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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

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CR22-02082 TUC-RM(EJM)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

No.

Plaintiff,

INDICTMENT

vs.

VIO: 18 U.S.C. § 2(a)
(Aiding and Abetting the
Commission of an Offense)
Counts 11-49

1. Victor Coronado,
(Counts 1-8, 11-49)

18 U.S.C. § 371
(Conspiracy)
Count 1

2. Fernando Palomares, Jr.,
(Counts 1, 8, 11-18)

18 U.S.C. § 554(a)
(Smuggling Goods from the United
States)
Counts 1-8

3. Julissa Leonor Torres,
(Count 18)

18 U.S.C. §§ 922(a)(1)(A) &
924(a)(1)(D)
(Engaging in the Business of
Dealing Firearms Without a
License)
Counts 9-10

4. Carlos Fernando Palomares-Leon,
(Counts 1, 6-7, 19-26, 27-32)

18 U.S.C. §§ 922(a)(6) & 924(a)(2)
(Making False Statements in
Connection with Acquisition of
Firearms)
Counts 11-49

5. Briana Marie Montpetit,
(Count 27)

6. Karla Romero,
(Counts 28-29)

7. Avery Danelle Gipson,
(Counts 30-31)

8. Kevin Allen Lapedus,
(Count 32)

9. Ray Alberto Laborin,
(Counts 33-34)

10. Elizar Olivares,
(Counts 1, 10, 35-39)

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

11. Kyle Rene Fazlollah,
(Counts 1-5, 9, 40-49)

12. Ty-Jhai Damon Grigsby,
(Count 49)

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

Between or about October of 2019 and July of 2020, in the District of Arizona, Defendants VICTOR CORONADO, FERNANDO PALOMARES, JR., CARLOS FERNANDO PALOMARES-LEON, ELIZAR OLIVARES, and KYLE RENE FAZLOLLAH 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: to knowingly export and send from the United States, and attempt to export and send from the United States, any merchandise, article, or object, contrary to any law or regulation of the United States, and to receive, conceal, buy, sell, and in any manner facilitate the transportation, concealment, and sale of such merchandise, article or object, knowing the same to be intended for exportation contrary to any law or regulation of the United States; in violation of Title 18, United States Code, Section 554(a); Title 50, United States Code, Section 4819; and Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774.

Purpose of the Conspiracy

The purpose of this conspiracy was to commit, and assist in the commission of, the unlawful smuggling of firearms from the United States into the Republic of Mexico. The firearms smuggled in the course of this conspiracy include:

- Radical Firearms RF15 multi caliber rifle
- 4 Riley Defense RAK47C 7.62x39mm rifles
- DPMS A15 5.56mm rifle
- 4 Radom/Pioneer Arms Sporter 7.62x39mm rifles
- Romarm/Cugir WASR10UF 7.62x39mm rifle
- Romarm/Cugir WASR10 7.62x39mm rifle
- 3 Romarm/Cugir RH10 7.62x39mm rifles

- 4 American Tactical Imports GOMX556P4BBFG 5.56mm pistols
- 6 Century Arms VSKA 7.62x39mm rifles
- 3 Century Arms M70AB2 7.62x39mm rifles
- Century Arms C39V2 7.62x39mm rifle
- Century Arms RAS47 7.62x39mm rifle
- Glock 17 Gen5, 9mm pistol
- 6 Barrett 82A1, .50 caliber rifles
- 4 Palmetto State Armory PSAK47 7.62x39mm rifles
- Palmetto State Armory PA15 multi caliber lower receiver
- 3 Beretta 92X 9mm pistols
- 2 Smith & Wesson M&P15 5.56mm rifles
- Sig Sauer P320 9mm pistol
- 2 Del Ton Inc DTI15 5.56mm rifles
- 2 FA Cugir M&M Inc M10-762 7.62x39mm rifles
- Anderson Manufacturing AM15 5.56mm rifle

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 and/or their co-conspirators would purchase and acquire firearms within the District of Arizona.

It was a further part of the conspiracy that certain defendants and/or their co-conspirators would provide the funds and directions for the firearm purchases to the defendants and/or co-conspirators who purchased the firearms and provide monetary compensation for the firearm purchases.

It was a further part of the conspiracy that certain defendants and/or their co-conspirators would transfer to the firearms purchased to other defendants and/or co-conspirators within the District of Arizona.

It was a further part of the conspiracy that the defendants and/or their co-conspirators would purchase and transfer the firearms with the knowledge that the ammunition was intended to ultimately be transported from the United States into the Republic of Mexico.

It was a further part of the conspiracy that certain defendants and/or their co-conspirators would transport the firearms 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 firearms 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 or about October 9, 2019, KYLE RENE FAZLOLLAH purchased an Anderson Manufacturing AM15 5.56mm rifle from a federally licensed firearms dealer in the District of Arizona. VICTOR CORONADO provided KYLE RENE FAZLOLLAH with the directions and funds to purchase the firearm. KYLE RENE FAZLOLLAH transferred the firearm to VICTOR CORONADO after he acquired it. VICTOR CORONADO or another co-conspirator then transported the firearm from Arizona to the Republic of Mexico.

On or about October 10, 2019, KYLE RENE FAZLOLLAH purchased a Century Arms VSKA 7.62x39mm rifle from a federally licensed firearms dealer in the District of Arizona. VICTOR CORONADO provided KYLE RENE FAZLOLLAH with the directions and funds to purchase the firearm. KYLE RENE FAZLOLLAH transferred the firearm to VICTOR CORONADO after he acquired it. VICTOR CORONADO or another co-conspirator then transported the firearm from Arizona to the Republic of Mexico.

