unnamed co-
18 conspirator. These firearms were intended for unlawful exportation from the United
19 States into the Republic of Mexico.

20 On May 21, 2015, in Phoenix, Arizona, Emilio Navarro purchased a firearm; a
21 Barrett model 82A1 .50 BMG semiautomatic rifle, serial number AA003862; from
22 Lancaster Armory LLC dba Petronov Armament/Phoenix Arsenal. Emilio Navarro stated
23 that he was the actual buyer of this firearm but instead purchased it on behalf of Irvying
24 Mendoza-Gonzalez. Irvying Mendoza-Gonzalez directed Emilio Navarro to purchase the
25 firearm, provided the funds with which Emilio Navarro purchased the firearm, and took
26 possession of the firearm after Emilio Navarro purchased it. This firearm was intended
27 for unlawful exportation from the United States into the Republic of Mexico.

1 On June 2, 2015, in Phoenix, Arizona, Emilio Navarro purchased firearms; a
2 Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle,
3 serial number AA000175; a Petronov Armament (Morrissey Inc.) model AAM-47
4 7.62x39mm semiautomatic rifle, serial number AA000355; and a Petronov Armament
5 (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number
6 AA000491; from Lancaster Armory LLC dba Petronov Armament/Phoenix Arsenal.
7 Emilio Navarro stated that he was the actual buyer of these firearms but instead
8 purchased them on behalf of Irvying Mendoza-Gonzalez. Irvying Mendoza-Gonzalez
9 directed Emilio Navarro to purchase the firearms, provided the funds with which Emilio
10 Navarro purchased the firearms, and took possession of the firearms after Emilio Navarro
11 purchased them. These firearms were intended for unlawful exportation from the United
12 States into the Republic of Mexico.

13 On June 3, 2015, in Phoenix, Arizona, Emilio Navarro purchased firearms; a
14 Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle,
15 serial number AA000170; a Petronov Armament (Morrissey Inc.) model AAM-47
16 7.62x39mm semiautomatic rifle, serial number AA000177; and a Petronov Armament
17 (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number
18 AA000178; from Lancaster Armory LLC dba Petronov Armament/Phoenix Arsenal.
19 Emilio Navarro stated that he was the actual buyer of these firearms but instead
20 purchased them on behalf of Irvying Mendoza-Gonzalez. Irvying Mendoza-Gonzalez
21 directed Emilio Navarro to purchase the firearms, provided the funds with which Emilio
22 Navarro purchased the firearms, and took possession of the firearms after Emilio Navarro
23 purchased them. These firearms were intended for unlawful exportation from the United
24 States into the Republic of Mexico. On the same date, Alvaro Rubio Beltran was the
25 driver of a white Saturn Ion (Arizona license plate BFA6714) in Mesa, Arizona.
26 Concealed in the vehicle were eighteen firearms; a Spike's Tactical model ST15 .223
27 REM semiautomatic rifle, serial number RM-20142; a Bushmaster model Carbon 15 .223
28 REM semiautomatic rifle, serial number CBC011454; a Bushmaster model Carbon 15

1 .223 REM semiautomatic rifle, serial number BK3008322; a DPMS model A15 .223
2 REM semiautomatic rifle, serial number FH222682; a Romarm model WASR-10
3 7.62x39mm semiautomatic rifle, serial number A1-6258-13; a Century Arms VZ2008
4 Sporter 7.62x39mm semiautomatic rifle, serial number VZ08PM-013585; a Zastava
5 model N-PAP DF 7.62x39mm semiautomatic rifle, serial number NPDP000292; a
6 Century Arms model Centurion 39 Sporter 7.62x39mm semiautomatic rifle, serial
7 number C39WM-005198; a Romarm model WASR-10 7.62x39mm semiautomatic rifle,
8 serial number 1-27919-2001; a Century Arms model VZ2008 Sporter 7.62x39mm
9 semiautomatic rifle, serial number VZ08PM-013998; a Petronov Armament (Morrissey
10 Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000170; a
11 Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle,
12 serial number AA000175; a Petronov Armament (Morrissey Inc.) model AAM-47
13 7.62x39mm semiautomatic rifle, serial number AA000177; a Petronov Armament
14 (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number
15 AA000178; a Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm
16 semiautomatic rifle, serial number AA000355; a Petronov Armament (Morrissey Inc.)
17 model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000491; a Childers
18 Guns (Kalashnicohn) model CG-1 7.62x39mm semiautomatic rifle, serial number
19 AM00426; and a Barrett model 82A1 .50 BMG semiautomatic rifle, serial number
20 AA003862. These firearms had been purchased by the defendants and co-conspirators,
21 and were intended for unlawful exportation from the United States into the Republic of
22 Mexico. These firearms were seized by law enforcement agents. Following the seizure,
23 Alvaro Rubio Beltran met with unnamed co-conspirators in Mexico, who demanded
24 payment for the seized firearms.

25 On August 17, 2015, in Tucson, Arizona, Isaac Leonardo Padilla purchased a
26 firearm; a Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-
27 31069-14; from Second Amendment Sports Inc. dba Second Amendment Sports. Isaac
28 Leonardo Padilla stated that he was the actual buyer of this firearm but instead purchased

1 it on behalf of his brother, Rigoberto Padilla, Jr. Rigoberto Padilla, Jr., directed Isaac
2 Leonardo Padilla to purchase the firearm. This firearm was intended for unlawful
3 exportation from the United States into the Republic of Mexico. Rigoberto Padilla, Jr.,
4 exited the United States and entered the Republic of Mexico through the Nogales,
5 Arizona, Port of Entry on the same date after Isaac Leonardo Padilla purchased this
6 firearm and re-entered the United States on foot later the same date.

7 On August 28, 2015, in Tucson, Arizona, Briana E. Moreno-Aguilar
8 purchased firearms; a Zastava model M70AB2 7.62x39mm semiautomatic rifle, serial
9 number AB2-C105663; and an Inter Ordnance Inc. model Sportster AK47 7.62x39mm
10 semiautomatic rifle, serial number S004305; from Semenko, Wayne Anthony dba Smoke
11 & Glory/SNG Tactical/SNG Arms. Briana E. Moreno-Aguilar stated that she was the
12 actual buyer of these firearms but instead purchased them on behalf of Rigoberto Padilla,
13 Jr. Rigoberto Padilla, Jr., provided the funds for the firearms and directed an unnamed
14 co-conspirator to purchase the firearms, who then provided the funds and instructions to
15 Briana E. Moreno-Aguilar. Rigoberto Padilla, Jr., took possession of the firearms after
16 Briana E. Moreno-Aguilar purchased them. These firearms were intended for unlawful
17 exportation from the United States into the Republic of Mexico. Rigoberto Padilla, Jr.,
18 exited the United States and entered the Republic of Mexico through the Nogales,
19 Arizona, Port of Entry on the same date after Briana E. Moreno-Aguilar purchased these
20 firearms and re-entered the United States on foot later the same date.

21 On September 8, 2015, in Apache Junction, Arizona, Isaac Leonardo Padilla
22 purchased firearms; a Century Arms model VZ2008 7.62x39mm semiautomatic rifle,
23 serial number VZ08PM-012335; from AJI Sports LLC dba AJI Sports; and a Century
24 Arms model M70AB2 7.62x39mm semiautomatic rifle, serial number AB2-C103864;
25 and a Century Arms model M70AB2 7.62x39mm semiautomatic rifle, serial number
26 AB2-C105526; from SCFS Enterprises LLC dba Sharky's Firearms. Isaac Leonardo
27 Padilla stated that he was the actual buyer of these firearms but instead purchased them
28 on behalf of Rigoberto Padilla, Jr. Rigoberto Padilla, Jr., directed Isaac Leonardo Padilla

1 to purchase the firearms. These firearms were intended for unlawful exportation from the
2 United States into the Republic of Mexico. Isaac Leonardo Padilla and Rigoberto
3 Padilla, Jr., exited the United States and entered the Republic of Mexico through the
4 Nogales, Arizona, Port of Entry on the same date after Isaac Leonardo Padilla purchased
5 these firearms, and both re-entered the United States separately on foot later the same
6 date.

7 On September 14, 2015, in Tucson, Arizona, Briana E. Moreno-Aguilar
8 purchased firearms; a Maadi Company model MISR 7.62x39mm semiautomatic rifle,
9 serial number CM11811; and a Romarm model M10-762 7.62x39mm semiautomatic
10 rifle, serial number MA-20820-13; from EZPAWN Arizona Inc. dba USA Pawn &
11 Jewelry. Briana E. Moreno-Aguilar stated that she was the actual buyer of these firearms
12 but instead purchased them on behalf of Rigoberto Padilla, Jr. Rigoberto Padilla, Jr.,
13 provided the funds for the firearms and directed an unnamed co-conspirator to purchase
14 the firearms, who then provided the funds and instructions to Briana E. Moreno-Aguilar.
15 These firearms were intended for unlawful exportation from the United States into the
16 Republic of Mexico. Rigoberto Padilla, Jr., exited the United States and entered the
17 Republic of Mexico through the Nogales, Arizona, Port of Entry on the same date after
18 Briana E. Moreno-Aguilar purchased these firearms and re-entered the United States in a
19 green Chevrolet pickup truck (Arizona license plate BCS2483) later the same date.
20 Rigoberto Padilla, Jr., again exited the United States and re-entered later the same date in
21 a blue Chevrolet pickup truck (Mexico license plate 81600).

