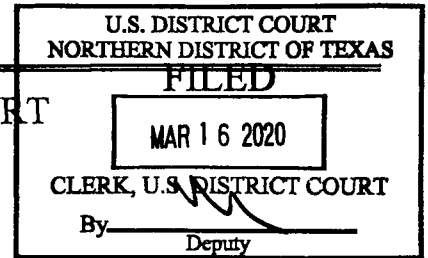


AO 91 (Rev. 11/11) Criminal Complaint



UNITED STATES DISTRICT COURT

for the
Northern District of Texas

United States of America)
v.)
Jose Celbey HERNANDEZ (1))
Rene S. RANGEL-MANJARREZ (2))

Case No. 3:20-MJ-257-BK

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 14, 2020 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

Code Section	Offense Description
18 U.S.C. § 554(a) 18 U.S.C. § 2(a)	fraudulently or knowingly attempts to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States.

This criminal complaint is based on these facts:

See Attached "AFFIDAVIT OF SPECIAL AGENT JOSE JOYA"

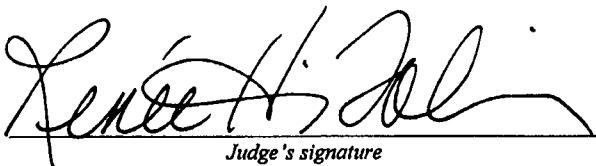
Continued on the attached sheet.


Complainant's signature

Jose Joya, Special Agent, ATF
Printed name and title

Sworn to before me and signed in my presence.

Date: 03/16/2020


Judge's signature

City and state: Dallas, Texas

RENEE HARRIS TOLIVER, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT OF SPECIAL AGENT JOSE JOYA

I, Jose Joya, having been duly sworn, do depose and state the following:

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been so employed since July 14, 2013. I have completed the Criminal Investigator training program and Special Agent Basic Training at the ATF National Academy. Additionally, I have completed the ATF Undercover Operations Training and am fluent in the Spanish language. I have been involved in numerous investigations involving firearms and narcotics violations. As a result of my training and experience as an ATF SA, I am knowledgeable about federal criminal firearms and narcotics laws.
2. This affidavit is made in support of a criminal complaint against **Rene S. RANGEL-MANJARREZ** and **Jose Celbey HERNANDEZ**, for violation of a violation of Title 18 U.S.C. § 554(a) and Title 18 U.S.C. § 2(a), for fraudulently or knowingly attempts to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States.
3. The information contained in this affidavit is based upon Affiant's personal knowledge and the knowledge of other law enforcement officers. This affidavit is

limited in scope to information relevant to this purpose and is not an exhaustive account of all information pertaining to **RANGEL-MANJARREZ** and **HERNANDEZ** or this investigation.

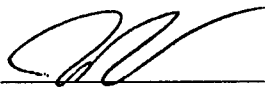
4. From March 4, 2020 through March 14, 2020, SA Joya, acting in an undercover capacity (UC) communicated with **HERNANDEZ** via cellular telephone. During their contact, **HERNANDEZ** stated he wanted to purchase several firearms in the United States that would be sent to Mexico. **HERNANDEZ** and the UC eventually agreed to conduct a firearms transaction/purchase on March 14, 2020.
5. On March 14, 2020, **HERNANDEZ** and **RANGEL-MANJARREZ** met with SA Joya, acting in a UC capacity to conduct a firearms transaction/purchase at 8250 South Hampton Road, Dallas, in the Northern District of Texas. During the meeting, **HERNANDEZ** and **RANGEL-MANJARREZ** purchased a Barrett rifle from the UC. **RANGEL-MANJARREZ** also carried the firearm to his car at **HERNANDEZ** command on behalf of **HERNANDEZ**. **HERNANDEZ** and **RANGEL-MANJARREZ** agreed to purchase a Barrett, .50 firearm with an obliterated serial number, which was to take place on a later date. Following the transaction, **HERNANDEZ** and **RANGEL-MANJARREZ** were detained and subsequently transported to the Irving Police Department (IPD) station where they were interviewed. Upon being detained, officers located two firearms in their vehicle. **RANGEL-MANJARREZ** also had a small quantity of cocaine on his person.

