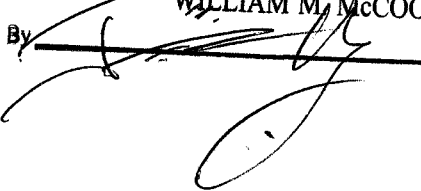


1 Presented to the Court by the foreman of the  
2 Grand Jury in open Court, in the presence of  
3 the Grand Jury and FILED in the U.S.  
4 DISTRICT COURT at Seattle, Washington.

5 NOVEMBER 21 2013

6 WILLIAM M. McCOOL, Clerk

7 By  Deputy

8 UNITED STATES DISTRICT COURT FOR THE  
9 WESTERN DISTRICT OF WASHINGTON  
10 AT SEATTLE

11 UNITED STATES OF AMERICA,

12 **CR 13**

13 **373 MJP**

14 Plaintiff,

15 ) INDICTMENT

16 v.

17 JAMES CONTRERAS,

18 Defendant.

19 The Grand Jury charges:

20 INTRODUCTION

21 At all times relevant to this indictment:

22 1. Defendant JAMES CONTRERAS (hereafter "CONTRERAS") was employed as a Special  
23 Agent by the Bureau of Alcohol, Tobacco, Firearms and Explosives (hereafter "ATF"), an agency of the  
24 executive branch of the government of the United States.

25 2. CONTRERAS held the positions of Group Supervisor and Sub-Cashier of the Agent Cashier  
26 Fund. The Agent Cashier fund is a cash fund maintained at each ATF Division Office that is used for  
27 investigative expenses such as purchasing evidence or making subsistence payments to confidential  
28 informants working with the ATF.

3. In his position as Group Supervisor / Sub-Cashier, CONTRERAS was responsible for  
reviewing and approving requests by Special Agents under his supervision to use money from the Agent

1 Cashier fund for authorized purposes; disbursing the requested funds to the requesting Special Agent;  
2 reviewing and signing the required forms pertaining to the use of money from the Agent Cashier fund;  
3 submitting the required forms for review and approval to the Agent Cashier; accounting for the money  
4 in the Agent Cashier fund for which he was responsible; and preparing monthly reports certifying the  
5 proper use of the funds and requesting replenishment of the expended funds from ATF Headquarters.

6 4. When a Special Agent under CONTRERAS's supervision wanted to request money  
7 from the Agent Cashier fund, he or she was required to fill out an ATF 3251.3 form entitled "Request  
8 for Advance of Funds for Investigative Purposes" (hereafter the "Request for Advance of Funds"). The  
9 Special Agent was required to sign the form at three different stages: when he or she requested the  
10 funds; when he or she received the money from CONTRERAS; and when returning any excess money  
11 or stating that all the money received was expended. In his position as Group Supervisor / Sub-Cashier,  
12 CONTRERAS was required to review the Request for Advance of Funds and sign the document at three  
13 different stages: when he approved the use of the funds for the stated purpose; when he gave the money  
14 to the requesting Special Agent; and when the requesting agent returned any excess money or stated that  
15 all the money received was expended.

16 5. When the Special Agent transferred the money from the Agent Cashier fund, he or  
17 she was required to fill out an ATF 3251.1 form entitled "Payment Receipt for Investigative Purposes  
18 and/or Information" (hereafter "Payment Receipt"), obtain the signature of the person receiving the  
19 money, enter his or her name and title, and enter the name and title of the person who witnessed the  
20 payment.

21 6. Once the money from the Agent Cashier fund was spent or transferred, the Special Agent  
22 was required to fill out and sign an ATF 3251.2A form entitled "Report of Expenditures for  
23 Investigative Purposes" (hereafter "Report of Expenditure"). The Special Agent was required to provide  
24 a detailed explanation of how the money was used and identify the investigation for which the money  
25 was used. CONTRERAS was required to sign the Request of Expenditures signifying review and  
26 approval of the explanation and use of the money from the Agent Cashier fund.

27 7. For each expenditure of money from the Agent Cashier fund, CONTRERAS was required to  
28

1 submit the Request for Advance of Funds, Payment Receipt (if money transferred by agent), and Report  
2 of Expenditures to the ATF Division Office for review and approval. In connection with each  
3 expenditure, CONTRERAS was also required to assign a Sub-Voucher number and make an entry for  
4 the expenditure in the Sub-Voucher Log.

5 8. Once a month, CONTRERAS signed an ATF Form 1129 entitled "Cashier Reimbursement  
6 Voucher and/Accountability Report," (hereafter "Cashier Reimbursement Voucher"), to which he  
7 attached the Sub-Voucher Log showing each expenditure from the Agent Cashier fund for the month. In  
8 signing the Cashier Reimbursement Voucher, CONTRERAS certified that each disbursement claimed  
9 was "correct and proper." CONTRERAS submitted the Sub-Voucher Log and Cashier Reimbursement  
10 Voucher to the Division Office for review and approval. The ATF Division Office in Seattle used the  
11 information on the Sub-Voucher Log and Cashier Reimbursement Voucher to request that ATF  
12 Headquarters replenish the money in the Division's Agent Cashier fund. In response to the request for  
13 replenishment and relying on the information provided by the Seattle Division Office, ATF  
14 Headquarters transferred ATF funds to the Seattle Division's Agent Cashier fund.

15 COUNT ONE: (18 U.S.C. § 1001(a)(3) – False Statements)

16 9. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
17 reference as if set forth in full herein.

18 10. Beginning on or about March 12, 2010, and continuing through on or about March 31, 2010,  
19 in the Western District of Washington, the defendant,

20 JAMES CONTRERAS,

21 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
22 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
23 executive branch of the government of the United States, that is, in connection with ATF investigation  
24 number 787045-10-0009:

25 a. CONTRERAS wrote what purported to be the signature of Special Agent WP on a  
26 Request for Advance of Funds form dated March 12, 2010, requesting funds from the Agent Cashier  
27 fund in order to make a \$300 subsistence payment to ATF confidential informant 290, and submitted the  
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1 form for supervisory approval knowing that the document contained the falsified signature of Special  
2 Agent WP.

3 b. CONTRERAS signed a Payment Receipt falsely showing that on March 12, 2010,  
4 Special Agent WP paid \$300 to ATF confidential informant CD, also known as informant 290, and  
5 CONTRERAS submitted the form for supervisory approval knowing that Special Agent WP did not  
6 make the purported payment to confidential informant CD.

7 c. CONTRERAS wrote what purported to be the signature of Special Agent WP on a  
8 Report of Expenditure form dated March 12, 2010, reporting that \$300 was paid to ATF confidential  
9 informant 290 and submitted the form for supervisory approval knowing that the document contained  
10 the falsified signature of Special Agent WP and Special Agent WP did not make the purported payment  
11 to informant 290.

12 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
13 Voucher dated March 31, 2010, accompanied by the Sub-Voucher Log listing the March 12, 2010  
14 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
15 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported March 12,  
16 2010 subsistence payment to informant 290 was not made as represented on the required ATF forms and  
17 the forms contained falsified signatures.

18 All in violation of Title 18, United States Code, Section 1001(a)(3).

19 COUNT TWO: (18 U.S.C. § 1001(a)(3) – False Statements)

20 11. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
21 reference as if set forth in full herein.

22 12. Beginning on or about August 28, 2010, and continuing through on or about August 31,  
23 2010, in the Western District of Washington, the defendant,

24 JAMES CONTRERAS,

25 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
26 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
27 executive branch of the government of the United States, that is, in connection with ATF investigation  
28

1 number 787046-10-0010:

2 a. CONTRERAS wrote what purported to be the signature of Special Agent DC on a  
3 Request for Advance of Funds form dated August 28, 2010, requesting funds from the Agent Cashier  
4 fund in order to make a \$600 subsistence payment to ATF confidential informant 289, and submitted the  
5 form for supervisory approval knowing that the document contained the falsified signature of Special  
6 Agent DC.

7 b. CONTRERAS signed a Payment Receipt falsely showing that on June 27, 2010,  
8 Special Agent DC signed the form and paid \$600 to ATF confidential informant JW, also known as  
9 informant 289, and CONTRERAS submitted the form for supervisory approval knowing that Special  
10 Agent DC did not sign the form and did not make the purported payment to confidential informant JW.

11 c. CONTRERAS wrote what purported to be the signature of Special Agent DC on a  
12 Report of Expenditure form dated August 28, 2010 reporting that \$600 was paid to ATF confidential  
13 informant 289 and submitted the form for supervisory approval knowing that the document contained  
14 the falsified signature of Special Agent DC and Special Agent DC did not make the purported payment  
15 to informant 289.

16 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
17 Voucher dated August 3, 2010 (for the period August 1, 2010 through August 31, 2010), accompanied  
18 by the Sub-Voucher Log listing the August 28, 2010 expenditure from the Agent Cashier fund described  
19 above, and falsely certified that the disbursement from the Agent Cashier fund was correct and proper  
20 when, in fact, he knew that the purported August 28, 2010 subsistence payment to informant 289 was  
21 not made as represented on the required ATF forms and the forms contained falsified signatures.

22 All in violation of Title 18, United States Code, Section 1001(a)(3).

23 COUNT THREE: (18 U.S.C. § 1001(a)(3) – False Statements)

24 13. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
25 reference as if set forth in full herein.

26 14. Beginning on or about November 9, 2010, and continuing through on or about November 29,  
27 2010, in the Western District of Washington, the defendant,

1 JAMES CONTRERAS,

2 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
3 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
4 executive branch of the government of the United States, that is, in connection with ATF investigation  
5 number 787046-10-0010:

6 a. CONTRERAS wrote what purported to be the signature of Special Agent MS on a  
7 Request for Advance of Funds form dated November 9, 2010, requesting funds from the Agent Cashier  
8 fund in order to make a \$500 subsistence payment to ATF confidential informant 289, and submitted the  
9 form for supervisory approval knowing that the document contained the falsified signature of Special  
10 Agent MS.

11 b. CONTRERAS signed a Payment Receipt falsely showing that on November 9, 2010,  
12 Special Agent MS signed the form and paid \$500 to ATF confidential informant JW, also known as  
13 informant 289, and CONTRERAS submitted the form for supervisory approval knowing that Special  
14 Agent MS did not sign the form and did not make the purported payment to confidential informant JW.

15 c. CONTRERAS wrote what purported to be the signature of Special Agent MS on a  
16 Report of Expenditure form dated November 10, 2010, reporting that \$500 was paid to ATF confidential  
17 informant 289 and submitted the form for supervisory approval knowing that the document contained  
18 the falsified signature of Special Agent MS and Special Agent MS did not make the purported payment  
19 to informant 289.

20 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
21 Voucher dated November 29, 2010, accompanied by the Sub-Voucher Log listing the November 9, 2010  
22 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
23 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported  
24 November 9, 2010 subsistence payment to informant 289 was not made as represented on the  
25 required ATF forms and the forms contained falsified signatures.

26 All in violation of Title 18, United States Code, Section 1001(a)(3).

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28 -6

1 COUNT FOUR: (18 U.S.C. § 1001(a)(3) – False Statements)

2 15. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
3 reference as if set forth in full herein.

4 16. Beginning on or about December 17, 2010, and continuing through on or about January 2,  
5 2011, in the Western District of Washington, the defendant,

6 JAMES CONTRERAS,

7 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
8 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
9 executive branch of the government of the United States, that is, in connection with ATF investigation  
10 number 787045-10-0023:

11 a. CONTRERAS wrote what purported to be the signature of Special Agent AL on a  
12 Request for Advance of Funds form dated December 17, 2010, requesting funds from the Agent Cashier  
13 fund in order to make a \$400 subsistence payment to ATF confidential informant 282, and submitted the  
14 form for supervisory approval knowing that the document contained the falsified signature of Special  
15 Agent AL.

16 b. CONTRERAS signed a Payment Receipt falsely showing that on December 17,  
17 2010, Special Agent AL signed the form and paid \$400 to ATF confidential informant MG, also known  
18 as informant 282, and CONTRERAS submitted the form for supervisory approval knowing that Special  
19 Agent AL did not sign the form and did not make the purported payment to confidential informant MG.

20 c. CONTRERAS wrote what purported to be the signature of Special Agent AL on a  
21 Report of Expenditure form dated December 17, 2010, reporting that \$400 was paid to ATF confidential  
22 informant 282 and submitted the form for supervisory approval knowing that the document contained  
23 the falsified signature of Special Agent AL and Special Agent AL did not make the purported payment  
24 to informant 282.

25 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
26 Voucher dated January 2, 2011, accompanied by the Sub-Voucher Log listing the December 17, 2010  
27 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
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1 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported December  
2 17, 2010 subsistence payment to informant 282 was not made as represented on the required ATF forms  
3 and the forms contained falsified signatures.

4 All in violation of Title 18, United States Code, Section 1001(a)(3).

5 COUNT FIVE: (18 U.S.C. § 1001(a)(3) – False Statements)

6 17. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
7 reference as if set forth in full herein.

8 18. On or about March 31, 2010, in the Western District of Washington, the defendant,

9 JAMES CONTRERAS,

10 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
11 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
12 executive branch of the government of the United States, that is, in connection with ATF investigation  
13 number 787045-10-0032:

14 a. CONTRERAS wrote what purported to be the signature of Special Agent DC on a  
15 Request for Advance of Funds form dated March 31, 2010, requesting funds from the Agent Cashier  
16 fund in order to make a \$300 subsistence payment to ATF confidential informant 294, and submitted the  
17 form for supervisory approval knowing that the document contained the falsified signature of Special  
18 Agent DC.

19 b. CONTRERAS signed a Payment Receipt falsely showing that on March 31, 2010,  
20 Special Agent DC paid \$300 to ATF confidential informant RO, also known as informant 294, and  
21 CONTRERAS submitted the form for supervisory approval knowing that Special Agent DC did not  
22 make the purported payment to confidential informant RO.

23 c. CONTRERAS wrote what purported to be the signature of Special Agent DC on a  
24 Report of Expenditure form dated March 31, 2010 reporting that \$300 was paid to ATF confidential  
25 informant 294 and submitted the form for supervisory approval knowing that the document contained  
26 the falsified signature of Special Agent DC and Special Agent DC did not make the purported payment  
27 to informant 294.



1 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
2 Voucher dated March 31, 2010, accompanied by the Sub-Voucher Log listing the March 31, 2010  
3 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
4 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported March 31,  
5 2010 subsistence payment to informant 294 was not made as represented on the required ATF forms and  
6 the forms contained falsified signatures.

7 All in violation of Title 18, United States Code, Section 1001(a)(3).

8 COUNT SIX: (18 U.S.C. § 1001(a)(3) – False Statements)

9 19. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
10 reference as if set forth in full herein.

11 20. Beginning on or about February 23, 2011, and continuing through on or about March 1,  
12 2011, in the Western District of Washington, the defendant,

13 JAMES CONTRERAS,

14 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
15 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
16 executive branch of the government of the United States, that is, in connection with ATF investigation  
17 number 787045-10-0032:

18 a. CONTRERAS signed what purported to be the signature of Special Agent DC on a  
19 Request for Advance of Funds form dated February 23, 2011, requesting funds from the Agent Cashier  
20 fund in order to make a \$300 subsistence payment to ATF confidential informant 286, and submitted the  
21 form for supervisory approval knowing that the document contained the falsified signature of Special  
22 Agent DC.

23 b. CONTRERAS signed a Payment Receipt falsely showing that on February 23, 2011,  
24 Special Agent DC signed the form and paid \$300 to ATF confidential informant VD, also known as  
25 informant 297, and CONTRERAS submitted the form for supervisory approval knowing that Special  
26 Agent DC did not sign the form and did not make the purported payment to either confidential informant  
27 286 or 297.

1 c. CONTRERAS wrote what purported to be the signature of Special Agent DC on a  
2 Report of Expenditure form dated February 23, 2011, reporting that \$300 was paid to ATF confidential  
3 informant 286 or 297 and submitted the form for supervisory approval knowing that the document  
4 contained the falsified signature of Special Agent DC and Special Agent DC did not make the purported  
5 payment to either informant 286 or 297.

6 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
7 Voucher dated March 1, 2011, accompanied by the Sub-Voucher Log listing the February 23, 2011  
8 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
9 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported February  
10 23, 2011 subsistence payment to informant 286 or 297 was not made as represented on the required ATF  
11 forms and the forms contained falsified signatures.

12 All in violation of Title 18, United States Code, Section 1001(a)(3).

13 COUNT SEVEN: (18 U.S.C. § 1001(a)(3) – False Statements)

14 21. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
15 reference as if set forth in full herein.

16 22. Beginning on or about April 30, 2011, and continuing through on or about May 1, 2011,  
17 in the Western District of Washington, the defendant,

18 JAMES CONTRERAS,

19 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
20 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
21 executive branch of the government of the United States, that is, in connection with ATF investigation  
22 number 787045-10-0032:

23 a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
24 Request for Advance of Funds form dated April 30, 2011, requesting funds from the Agent Cashier fund  
25 in order to make a \$700 subsistence payment to ATF confidential informant 301, and submitted the form  
26 for supervisory approval knowing that the document contained the falsified signature of Special Agent  
27 TH.

1 b. CONTRERAS signed a Payment Receipt falsely showing that on April 30, 2011,  
2 Special Agent TH signed the form and paid \$700 to ATF confidential informant BD, also known as  
3 informant 301, and CONTRERAS submitted the form for supervisory approval knowing that Special  
4 Agent TH did not sign the form and did not make the purported payment to confidential informant 301.

5 c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
6 Report of Expenditure form dated April 30, 2011, reporting that \$700 was paid to ATF confidential  
7 informant 301 and submitted the form for supervisory approval knowing that the document contained  
8 the falsified signature of Special Agent TH and Special Agent TH did not make the purported payment  
9 to informant 301.

10 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
11 Voucher dated May 1, 2011, accompanied by the Sub-Voucher Log listing the April 30, 2011  
12 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
13 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported April 30,  
14 2011 subsistence payment to informant 301 was not made as represented on the required ATF forms and  
15 the forms contained falsified signatures.

16 All in violation of Title 18, United States Code, Section 1001(a)(3).

17 COUNT EIGHT: (18 U.S.C. § 1001(a)(3) – False Statements)

18 23. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
19 reference as if set forth in full herein.

20 24. Beginning on or about May 20, 2011, and continuing through on or about June 1, 2011, in  
21 the Western District of Washington, the defendant,

22 JAMES CONTRERAS,

23 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
24 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
25 executive branch of the government of the United States, that is, in connection with ATF investigation  
26 number 787045-10-0032:

27 ///

1 a. CONTRERAS wrote what purported to be the signature of Special Agent WP on a  
2 Request for Advance of Funds form dated May 20, 2011, requesting funds from the Agent Cashier fund  
3 in order to make a subsistence payment to ATF confidential informant 301, and submitted the form for  
4 supervisory approval knowing that the document contained the falsified signature of Special Agent WP.

5 b. CONTRERAS signed a Payment Receipt falsely showing that on May 20, 2011,  
6 Special Agent WP signed the form and paid \$200 to ATF confidential informant BD, also known as  
7 informant 301, and CONTRERAS submitted the form for supervisory approval knowing that Special  
8 Agent WP did not sign the form and did not make the purported payment to confidential informant 301.

9 c. CONTRERAS wrote what purported to be the signature of Special Agent WP on a  
10 Report of Expenditure form dated May 20, 2011, reporting that \$200 was paid to ATF confidential  
11 informant 301 and submitted the form for supervisory approval knowing that the document contained  
12 the falsified signature of Special Agent WP and Special Agent WP did not make the purported payment  
13 to informant 301.

14 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
15 Voucher dated June 1, 2011, accompanied by the Sub-Voucher Log listing the May 20, 2011  
16 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
17 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported May 20,  
18 2011 subsistence payment to informant 301 was not made as represented on the required ATF forms and  
19 the forms contained falsified signatures.

20 All in violation of Title 18, United States Code, Section 1001(a)(3).

21 COUNT NINE: (18 U.S.C. § 1001(a)(3) – False Statements)

22 25. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
23 reference as if set forth in full herein.

24 26. Beginning on or about June 30, 2011, and continuing through on or about July 1, 2011, in the  
25 Western District of Washington, the defendant,

26 JAMES CONTRERAS,

27 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
28

1 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
2 executive branch of the government of the United States, that is, in connection with ATF investigation  
3 number 787045-10-0032:

4 a. CONTRERAS wrote what purported to be the signature of Special Agent DC on a  
5 Request for Advance of Funds form dated June 30, 2011, requesting funds from the Agent Cashier fund  
6 in order to make a subsistence payment of \$2,500 to ATF confidential informant 301, and submitted the  
7 form for supervisory approval knowing that the document contained the falsified signature of Special  
8 Agent DC.

9 b. CONTRERAS signed a Payment Receipt falsely showing that on June 30, 2011,  
10 Special Agent DC signed the form as a witness to CONTRERAS's purported payment of \$2,500 to ATF  
11 confidential informant BD, also known as informant 301, and CONTRERAS submitted the form for  
12 supervisory approval knowing that Special Agent DC did not sign the form and did not witness  
13 CONTRERAS make the purported payment to confidential informant 301.

14 c. CONTRERAS wrote what purported to be the signature of Special Agent DC on a  
15 Report of Expenditure form dated June 30, 2011, reporting that \$2,500 was paid to ATF confidential  
16 informant 301 and submitted the form for supervisory approval knowing that the document contained  
17 the falsified signature of Special Agent DC and Special Agent DC did not witness CONTRERAS make  
18 the purported payment to informant 301.

19 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
20 Voucher dated July 1, 2011, accompanied by the Sub-Voucher Log listing the June 30, 2011 expenditure  
21 from the Agent Cashier fund described above, and falsely certified that the disbursement from the Agent  
22 Cashier fund was correct and proper when, in fact, he knew that the purported June 30, 2011 subsistence  
23 payment to informant 301 was not made as represented on the required ATF forms and the forms  
24 contained falsified signatures.

