

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA

3:20-cr- 478 IM

v.

INDICTMENT

**DAVID ACOSTA-ROSALES;
NESTOR GABRIEL RODRIGUEZ;
MATTHEW JON SANCHEZ;
JOSE DE JESUS RODRIGUEZ;
MAURICIO ESTEBAN RODRIGUEZ;
ROBERTO GONZALEZ;
JOSE RICARDO FLORES-SARABIA;
BRYAN LEE ANDRE;
MARIANO AISPURO BELTRAN;
LLODANY DAVID ACOSTA-MICHEL;
JULIO ABOYTES-ZAVALA,**

**18 U.S.C. §§ 922(a)(6), 924(a)(2)
18 U.S.C. §§ 922(k), 924(a)(1)(B)
18 U.S.C. § 554(a)
18 U.S.C. § 371
18 U.S.C. § 2**

Forfeiture Allegations

UNDER SEAL

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

**(Conspiracy to Make False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6), 924(a)(2), and 371)**

Beginning on an unknown date up to and including the date of indictment, in the District of Oregon, defendants **DAVID ACOSTA-ROSALES, NESTOR GABRIEL RODRIGUEZ, MATTHEW JON SANCHEZ, JOSE DE JESUS RODRIGUEZ, MAURICIO ESTEBAN RODRIGUEZ, ROBERTO GONZALEZ, JOSE RICARDO FLORES-SARABIA, BRYAN LEE ANDRE, MARIANO AISPURO BELTRAN, LLODANY DAVID ACOSTA-MICHEL,**

Indictment

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and **JULIO ABOYTES-ZAVALA**, did knowingly and intentionally combine, conspire, confederate, and agree together and with persons known and unknown to the grand jury, to commit offenses against the United States, that is: knowingly making false and fictitious written statements to federally licensed firearms dealers, which statements were intended to deceive the federally licensed firearms dealers as to a fact material to the lawfulness of such sale of the said firearm under Chapter 44, Title 18, United States Code; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Purpose of the Conspiracy

The purpose of this conspiracy was to unlawfully purchase, transfer, and transport firearms on behalf of other individuals, with the ultimate destination of the firearms being 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 certain defendants would receive orders or requests for certain firearms or types of firearms from other co-conspirators seeking to obtain such firearms.

It was a further part of the conspiracy that certain defendants would fulfill those orders or requests personally, or with the assistance of other defendants and/or co-conspirators acting on the defendants' behalf.

It was a further part of the conspiracy that certain defendants and/or co-conspirators would purchase firearms from federally licensed firearms dealers in the District of Oregon.

It was a further part of the conspiracy that, in purchasing the firearms, these defendants would make false statements and representations to the federally licensed firearms dealers, in that

in connection with each purchase, the purchasing defendant would state that he was the actual transferee/buyer of the firearms.

It was a further part of the conspiracy that the defendants and/or co-defendants who purchased the firearms from the federally licensed firearms dealers would receive a profit or commission for each purchase.

It was a further part of the conspiracy that certain defendants and/or co-conspirators would provide the funds and directions to the purchasing defendants to purchase the firearms involved in the conspiracy.

It was a further part of the conspiracy that certain defendants and/or co-conspirators would provide vehicles for use in the purchase of the firearms, and/or would transport other defendants to the businesses of the federally licensed firearms dealers in order to purchase the firearms.

It was a further part of the conspiracy that, following each firearm purchase, the purchasing defendant would transfer possession of the firearms to other defendants or co-conspirators.

It was a further part of the conspiracy that certain defendants and/or co-defendants obliterated the serial numbers of certain firearms.

It was a further part of the conspiracy that certain defendants arranged for the transportation of the firearms to a location outside of the District of Oregon.

It was a further part of the conspiracy that the ultimate destination of the firearms was Mexico.

Overt Acts

In furtherance of the conspiracy, one or more of the defendants and/or co-conspirators committed, or caused to be committed, the overt acts described in Counts 2 through 52.

COUNT 2

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about September 23, 2019, at or near Portland, in the District of Oregon, defendant **LLODANY DAVID ACOSTA-MICHEL**, in connection with the acquisition of firearms, that is; one Barrett, model 82A1, .50 caliber rifle, serial number AA009111; from Sportsman's Warehouse, 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 Sportsman's Warehouse, which statement was intended to deceive Sportsman's Warehouse as to a fact material to the lawfulness of such sale of said firearms to **LLODANY DAVID ACOSTA-MICHEL** under Chapter 44, Title 18, United States Code; in that **LLODANY DAVID ACOSTA-MICHEL** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 3

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about October 2, 2019, at or near Gresham, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, .308 caliber rifle, serial number H0C11346; from Keith's Sporting Goods 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 Keith's

Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 4

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about October 6, 2019, at or near Portland, Oregon, in the District of Oregon, defendant **MAURICIO ESTEBAN RODRIGUEZ**, in connection with the acquisition of firearms, that is; one FN Herstal, SCAR 17S, .308 (7.62) caliber rifle, serial number HC63808; from Sportsman's Warehouse, 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 Sportsman's Warehouse, which statement was intended to deceive Sportsman's Warehouse as to a fact material to the lawfulness of such sale of said firearms to **MAURICIO ESTEBAN RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **MAURICIO ESTEBAN RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 5

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about October 8, 2019, at or near Sandy, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, 7.62 caliber rifle, serial number HC65551; from Rapid Fire

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 Rapid Fire Arms LLC, which statement was intended to deceive Rapid Fire Arms LLC as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 6

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about October 11, 2019, at or near Gresham, in the District of Oregon, defendant **MAURICIO ESTEBAN RODRIGUEZ**, in connection with the acquisition of firearms, that is; one FN Herstal, model SCAR 17S, .308 (7.62) caliber rifle, serial number H0C11609; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **MAURICIO ESTEBAN RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **MAURICIO ESTEBAN RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

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COUNT 7

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about October 12, 2019, at or near Portland, in the District of Oregon, defendant **LLODANY DAVID ACOSTA-MICHEL**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, .308 caliber rifle, serial number HC63793; from Sportsman's Warehouse, 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 Sportsman's Warehouse, which statement was intended to deceive Sportsman's Warehouse as to a fact material to the lawfulness of such sale of said firearms to **LLODANY DAVID ACOSTA-MICHEL** under Chapter 44, Title 18, United States Code; in that **LLODANY DAVID ACOSTA-MICHEL** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 8

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about November 4, 2019, at or near Gresham, in the District of Oregon, defendant **LLODANY DAVID ACOSTA-MICHEL**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, .308 caliber rifle, serial number HC65666; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **LLODANY DAVID ACOSTA-MICHEL** under Chapter 44, Title 18, United States Code; in that **LLODANY DAVID ACOSTA-**

MICHEL stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 9
(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

On or about November 8, 2019, at or near Portland, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, .762 caliber rifle, serial number HC65456; from Sportsman's Warehouse, 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 Sportsman's Warehouse, which statement was intended to deceive Sportsman's Warehouse as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 10
(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

On or about November 11, 2019, at or near Milwaukie, in the District of Oregon, defendant **LLODANY DAVID ACOSTA-MICHEL**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, .308 caliber rifle, serial number H0C14423; from Guns Oregon 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 Guns Oregon LLC, which statement was intended to deceive Guns Oregon LLC as to a fact material to the lawfulness

of such sale of said firearms to **LLODANY DAVID ACOSTA-MICHEL** under Chapter 44, Title 18, United States Code; in that **LLODANY DAVID ACOSTA-MICHEL** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 11

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about November 11, 2019, at or near Hillsboro, in the District of Oregon, defendant **JOSE RICARDO FLORES-SARABIA**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, .308 (7.62) caliber rifle, serial number H0C14329; from Oregon Arms and Ammunition 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 Oregon Arms and Ammunition LLC, which statement was intended to deceive Oregon Arms and Ammunition LLC as to a fact material to the lawfulness of such sale of said firearms to **JOSE RICARDO FLORES-SARABIA** under Chapter 44, Title 18, United States Code; in that **JOSE RICARDO FLORES-SARABIA** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 12

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about November 13, 2019, at or near Sandy, in the District of Oregon, defendant **JOSE RICARDO FLORES-SARABIA**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, .308 (7.62) caliber rifle, serial number H0C12437; from Rapid Fire 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 Rapid Fire Arms LLC, which statement was intended to deceive Rapid Fire Arms LLC as to a fact material to the lawfulness of such sale of said firearms to **JOSE RICARDO FLORES-SARABIA** under Chapter 44, Title 18, United States Code; in that **JOSE RICARDO FLORES-SARABIA** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 13