22 On September 19, 2015, in Apache Junction, Arizona, Isaac Leonardo Padilla
23 purchased firearms; a Century Arms model M70 7.62x39mm semiautomatic rifle, serial
24 number AB2-C106543; and a Romarm model GP WASR 7.62x39mm semiautomatic
25 rifle, serial number 1974FD4559; from AJI Sports LLC dba AJI Sports. Isaac Leonardo
26 Padilla stated that he was the actual buyer of these firearms but instead purchased them
27 on behalf of Rigoberto Padilla, Jr. Rigoberto Padilla, Jr., directed Isaac Leonardo Padilla
28 to purchase the firearms. These firearms were intended for unlawful exportation from the

1 United States into the Republic of Mexico. Isaac Leonardo Padilla and Rigoberto
2 Padilla, Jr., exited the United States and entered the Republic of Mexico through the
3 Nogales, Arizona, Port of Entry on the same date after Isaac Leonardo Padilla purchased
4 these firearms, and both re-entered the United States separately on foot later the same
5 date.

6 On September 23, 2015, in Apache Junction, Arizona, Isaac Leonardo Padilla
7 purchased firearms; a Romarm model SAR-1 7.62x39mm semiautomatic rifle, serial
8 number S1-04976-99; and a Zastava model N-PAP M70 7.62x39mm semiautomatic rifle,
9 serial number N-PAP035945; from AJI Sports LLC dba AJI Sports. Isaac Leonardo
10 Padilla stated that he was the actual buyer of these firearms but instead purchased them
11 on behalf of Rigoberto Padilla, Jr. Rigoberto Padilla, Jr., directed Isaac Leonardo Padilla
12 to purchase the firearms and took possession of the firearms after Isaac Leonardo Padilla
13 purchased them. On the same date, in Tucson, Arizona, Briana E. Moreno-Aguilar
14 purchased firearms; a Smith and Wesson model M&P15 5.56x45mm semiautomatic rifle,
15 serial number SX00684; and a Smith and Wesson model M&P15 5.56x45mm
16 semiautomatic rifle, serial number SX01000; from EZPAWN Arizona Inc. dba USA
17 Pawn & Jewelry; and a Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial
18 number A1-40034-15; from Semenko, Wayne Anthony dba Smoke & Glory/SNG
19 Tactical/SNG Arms. Briana E. Moreno-Aguilar stated that she was the actual buyer of
20 these firearms but instead purchased them on behalf of Rigoberto Padilla, Jr. Rigoberto
21 Padilla, Jr., provided the funds for the firearms and directed an unnamed co-conspirator
22 to purchase the firearms, who then provided the funds and instructions to Briana E.
23 Moreno-Aguilar. All of these firearms were intended for unlawful exportation from the
24 United States into the Republic of Mexico. Isaac Leonardo Padilla and Rigoberto
25 Padilla, Jr., exited the United States and entered the Republic of Mexico through the
26 Nogales, Arizona, Port of Entry at some point after Isaac Leonardo Padilla and Briana E.
27 Moreno-Aguilar purchased these firearms, and both re-entered the United States on foot
28 on September 24, 2015.

1 On September 25, 2015, in Apache Junction, Arizona, Karen Lizbeth Padilla
2 purchased firearms; an Inter Ordnance model AKM247 7.62x39mm semiautomatic rifle,
3 serial number S002816; and a Century Arms model Champion 7.62x39mm
4 semiautomatic pistol, serial number CN-0395-07; from AJI Sports LLC dba AJI Sports.
5 Karen Lizbeth Padilla stated that she was the actual buyer of these firearms but instead
6 purchased them on behalf of Rigoberto Padilla, Jr. Rigoberto Padilla, Jr., directed Karen
7 Lizbeth Padilla to purchase the firearms. On the same date, Christian Alexis Padilla
8 purchased firearms; a Zastava model N-PAP 7.62x39mm semiautomatic rifle, serial
9 number N-PAP021283; and a FEG model AMD-63 7.62x39mm semiautomatic rifle,
10 serial number CI005197; from AJI Sports LLC dba AJI Sports. Christian Alexis Padilla
11 stated that he was the actual buyer of these firearms but instead purchased them on behalf
12 of Rigoberto Padilla, Jr. Rigoberto Padilla, Jr., directed Christian Alexis Padilla to
13 purchase the firearms. On the same date in Tucson, Arizona, Briana E. Moreno-Aguilar
14 purchased a firearm; a Smith and Wesson model M&P15 5.56x45mm semiautomatic
15 rifle, serial number SX02287; from EZPAWN Arizona Inc. dba USA Pawn & Jewelry.
16 Briana E. Moreno-Aguilar stated that she was the actual buyer of these firearms but
17 instead purchased them on behalf of Rigoberto Padilla, Jr. Rigoberto Padilla, Jr.,
18 provided the funds for the firearm and directed an unnamed co-conspirator to purchase
19 the firearm, who then provided the funds and instructions to Briana E. Moreno-Aguilar.
20 All of these firearms were intended for unlawful exportation from the United States into
21 the Republic of Mexico. On the same date, Edgar Vega-Barreras and Melchor Enrique
22 Urquides-Tapia entered the United States from the Republic of Mexico through the
23 Nogales, Arizona, Port of Entry in a red Chevrolet Cheyenne pickup truck (Mexico
24 license plate VD26192). Later the same date Edgar Vega-Barreras and Melchor Enrique
25 Urquides-Tapia exited the United States in a white Chevrolet Aveo (Arizona license plate
26 BHK1108).