6. On March 14, 2020, **HERNANDEZ** and **RANGEL-MANJARREZ** were advised of their Miranda rights to which they waived. During the audio/video recorded interview of both subjects, they admitted to providing false information on several ATF Forms 4473 completed for the previous purchase of two Barrett firearms.
7. During an interview, **HERNANDEZ** admitted that he previously paid **RANGEL-MANJARREZ** \$600.00 for his assistance with the purchase of a Barrett rifle, model M82A1, caliber: .50, with serial number: AA009613 and a second Barrett rifle, caliber .50, (model and serial number unknown, from a Federal Firearms Licensee (FFL), Gun Boss, 415 Bowen, Pleasanton, TX 78064, on January 31, 2020 and March 13, 2020. **HERNANDEZ** admitted to paying Rangel \$250 for coming/driving up with **HERNANDEZ** for security in the event he was robbed during the deal on March 14, 2020. **HERNANDEZ** also admitted that he would be paid \$1,000 for each firearm that went to Mexico.
8. Agents asked **HERNANDEZ** if he was aware that it was illegal to provide false information on an ATF Form 4473 with respect to the actual firearms purchaser. **HERNANDEZ** confirmed that he was aware.
9. During an interview, **RANGEL-MANJARREZ** admitted he previously purchased the aforementioned two Barrett rifles from a FFL, Gun Boss, while knowing that he was not the actual firearms purchaser. **HERNANDEZ** was paying **RANGEL** for his services/assistance with the purchase of the firearm. **RANGEL-MANJARREZ** also admitted he was aware he provided false

information on the ATF Form 4473 completed on January 31, 2020 and March 13, 2020, with respect to the actual purchaser of the firearms.

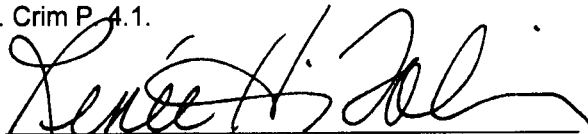
10. A query of the ATF Firearms Transaction Records, ATF Form 4473, confirmed that **RANGEL-MANJARREZ** completed a Firearms Transaction Record for the aforementioned Barrett rifles on January 31, 2020 and March 13, 2020.
11. A review of the ATF Form 4473 completed by **RANGEL-MANJARREZ** revealed that he checked the box for “yes” in response to question #11.a. on page one—*“Are you the actual transferee/buyer of the firearm(s) listed on this form? Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you.”*
Additionally, **RANGEL-MANJARREZ** signed his name in box #14, as the “Transferee’s/Buyer’s Signature,” on page two of the ATF Form 4473, certifying that he understood that answering “yes” to question 11.a. if he was not the actual transferee/buyer is a crime punishable as a felony under Federal law, and may also violate State and/or local law and that he understood that making any false oral or written statement, or exhibiting any false or misrepresented identification with respect to this transaction, is a crime punishable as a felony under Federal law and may also violate State and/or local law. A notice of the aforementioned information is located on page two of the ATF Form 4473, directly above box #14.
12. A query of the ATF Federal Licensing System reflected that Gun Boss is a Federal Firearms Licensee (FFL Number 5-74-07284).

13. Based on the aforementioned facts, I believe there is probable cause to believe that March 14, 2020, **HERNANDEZ** and **RANGEL-MANJARREZ** committed a violation of Title 18 U.S.C. § 554(a) and Title 18 U.S.C. § 2(a) by fraudulently or knowingly attempts to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States.



Jose Joya
Special Agent, ATF

Subscribed and sworn to before me this 16th day of March, 2020.
Electronic warrant issued pursuant to Fed. R. Crim P. 4.1.



RENEE HARRIS TOLIVER
UNITED STATES MAGISTRATE JUDGE

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America
v.
Jose Celbey HERNANDEZ (1)

Case No. 3:20-MJ-257-BK

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay (name of person to be arrested) Jose Celbey HERNANDEZ, who is accused of an offense or violation based on the following document filed with the court:

- Indictment, Superseding Indictment, Information, Superseding Information, Complaint, Probation Violation Petition, Supervised Release Violation Petition, Violation Notice, Order of the Court

This offense is briefly described as follows:

On or about March 14, 2020, the defendant, Jose Celbey HERNANDEZ, did fraudulently or knowingly attempt to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States.

Date: 03/16/2020

Handwritten signature of Renee Harris Toliver

Issuing officer's signature

City and state: Dallas, Texas

RENEE HARRIS TOLIVER, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) and the person was arrested on (date) at (city and state)

Date:

Arresting officer's signature

Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: Jose Celbey HERNANDEZ

Known aliases: None known

Last known residence: 275 Morningside Street, Apt. #59, Brownsville, TX 78521

Prior addresses to which defendant/offender may still have ties: None known

Last known employment: None

Last known telephone numbers: (956) 346-0567

Place of birth: Brownsville, TX

Date of birth: 04/24/1990

Social Security number: 644-16-1577

Height: 6'02" Weight: 320

Sex: Male Race: White

Hair: Black Eyes: Brown

Scars, tattoos, other distinguishing marks: None known

History of violence, weapons, drug use: None known

Known family, friends, and other associates (*name, relation, address, phone number*): None known

FBI number: None

Complete description of auto: 2006, Chevrolet Silverado, 1500, TXLP: KJP1349

Investigative agency and address: ATF Dallas Group VII, 1114 Commerce Street Rm.# 303, Dallas, TX 75242

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*):
None known

Date of last contact with pretrial services or probation officer (*if applicable*):
None known

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
Northern District of Texas

United States of America
v.
Rene S. RANGEL-MANJARREZ (2)

Case No. 3:20-MJ-257-BK

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

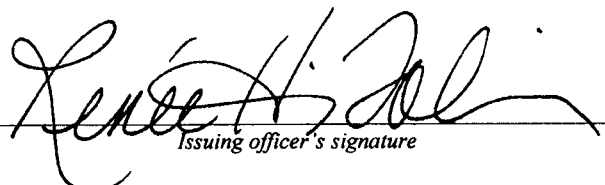
YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) Rene S. RANGEL-MANJARREZ,
who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
- Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

On or about March 14, 2020, the defendant, Rene S. RANGEL-MANJARREZ, did fraudulently or knowingly attempt to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States.

Date: 03/16/2020


Issuing officer's signature

City and state: Dallas, Texas

RENEE HARRIS TOLIVER, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

AO 442 (Rev. 11/11) Arrest Warrant (Page 2)

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: Rene S RANGEL-MANJARREZ

Known aliases: None known

Last known residence: 1642 Cleveland St., Brownsville, TX 78521

Prior addresses to which defendant/offender may still have ties: None known

Last known employment: None

Last known telephone numbers: (956) 459-8312

Place of birth: Brownsville, TX

Date of birth: 09/11/1986

Social Security number: 466-79-3509

Height: 5'07" Weight: 200

Sex: Male Race: White

Hair: Black Eyes: Brown

Scars, tattoos, other distinguishing marks: None known

History of violence, weapons, drug use: None known

Known family, friends, and other associates (*name, relation, address, phone number*): None known

FBI number: None

Complete description of auto: None

Investigative agency and address: ATF Dallas Group VII, 1114 Commerce Street Rm.# 303, Dallas, TX 75242

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*):
None known

Date of last contact with pretrial services or probation officer (*if applicable*):
None known