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about November 21, 2019, at or near Sandy, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, 7.62 caliber rifle, serial number H0C12463; from Rapid Fire 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 Rapid Fire Arms LLC, which statement was intended to deceive Rapid Fire Arms LLC as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 14

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about November 23, 2019, at or near Gresham, in the District of Oregon, defendant **JOSE DE JESUS RODRIGUEZ**, in connection with the acquisition of firearms, that is; one FN

HERSTAL, model SCAR 17S, 7.62 (.308) caliber rifle, serial number HC62938; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **JOSE DE JESUS RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **JOSE DE JESUS RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 15

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about November 25, 2019, at or near Hillsboro, in the District of Oregon, defendant **JOSE RICARDO FLORES-SARABIA**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, 7.62 caliber rifle, serial number H0C12491; from Oregon Arms & Ammunition, 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 Oregon Arms & Ammunition, which statement was intended to deceive Oregon Arms & Ammunition as to a fact material to the lawfulness of such sale of said firearms to **JOSE RICARDO FLORES-SARABIA** under Chapter 44, Title 18, United States Code; in that **JOSE RICARDO FLORES-SARABIA** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

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COUNT 16

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about January 2, 2020, at or near Sandy, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; one Barrett, model 82A1, .50 caliber rifle, serial number AA009405; from Rapid Fire 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 Rapid Fire Arms LLC, which statement was intended to deceive Rapid Fire Arms LLC as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 17

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about January 4, 2020, at or near Gresham, in the District of Oregon, defendant **MAURICIO ESTEBAN RODRIGUEZ**, in connection with the acquisition of firearms, that is; two Smith and Wesson, model M&P15 Magpul, caliber 5.56 (.223) rifles, serial numbers TL05080 and TL05086; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **MAURICIO ESTEBAN RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that

MAURICIO ESTEBAN RODRIGUEZ stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 18
(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

On or about January 4, 2020, at or near Gresham, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; five Smith and Wesson, model M&P15 Magpul, caliber 5.56 (.223) rifles, serial numbers TK12457, TK12592, TK12464, TK14150, and TK12478; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 19
(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

On or about January 5, 2020, at or near Gresham, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; three Ruger, model AR556, 5.56 (.223) caliber rifles, serial numbers 856-25681, 855-57353, and 856-27959; and one Diamondback model DB15, serial number 856-27959; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 20

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about January 5, 2020, at or near Gresham, in the District of Oregon, defendant **JOSE DE JESUS RODRIGUEZ**, in connection with the acquisition of firearms, that is; two Smith and Wesson, model M&P15 MAGPUL, 5.56 (223) caliber rifles, serial numbers TL05079 and TK14207; and one Smith and Wesson, model M&P SPORT II, 5.56 (.223) caliber rifle, serial number TK60941; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **JOSE DE JESUS RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **JOSE DE JESUS RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

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COUNT 21

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about January 10, 2020, at or near Sandy, in the District of Oregon, defendant **MATTHEW JON SANCHEZ**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, .308 caliber rifle, serial number H0C14869; from Rapid Fire 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 Rapid Fire Arms LLC, which statement was intended to deceive Rapid Fire Arms LLC as to a fact material to the lawfulness of such sale of said firearms to **MATTHEW JON SANCHEZ** under Chapter 44, Title 18, United States Code; in that **MATTHEW JON SANCHEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 22

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about January 10, 2020, at or near Gresham, in the District of Oregon, defendant **JOSE DE JESUS RODRIGUEZ**, in connection with the acquisition of firearms, that is; one Barrett, model 82A1, .50 caliber rifle, serial number AA009407; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **JOSE DE JESUS RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **JOSE DE JESUS RODRIGUEZ** stated that he was the actual

transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 23

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about January 12, 2020, at or near Sandy, in the District of Oregon, defendant **MATTHEW JON SANCHEZ**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, .308 caliber rifle, serial number H0C12280; from Rapid Fire 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 Rapid Fire Arms LLC, which statement was intended to deceive Rapid Fire Arms LLC as to a fact material to the lawfulness of such sale of said firearms to **MATTHEW JON SANCHEZ** under Chapter 44, Title 18, United States Code; in that **MATTHEW JON SANCHEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 24