27 On September 26, 2015, in Tucson, Arizona, Leslie Marlene Padilla purchased
28 a firearm; a Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number

1 A1-21777-14; from BKM Guns Inc. dba Murphy's Gun Shop. Leslie Marlene Padilla
2 stated that she was the actual buyer of this firearm but instead purchased it on behalf of
3 Rigoberto Padilla, Jr. Rigoberto Padilla, Jr., directed Leslie Marlene Padilla to purchase
4 the firearm. On the same date, Christian Alexis Padilla purchased a firearm; an Izmash
5 model Saiga Sporter 7.62x39mm semiautomatic rifle, serial number H06108829; from
6 BKM Guns Inc. dba Murphy's Gun Shop. Christian Alexis Padilla stated that he was the
7 actual buyer of this firearm but instead purchased it on behalf of Rigoberto Padilla, Jr.
8 Rigoberto Padilla, Jr., directed Christian Alexis Padilla to purchase the firearm. These
9 firearms were intended for unlawful exportation from the United States into the Republic
10 of Mexico. On the same date, Edgar Vega-Barreras and Rigoberto Padilla, Jr., exited the
11 United States and entered the Republic of Mexico through the Nogales, Arizona, Port of
12 Entry in a white Chevrolet Aveo (Arizona license plate BHK1108). Later the same date,
13 Rigoberto Padilla Jr., re-entered the United States alone in the same white Chevrolet
14 Aveo. On the same date, three firearms previously purchased by Isaac Leonardo Padilla;
15 the Romarm model GP WASR 7.62x39mm semiautomatic rifle, serial number
16 1974FD4559; the Romarm model SAR-1 7.62x39mm semiautomatic rifle, serial number
17 S1-04976-99; and the Zastava model N-PAP M70 7.62x39mm semiautomatic rifle, serial
18 number N-PAP035945; were recovered in the Republic of Mexico.

19 On September 30, 2015, in Tucson, Arizona, Leslie Marlene Padilla purchased
20 firearms; a Zastava model O-Pap 7.62x39mm semiautomatic rifle, serial number O-
21 PAP011422; from Schuyler Arms LLC; and a Romarm model WASR-10 7.62x39mm
22 semiautomatic rifle, serial number A1-12909-13; from Liberty Pawn Shop Inc. Leslie
23 Marlene Padilla stated that she was the actual buyer of these firearms but instead
24 purchased them on behalf of Rigoberto Padilla, Jr. Rigoberto Padilla, Jr., directed Leslie
25 Marlene Padilla to purchase the firearms. On the same date, Christian Alexis Padilla
26 purchased firearms; an Inter Ordnance model M214 7.62x39mm semiautomatic rifle,
27 serial number S008790; from Schuyler Arms LLC; and a Romarm model SAR 3
28 5.56x45mm semiautomatic rifle, serial number S3004901999; from Liberty Pawn Shop

1 Inc. Christian Alexis Padilla stated that he was the actual buyer of these firearms but
2 instead purchased them on behalf of Rigoberto Padilla, Jr. Rigoberto Padilla, Jr., directed
3 Christian Alexis Padilla to purchase the firearms. Isaac Leonardo Padilla provided the
4 funds to Christian Alexis Padilla for the purchase of the Romarm model SAR 3
5 5.56x45mm semiautomatic rifle, serial number S3004901999. All of these firearms were
6 intended for unlawful exportation from the United States into the Republic of Mexico.

7 On October 3, 2015, in Glendale, Arizona, Leslie Marlene Padilla purchased a
8 firearm; a Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-
9 37193-15; from Lone Wolf Trading Company LLC. On the same date, in Apache
10 Junction, Arizona, Leslie Marlene Padilla purchased a firearm; an Inter Ordnance model
11 Sporter 7.62x39mm semiautomatic rifle, serial number 035842; from AJI Sports LLC
12 dba AJI Sports, in Apache Junction, Arizona. Isaac Leonardo Padilla drove Leslie
13 Marlene Padilla to purchase this firearm in a dark blue Buick Lucerne (Arizona
14 temporary tag PU38836). Leslie Marlene Padilla stated that she was the actual buyer of
15 these firearms but instead purchased them on behalf of Rigoberto Padilla, Jr. Rigoberto
16 Padilla, Jr., directed Leslie Marlene Padilla to purchase the firearms. These firearms
17 were intended for unlawful exportation from the United States into the Republic of
18 Mexico.

19 On October 17, 2015, in Tucson, Arizona, Leslie Marlene Padilla purchased
20 firearms; an Inter Ordnance model M247C 7.62x39mm semiautomatic rifle, serial
21 number S007187; an Inter Ordnance model M247C 7.62x39mm semiautomatic rifle,
22 serial number S008966; and an Inter Ordnance model M247C 7.62x39mm semiautomatic
23 rifle, serial number S007049; from Schuyler Arms LLC. Leslie Marlene Padilla stated
24 that she was the actual buyer of these firearms but instead purchased them on behalf of
25 Rigoberto Padilla, Jr. Rigoberto Padilla, Jr., directed Leslie Marlene Padilla to purchase
26 the firearms. These firearms were intended for unlawful exportation from the United
27 States into the Republic of Mexico. On the same date, Rigoberto Padilla, Jr., entered the
28 United States from the Republic of Mexico through the Nogales, Arizona, Port of Entry

1 on foot. Later the same date Rigoberto Padilla, Jr., exited the United States, then again
2 entered the United States in a white Chevrolet Aveo (Arizona temporary tag PV10115).
3 Later the same date Rigoberto Padilla, Jr., again exited the United States and then entered
4 the United States a third time on foot.

5 On October 21, 2015, in Rio Rico, Arizona, Isaac Leonardo Padilla was
6 interviewed by law enforcement agents regarding his firearms purchases. Isaac Leonardo
7 Padilla stated that eight firearms were stolen from him after October 3, 2015. In fact,
8 Isaac Leonardo Padilla transferred these firearms (three of which - the Romarm model
9 GP WASR 7.62x39mm semiautomatic rifle, serial number 1974FD4559; the Romarm
10 model SAR-1 7.62x39mm semiautomatic rifle, serial number S1-04976-99; and Zastava
11 model N-PAP M70 7.62x39mm semiautomatic rifle, serial number N-PAP035945 - were
12 recovered in the Republic of Mexico on September 26, 2015) to Rigoberto Padilla, Jr.

13 On November 24, 2015, in Phoenix, Arizona, Abraham Bustamante purchased
14 10,080 rounds of Yugoslavian 7.62x39mm ammunition and 300 rounds of Magtech .380
15 ACP ammunition. Melchor Enrique Urquides-Tapia and Javier David Bustamante-
16 Gaytan supplied the funds used to purchase this ammunition. On the same date,
17 Abraham Bustamante, Melchor Enrique Urquides-Tapia, and Javier David Bustamante-
18 Gaytan concealed the ammunition in suitcases with the intent of unlawfully exporting it
19 from the United States into the Republic of Mexico.

20 On November 25, 2015, in Nogales, Arizona, Melchor Enrique Urquides-
21 Tapia attempted to unlawfully export the 10,080 rounds of Yugoslavian 7.62x39mm
22 ammunition and 300 rounds of Magtech .380 ACP ammunition. This ammunition was
23 concealed in suitcases and a bag inside a blue Chevrolet Malibu (Mexico license plate
24 WCL7740), which Melchor Enrique Urquides-Tapia attempted to drive from the United
25 States into the Republic of Mexico through the Nogales, Arizona, Port of Entry. Edgar
26 Vega-Barreras and Jose Verdugo-Bernal provided the direction and payment for Melchor
27 Enrique Urquides-Tapia to unlawfully export the ammunition.

1 On November 26, 2016, Edgar Vega-Barreras and Jose Verdugo-Bernal
2 entered the United States from the Republic of Mexico through the Nogales, Arizona,
3 Port of Entry in a silver Toyota Corolla (Mexico license plate WCL7189).
4 Approximately an hour and a half later the same date, Edgar Vega-Barreras and Jose
5 Verdugo-Bernal exited the United States in a white Saturn Ion (Arizona license plate
6 BNT4218). Approximately two hours later the same date, Jessica Bridget Soto entered
7 the United States from the Republic of Mexico through the Nogales, Arizona, Port of
8 Entry in the same Saturn Ion.

9 On December 23, 2015, in Tucson and Phoenix, Arizona, Andrei Rene Garcia
10 and Luis Fidel Garcia purchased firearms; a Century Arms model Centurion 39 Sporter
11 7.62x39mm semiautomatic rifle, serial number C39WM-000196; and a Petronov
12 Armament (Morrissey Inc.) model AAM47 7.62x39mm semiautomatic rifle, serial
13 number AA000245. Andrei Rene Garcia and Luis Fidel Garcia concealed these firearms
14 in Andrei Rene Garcia's residence in Tucson, Arizona. These firearms were intended for
15 unlawful exportation from the United States into the Republic of Mexico.

16 On December 28, 2015, while in the Republic of Mexico, Luis Fidel Garcia
17 contacted Andrei Rene Garcia at his residence in Tucson, Arizona, to coordinate the
18 unlawful exportation of the Century Arms model Centurion 39 Sporter 7.62x39mm
19 semiautomatic rifle, serial number C39WM-000196; and the Petronov Armament
20 (Morrissey Inc.) model AAM47 7.62x39mm semiautomatic rifle, serial number
21 AA000245; from the United States into the Republic of Mexico. On the same date,
22 consistent with the arrangements made by Luis Fidel Garcia, two unnamed co-
23 conspirators arrived at Andrei Rene Garcia's residence. Andrei Rene Garcia transferred
24 possession of the firearms to these two individuals.