25 All in violation of Title 18, United States Code, Section 1001(a)(3).

26 ///

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1 COUNT TEN: (18 U.S.C. § 1001(a)(3) – False Statements)

2 27. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
3 reference as if set forth in full herein.

4 28. Beginning on or about February 12, 2011, and continuing through on or about March 1,  
5 2011, in the Western District of Washington, the defendant,

6 JAMES CONTRERAS,

7 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
8 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
9 executive branch of the government of the United States, that is, in connection with ATF investigation  
10 number 787045-10-0045:

11 a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
12 Request for Advance of Funds form dated February 12, 2011, requesting funds from the Agent Cashier  
13 fund in order to make a \$700 subsistence payment to ATF confidential informant 282, and submitted the  
14 form for supervisory approval knowing that the document contained the falsified signature of Special  
15 Agent TH.

16 b. CONTRERAS signed a Payment Receipt falsely showing that on February 12, 2011,  
17 Special Agent TH signed the form and paid \$700 to ATF confidential informant MG, also known as  
18 informant 282, and CONTRERAS submitted the form for supervisory approval knowing that Special  
19 Agent TH did not sign the form and did not make the purported payment to confidential informant MG.

20 c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
21 Report of Expenditure form dated February 12, 2011, reporting that \$700 was paid to ATF confidential  
22 informant 282 and submitted the form for supervisory approval knowing that the document contained  
23 the falsified signature of Special Agent TH and Special Agent TH did not make the purported payment  
24 to informant 282.

25 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
26 Voucher dated March 1, 2011, accompanied by the Sub-Voucher Log listing the February 12, 2011  
27 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
28

1 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported February  
2 12, 2011 subsistence payment to informant 282 was not made as represented on the required ATF forms  
3 and the forms contained falsified signatures.

4 All in violation of Title 18, United States Code, Section 1001(a)(3).

5 COUNT ELEVEN: (18 U.S.C. § 1001(a)(3) – False Statements)

6 29. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
7 reference as if set forth in full herein.

8 30. Beginning on or about February 5, 2011, and continuing through on or about March 1, 2011,  
9 in the Western District of Washington, the defendant,

10 JAMES CONTRERAS,

11 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
12 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
13 executive branch of the government of the United States, that is, in connection with ATF investigation  
14 number 787045-11-0019:

15 a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
16 Request for Advance of Funds form dated February 5, 2011, requesting funds from the Agent Cashier  
17 fund in order to make a \$200 subsistence payment to ATF confidential informant 282, and submitted the  
18 form for supervisory approval knowing that the document contained the falsified signature of Special  
19 Agent TH.

20 b. CONTRERAS signed a Payment Receipt falsely showing that on February 5, 2011,  
21 Special Agent TH signed the form and paid \$200 to ATF confidential informant MG, also known as  
22 informant 282, and CONTRERAS submitted the form for supervisory approval knowing that Special  
23 Agent TH did not sign the form and did not make the purported payment to confidential informant MG.

24 c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
25 Report of Expenditure form dated February 5, 2011, reporting that \$200 was paid to ATF confidential  
26 informant 282 and submitted the form for supervisory approval knowing that the document contained  
27 the falsified signature of Special Agent TH and Special Agent TH did not make the purported payment

1 to informant 282.

2 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
3 Voucher dated March 1, 2011, accompanied by the Sub-Voucher Log listing the February 5, 2011  
4 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
5 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported February  
6 5, 2011 subsistence payment to informant 282 was not made as represented on the required ATF forms  
7 and the forms contained falsified signatures.

8 All in violation of Title 18, United States Code, Section 1001(a)(3).

9 COUNT TWELVE: (18 U.S.C. § 1001(a)(3) – False Statements)

10 31. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
11 reference as if set forth in full herein.

12 32. Beginning on or about February 28, 2011, and continuing through on or about March 1,  
13 2011, in the Western District of Washington, the defendant,

14 JAMES CONTRERAS,

15 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
16 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
17 executive branch of the government of the United States, that is, in connection with ATF investigation  
18 number 787045-11-0023:

19 a. CONTRERAS wrote what purported to be the signature of Special Agent WP on a  
20 Request for Advance of Funds form dated February 28, 2011, requesting funds from the Agent Cashier  
21 fund in order to make a \$200 subsistence payment to ATF confidential informant 297, and submitted the  
22 form for supervisory approval knowing that the document contained the falsified signature of Special  
23 Agent WP.

24 b. CONTRERAS signed a Payment Receipt falsely showing that on February 28, 2011,  
25 Special Agent WP signed the form and paid \$200 to ATF confidential informant VD, also known as  
26 informant 297, and CONTRERAS submitted the form for supervisory approval knowing that Special  
27 Agent WP did not sign the form and did not make the purported payment to confidential informant VD.



