

United States Courts  
Southern District of Texas  
FILED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION

FEB 09 2021 BM M

Nathan Ochsner, Clerk  
Laredo Division

UNITED STATES OF AMERICA

v.

LIZZETTE B. JAIMES

§  
§  
§  
§  
§

CRIMINAL NO.

**L - 21 - 0250**

INDICTMENT

THE GRAND JURY CHARGES THAT:

**MGM**

COUNT ONE

On or about **January 18, 2021**, in the Southern District of Texas and within the jurisdiction of the Court. Defendant,

**LIZZETTE B. JAIMES,**

did fraudulently and knowingly export and send, and attempt to export and send from the United States to the United Mexican States, merchandise, articles, and objects, that is:

1. Colt, Model: Super, .38 caliber handgun, serial number GV007369;
2. Pietro Beretta, .380 caliber handgun, serial number D52539W;
3. Sig Sauer, Model: Mosquito, .22 caliber handgun, serial number F307475;
4. Kahr, Model: CW, .380 caliber handgun, serial number RH6502;
5. TCM, Model :1911 .22 caliber handgun, serial number TCM042551;
6. Taurus, Model: P22, .22 caliber handgun, serial number Z026297;
7. Ruger, Model: SR22 .22 caliber handgun, serial number 36170342;
8. Kel-Tec, Model: CNC, .380 caliber handgun, serial number LF023;
9. Glock, Model: 26, nine millimeter handgun, serial number ADAU259;
10. 11 firearms magazines in various calibers;
11. One handgun barrel in nine millimeter, serial number 7782;
12. 200 rounds of ammunition, Brand: Monarch, .380 ACP caliber;
13. 20 rounds of ammunition, Brand: RIP, .380 ACP caliber;
14. 20 rounds of ammunition, Brand Hornady, nine millimeter ammunition; and
15. 2 rounds of ammunition, Brand: TCM, .22 caliber.

contrary to the laws and regulations of the United States, to wit: **Title 50, United States Code, Section 4819(a)(2) and (b) and Title 15, Code of Federal Regulations Section 730, et. seq.,** and did receive, conceal, buy, sell, and in any manner facilitated the transportation, concealment, and

sale of said merchandise, articles, and objects, prior to exportation, knowing the same to be intended for exportation contrary to said laws and regulations of the United States, in violation of Title 18, United States Code, Sections 554 and 2.

**COUNT TWO**

On or about January 18, 2021, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

**LIZZETTE B. JAIMES,**

with the intent to evade a currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly conceal more than \$10,000.00, in currency and other monetary instruments namely, NINETY-NINE THOUSAND SEVEN HUNDRED FORTY-SEVEN AND NO/100THS (\$99,747.00) DOLLARS UNITED STATES CURRENCY in any conveyance, article of luggage, merchandise, and other container, namely, a duffel bag and purse, and did transport and transfer and attempted to transport and transfer such currency and monetary instruments from a place within the United States, to a place outside of the United States, in violation of Title 31, United States Code, Section 5332.

**NOTICE OF HOLDINGS SUBJECT TO FORFEITURE**

**18 U.S.C. §554**

**(Count One)**

Pursuant to 19 U.S.C. § 1595a (d) and 28 U.S.C. § 2461 the United States gives notice to defendant,

**LIZZETTE B. JAIMES,**

that upon conviction of a violation of 18 U.S.C. 554, as charged in this Indictment, all merchandise exported or sent from the United States or attempted to be exported or sent from the United States contrary to law, or the proceeds or value thereof, and property used to facilitate the exporting or sending of such merchandise, the attempted exporting or sending of such merchandise, or the

receipt, purchase, transportation, concealment, or sale of such merchandise prior to exportation shall be forfeited to the United States and includes, but is not limited to:

1. Colt, Model: Super, .38 caliber handgun, serial number GV007369;
2. Pietro Beretta, .380 caliber handgun, serial number D52539W;
3. Sig Sauer, Model: Mosquito, .22 caliber handgun, serial number F307475;
4. KAIIR, Model: CW, .380 caliber handgun, serial number RH6502;
5. TCM, Model :1911 .22 caliber handgun, serial number TCM042551;
6. Taurus, Model: P22, .22 caliber handgun, serial number Z026297;
7. Ruger, Model: SR22 .22 caliber handgun, serial number 36170342;
8. Kel-Tec, Model: CNC, .380 caliber handgun, serial number LF023;
9. Glock, Model: 26, nine millimeter handgun, serial number ADAU259;
10. 11 firearms magazines in various calibers;
11. One handgun barrel in nine millimeter, serial number 7782;
12. 200 rounds of ammunition, Brand: Monarch, .380 ACP caliber;
13. 20 rounds of ammunition, Brand: RIP, .380 ACP caliber;
14. 20 rounds of ammunition, Brand Hornady, nine millimeter ammunition; and
15. 2 rounds of ammunition, Brand: TCM, .22 caliber.

**NOTICE OF HOLDINGS SUBJECT TO FORFEITURE**

**18 U.S.C. §5332**

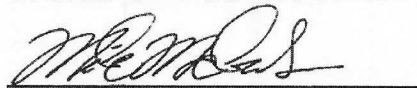
**(Count Two)**

Pursuant to Title 31, United States Code, Section 5332(b)(2), the United States of America hereby gives notice that the United States Currency involved in the felony offense alleged in Count TWO of this Indictment, and any property, real and personal, involved in such offense is subject to forfeiture to the United States of America, including, but not limited to the following: NINETY-NINE THOUSAND SEVEN HUNDRED FORTY-SEVEN AND NO/100THS (\$99,747.00) DOLLARS UNITED STATES CURRENCY.

A TRUE BILL:

~~FOREMAN OF THE GRAND JURY~~

RYAN K. PATRICK  
UNITED STATES ATTORNEY



Michael Makens  
Assistant United States Attorney

USA-74-24b  
(Rev. 6-1-71)

**CRIMINAL DOCKET** **L - 21 - 0250**

LAREDO DIVISION

NO. \_\_\_\_\_

FILE: 21-00480  
INDICTMENT

MAG#: 21-00126  
Filed: February 9, 2021

Judge: \_\_\_\_\_

ATTORNEYS:

UNITED STATES OF AMERICA

RYAN K. PATRICK, USA  
MICHAEL MAKENS, AUSA

VS.

**LIZZETTE B. JAIMES**

**CHARGE:**

- Ct. 1: Smuggling Goods from the United States  
[18 USC 554 & 2]
- Ct. 2: Bulk cash smuggling into or out of the United States  
[31 USC 5332]

Notice of Forfeiture

**TOTAL COUNTS: 2**

**PENALTY:**

- Ct. 1: 0 to 10 years and/or \$250,000 Fine, \$100 special assessment,  
Not more than a three (3)-year term of supervised release
- Ct. 2: Not more than 5 years, and, \$100 Special Assessment,  
Not More Than a 3 Year Term of Supervised Release

In Jail:

On Bond:

Name & Address of Surety:

No Arrest: