

September 06, 2023

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

UNITED STATES OF AMERICA

v.

MARIO REYES

JORGE LUIS VELASQUEZ

JULIO CESAR RODRIGUEZ-AZUA

CARLOS MIGUEL PEREZ-GONZALEZ

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Criminal No. M-23-1248

SEALED INDICTMENT

THE GRAND JURY CHARGES:

Count One

From on or about July 11, 2023 and continuing through on or about August 18, 2023 in the Southern District of Texas, Defendants

MARIO REYES

did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the grand jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956(a)(2)(A), to wit: to transport, transmit, transfer, or attempts to transport, transmit, or transfer a monetary instrument or funds from a place outside the United States to or through a place inside the United States with the intent to promote the carrying on of specified unlawful activity, namely, the smuggling of goods contrary to Title 18, United States Code, Section 554.

In violation of Title 18, United States Code, Section 1956(h).

Count Two

From on or about September 21, 2021 through at least August 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: a Glock, Model 27, .40 caliber handgun; a Beretta, Model 92, 9mm handgun; a Beretta, Model 92X, 9mm handgun, an Aero Precision, .223 caliber rifle, approximately 15,700 rounds of .50 caliber ammunition, 13,860 rounds of 7.62 caliber ammunition, 4,000 rounds of 5.56 caliber ammunition; 3,000 rounds of .38 super caliber ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

Count Three

From on or about February 7, 2023 through at least August 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 11,480 rounds of .50 caliber ammunition, 11,220 rounds of 7.62x39mm caliber ammunition, 4,000 rounds of 5.56mm caliber ammunition; and 3,000 rounds of .38 super caliber ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States

Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

Count Four

On or about August 8, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JORGE LUIS VELASQUEZ

did fraudulently and knowingly export and send from the United States or attempt to export and send from the United States to the United Mexican States, any merchandise, article, or object, to wit: approximately 1,500 rounds of .50 caliber ammunition, contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

Count Five

From on or about July 11, 2023 through at least August 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

MARIO REYES

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 6,200 rounds of .50 caliber ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

Count Six

From on or about September 8, 2021 through at least August 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JULIO CESAR RODRIGUEZ-AZUA

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 440,000 rounds of 7.62x39 caliber ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

Count Seven

From on or about September 8, 2021 through at least August 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

CARLOS MIGUEL PEREZ-GONZALEZ

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 200,000 rounds of 7.62x39 caliber ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

Count Eight

On or about August 17, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

CARLOS MIGUEL PEREZ-GONZALEZ

knowingly being an alien who was illegally and unlawfully in the United States, did knowingly possess in and affecting interstate and foreign commerce, a firearm, namely, one Glock, Model 21, .45 caliber handgun.

In violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(8).

NOTICE OF FORFEITURE
19 U.S.C. § 1595a(d) and 28 U.S.C. § 2461

Pursuant to 19 U.S.C. § 1595a(d), 18 U.S.C. 924(d)(1), and 28 U.S.C. § 2461 the United States gives notice to defendants,

MARIO REYES

JORGE LUIS VELASQUEZ
JULIO CESAR RODRIGUEZ-AZUA
and
CARLOS MIGUEL PEREZ-GONZALEZ

that upon conviction of a violation of Title 18 U.S.C. §554, as charged in this Indictment, all merchandise exported or sent from the United States or attempted to be exported or sent from the United States contrary to law, or the proceeds or value thereof, and property used to facilitate the exporting or sending of such merchandise, the attempted exporting or sending of such merchandise, or the receipt, purchase, transportation, concealment, or sale of such merchandise prior to exportation shall be forfeited to the United States and includes, but is not limited to the following:

approximately 1,500 rounds of .50 caliber ammunition seized on August 8, 2023;
approximately 10,000 rounds of 7.62 x 39 caliber ammunition seized on August 17, 2023;
approximately 34 rounds of .45 caliber ammunition seized on August 17, 2023;
approximately 1,800 rounds of .50 caliber ammunition seized on August 18, 2023;
approximately 15,021 rounds of 7.62 x 39 caliber ammunition seized on August 18, 2023;
approximately 5,000 rounds of 7.62 x 39 caliber ammunition seized on August 30, 2023 and
approximately 150 rounds of .50 caliber ammunition seized on August 30, 2023

and that upon conviction of a violation of Title 18 U.S.C. § 922(g)(5)(A), all firearms and ammunition involved in said violation are subject to forfeiture, including, but not limited to, the following:

a Glock, Model 21, .45 caliber handgun

A TRUE BILL

FOREPERSON

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY