

FILED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

OCT 05 2022

for the
WESTERN District of TEXAS

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY DEPUTY CLERK

United States of America
v.
Chandler Britain Bradford

Case No. SA-22-MJ-

1505

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 October 4, 2022 in the county of Comal in the
Western District of Texas, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: 18 U.S.C. §§ 922(a)(1)(A), and 554 & 2; Unlicensed Manufacturing of Firearms, and Smuggling of Goods/Aiding & Abetting. Includes penalties: Not More Than 5 Years Imprisonment, \$250,000 Fine, 3 Years Supervised Release, and \$100 Mandatory Special Assessment; Not More Than 10 Years Imprisonment, \$250,000 Fine, 3 Years Supervised Release, and \$100 Mandatory Special Assessment.

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

ERIC WATKINS Digitally signed by ERIC WATKINS
Date: 2022.10.05 10:58:03 -05'00'

Complainant's signature

Eric Watkins, ATF Special Agent

Printed name and title

- Sworn to before me and signed in my presence.
Sworn to telephonically and signed electronically.

Date: 10/5/2022

Handwritten signature of Henry J. Bemporad

Judge's signature

City and state: San Antonio, Texas

Henry J. Bemporad, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Eric Watkins, duly sworn do hereby depose and state:

1. Your affiant is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since October 2018. Additionally, between April 2014 and October 2018 your affiant was a sworn ATF Task Force Officer, and therefore, since April 2014, your affiant has participated in investigations concerning violations of Titles 18, 21, and 26.
2. The United States, including the ATF, has been investigating Chandler Britain BRADFORD, Center Fire Trading, LLC dba Centerkote (hereafter referred to as CFT), and other co-conspirators for offenses including illegally exporting goods from the U.S. and manufacturing firearms without a federal license. Your affiant has found evidence of BRADFORD's receipt of multiple wires from Mexican-based businesses that correspond to BRADFORD's purchases of an immense quantity of AR-15 parts.
3. From January 31, 2018, through April 24, 2020, CFT maintained a federal firearms license allowing the lawful manufacturing/transfer of firearms.
4. For unknown reasons, CFT voluntarily surrendered their federal firearms license and submitted their firearm transfer records to ATF's Out of Business Records Center on April 24, 2020. SA Watkins found BRADFORD and another individual documented as CFT's managers in the Federal Licensing System.
5. Your affiant observed, through information obtained via search warrant, that BRADFORD purchased an immense quantity of AR-15 parts and accessories, and Glock parts, from approximately April 24, 2020, through the end of July 2022. Your affiant knows from reviewing invoices of firearm parts purchased by BRADFORD that he spent more than \$1 million on firearm parts.
6. On September 26, 2022, BRADFORD traveled to Laredo, Texas, and arrived at a storage facility. ATF Agents from Laredo observed BRADFORD unloading multiple boxes described as large and heavy into a storage unit from the bed of his Ford F-150. Agents observed BRADFORD close the door to the unit and travel to a Taco Palenque, where he ate alone and utilized his cellphone. ATF Agents in Laredo continued to maintain surveillance on the unit after BRADFORD left. BRADFORD traveled away from Taco Palenque towards San Antonio after finishing lunch.
7. Following BRADFORD's activities in Laredo, your affiant obtained a search warrant for the storage unit from a federal magistrate judge in Laredo. Agents executed the search warrant without issue on September 26, 2022, which resulted in the seizure of 100 AR-15 upper receivers with 7.5" barrels, bolt carrier groups, and charging handles.

8. On September 30, 2022, agents observed via historical video that BRADFORD loaded approximately seven boxes (with two boxes already in the bed) into his Ford F-150 from a hot rod shop in New Braunfels where BRADFORD previously ordered firearm parts to be shipped. Agents observed via court-authorized vehicle tracking that BRADFORD traveled to the area of a storage facility in Laredo, before going to a Taco Palenque. Following Taco Palenque, BRADFORD traveled back to the hot rod shop in New Braunfels but did not unload any boxes.
9. On October 4, 2022, agents observed BRADFORD traveling to Laredo in his truck. Agents from ATF Laredo observed BRADFORD travel to a storage facility in Laredo, where BRADFORD transferred multiple boxes from his F-150 to the interior of a storage unit. BRADFORD traveled away from the facility and went to a Taco Palenque, following the same pattern of behavior as September 30, 2022.
10. While agents were obtaining the tenant's information and video of BRADFORD's activities, an individual approached the storage unit, opened it, and began unpacking, then repacking the contents of the boxes delivered by BRADFORD. Agents approached the individual, identified themselves, and gained his cooperation. The individual admitted he was the tenant and the boxes contained firearms. Agents obtained verbal consent to search the boxes, which revealed completed AR-15 upper receivers, and various AR-15 parts. The tenant admitted his job is to package the firearm parts, then notify other individuals who smuggle the firearm parts to Monterrey, Mexico.
11. The tenant stated that a "guero or gringo" delivers the packages to the storage unit, and the "guero or gringo" only communicates with the boss in Monterrey, Mexico.
12. After leaving Laredo, agents observed via court-authorized vehicle tracking that BRADFORD traveled to his residence on Landa Street in New Braunfels, where ATF agents detained and arrested BRADFORD. Upon search incident to arrest, BRADFORD was found to possess the keys to his Ford F-150, his residence, and a key ring with over 20 keys consistent with storage unit locks.
13. Following BRADFORD's arrest, your affiant applied for, and received, premises search warrants for BRADFORD's residence and the hot rod shop in New Braunfels associated with BRADFORD. During execution of the warrant at the hot rod shop, agents seized hundreds of AR-15 parts, numerous pieces of firearm manufacturing equipment (drill press, AR-15 armorer's tools, drill bits, armorer's cleaning mats with firearm diagrams, router, jigs, etc.), multiple privately manufactured AR-15 and Glock-variant firearms, and incomplete 80% lower receivers for AR-15s and Glock-variant firearms.
14. Based on the above facts, your affiant believes there is probable cause that BRADFORD has violated 18 U.S.C. §§ 922(a)(1)(A) (Unlicensed Manufacturing of Firearms), and 554 & 2 (Smuggling of Goods and Aiding & Abetting).

ERIC WATKINS Digitally signed by ERIC WATKINS
Date: 2022.10.05 10:57:31 -05'00'

Special Agent Eric Watkins
Bureau of Alcohol, Tobacco, Firearms and
Explosives

SUBSCRIBED AND SWORN TO ME THIS 5th DAY OF OCTOBER, 2022



HONORABLE HENRY J. BEMPORAD
UNITED STATES MAGISTRATE JUDGE