25 On December 29, 2015, in Phoenix, Arizona, Jessica Bridget Soto purchased
26 2,000 rounds of Wolf Gold .223 REM ammunition, 500 rounds of Armscor .22 Magnum
27 ammunition, 2,000 rounds of Magtech 9mm Luger ammunition, 2,000 rounds of WPA
28 .223 REM ammunition, 1,000 rounds of Russian 7.62x39mm ammunition, and 21,000

1 rounds of WPA 7.62x39mm ammunition. An unnamed co-conspirator in Nogales,
2 Arizona, provided the direction and funds for Jessica Bridget Soto to purchase the
3 ammunition. This ammunition was intended for unlawful exportation from the United
4 States into the Republic of Mexico.

5 On January 5, 2015, in Phoenix, Arizona, Jessica Bridget Soto purchased
6 19,000 rounds of WPA 7.62x39mm ammunition, 1,000 rounds of WPA .223 REM
7 ammunition, 2,000 rounds of Aguila .38 Super ammunition, 2,000 rounds of Sellier and
8 Bellot 9mm Luger ammunition, and 2,000 rounds of Sellier and Bellot .45 ACP
9 ammunition. This ammunition was concealed in a vehicle driven by Jessica Bridget
10 Soto. Unnamed co-conspirators in Tucson and Nogales, Arizona, provided the direction
11 and funds for Jessica Bridget Soto to purchase the ammunition. This ammunition was
12 intended for unlawful exportation from the United States into the Republic of Mexico.

13 On January 7, 2015, in Phoenix, Arizona, Diana Marie Arreola purchased
14 10,000 rounds of WPA 7.62x39mm ammunition. Diana Marie Arreola transferred this
15 ammunition to another individual with the belief that the ammunition would be
16 unlawfully exported from the United States into the Republic of Mexico. Javier David
17 Bustamante-Gaytan coordinated this transfer of ammunition. Diana Marie Arreola was
18 directed to purchase the ammunition by an unnamed co-conspirator in Mexico, who also
19 provided direction to other defendants for firearm and ammunition purchases. Law
20 enforcement agents were able to intercept this ammunition and substitute it with false
21 ammunition.

22 On January 8, 2015, in Nogales, Arizona, the false ammunition that was
23 substituted for the 10,000 rounds of WPA 7.62x39mm ammunition was seized from an
24 unnamed co-conspirator. Ten firearms were also seized from the same unnamed co-
25 conspirator; a Norinco model MAK-90 Sporter 7.62x39mm semiautomatic rifle, serial
26 number 94114075; a Romarm model GP WASR 10/63 7.62x39mm semiautomatic rifle,
27 serial number CL-1990-76; a Romarm model M10-762 7.62x39mm semiautomatic rifle,
28 serial number MA-10220-12; a Maadi model ARM 7.62x39mm semiautomatic rifle,

1 serial number AC0063829; a Century Arms model RAS47 7.62x39mm semiautomatic
2 rifle, serial number RAS47007535; a Romarm model Romak 991 7.62x39mm
3 semiautomatic rifle, serial number 1-04022-99; a Century Arms model Centurion 39
4 Sporter 7.62x39mm semi-automatic rifle, serial number 39NC13454; a Romarm model
5 GP WASR 10/63 7.62x39mm semi-automatic rifle, serial number 1981MK0602; a
6 Romarm model WASR 10 7.62x39mm semiautomatic rifle, serial number A1-22854-14;
7 and a Century Arms model GP1975 7.62x39mm semiautomatic rifle (bull pup), serial
8 number GP7501588. Jorge Acosta-Licerio procured these firearms and provided them to
9 an unnamed co-conspirator for unlawful exportation from the United States into the
10 Republic of Mexico. On the same date, Edgar Vega-Barreras entered the United States
11 from the Republic of Mexico.

12 On February 4, 2015, Jorge Acosta-Licerio was found in possession of four
13 firearms; a ITM Arms (Wise Lite Arms) model MK-99 7.62x39mm semiautomatic pistol,
14 serial number 0016600; a Nodak Spud model NDS-3 7.62x39mm semiautomatic rifle,
15 serial number M006145; a Romarm model Romak 991 7.62x39mm semiautomatic rifle,
16 serial number 1-00551-99; and a Zastava model N-PAP M70 7.62x39mm semiautomatic
17 rifle, serial number N-PAP006970. Jorge Acosta-Licerio procured and possessed these
18 firearms with the intent that they would be subsequently unlawfully exported from the
19 United States into the Republic of Mexico.