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about January 16, 2020, at or near Gresham, in the District of Oregon, defendant **JOSE DE JESUS RODRIGUEZ**, in connection with the acquisition of firearms, that is; one Barrett, model 82A1, .50 caliber rifle, serial number AA009616; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **JOSE DE JESUS RODRIGUEZ** under Chapter 44,

Title 18, United States Code; in that **JOSE DE JESUS RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 25
(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

On or about January 17, 2020, at or near Gresham, in the District of Oregon, defendant **MATTHEW JON SANCHEZ**, in connection with the acquisition of firearms, that is; two Barrett, model 82A1, .50 caliber rifles, serial numbers AA009173 and AA009176; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **MATTHEW JON SANCHEZ** under Chapter 44, Title 18, United States Code; in that **MATTHEW JON SANCHEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 26
(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

On or about January 27, 2020, at or near Gresham, in the District of Oregon, defendant **JOSE DE JESUS RODRIGUEZ**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, .308 caliber rifle, serial number H0C15217; from Keith's Sporting Goods Inc. 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 Keith's Sporting Goods

Inc. Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **JOSE DE JESUS RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **JOSE DE JESUS RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 27

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about February 4, 2020, at or near Gresham, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; one Barrett, model 82A1, .50 caliber rifle, serial number AA009634; from Keith's Sporting Goods Inc. 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 Keith's Sporting Goods Inc. Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 28

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about February 5, 2020, at or near Gresham, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, .308 caliber rifle, serial number H0C14822; from Keith's

Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 29

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about February 7, 2020, at or near Hillsboro, in the District of Oregon, defendant **JOSE RICARDO FLORES-SARABIA**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, .308 caliber rifle, serial number H0C15078; from Oregon Arms & Ammunition, 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 Oregon Arms & Ammunition, which statement was intended to deceive Oregon Arms & Ammunition as to a fact material to the lawfulness of such sale of said firearms to **JOSE RICARDO FLORES-SARABIA** under Chapter 44, Title 18, United States Code; in that **JOSE RICARDO FLORES-SARABIA** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

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COUNT 30

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about February 7, 2020, at or near Gresham, in the District of Oregon, defendant **JOSE DE JESUS RODRIGUEZ**, in connection with the acquisition of firearms, that is; two FN HERSTAL, model SCAR 16S, 5.56 (.223) caliber rifles, serial numbers LC39301 and LC39303; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **JOSE DE JESUS RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **JOSE DE JESUS RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 31

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about February 11, 2020, at or near Sandy, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; two FN HERSTAL, model SCAR 17S, 7.62 caliber rifles, serial numbers H0C12915 and H0C12991; from Rapid Fire 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 Rapid Fire Arms LLC, which statement was intended to deceive Rapid Fire Arms LLC as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that

he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 32
(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

On or about February 11, 2020, at or near Sandy, in the District of Oregon, defendant **MATTHEW JON SANCHEZ**, in connection with the acquisition of firearms, that is; two FN HERSTAL, model SCAR 17S, 7.62 caliber rifles, serial numbers H0C13082 and H0C13068; from Rapid Fire 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 Rapid Fire Arms LLC, which statement was intended to deceive Rapid Fire Arms LLC as to a fact material to the lawfulness of such sale of said firearms to **MATTHEW JON SANCHEZ** under Chapter 44, Title 18, United States Code; in that **MATTHEW JON SANCHEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 33
(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

On or about March 12, 2020, at or near Gresham, in the District of Oregon, defendant **ROBERTO GONZALEZ**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 16S, 5.56 (.223) caliber rifle, serial number LC39245; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to

a fact material to the lawfulness of such sale of said firearms to **ROBERTO GONZALEZ** under Chapter 44, Title 18, United States Code; in that **ROBERTO GONZALEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 34

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about March 12, 2020, at or near Gresham, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 16S, 5.56 (.223) caliber rifle, serial number LC38710; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 35

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about March 12, 2020, at or near Gresham, in the District of Oregon, defendant **JOSE DE JESUS RODRIGUEZ**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 16S, 5.56 (.223) caliber rifle, serial number LC39199; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **JOSE DE JESUS RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **JOSE DE JESUS RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 36