On or about October 11, 2019, KYLE RENE FAZLOLLAH purchased a Romarm/Cugir RH10 7.62x39mm rifle and a Century Arms VSKA 7.62x39mm rifle from a federally licensed firearms dealer in the District of Arizona. Also on October 11, 2019, another individual purchased a Smith & Wesson Model M&P 15, 5.56mm rifle from a federally licensed firearms dealer in the District of Arizona. VICTOR CORONADO

1 provided KYLE RENE FAZLOLLAH with the directions and funds to purchase the
2 firearms. KYLE RENE FAZLOLLAH provided the other individual with the directions
3 and funds to purchase the Smith & Wesson Model M&P 15, 5.56mm rifle. The other
4 individual transferred the Smith & Wesson Model M&P 15, 5.56mm rifle to KYLE RENE
5 FAZLOLLAH after he acquired it. KYLE RENE FAZLOLLAH then provided all three
6 firearms to Victor CORONADO. VICTOR CORONADO or another co-conspirator then
7 transported the firearms from Arizona to the Republic of Mexico. On or about June 21,
8 2020, the Smith & Wesson Model M&P 15, 5.56mm rifle was recovered in the Republic
9 of Mexico. On or about March 24, 2022, the Century Arms VSKA 7.62x39mm rifle was
10 recovered in the Republic of Mexico.

11 On or about October 17, 2019, FERNANDO PALOMARES, JR., purchased a
12 Radical Firearms RF15 multi caliber rifle and a Riley Defense RAK47 7.62x39mm rifle
13 from a federally licensed firearms dealer in the District of Arizona. VICTOR
14 CORONADO provided FERNANDO PALOMARES, JR., with the directions and funds
15 to purchase the firearms. FERNANDO PALOMARES, JR., transferred the firearms to
16 VICTOR CORONADO after he acquired them. VICTOR CORONADO or another co-
17 conspirator then transported the firearms from Arizona to the Republic of Mexico.

18 On or about October 22, 2019, KYLE RENE FAZLOLLAH purchased a
19 Romarm/Cugir RH10 7.62x39mm rifle from a federally licensed firearms dealer in the
20 District of Arizona. VICTOR CORONADO provided KYLE RENE FAZLOLLAH with
21 the directions and funds to purchase the firearm. KYLE RENE FAZLOLLAH transferred
22 the firearm to VICTOR CORONADO after he acquired it. VICTOR CORONADO or
23 another co-conspirator then transported the firearm from Arizona to the Republic of
24 Mexico. On or about June 26, 2020, the Romarm/Cugir RH10 7.62x39mm rifle was
25 recovered in the Republic of Mexico.

26 On or about October 24, 2019, FERNANDO PALOMARES, JR., purchased a
27 DPMS A15 5.56mm rifle and a Riley Defense RAK47 7.62x39mm rifle from a federally
28 licensed firearms dealer in the District of Arizona. VICTOR CORONADO provided

1 FERNANDO PALOMARES, JR., with the directions and funds to purchase the firearms.
2 FERNANDO PALOMARES, JR., transferred the firearms to VICTOR CORONADO after
3 he acquired them. VICTOR CORONADO or another co-conspirator then transported the
4 firearms from Arizona to the Republic of Mexico.

5 On or about October 28, 2019, KYLE RENE FAZLOLLAH purchased a Smith
6 & Wesson M&P 15 5.56mm rifle and a Del Ton DTI15 5.56mm rifle from a federally
7 licensed firearms dealer in the District of Arizona. VICTOR CORONADO provided
8 KYLE RENE FAZLOLLAH with the directions and funds to purchase the firearms.
9 KYLE RENE FAZLOLLAH transferred the firearms to VICTOR CORONADO after he
10 acquired them. VICTOR CORONADO or another co-conspirator then transported the
11 firearms from Arizona to the Republic of Mexico.

12 On or about November 27, 2019, FERNANDO PALOMARES, JR., purchased
13 a Radom/Pioneer Arms Sporter 7.62x39mm rifle and a Romarm/Cugir WASR10UF
14 7.62x39mm rifle from a federally licensed firearms dealer in the District of Arizona.
15 VICTOR CORONADO provided FERNANDO PALOMARES, JR., with the directions
16 and funds to purchase the firearms. FERNANDO PALOMARES, JR., transferred the
17 firearms to VICTOR CORONADO after he acquired them. VICTOR CORONADO or
18 another co-conspirator then transported the firearms from Arizona to the Republic of
19 Mexico.

20 On or about December 28, 2019, ELIZAR OLIVARES purchased a Del Ton
21 Inc DTI15 5.56mm rifle from a federally licensed firearms dealer in the District of Arizona.
22 VICTOR CORONADO provided ELIZAR OLIVARES with the directions and funds to
23 purchase the firearm. ELIZAR OLIVARES transferred the firearm to VICTOR
24 CORONADO after he acquired it. VICTOR CORONADO or another co-conspirator then
25 transported the firearm from Arizona to the Republic of Mexico.

26 On or about January 4, 2020, ELIZAR OLIVARES purchased a Barrett 82A1
27 .50 caliber rifle from a federally licensed firearms dealer in the District of Arizona.
28 VICTOR CORONADO provided ELIZAR OLIVARES with the directions and funds to

1 purchase the firearm. ELIZAR OLIVARES transferred the firearm to VICTOR
2 CORONADO after he acquired it. VICTOR CORONADO or another co-conspirator then
3 transported the firearm from Arizona to the Republic of Mexico.

4 On or about January 5, 2020, FERNANDO PALOMARES, JR., purchased two
5 American Tactical Imports GOMX556P4BBFG 5.56mm pistols from a federally licensed
6 firearms dealer in the District of Arizona. Also on or about January 5, 2020, at the request
7 of FERNANDO PALOMARES, JR., another individual purchased two American Tactical
8 Imports GOMX556P4BBFG 5.56mm pistols from the same federally licensed firearms
9 dealer in the District of Arizona. VICTOR CORONADO provided FERNANDO
10 PALOMARES, JR., and the other individual with the directions and funds to purchase the
11 firearms. FERNANDO PALOMARES, JR., and the other individual transferred the
12 firearms to VICTOR CORONADO after they acquired them. VICTOR CORONADO or
13 another co-conspirator then transported the firearms from Arizona to the Republic of
14 Mexico.

