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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

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CR18-2062TUC

REC(BW)

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

10 United States of America,
11
12 Plaintiff,

13 vs.

14 Ricardo Alberto RUIZ Pelayo,
15
16 Defendant.

INDICTMENT

Violations:

18 U.S.C. § 554; 22 USC § 2778; and 22
CFR §§ 121.1 & 123.1
(Smuggling Goods from the United States)

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

17 **THE GRAND JURY CHARGES:**

18 **COUNT 1**

19 On or about September 13, 2018, at the Mariposa Port of Entry, in Nogales and the
20 District of Arizona, Ricardo Alberto RUIZ Pelayo did fraudulently and knowingly attempt
21 to export and send, from the United States into the Republic of Mexico, any merchandise,
22 article or object contrary to any law or regulation of the United States, and received,
23 concealed, bought, sold, and in any manner facilitated the transportation, concealment, and
24 sale of such merchandise, article or object, to wit: one Glock 22 handgun, s/n EAP014; one
25 Glock 19 handgun, s/n DLG483US; one Smith & Wesson M&P 15 rifle, s/n SV61848; one
26 Aero Precision AR15 Platform rifle, s/n DLR03514; one AR15 Platform rifle, unbranded/
27 unserialized; and 3 magazines; knowing the same to be intended for exportation contrary
28 to any law or regulation of the United States, to wit: Sections 22 U.S.C. 2778(b) and (c),

1 and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1; all in violation
2 of Title 18 U.S.C. § 554.

3 **FORFEITURE ALLEGATION**

4 Upon conviction of the Indictment, the defendant, Ricardo Alberto RUIZ Pelayo,
5 shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d),
6 and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved
7 in the commission of the offense, including, but not limited to: one Glock 22 handgun, s/n
8 EAP014; one Glock 19 handgun, s/n DLG483US; one Smith & Wesson M&P 15 rifle, s/n
9 SV61848; one Acro Precision AR15 Platform rifle, s/n DLR03514; one AR15 Platform
10 rifle, unbranded/ unserialized; and 3 magazines.

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

13
14 A TRUE BILL
15 /s/

16 _____
Presiding Juror

17 ELIZABETH A. STRANGE
18 First Assistant United States Attorney
19 District of Arizona

20 /s/

**REDACTED FOR
PUBLIC DISCLOSURE**

21 Assistant U.S. Attorney
22 Micah Schmit

23 Dated: October 10, 2018
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