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about March 16, 2020, at or near Sandy, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; one Barrett, model M82, .50 caliber rifle, serial number AA009532; from Rapid Fire 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 Rapid Fire Arms LLC, which statement was intended to deceive Rapid Fire Arms LLC as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 37

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about March 16, 2020, at or near Sandy, in the District of Oregon, defendant **MATTHEW JON SANCHEZ**, in connection with the acquisition of firearms, that is; one Barrett,

model M82, .50 caliber rifle, serial number AA009533; and one Century Arms, model GP, 7.62 caliber rifle, serial number A1-71794-19; from Rapid Fire 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 Rapid Fire Arms LLC, which statement was intended to deceive Rapid Fire Arms LLC as to a fact material to the lawfulness of such sale of said firearms to **MATTHEW JON SANCHEZ** under Chapter 44, Title 18, United States Code; in that **MATTHEW JON SANCHEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 38

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about April 1, 2020, at or near Salem, in the District of Oregon, defendant **ROBERTO GONZALEZ**, in connection with the acquisition of firearms, that is; two Pioneer Arms, model Sporter, 7.62 caliber rifles, serial numbers PAC1132393 and PAC1132501; from Ticker Licker Firearms 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 Ticker Licker Firearms LLC, which statement was intended to deceive Ticker Licker Firearms LLC as to a fact material to the lawfulness of such sale of said firearms to **ROBERTO GONZALEZ** under Chapter 44, Title 18, United States Code; in that **ROBERTO GONZALEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

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COUNT 39

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about April 1, 2020, at or near Salem, in the District of Oregon, defendant **JOSE DE JESUS RODRIGUEZ**, in connection with the acquisition of firearms, that is; three Pioneer Arms, model Sporter, 7.62 caliber rifles, serial numbers PAC1132542, PAC1132528, and PAC1132442; and one Century Arms, model M70AB2, .762 caliber rifle, serial number AB2-CI08872; from Ticker Licker Firearms 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 Ticker Licker Firearms LLC, which statement was intended to deceive Ticker Licker Firearms LLC as to a fact material to the lawfulness of such sale of said firearms to **JOSE DE JESUS RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **JOSE DE JESUS RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 40

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about April 1, 2020, at or near Salem, in the District of Oregon, defendant **MATTHEW JON SANCHEZ**, in connection with the acquisition of firearms, that is; three Pioneer Arms, model Sporter, 7.62 caliber rifles, serial numbers PAC1130616, PAC1132533, and PAC1132499; from Ticker Licker Firearms 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 Ticker Licker Firearms LLC, which statement was intended to deceive Ticker Licker Firearms LLC as to a fact material to the lawfulness of such sale of said firearms to **MATTHEW**

JON SANCHEZ under Chapter 44, Title 18, United States Code; in that **MATTHEW JON SANCHEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 41
(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

On or about April 1, 2020, at or near Salem, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; three Pioneer Arms, model Sporter, .762 caliber rifles, serial numbers PAC1132594, PAC1132428, and PAC1132592; and one Century Arms, model M70AB2, .762 caliber rifle, serial number AB2C109043; from Ticker Licker Firearms 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 Ticker Licker Firearms LLC, which statement was intended to deceive Ticker Licker Firearms LLC as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 42
(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

On or about April 28, 2020, at or near Gresham, in the District of Oregon, defendant **JOSE RICARDO FLORES-SARABIA**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, .308 caliber rifle, serial number H0C16011; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **JOSE RICARDO FLORES-SARABIA** under Chapter 44, Title 18, United States Code; in that **JOSE RICARDO FLORES-SARABIA** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 43

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about April 28, 2020, at or near Beaverton, in the District of Oregon, defendant **NESTOR GABRIEL RODRIGUEZ**, in connection with the acquisition of firearms, that is; one Barrett, model 82A1, .50 caliber rifle, serial number AA009501; from J&B Firearm Sales 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 J&B Firearm Sales Inc., which statement was intended to deceive J&B Firearm Sales Inc. as to a fact material to the lawfulness of such sale of said firearms to **NESTOR GABRIEL RODRIGUEZ** under Chapter 44, Title 18, United States Code; in that **NESTOR GABRIEL RODRIGUEZ** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 44