15 On or about January 24, 2020, FERNANDO PALOMARES, JR., purchased a
16 Radom/Pioneer Arms Sporter 7.62x39mm rifle and a Century Arms VSKA 7.62x39mm
17 rifle from a federally licensed firearms dealer in the District of Arizona. Also on January
18 24, 2020, KYLE RENE FAZLLOLAH purchased an additional two Radom/Pioneer Arms
19 Sporter 7.62x39mm rifles from a federally licensed firearms dealer in the District of
20 Arizona. VICTOR CORONADO provided FERNANDO PALOMARES, JR., and KYLE
21 RENE FAZLLOLAH with the directions and funds to purchase the firearms. FERNANDO
22 PALOMARES, JR., and KYLE RENE FAZLLOLAH transferred the firearms to VICTOR
23 CORONADO after they acquired them. VICTOR CORONADO or another co-conspirator
24 then transported the firearms from Arizona to the Republic of Mexico.

25 On or about February 15, 2020, ELIZAR OLIVARES purchased a Riley
26 Defense RAK47 7.62x39mm rifle from one federally licensed firearms dealer in the
27 District of Arizona, and purchased a FA Cugir M&M Inc M10-762 7.62x39mm rifle and a
28 Century Arms M70AB2 7.62x39mm rifle from another federally licensed firearms dealer

1 in the District of Arizona. VICTOR CORONADO provided ELIZAR OLIVARES with
2 the directions and funds to purchase the firearms. ELIZAR OLIVARES transferred the
3 firearms to VICTOR CORONADO after he acquired them. VICTOR CORONADO or
4 another co-conspirator then transported the firearms from Arizona to the Republic of
5 Mexico.

6 On or about February 16, 2020, FERNANDO PALOMARES, JR., purchased
7 two Century Arms M70AB2 7.62x39mm rifles from a federally licensed firearms dealer in
8 the District of Arizona. VICTOR CORONADO provided FERNANDO PALOMARES,
9 JR., with the directions and funds to purchase the firearms. FERNANDO PALOMARES,
10 JR., transferred the firearms to VICTOR CORONADO after he acquired them. VICTOR
11 CORONADO or another co-conspirator then transported the firearms from Arizona to the
12 Republic of Mexico. On or about September 22, 2020, one of the Century Arms M70AB2
13 7.62x39mm rifles was recovered in the Republic of Mexico.

14 On or about March 21, 2020, CARLOS FERNANDO PALOMARES-LEON
15 purchased a Romarm/Cugir RH10 7.62x39mm rifle from a federally licensed firearms
16 dealer in the District of Arizona. VICTOR CORONADO provided CARLOS
17 FERNANDO PALOMARES-LEON with the directions and funds to purchase the firearm.
18 CARLOS FERNANDO PALOMARES-LEON transferred the firearm to VICTOR
19 CORONADO after he acquired it. VICTOR CORONADO or another co-conspirator then
20 transported the firearm from Arizona to the Republic of Mexico.

21 On or about March 23, 2020, CARLOS FERNANDO PALOMARES-LEON
22 purchased a Century Arms C39V2 7.62x39mm rifle from a federally licensed firearms
23 dealer in the District of Arizona. VICTOR CORONADO provided CARLOS
24 FERNANDO PALOMARES-LEON with the directions and funds to purchase the firearm.
25 CARLOS FERNANDO PALOMARES-LEON transferred the firearm to VICTOR
26 CORONADO after he acquired it. VICTOR CORONADO or another co-conspirator then
27 transported the firearm from Arizona to the Republic of Mexico.

28

1 On or about March 24, 2020, an individual purchased a Palmetto State Armory
2 PSAK47 7.62x39mm rifle from a federally licensed firearms dealer in the District of
3 Arizona. CARLOS FERNANDO PALOMARES-LEON provided the individual with the
4 directions and funds to purchase the firearm. The individual transferred the firearm to
5 CARLOS FERNANDO PALOMARES-LEON after he acquired it. CARLOS
6 FERNANDO PALOMARES-LEON then provided the firearm to Victor CORONADO.
7 VICTOR CORONADO or another co-conspirator then transported the firearm from
8 Arizona to the Republic of Mexico.

9 On or about April 1, 2020, an individual purchased a Riley Defense RAK47
10 7.62x39mm rifle from a federally licensed firearms dealer in the District of Arizona.
11 CARLOS FERNANDO PALOMARES-LEON provided the individual with the directions
12 and funds to purchase the firearm. The individual transferred the firearm to CARLOS
13 FERNANDO PALOMARES-LEON after he acquired it. CARLOS FERNANDO
14 PALOMARES-LEON then provided the firearm to Victor CORONADO. VICTOR
15 CORONADO or another co-conspirator then transported the firearm from Arizona to the
16 Republic of Mexico.

17 On or about April 10, 2020, two individuals each purchased a Palmetto State
18 Armory PSAK47 7.62x39mm rifle from a federally licensed firearms dealer in the District
19 of Arizona. CARLOS FERNANDO PALOMARES-LEON provided the individuals with
20 the directions and funds to purchase the firearms. The individuals transferred the firearms
21 to CARLOS FERNANDO PALOMARES-LEON after they acquired them. CARLOS
22 FERNANDO PALOMARES-LEON then provided the firearms to Victor CORONADO.
23 VICTOR CORONADO or another co-conspirator then transported the firearms from
24 Arizona to the Republic of Mexico.

25 On or about April 16, 2020, CARLOS FERNANDO PALOMARES-LEON and
26 another individual each purchased a Barrett 82A1 .50 caliber rifle from federally licensed
27 firearms dealers in the District of Arizona. VICTOR CORONADO provided CARLOS
28 FERNANDO PALOMARES-LEON and the other individual with the directions and funds

1 to purchase the firearms. CARLOS FERNANDO PALOMARES-LEON and the other
2 individual transferred the firearms to VICTOR CORONADO after they acquired them.
3 VICTOR CORONADO or another co-conspirator then transported the firearms from
4 Arizona to the Republic of Mexico.

5 On or about April 18, 2020, an individual purchased a Sig Sauer P320 9mm
6 pistol from a federally licensed firearms dealer in the District of Arizona. VICTOR
7 CORONADO provided the individual with the directions and funds to purchase the
8 firearm. The individual transferred the firearm to VICTOR CORONADO after he acquired
9 it. VICTOR CORONADO or another co-conspirator then transported the firearm from
10 Arizona to the Republic of Mexico.

