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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

CR10-1494 TUC Jme/GEE

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF ARIZONA

9 United States of America,
10 Plaintiff,
11 v.
12 Charice Chauntel Gaede,
Emmanuel Bermudez Vasquez,
13 Elias Bermudez Vasquez,
14 Defendants.

) INDICTMENT
) Violations:
) 18 USC §554(a)
) 26 USC §5861(d)
) 26 USC §5871
) (Attempted Unlawful Export;
) Possession of an Unregistered
) Firearm)

15 THE GRAND JURY CHARGES:

16 COUNT 1


17 From on or about April 30, 2010, to June 3, 2010, at or near Tucson, in the
18 District of Arizona, CHARICE CHAUNTEL GAEDE, EMMANUEL BERMUDEZ
19 VASQUEZ, and ELIAS BERMUDEZ VASQUEZ, knowingly attempted to export and send
20 from the United States any merchandise, article, or object contrary to any law or regulation
21 of the United States, and received, concealed, bought, sold, and in any manner facilitated
22 the transportation, concealment, and sale of such merchandise, article or object, prior to
23 exportation, knowing the same to be intended for exportation contrary to any law or
24 regulation of the United States: to wit; CHARICE CHAUNTEL GAEDE, EMMANUEL
25 BERMUDEZ VASQUEZ, and ELIAS BERMUDEZ VASQUEZ bought, concealed, and
26 facilitated the transportation of 1,500 rounds Russian (Tula) .30 Carbine ammunition, 4,000

1 rounds Wolf 7.62x39mm ammunition, 2,000 rounds Wolf .45 ACP ammunition, and 2,000
2 rounds Wolf .223 caliber ammunition, knowing said ammunition to be intended for
3 exportation, and attempted to export said ammunition; in violation of Title 18, United States
4 Code, Section 554(a).

5 **COUNT 2**

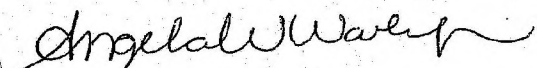
6 On or about June 3, 2010, at or near Tucson, in the District of Arizona,
7 CHARICE CHAUNTEL GAEDE and EMMANUEL BERMUDEZ VASQUEZ possessed
8 a firearm, that is; a Savage 12 gauge shotgun, no serial number, having a barrel less than
9 18 inches, that is, approximately 12.5 inches; not registered to CHARICE CHAUNTEL
10 GAEDE or EMMANUEL BERMUDEZ VASQUEZ in the National Firearms Registration
11 and Transfer Record, in violation of Title 26, United States Code, Sections 5861(d) and
12 5871.

13 A TRUE BILL

14 
15 Presiding Juror

16 DENNIS K. BURKE
17 United States Attorney
18 District of Arizona

JUN 23 2010

18 
19 Assistant U.S. Attorney

REDACTED FOR
PUBLIC DISCLOSURE