1 c. CONTRERAS wrote what purported to be the signature of Special Agent WP on a  
2 Report of Expenditure form dated February 28, 2011, reporting that \$200 was paid to ATF confidential  
3 informant 297 and submitted the form for supervisory approval knowing that the document contained  
4 the falsified signature of Special Agent WP and Special Agent WP did not make the purported payment  
5 to informant 297.

6 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
7 Voucher dated March 1, 2011, accompanied by the Sub-Voucher Log listing the February 28, 2011  
8 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
9 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported February  
10 28, 2011 subsistence payment to informant 297 was not made as represented on the required ATF forms  
11 and the forms contained falsified signatures.

12 All in violation of Title 18, United States Code, Section 1001(a)(3).

13 COUNT THIRTEEN: (18 U.S.C. § 1001(a)(3) – False Statements)

14 33. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
15 reference as if set forth in full herein.

16 34. Beginning on or about March 23, 2011, and continuing through on or about March 31, 2011,  
17 in the Western District of Washington, the defendant,

18 JAMES CONTRERAS,

19 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
20 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
21 executive branch of the government of the United States, that is, in connection with ATF investigation  
22 number 787045-11-0030:

23 a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
24 Request for Advance of Funds form dated March 23, 2011, requesting funds from the Agent Cashier  
25 fund in order to make a \$1,500 subsistence payment to ATF confidential informant 298, and submitted  
26 the form for supervisory approval knowing that the document contained the falsified signature of Special  
27 Agent TH.

1           b. CONTRERAS signed a Payment Receipt falsely showing that on March 23, 2011,  
2 Special Agent TH signed the form and paid \$1,500 to ATF confidential informant JJ, also known as  
3 informant 298, and CONTRERAS submitted the form for supervisory approval knowing that Special  
4 Agent TH did not sign the form and did not make the purported payment to confidential informant JJ.

5           c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
6 Report of Expenditure form dated March 23, 2011, reporting that \$1,500 was paid to ATF confidential  
7 informant 298 and submitted the form for supervisory approval knowing that the document contained  
8 the falsified signature of Special Agent TH and Special Agent TH did not make the purported payment  
9 to informant 298.

10           d. CONTRERAS signed and submitted for review a Cash Reimbursement Voucher  
11 dated March 31, 2011, accompanied by the Sub-Voucher Log listing the March 23, 2011 expenditure  
12 from the Agent Cashier fund described above, and falsely certified that the disbursement from the Agent  
13 Cashier fund was correct and proper when, in fact, he knew that the purported March 23, 2011  
14 subsistence payment to informant 298 was not made as represented on the required ATF forms and the  
15 forms contained falsified signatures.

16           All in violation of Title 18, United States Code, Section 1001(a)(3).

17 COUNT FOURTEEN: (18 U.S.C. § 1001(a)(3) – False Statements)

18           35. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
19 reference as if set forth in full herein.

20           36. On or about March 31, 2011, in the Western District of Washington, the defendant,  
21   JAMES CONTRERAS,  
22 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
23 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
24 executive branch of the government of the United States, that is, in connection with ATF investigation  
25 number 787045-11-0033:

26           a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
27 Request for Advance of Funds form dated March 31, 2011, requesting funds from the Agent Cashier  
28

1 fund in order to make a \$2,600 subsistence payment to ATF confidential informant 282, and submitted  
2 the form for supervisory approval knowing that the document contained the falsified signature of Special  
3 Agent TH.

4 b. CONTRERAS signed a Payment Receipt falsely showing that on March 31, 2011,  
5 Special Agent AL signed the form and paid \$2,600 to ATF confidential informant MG, also known as  
6 informant 282, and CONTRERAS submitted the form for supervisory approval knowing that Special  
7 Agent AL did not sign the form and did not make the purported payment to confidential informant MG.

8 c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
9 Report of Expenditure form dated March 31, 2011, reporting that \$2,600 was paid to ATF confidential  
10 informant 282 by Special Agent TH, and submitted the form for supervisory approval knowing that the  
11 document contained the falsified signature of Special Agent TH and neither Special Agent AL nor  
12 Special Agent TH made the purported payment to informant 282.

13 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
14 Voucher dated March 31, 2011, accompanied by the Sub-Voucher Log listing the March 31, 2011  
15 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
16 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported March 31,  
17 2011 subsistence payment to informant 282 was not made as represented on the required ATF forms and  
18 the forms contained falsified signatures.