11 On or about May 6, 2020, ELIZAR OLIVARES purchased a Century Arms
12 VSKA 7.62x39mm rifle from a federally licensed firearms dealer in the District of Arizona.
13 Also on May 6, 2020, KYLE RENE FAZLLOLAH purchased a Romarm/Cugir WASR10
14 7.62x39mm rifle from a federally licensed firearms dealer in the District of Arizona.
15 VICTOR CORONADO provided ELIZAR OLIVARES and KYLE RENE FAZLLOLAH
16 with the directions and funds to purchase the firearm. ELIZAR OLIVARES and KYLE
17 RENE FAZLLOLAH transferred the firearms to VICTOR CORONADO after they
18 acquired them. VICTOR CORONADO or another co-conspirator then transported the
19 firearms from Arizona to the Republic of Mexico.

20 On or about May 8, 2020, FERNANDO PALOMARES, JR., purchased a Glock
21 17 Gen5 9mm pistol and a Century Arms VSKA 7.62x39mm rifle from a federally licensed
22 firearms dealer in the District of Arizona. Also on or about May 8, 2020, CARLOS
23 FERNANDO PALOMARES-LEON purchased a Barrett 82A1 .50 caliber rifle from
24 another federally licensed firearms dealer in the District of Arizona. VICTOR
25 CORONADO provided FERNANDO PALOMARES, JR., and CARLOS FERNANDO
26 PALOMARES-LEON with the directions and funds to purchase the firearms.
27 FERNANDO PALOMARES, JR., and CARLOS FERNANDO PALOMARES-LEON
28 both transferred the firearms to VICTOR CORONADO after they acquired them.

1 VICTOR CORONADO or another co-conspirator then transported the firearms from
2 Arizona to the Republic of Mexico. On or about September 22, 2020, the Barrett 82A1 .50
3 caliber rifle was recovered in the Republic of Mexico.

4 On or about May 14, 2019, KYLE RENE FAZLOLLAH purchased a Century
5 Arms RAS47 7.62x39mm rifle from a federally licensed firearms dealer in the District of
6 Arizona. VICTOR CORONADO provided KYLE RENE FAZLOLLAH with the
7 directions and funds to purchase the firearm. KYLE RENE FAZLOLLAH transferred the
8 firearm to VICTOR CORONADO after he acquired it. VICTOR CORONADO or another
9 co-conspirator then transported the firearm from Arizona to the Republic of Mexico. On
10 or about May 11, 2021, the Century Arms RAS47 7.62x39mm rifle was recovered in the
11 Republic of Mexico.

12 On or about May 28, 2020, CARLOS FERNANDO PALOMARES-LEON
13 purchased a Palmetto State Armory PSAK47 7.62x39mm rifle from a federally licensed
14 firearms dealer in the District of Arizona. VICTOR CORONADO provided CARLOS
15 FERNANDO PALOMARES-LEON with the directions and funds to purchase the firearm.
16 CARLOS FERNANDO PALOMARES-LEON transferred the firearm to VICTOR
17 CORONADO after he acquired it. VICTOR CORONADO or another co-conspirator then
18 transported the firearm from Arizona to the Republic of Mexico. On or about December
19 12, 2020, the Palmetto State Armory PSAK47 7.62x39mm rifle was recovered in the
20 Republic of Mexico.

21 On or about June 3, 2020, an individual purchased a Barrett 82A1 .50 caliber
22 rifle from a federally licensed firearms dealer in the District of Arizona. CARLOS
23 FERNANDO PALOMARES-LEON provided the individual with the directions and funds
24 to purchase the firearm. The individual transferred the firearm to CARLOS FERNANDO
25 PALOMARES-LEON after she acquired it. CARLOS FERNANDO PALOMARES-
26 LEON then provided the firearm to VICTOR CORONADO. VICTOR CORONADO or
27 another co-conspirator then transported the firearm from Arizona to the Republic of
28 Mexico.

1 On or about June 4, 2020, KYLE RENE FAZLOLLAH purchased an FA Cugir
2 M&M Inc M10-762, 7.62x39mm rifle from a federally licensed firearms dealer in the
3 District of Arizona. VICTOR CORONADO provided KYLE RENE FAZLOLLAH with
4 the directions and funds to purchase the firearm. KYLE RENE FAZLOLLAH transferred
5 the firearm to VICTOR CORONADO after he acquired it. VICTOR CORONADO or
6 another co-conspirator then transported the firearm from Arizona to the Republic of
7 Mexico.

8 On or about June 16, 2020, CARLOS FERNANDO PALOMARES-LEON
9 purchased a Century Arms VSKA, 7.62x39mm rifle from a federally licensed firearms
10 dealer in the District of Arizona. VICTOR CORONADO provided CARLOS
11 FERNANDO PALOMARES-LEON with the directions and funds to purchase the firearm.
12 CARLOS FERNANDO PALOMARES-LEON transferred the firearm to VICTOR
13 CORONADO after he acquired it. VICTOR CORONADO or another co-conspirator then
14 transported the firearm from Arizona to the Republic of Mexico.

15 On or about June 26, 2020, CARLOS FERNANDO PALOMARES-LEON
16 purchased a Palmetto State Armory PA15 multi-caliber lower receiver and a Beretta 92X
17 9mm pistol from a federally licensed firearms dealer in the District of Arizona. VICTOR
18 CORONADO provided CARLOS FERNANDO PALOMARES-LEON with the directions
19 and funds to purchase the firearms. CARLOS FERNANDO PALOMARES-LEON
20 transferred the firearms to VICTOR CORONADO after he acquired them. VICTOR
21 CORONADO or another co-conspirator then transported the firearms from Arizona to the
22 Republic of Mexico.

23 On or about July 17, 2020, an individual purchased a Barrett 82A1 .50 caliber
24 rifle and a Beretta 92X 9mm pistol from a federally licensed firearms dealer in the District
25 of Arizona. CARLOS FERNANDO PALOMARES-LEON provided the individual with
26 the directions and funds to purchase the firearms. The individual transferred the firearms
27 to CARLOS FERNANDO PALOMARES-LEON after she acquired them. CARLOS
28 FERNANDO PALOMARES-LEON then provided the firearm to VICTOR CORONADO.

1 VICTOR CORONADO or another co-conspirator then transported the firearms from
2 Arizona to the Republic of Mexico.

3 On or about July 18, 2020, CARLOS FERNANDO PALOMARES-LEON
4 purchased a Beretta 92X 9mm pistol from a federally licensed firearms dealer in the
5 District of Arizona. VICTOR CORONADO provided CARLOS FERNANDO
6 PALOMARES-LEON with the directions and funds to purchase the firearm. CARLOS
7 FERNANDO PALOMARES-LEON transferred the firearm to VICTOR CORONADO
8 after he acquired it. VICTOR CORONADO or another co-conspirator then transported the
9 firearm from Arizona to the Republic of Mexico.

10 All of the aforementioned firearms qualify as United States Commerce Control
11 List items, and therefore are prohibited by law for export from the United States into
12 Mexico without a valid license. None of the aforementioned defendants or their co-
13 conspirators had a license or any other lawful authority to export the firearms from the
14 United States into Mexico.

15 All in violation of Title 18, United States Code, Section 371.

16 **COUNT 2**

17 Between on or about October 11, 2019, and March 24, 2022, in the District of
18 Arizona, Defendants VICTOR CORONADO and KYLE RENE FAZLOLLAH knowingly
19 and fraudulently exported and sent from the United States any merchandise, article, or
20 object contrary to any law or regulation of the United States, and received, concealed,
21 bought, sold, and in any manner facilitated the transportation, concealment, and sale of
22 such merchandise, article or object, that is: a Century Arms VSKA 7.62x39mm rifle;
23 knowing the same to be intended for exportation contrary to any law or regulation of the
24 United States, to wit: Title 50, United States Code, Section 4819; and Title 15, Code of
25 Federal Regulations, Parts 736.2, 738, and 774.

26 In violation of Title 18, United States Code, Section 554(a).
27
28

COUNT 3

Between on or about October 22, 2019, and June 26, 2020, in the District of Arizona, Defendants VICTOR CORONADO and KYLE RENE FAZLOLLAH knowingly and fraudulently exported and sent 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: a Romarm/Cugir RH10 7.62x39mm rifle; knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; and Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774.

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

COUNT 4

Between on or about May 14, 2020, and May 11, 2021, in the District of Arizona, Defendants VICTOR CORONADO and KYLE RENE FAZLOLLAH knowingly and fraudulently exported and sent 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: a Century Arms RAS47 7.62x39mm rifle; knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; and Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774.

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

COUNT 5

Between on or about October 11, 2019, and June 21, 2020, in the District of Arizona, Defendants VICTOR CORONADO and KYLE RENE FAZLOLLAH knowingly and fraudulently exported and sent 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

1 merchandise, article or object, that is: a Smith & Wesson M&P 15 5.56mm rifle; knowing
2 the same to be intended for exportation contrary to any law or regulation of the United
3 States, to wit: Title 50, United States Code, Section 4819; and Title 15, Code of Federal
4 Regulations, Parts 736.2, 738, and 774.

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

6 **COUNT 6**

7 Between on or about May 8, 2020, and September 22, 2020, in the District of
8 Arizona, Defendants VICTOR CORONADO and CARLOS FERNANDO PALOMARES-
9 LEON knowingly and fraudulently exported and sent from the United States any
10 merchandise, article, or object contrary to any law or regulation of the United States, and
11 received, concealed, bought, sold, and in any manner facilitated the transportation,
12 concealment, and sale of such merchandise, article or object, that is: a Barrett 82A1 .50
13 caliber rifle; knowing the same to be intended for exportation contrary to any law or
14 regulation of the United States, to wit: Title 50, United States Code, Section 4819; and
15 Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774.

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

17 **COUNT 7**

18 Between on or about May 28, 2020, and December 12, 2020, in the District of
19 Arizona, Defendants VICTOR CORONADO and CARLOS FERNANDO PALOMARES-
20 LEON knowingly and fraudulently exported and sent from the United States any
21 merchandise, article, or object contrary to any law or regulation of the United States, and
22 received, concealed, bought, sold, and in any manner facilitated the transportation,
23 concealment, and sale of such merchandise, article or object, that is: a Palmetto State
24 Armory PSAK47 7.62x39mm rifle; knowing the same to be intended for exportation
25 contrary to any law or regulation of the United States, to wit: Title 50, United States Code,
26 Section 4819; and Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774.

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

COUNT 8

Between on or about February 16, 2020, and September 22, 2020, in the District of Arizona, Defendants VICTOR CORONADO and FERNANDO PALOMARES, JR., knowingly and fraudulently exported and sent 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: a Century Arms M70AB2 7.62x39mm rifle; knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; and Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774.

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

COUNT 9

Between on or about October of 2019 and June of 2020, in the District of Arizona, Defendant KYLE RENE FAZLOLLAH, not being a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing firearms.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

COUNT 10

Between on or about December of 2019 and on or about May of 2020, in the District of Arizona, Defendant ELIZAR OLIVARES, not being a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing firearms.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

COUNTS 11 - 17

On or about the dates listed below, in the District of Arizona, Defendants FERNANDO PALOMARES, JR., and VICTOR CORONADO knowingly made false

statements and representations in connection with the acquisition of firearms to the businesses listed below, which were intended and likely to deceive the businesses as to a fact material to the lawfulness of the sale of firearms by the business, each of which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each listed business, in that Defendant FERNANDO PALOMARES, JR., stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he was knowingly acquiring the firearms on behalf of Defendant VICTOR CORONADO; and Defendant VICTOR CORONADO aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

| Count | Date | FFL | Firearms |
|-------|------------|--------------------------------|---|
| 11 | 10/17/2019 | The Hub | Radical Firearms RF15 multi caliber rifle Riley Defense RAK47 7.62x39mm rifle |
| 12 | 10/24/2019 | Diamondback Shooting Sports | DPMS A15 5.56mm rifle Riley Defense RAK47 7.62x39mm rifle |
| 13 | 11/27/2019 | SNG Tactical | Radom/Pioneer Arms Sporter 7.62x39mm rifle Romarm/Cugir WASR10UF 7.62x39mm rifle |
| 14 | 01/05/2020 | Big D's Hot Shots | 2 ATI GOMX556P4BBFG 5.56mm pistols |
| 15 | 01/24/2020 | SNG Tactical | Century Arms VSKA 7.62x39mm rifle Radom/Pioneer Arms Sporter 7.62x39mm rifle |
| 16 | 02/16/2020 | SNG Tactical | 2 Century Arms M70AB2 7.62x39mm rifles |
| 17 | 05/08/2020 | Second Amendment Sports | Century Arms VSKA 7.62x39mm rifle Glock 17 Gen5 9mm pistol |

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT 18

On or about the date listed below, in the District of Arizona, Defendants JULISSA LEONOR TORRES, VICTOR CORONADO, and FERNANDO PALOMARES, JR., knowingly made false statements and representations in connection with the acquisition of firearms to the business listed below, which were intended and likely to deceive the business as to a fact material to the lawfulness of the sale of firearms by the business, which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with

respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the business, in that Defendant JULISSA LEONOR TORRES stated that she was the actual transferee/buyer of the firearms, whereas in truth and fact, she was knowingly acquiring the firearms on behalf of Defendants VICTOR CORONADO and FERNANDO PALOMARES, JR.; and Defendants VICTOR CORONADO and FERNANDO PALOMARES, JR., aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

| Count | Date | FFL | Firearm |
|-------|------------|-------------------|------------------------------------|
| 18 | 01/05/2020 | Big D's Hot Shots | 2 ATI GOMX556P4BBFG 5.56mm pistols |

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNTS 19 - 26

On or about the dates listed below, in the District of Arizona, Defendants CARLOS FERNANDO PALOMARES-LEON and VICTOR CORONADO knowingly made false statements and representations in connection with the acquisition of firearms to the businesses listed below, which were intended and likely to deceive the businesses as to a fact material to the lawfulness of the sale of firearms by the business, each of which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each listed business, in that Defendant CARLOS FERNANDO PALOMARES-LEON stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he was knowingly acquiring the firearms on behalf of Defendant VICTOR CORONADO; and Defendant VICTOR CORONADO aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

| Count | Date | FFL | Firearms |
|-------|------------|--------------|--|
| 19 | 03/21/2020 | Liberty Pawn | Romarm/Cugir RH10 7.62x39mm rifle |
| 20 | 03/23/2020 | Jim's Guns | Century Arms C39V2 7.62x39mm rifle |
| 21 | 04/16/2020 | Jim's Guns | Barrett 82A1 .50 caliber rifle |
| 22 | 05/08/2020 | Jim's Guns | Barrett 82A1 .50 caliber rifle |
| 23 | 05/28/2020 | Jim's Guns | Palmetto State Armory PSAK47 7.62x39mm rifle |

| | | | |
|----|------------|------------|---|
| 24 | 06/16/2020 | Jim's Guns | Century Arms VSKA, 7.62x39mm rifle |
| 25 | 06/26/2020 | Jim's Guns | Palmetto State Armory PA15 multi-cal lower receiver Beretta 92X 9mm pistol |
| 26 | 07/18/2020 | Jim's Guns | Beretta 92X 9mm pistol |

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT 27

On or about the date listed below, in the District of Arizona, Defendants BRIANA MARIE MONTPETIT, VICTOR CORONADO, and FERNANDO PALOMARES, JR., knowingly made false statements and representations in connection with the acquisition of firearms to the business listed below, which were intended and likely to deceive the business as to a fact material to the lawfulness of the sale of firearms by the business, which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the business, in that Defendant BRIANA MARIE MONTPETIT stated that she was the actual transferee/buyer of the firearms, whereas in truth and fact, she was knowingly acquiring the firearms on behalf of Defendants VICTOR CORONADO and FERNANDO PALOMARES, JR.; and Defendants VICTOR CORONADO and FERNANDO PALOMARES, JR., aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

| Count | Date | FFL | Firearm |
|-------|-----------|------------|--|
| 27 | 7/17/2019 | Jim's Guns | Barrett 82A1 .50 caliber rifle Beretta 92X 9mm pistol |

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNTS 28 - 29

On or about the dates listed below, in the District of Arizona, Defendants KARLA ROMERO, VICTOR CORONADO, and CARLOS FERNANDO PALOMARES-LEON knowingly made false statements and representations in connection with the acquisition of firearms to the businesses listed below, which were intended and likely to deceive the businesses as to a fact material to the lawfulness of the sale of firearms by the business,

each of which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each listed business, in that Defendant KARLA ROMERO stated that she was the actual transferee/buyer of the firearms, whereas in truth and fact, she was knowingly acquiring the firearms on behalf of Defendants VICTOR CORONADO and CARLOS FERNANDO PALOMARES-LEON; and Defendants VICTOR CORONADO and CARLOS FERNANDO PALOMARES-LEON aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

| Count | Date | FFL | Firearms |
|-------|------------|------------|--|
| 28 | 04/10/2020 | Jim's Guns | Palmetto State Armory PSAK47 7.62x39mm rifle |
| 29 | 06/03/2020 | Jim's Guns | Barrett 82A1 .50 caliber rifle |

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNTS 30 - 31

On or about the dates listed below, in the District of Arizona, Defendants AVERY DANELLE GIPSON, VICTOR CORONADO, and CARLOS FERNANDO PALOMARES-LEON knowingly made false statements and representations in connection with the acquisition of a firearm to the business listed below, which were intended and likely to deceive the business as to a fact material to the lawfulness of the sale of firearms by the business, which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the business, in that Defendant AVERY DANELLE GIPSON stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he was knowingly acquiring the firearms on behalf of Defendants VICTOR CORONADO and CARLOS FERNANDO PALOMARES-LEON; and Defendants VICTOR CORONADO and CARLOS FERNANDO PALOMARES-LEON aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

| Count | Date | FFL | Firearm |
|-------|------------|------------|--|
| 30 | 04/01/2019 | Jim's Guns | Riley Defense RAK47 7.62x39mm rifle |
| 31 | 04/10/2019 | Jim's Guns | Palmetto State Armory PSAK47 7.62x39mm rifle |

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT 32

On or about the date listed below, in the District of Arizona, Defendants KEVIN ALLEN LAPEDUS, VICTOR CORONADO, and CARLOS FERNANDO PALOMARES-LEON knowingly made false statements and representations in connection with the acquisition of a firearm to the business listed below, which were intended and likely to deceive the business as to a fact material to the lawfulness of the sale of firearm by the business, which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the business, in that Defendant KEVIN ALLEN LAPEDUS stated that he was the actual transferee/buyer of the firearm, whereas in truth and fact, he was knowingly acquiring the firearm on behalf of Defendants VICTOR CORONADO and CARLOS FERNANDO PALOMARES-LEON; and Defendants VICTOR CORONADO and CARLOS FERNANDO PALOMARES-LEON aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

| Count | Date | FFL | Firearm |
|-------|------------|------------|--|
| 32 | 03/24/2020 | Jim's Guns | Palmetto State Armory PSAK47 7.62x39mm rifle |

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNTS 33 - 34

On or about the dates listed below, in the District of Arizona, Defendants RAY ALBERTO LABORIN and VICTOR CORONADO knowingly made false statements and representations in connection with the acquisition of firearms to the businesses listed below, which were intended and likely to deceive the business as to a fact material to the lawfulness of the sale of firearms by the businesses, which were licensed under the

provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the businesses, in that Defendant RAY ALBERTO LABORIN stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he was knowingly acquiring the firearms on behalf of Defendant VICTOR CORONADO; and Defendant VICTOR CORONADO aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

| Count | Date | FFL | Firearm |
|-------|------------|--------------|--------------------------------|
| 33 | 04/16/2020 | James 410 | Barrett 82A1 .50 caliber rifle |
| 34 | 04/18/2020 | SNG Tactical | Sig Sauer P320 9mm pistol |

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNTS 35 - 39

On or about the dates listed below, in the District of Arizona, Defendants ELIZAR OLIVARES and VICTOR CORONADO knowingly made false statements and representations in connection with the acquisition of firearms to the businesses listed below, which were intended and likely to deceive the business as to a fact material to the lawfulness of the sale of firearms by the businesses, which were licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the businesses, in that Defendant ELIZAR OLIVARES stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he was knowingly acquiring the firearms on behalf of Defendant VICTOR CORONADO; and Defendant VICTOR CORONADO aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

| Count | Date | FFL | Firearm |
|-------|------------|------------------|-------------------------------------|
| 35 | 12/28/2019 | City Wide Supply | Del Ton Inc DTI15 5.56mm rifle |
| 36 | 01/04/2020 | James 410 | Barrett 82A1 .50 caliber rifle |
| 37 | 02/15/2020 | The Hub | Riley Defense RAK47 7.62x39mm rifle |

| | | | |
|---|----|------------|-------------------------------------|
| 1 | | | FA Cugir M&M Inc M10-762 |
| 2 | | | 7.62x39mm rifle |
| 3 | 38 | 02/15/2020 | SNG Tactical |
| 4 | 39 | 05/06/2020 | Second Amendment Sports |
| 5 | | | Century Arms M70AB2 7.62x39mm rifle |
| 6 | | | Century Arms VSKA 7.62x39mm rifle |

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNTS 40 - 48

On or about the dates listed below, in the District of Arizona, Defendants KYLE RENE FAZLOLLAH and VICTOR CORONADO knowingly made false statements and representations in connection with the acquisition of firearms to the businesses listed below, which were intended and likely to deceive the business as to a fact material to the lawfulness of the sale of firearms by the businesses, which were licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the businesses, in that Defendant KYLE RENE FAZLOLLAH stated that he was the actual transferee/buyer of the firearms, whereas in truth and fact, he was knowingly acquiring the firearms on behalf of Defendant VICTOR CORONADO; and Defendant VICTOR CORONADO aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

| Count | Date | FFL | Firearm |
|-------|------------|-----------------------------|---|
| 40 | 10/09/2019 | USA Pawn & Jewelry | Anderson Manufacturing AM15 5.56mm rifle |
| 41 | 10/10/2019 | Diamondback Shooting Sports | Century Arms VSKA 7.62x39mm rifle |
| 42 | 10/11/2019 | Liberty Pawn | Romarm/Cugir RH10 7.62x39mm rifle |
| 43 | 10/22/2019 | The Hub | Century Arms VSKA 7.62x39mm rifle |
| 44 | 10/28/2019 | USA Pawn & Jewelry | Romarm/Cugir RH10 7.62x39mm rifle |
| 45 | 01/24/2020 | SNG Tactical | Smith & Wesson M&P 15 5.56mm rifle |
| 46 | 05/06/2020 | The Hub | Del Ton DTI15 5.56mm rifle |
| 47 | 05/14/2020 | Second Amendment Sports | 2 Radom/Pioneer Arms Sporter 7.62x39mm rifles |
| | | | Romarm/Pioneer Arms WASR10 7.62x39mm rifle |
| | | | Century Arms RAS47 7.62x39mm rifle |

| | | | |
|----|------------|--------------|---|
| 48 | 06/04/2020 | SNG Tactical | FA Cugir M&M Inc M10-762 7.62x39mm rifle |
|----|------------|--------------|---|

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT 49

On or about the date listed below, in the District of Arizona, Defendants TY-JHAI DAMON GRIGSBY, VICTOR CORONADO, and KYLE RENE FAZLOLLAH knowingly made false statements and representations in connection with the acquisition of a firearm to the business listed below, which were intended and likely to deceive the business as to a fact material to the lawfulness of the sale of firearm by the business, which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the business, in that Defendant TY-JHAI DAMON GRIGSBY stated that he was the actual transferee/buyer of the firearm, whereas in truth and fact, he was knowingly acquiring the firearm on behalf of Defendants VICTOR CORONADO and KYLE RENE FAZLOLLAH; and Defendants VICTOR CORONADO and KYLE RENE FAZLOLLAH aided, abetted, counseled, commanded, induced, and procured such false and fictitious statements:

| Count | Date | FFL | Firearms |
|-------|------------|--------------|------------------------------------|
| 49 | 10/11/2019 | Liberty Pawn | Smith & Wesson M&P 15 5.56mm rifle |

In violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

FORFEITURE ALLEGATION

Upon conviction of Counts One through Forty-Nine of the Indictment, the defendants, VICTOR CORONADO, FERNANDO PALOMARES, JR., JULISSA LEONOR TORRES, CARLOS FERNANDO PALOMARES-LEON, BRIANA MARIE MONTPETIT, KARLA ROMERO, AVERY DANIELLE GIPSON, KEVIN ALLEN LAPEDUS, RAY ALBERTO LABORIN, ELIZAR OLIVARES, KYLE RENE FAZLOLLAH, and TY-JHAI DAMON GRIGSBY, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code,

Section 2461(c), any firearms involved in the commission of the offense, including, but not limited to:

| Line # | Asset Description | Serial Number |
|--------|---|---------------|
| 1 | Radical Firearms RF15 multi caliber rifle | 19-106183 |
| 2 | Riley Defense RAK47C 7.62x39mm rifle | B08228 |
| 3 | DPMS A15 5.56mm rifle | FFH106847 |
| 4 | Riley Defense RAK47C 7.62x39mm rifle | B08166 |
| 5 | Radom/Pioneer Arms Sporter 7.62x39mm rifle | PAC1126549 |
| 6 | Romarm/Cugir WASR10UF 7.62x39mm rifle | UF-3915-19 |
| 7 | 2 ATI GOMX556P4BBFG 5.56mm pistols | NS232176 |
| 8 | | NS232181 |
| 9 | Century Arms VSKA 7.62x39mm rifle | SV7009031 |
| 10 | Radom/Pioneer Arms Sporter 7.62x39mm rifle | PAC1129624 |
| 11 | 2 Century Arms M70AB2 7.62x39mm rifles | AB2-C108276 |
| 12 | | AB2-C108660 |
| 13 | Century Arms VSKA 7.62x39mm rifle | SV7020688 |
| 14 | Glock 17 Gen5 9mm pistol | ADFU326 |
| 15 | 2 ATI GOMX556P4BBFG 5.56mm pistols | NS232685 |
| 16 | | NS232937 |
| 17 | Romarm/Cugir RH10 7.62x39mm rifle | MA-30356-19 |
| 18 | Century Arms C39V2 7.62x39mm rifle | C39V2A47368 |
| 19 | Barrett 82A1 .50 caliber rifle | AA009853 |
| 20 | Barrett 82A1 .50 caliber rifle | AA009626 |
| 21 | Palmetto State Armory PSAK47 7.62x39mm rifle | AKB022310 |
| 22 | Century Arms VSKA 7.62x39mm rifle | SV7008715 |
| 23 | Palmetto State Armory PA15 multi-caliber lower receiver | SCD072688 |

| | | |
|----|---|--------------------------|
| 21 | Beretta 92X 9mm pistol | 92X0020937 |
| 22 | Beretta 92X 9mm pistol | 92X0020158 |
| 23 | Barrett 82A1 .50 caliber rifle | AA010211 |
| 24 | Beretta 92X 9mm pistol | 92X0026457 |
| 25 | Palmetto State Armory PSAK47 7.62x39mm rifle | AK009870 |
| 26 | Barrett 82A1 .50 caliber rifle | AA010156 |
| 27 | Riley Defense RAK47C 7.62x39mm rifle | B13450 |
| 28 | Palmetto State Armory PSAK47 7.62x39mm rifle | AKB023065 |
| 29 | Palmetto State Armory PSAK47 7.62x39mm rifle | AK007387 |
| 30 | Barrett 82A1 .50 caliber rifle | AA009888 |
| 31 | Sig Sauer P320 9mm pistol | 58C097788 |
| 32 | Del Ton Inc DT115 5.56mm rifle | DTI-S207611 |
| 33 | Barrett 82A1 .50 caliber rifle | AA005254 |
| 34 | Riley Defense RAK47C 7.62x39mm rifle | B08418 |
| 35 | FA Cugir M&M Inc M10-762 7.62x39mm rifle | MA-28870-19RO |
| 36 | Century Arms M70AB2 7.62x39mm rifle | AB2-C108602 |
| 37 | Century Arms VSKA 7.62x39mm rifle | SV7019626 |
| 38 | Anderson Manufacturing AM15 5.56mm rifle | 15221478 |
| 39 | Century Arms VSKA 7.62x39mm rifle | SV7008878 |
| 40 | Romarm/Cugir RH10 7.62x39mm rifle | MA-29701-19 |
| 41 | Century Arms VSKA 7.62x39mm rifle | SV7007950 |
| 42 | Romarm/Cugir RH10 7.62x39mm rifle | MA-28375-19 |
| 43 | Smith & Wesson M&P 15 5.56mm rifle | SV17153 |
| 44 | Del Ton Inc DT115 5.56mm rifle | DTI-S145892 |
| 45 | 2 Radom/Pioneer Arms Sporter 7.62x39mm rifles | PAC1129350 PAC1129533 |
| 46 | Romarm/Pioneer Arms WASR10 7.62x39mm rifle | A1-75869-20 |

| | | |
|----|--|---------------|
| 47 | Century Arms RAS47 7.62x39mm rifle | RAS47P004184 |
| 48 | FA Cugir M&M Inc M10-762 7.62x39mm rifle | MA-29314-19RO |
| 49 | Smith & Wesson M&P 15 5.56mm rifle | TJ60087 |

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 924(d), Title 28, United States Code, Section 2461(c) and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

/s/

FOREPERSON OF THE GRAND JURY
Dated: September 21, 2022

GARY M. RESTAINO
United States Attorney
District of Arizona

REDACTED FOR
PUBLIC DISCLOSURE

/s/

ANGELA W. WOOLRIDGE
Assistant U.S. Attorney