

AO 91 (Rev. 11/11) Criminal Complaint

FELONY

United States Courts Southern

UNITED STATES DISTRICT COURT

District of Texas

FILED

for the

March 18, 2023

Southern District of Texas

Nathan Ochsner, Clerk of Court

United States of America
v.
Roberto Lugardo MORENO

Case No. B-23-MJ-245-1

Defendant(s)

CRIMINAL COMPLAINT

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

On or about the date(s) of March 17, 2023 in the county of Cameron in the Southern District of Texas, the defendant(s) violated:

Code Section
18
Title 18 USC § 554
Title 18 USC § 371
18

Offense Description

Knowingly conspired to export or send from the United States, or attempt to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for the exportation contrary to any law or regulation of the United States, to wit: a Diamondback Arms, Inc. DB-15 multi-caliber AR style pistol, serial number: DBIS94494

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

ANDRES CONTRERAS JR

Digitally signed by ANDRES CONTRERAS JR Date: 2023.03.18 10:49:40 -05'00'

Complainant's signature

Andres Contreras, HSI Special Agent

Printed name and title

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed. R. Crim. P. 4.1, on

Date: 03/18/2023

Ronald G. Morgan signature

Judge's signature

City and state: Brownsville, Texas

Ronald G. Morgan, U.S. Magistrate Judge

Printed name and title

Attachment A

B-23-MJ-245-1

On March 17, 2023, Homeland Security Investigations (HSI) and the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Special Agents (SAs) conducted a post-Miranda interview of Roberto Lugardo MORENO. On this date, MORENO admitted to purchasing a Diamondback Arms, Inc. DB-15 multi-caliber AR style pistol, serial number: DBIS94494 on October 17, 2019. MORENO admitted to purchasing this and other firearms for individuals that he knew were going to provide them to a Gulf Cartel figure in Mexico. MORENO further admitted that he knew it was illegal to do so.

On March 14, 2023, HSI Harlingen received information that the aforementioned Diamondback Arms, Inc. DB-15 multi-caliber AR style pistol, serial number: DBIS94494 had been recovered by Mexican authorities and linked to an incident involving the murders and kidnappings of US citizens which occurred on March 3, 2023 in Matamoros, Tamaulipas, Mexico.

MORENO also stated that he did not apply for a license to export any firearm from the United States and that he knowingly purchased the AR style pistol knowing that it would be exported to Mexico without the proper license to export to Mexico contrary to law. MORENO stated that he received one payment of one hundred dollars (\$100) during the period that he purchased firearms for individuals that he knew were going to provide them to a Gulf Cartel figure in Mexico.

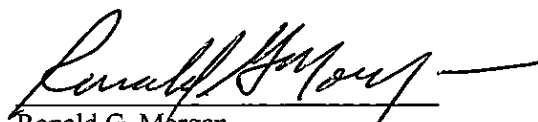
ANDRES  
CONTRERAS JR

Digitally signed by ANDRES  
CONTRERAS JR  
Date: 2023.03.18 10:59:23  
-05'00'

Andy Contreras, Special Agent  
Homeland Security Investigations

18

Sworn to before me and signed on March ~~XX~~ 2023 in Brownsville, Texas.

  
Ronald G. Morgan  
United States Magistrate Judge