20 All in violation of 18 U.S.C. Section 371.

21 **FORFEITURE ALLEGATION**

22 Upon conviction of one or more of the offenses alleged in Counts 1 through 43, 45
23 through 49, and 52 through 59 of this Indictment, the defendants, EDGAR VEGA-
24 BARRERAS, RIGOBERTO PADILLA, JR., ISAAC LEONARDO PADILLA, KAREN
25 LIZBETH PADILLA, LESLIE MARLENE PADILLA, CHRISTIAN ALEXIS
26 PADILLA, BRIANA E. MORENO-AGUILAR, EMILIO NAVARRO, ERIK
27 BARTHOLOMEW SALAZAR, GABRIELLA VICTORIA GONZALEZ, DIANA
28 MARIE ARREOLA, MELCHOR ENRIQUE URQUIDES-TAPIA, JAVIER DAVID

1 BUSTAMANTE-GAYTAN, ABRAHAM BUSTAMANTE, LUIS FIDEL GARCIA,
 2 ALVARO RUBIO BELTRAN, ANDREI RENE GARCIA, IRVYING MENDOZA-
 3 GONZALEZ, JESSICA BRIDGET SOTO, JOSE ALONSO VERDUGO-BERNAL, and
 4 JORGE ACOSTA-LICERIO, shall forfeit to the United States:

5 a) pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28,
 6 United States Code, Section 2461(c), any property, real or personal, which constitutes or
 7 is derived from proceeds traceable to a violation of Title 18, United States Code, Section
 8 554 or a conspiracy to commit such offense; and

9 b) pursuant to Title 18, United States Code, Section 924(d), and Title 28,
 10 United States Code, Section 2461(c) any firearms and ammunition involved in the
 11 commission of an offense in violation of Title 18, United States Code, Section 922,
 12 including, but not limited to:

- 13 • Romarm model Draco 7.62x39mm semiautomatic pistol, serial number DA258814
- 14 • Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-21076-14
- 15 • Petronov Armament model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000482
- 16 • Petronov Armament model AAM-47UF 7.62x39mm semiautomatic rifle, serial number AA000055
- 17 • Century Arms model M70 AB2 7.62x39mm semiautomatic rifle, serial number AB206970
- 18 • Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-6258-13
- 19 • Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number 1-27919-2001
- 20 • Century Arms model Centurion 39 Sporter 7.62x39mm semiautomatic rifle, serial number C39WM-005198
- 21 • Childers Guns (Kalashnicohn) model CG-1 7.62x39mm semiautomatic rifle, serial number AM00426
- 22 • Century Arms model VZ2008 Sporter 7.62x39mm semiautomatic rifle, serial number VZ08PM-013585
- 23 • Century Arms model VZ2008 Sporter 7.62x39mm semiautomatic rifle, serial number VZ08PM-013998
- 24 • Barrett model 82A1 .50 BMG semiautomatic rifle, serial number AA003862
- 25 • Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000175
- 26 • Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000355
- 27 • Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000491
- 28 • Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000170

- 1 • Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000177
- 2 • Petronov Armament (Morrissey Inc.) model AAM-47 7.62x39mm semiautomatic rifle, serial number AA000178
- 3 • Spike's Tactical model ST15 .223 REM semiautomatic rifle, serial number RM-20142
- 4 • Bushmaster model Carbon 15 .223 REM semiautomatic rifle, serial number CBC011454
- 5 • Bushmaster model Carbon 15 .223 REM semiautomatic rifle, serial number BK3008322
- 6 • DPMS model A15 .223 REM semiautomatic rifle, serial number FH222682
- 7 • Zastava model N-PAP DF 7.62x39mm semiautomatic rifle, serial number NPDP000292
- 8 • Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-31069-14
- 9 • Zastava model M70AB2 7.62x39mm semiautomatic rifle, serial number AB2-C105663
- 10 • Inter Ordnance Inc. model Sportster AK47 7.62x39mm semiautomatic rifle, serial number S004305
- 11 • Century Arms model VZ2008 7.62x39mm semiautomatic rifle, serial number VZ08PM-012335
- 12 • Century Arms model M70AB2 7.62x39mm semiautomatic rifle, serial number AB2-C103864
- 13 • Century Arms model M70AB2 7.62x39mm semiautomatic rifle, serial number AB2-C105526
- 14 • Maadi Company model MISR 7.62x39mm semiautomatic rifle, serial number CM11811
- 15 • Romarm model M10-762 7.62x39mm semiautomatic rifle, serial number MA-20820-13
- 16 • Century Arms model M70 7.62x39mm semiautomatic rifle, serial number AB2-C106543
- 17 • Romarm model GP WASR 7.62x39mm semiautomatic rifle, serial number 1974FD4559
- 18 • Romarm model SAR-1 7.62x39mm semiautomatic rifle, serial number S1-04976-99
- 19 • Zastava model N-PAP M70 7.62x39mm semiautomatic rifle, serial number N-PAP035945
- 20 • Smith and Wesson model M&P15 5.56x45mm semiautomatic rifle, serial number SX00684
- 21 • Smith and Wesson model M&P15 5.56x45mm semiautomatic rifle, serial number SX01000
- 22 • Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-40034-15
- 23 • Inter Ordnance model AKM247 7.62x39mm semiautomatic rifle, serial number S002816
- 24 • Century Arms model Champion 7.62x39mm semiautomatic pistol, serial number CN-0395-07
- 25 • Zastava model N-PAP 7.62x39mm semiautomatic rifle, serial number N-PAP021283
- 26 • FEG model AMD-63 7.62x39mm semiautomatic rifle, serial number CI005197
- 27 • Smith and Wesson model M&P15 5.56x45mm semiautomatic rifle, serial number SX02287
- 28 • Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-21777-14
- Izmash model Saiga Sporter 7.62x39mm semiautomatic rifle, serial number H06108829