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about May 9, 2020, at or near Milwaukie, in the District of Oregon, defendant **JULIO ABOYTES-ZAVALA**, in connection with the acquisition of firearms, that is; one FN

HERSTAL, model SCAR 17S, .308 caliber rifle, serial number H0C15536; from Guns Oregon 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 Guns Oregon LLC, which statement was intended to deceive Guns Oregon LLC as to a fact material to the lawfulness of such sale of said firearms to **JULIO ABOYTES-ZAVALA** under Chapter 44, Title 18, United States Code; in that **JULIO ABOYTES-ZAVALA** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 45

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about May 20, 2020, at or near Hillsboro, in the District of Oregon, defendant **BRYAN LEE ANDRE**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 17S, 7.62 caliber rifle, serial number H0C13953; from MK Tactical LLC Guns and Training, 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 MK Tactical LLC Guns and Training, which statement was intended to deceive MK Tactical LLC Guns and Training as to a fact material to the lawfulness of such sale of said firearms to **BRYAN LEE ANDRE** under Chapter 44, Title 18, United States Code; in that **BRYAN LEE ANDRE** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

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COUNT 46

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about July 8, 2020, at or near Hillsboro, in the District of Oregon, defendant **BRYAN LEE ANDRE**, in connection with the acquisition of firearms, that is; one Barrett, model 82A1, .50 caliber rifle, serial number AA010477; from MK Tactical LLC Firearms and Training, 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 MK Tactical LLC Firearms and Training, which statement was intended to deceive MK Tactical LLC Firearms and Training as to a fact material to the lawfulness of such sale of said firearms to **BRYAN LEE ANDRE** under Chapter 44, Title 18, United States Code; in that **BRYAN LEE ANDRE** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 47

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about July 27, 2020, at or near Gresham, in the District of Oregon, defendant **JOSE RICARDO FLORES-SARABIA**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 20S, .308 caliber rifle, serial number PR12136; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. as to a fact material to the lawfulness of such sale of said firearms to **JOSE RICARDO FLORES-SARABIA** under Chapter 44, Title 18, United States Code; in that **JOSE RICARDO FLORES-SARABIA** stated

that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 48
(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

On or about July 30, 2020, at or near Tualatin, in the District of Oregon, defendant **JOSE RICARDO FLORES-SARABIA**, in connection with the acquisition of firearms, that is; one FN HERSTAL, model SCAR 20S, 7.62 caliber rifle, serial number PR13997; from Cabela's, 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 Cabela's, which statement was intended to deceive Cabela's as to a fact material to the lawfulness of such sale of said firearms to **JOSE RICARDO FLORES-SARABIA** under Chapter 44, Title 18, United States Code; in that **JOSE RICARDO FLORES-SARABIA** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 49
(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

On or about August 3, 2020, at or near Hillsboro, in the District of Oregon, defendant **BRYAN LEE ANDRE**, in connection with the acquisition of firearms, that is; one Barrett, model 82A1, .50 caliber rifle, serial number AA010620; from MK Tactical LLC Firearms and Training, 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 MK Tactical LLC Firearms and Training, which statement was intended to deceive MK Tactical LLC Firearms and Training as to a fact material to the lawfulness of such sale of said firearms to **BRYAN LEE ANDRE** under

Chapter 44, Title 18, United States Code; in that **BRYAN LEE ANDRE** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 50

**(False Statements in Connection with Acquisition of Firearm)
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))**

On or about September 15, 2020, at or near Gresham, in the District of Oregon, defendant **MARIANO AISPURO BELTRAN**, in connection with the acquisition of firearms, that is; two FN HERSTAL, model SCAR 20S, .308 caliber rifles, serial numbers PR12294 and PR12184; from Keith's Sporting Goods 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 Keith's Sporting Goods Inc., which statement was intended to deceive Keith's Sporting Goods Inc. and Training as to a fact material to the lawfulness of such sale of said firearms to **MARIANO AISPURO BELTRAN** under Chapter 44, Title 18, United States Code; in that **MARIANO AISPURO BELTRAN** stated that he was the actual transferee/buyer of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 51

**(Possessing and Receiving Firearm with Obliterated Serial Number)
(18 U.S.C. §§ 922(k), 924(a)(1)(B), 2)**

On or about April 30, 2020, in the District of Oregon, defendants **DAVID ACOSTA-ROSALES** and **NESTOR RODRIGUEZ** did knowingly possess and receive firearms which had the importer's and manufacturer's serial numbers removed, obliterated, and altered, after such firearms had been shipped and transported in interstate and foreign commerce, to wit: Six (6) FN, model Five-seveN, 5.7 caliber pistols; Four (4) Kel-Tec, model PMR30, .22 caliber pistols; Two

(2) Century Arms, AK-47 type, 7.62 caliber rifles; One (1) FNH, model SCAR 16S, 5.56 caliber rifle; and One (1) Barrett, model 82A1, .50 caliber rifle.