- 1 • Zastava model O-Pap 7.62x39mm semiautomatic rifle, serial number O-PAP011422
- 2 • Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-12909-13
- 3 • Inter Ordnance model M214 7.62x39mm semiautomatic rifle, serial number S008790
- 4 • Romarm model SAR 3 5.56x45mm semiautomatic rifle, serial number S3004901999
- 5 • Romarm model WASR-10 7.62x39mm semiautomatic rifle, serial number A1-37193-15
- 6 • Inter Ordnance model Sporter 7.62x39mm semiautomatic rifle, serial number 035842
- 7 • Inter Ordnance model M247C 7.62x39mm semiautomatic rifle, serial number S007187
- 8 • Inter Ordnance model M247C 7.62x39mm semiautomatic rifle, serial number S008966
- 9 • Inter Ordnance model M247C 7.62x39mm semiautomatic rifle, serial number S007049
- 10 • Century Arms model Centurion 39 Sporter 7.62x39mm semiautomatic rifle, serial number C39WM-000196
- 11 • Petronov Armament (Morrissey Inc.) model AAM47 7.62x39mm semiautomatic rifle, serial number AA000245
- 12 • Norinco model MAK-90 Sporter 7.62x39mm semiautomatic rifle, serial number 94114075
- 13 • Romarm model GP WASR 10/63 7.62x39mm semiautomatic rifle, serial number CL-1990-76
- 14 • Romarm model M10-762 7.62x39mm semiautomatic rifle, serial number MA-10220-12
- 15 • Maadi model ARM 7.62x39mm semiautomatic rifle, serial number AC006382
- 16 • Century Arms model RAS47 7.62x39mm semiautomatic rifle, serial number RAS47007535
- 17 • Romarm model Romak 991 7.62x39mm semiautomatic rifle, serial number 1-04022-99
- 18 • Century Arms model Centurion 39 Sporter 7.62x39mm semi-automatic rifle, serial number 39NC13454
- 19 • Romarm model GP WASR 10/63 7.62x39mm semi-automatic rifle, serial number 1981MK0602
- 20 • Romarm model WASR 10 7.62x39mm semiautomatic rifle, serial number A1-22854-14
- 21 • Century Arms model GP1975 7.62x39mm semiautomatic rifle (bull pup), serial number GP7501588
- 22 • ITM Arms (Wise Lite Arms) model MK-99 7.62x39mm semiautomatic pistol, serial number 0016600
- 23 • Nodak Spud model NDS-3 7.62x39mm semiautomatic rifle, serial number M006145
- 24 • Romarm model Romak 991 7.62x39mm semiautomatic rifle, serial number 1-00551-99
- 25 • Zastava model N-PAP M70 7.62x39mm semiautomatic rifle, serial number N-PAP006970
- 26 • 10,080 rounds of Yugoslavian 7.62x39mm ammunition
- 27 • 300 rounds of Magtech .380 ACP ammunition
- 28 • 2,000 rounds of Wolf Gold .223 REM ammunition
- 500 rounds of Armscor .22 Magnum ammunition
- 2,000 rounds of Magtech 9mm Luger ammunition
- 2,000 rounds of WPA .223 REM ammunition
- 1,000 rounds of Russian 7.62x39mm ammunition

- 21,000 rounds of WPA 7.62x39mm ammunition
- 19,000 rounds of WPA 7.62x39mm ammunition
- 1,000 rounds of WPA .223 REM ammunition
- 2,000 rounds of Aguila .38 Super ammunition
- 2,000 rounds of Sellier and Bellot 9mm Luger ammunition
- 2,000 rounds of Sellier and Bellot .45 ACP ammunition
- 10,000 rounds of WPA 7.62x39mm ammunition

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, 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 defendants up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendants.

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

A TRUE BILL

/s/

Presiding Juror

JOHN S. LEONARDO
United States Attorney
District of Arizona

/s/

Assistant U.S. Attorney

Dated: March 9, 2016

**REDACTED FOR
PUBLIC DISCLOSURE**