In violation of Title 18, United States Code, Sections 922(k), 924(a)(1)(B), and 2.

COUNT 52
(Smuggle Goods from the United States)
(18 U.S.C. § 554(a))

From about September 2019, until the date of this indictment, defendant **DAVID ACOSTA-ROSALES**, fraudulently and knowingly received, concealed, bought, sold, and facilitated the transportation, concealment, and sale of merchandise, articles, and objects, prior to exportation, that is; eighteen (18) FN HERSTAL, model SCAR 17S, .308 (7.62) caliber rifles, serial numbers H0C11346, HC63808, HC65551, H0C11609, HC63793, HC65666, HC65456, H0C14423, H0C12463, HC62938, H0C14869, H0C15217, H0C12280, H0C4822; H0C12915, H0C12991, H0C13082, H0C13068; five (5) FN HERSTAL, model SCAR 16S, .556 (.223) caliber rifles, serial numbers LC39301, LC39303, LC39245, LC38710, LC39199; two (2) Barrett, model M82, .50 caliber rifles, serial numbers AA009532, AA009533; eight (8) Barrett, model 82A1, .50 caliber rifles, serial numbers AA009111, AA009405, AA009407, AA009616, AA09173, AA009176, AA009634, AA009532, AA009501; nine (9) Smith and Wesson, model M&P15 Magpul, caliber 5.56 (.223) rifles, serial numbers TL05080, TL05086, TK12457, TK12592, TK12464, TK14150, TK12478, TL05079 and TK14207; three (3) Ruger, model AR556, 5.56 caliber (.223) caliber rifles, serial numbers 856-25681, 855-57353, 856-27959; one (1) Smith and Wesson, model M&P SPORT II, 5.56 (.223) caliber rifle, serial number TK60941; eleven (11) Pioneer Arms, model Sporter, 7.62 caliber rifles, serial numbers PAC1132393, PAC1132501, PAC1132542, PAC1132528, PAC1132442, PAC1130616, PAC1132533, PAC1132499;

PAC1132594, PAC1132428, PAC1132592; one (1) Century Arms, model M70AB2, 7.62 caliber rifle, serial number AB2-CI0887, and one (1) Century Arms, model GP, 7.62 caliber rifle, serial number A1-71794-19; 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; Title 22, Code of Federal Regulations, Part 123.1; Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Part 774; and Title 15, Code of Federal Regulations.

In violation of Title 18, United States Code, Section 554(a).

FIRST FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in Counts 1 through 51 of this Indictment, the defendants, **DAVID ACOSTA-ROSALES, NESTOR GABRIEL RODRIGUEZ, MATTHEW JON SANCHEZ, JOSE DE JESUS RODRIGUEZ, MAURICIO ESTEBAN RODRIGUEZ, ROBERTO GONZALEZ, JOSE RICARDO FLORES-SARABIA, BRYAN LEE ANDRE, MARIANO AISPURIO BELTRAN, LLODANY DAVID ACOSTA-MICHEL, and JULIO ABOYTES-ZAVALA** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c) any firearms and ammunition involved in the commission of an offense in violation of Title 18, United States Code, Section 922, including, but not limited to the firearms described in Counts 1 through 51.

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SECOND FORFEITURE ALLEGATION

Upon conviction of the offense alleged in Count 52 of this Indictment, defendant **DAVID ACOSTA-ROSALES** shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code 554.

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.

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

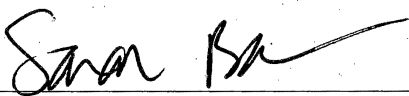
Dated: October 6, 2020

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney



SARAH BARR, WSB #40758
Assistant United States Attorney