19 All in violation of Title 18, United States Code, Section 1001(a)(3).

20 COUNT FIFTEEN: (18 U.S.C. § 1001(a)(3) – False Statements)

21 37. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
22 reference as if set forth in full herein.

23 38. On or about April 19, 2011, and continuing through on or about May 1, 2011, in the Western  
24 District of Washington, the defendant,

25 JAMES CONTRERAS,

26 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
27 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the

1 executive branch of the government of the United States, that is, in connection with ATF investigation  
2 number 787045-11-0034:

3 a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
4 Request for Advance of Funds form dated April 19, 2011, requesting funds from the Agent Cashier fund  
5 in order to make a \$400 subsistence payment to ATF confidential informant 299, and submitted the form  
6 for supervisory approval knowing that the document contained the falsified signature of Special Agent  
7 TH.

8 b. CONTRERAS signed a Payment Receipt falsely showing that on April 19, 2011,  
9 Special Agent TH signed the form and paid \$400 to ATF confidential informant JJ, also known as  
10 informant 298, and CONTRERAS submitted the form for supervisory approval knowing that Special  
11 Agent TH did not sign the form and did not make the purported payment to confidential informant JJ.

12 c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
13 Report of Expenditure form dated April 19, 2011, reporting that \$400 was paid to ATF confidential  
14 informant 298 or 299 and submitted the form for supervisory approval knowing that the document  
15 contained the falsified signature of Special Agent TH and Special Agent TH did not make the purported  
16 payment to either informant 298 or 299.

17 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
18 Voucher dated May 1, 2011, accompanied by the Sub-Voucher Log listing the April 19, 2011  
19 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
20 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported April 19,  
21 2011 subsistence payment to informant 298 or 299 was not made as represented on the required ATF  
22 forms and the forms contained falsified signatures.

23 All in violation of Title 18, United States Code, Section 1001(a)(3).

24 COUNT SIXTEEN: (18 U.S.C. § 1001(a)(3) – False Statements)

25 39. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
26 reference as if set forth in full herein.

27 40. Beginning on or about May 16, 2011, and continuing through on or about June 1, 2011,  
28

1 in the Western District of Washington, the defendant,

2 JAMES CONTRERAS,

3 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
4 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
5 executive branch of the government of the United States, that is, in connection with ATF investigation  
6 number 787045-11-0041:

7 a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
8 Request for Advance of Funds form dated May 16, 2011, requesting funds from the Agent Cashier fund  
9 in order to make a \$300 subsistence payment to ATF confidential informant 300, and submitted the form  
10 for supervisory approval knowing that the document contained the falsified signature of Special Agent  
11 TH.

12 b. CONTRERAS signed a Payment Receipt falsely showing that on May 16, 2011,  
13 Special Agent TH paid \$300 to ATF confidential informant JAJ, also known as informant 300, and  
14 CONTRERAS submitted the form for supervisory approval knowing that Special Agent TH did not  
15 make the purported payment to confidential informant JAJ.

16 c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
17 Report of Expenditure form dated May 16, 2011, reporting that \$300 was paid to ATF confidential  
18 informant 300 and submitted the form for supervisory approval knowing that the document contained  
19 the falsified signature of Special Agent TH and Special Agent TH did not make the purported payment  
20 to informant 300.

21 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
22 Voucher dated June 1, 2011, accompanied by the Sub-Voucher Log listing the May 16, 2011  
23 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
24 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported May 16,  
25 2011 subsistence payment to informant 300 was not made as represented on the required ATF forms and  
26 the forms contained falsified signatures.

27 All in violation of Title 18, United States Code, Section 1001(a)(3).

1 COUNT SEVENTEEN: (18 U.S.C. § 1001(a)(3) – False Statements)

2 41. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
3 reference as if set forth in full herein.

4 42. Beginning on or about May 31, 2011, and continuing through on or about June 1, 2011, in  
5 the Western District of Washington, the defendant,

6 JAMES CONTRERAS,

7 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
8 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
9 executive branch of the government of the United States, that is, in connection with ATF investigation  
10 number 787045-11-0041:

11 a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
12 Request for Advance of Funds form dated May 31, 2011, requesting funds from the Agent Cashier fund  
13 in order to purchase a pistol from “Red,” and submitted the form for supervisory approval knowing that  
14 the document contained the falsified signature of Special Agent TH.

15 b. CONTRERAS signed a Payment Receipt falsely showing that on May 31, 2011,  
16 Special Agent TH paid \$300 to ATF confidential informant JAJ, also known as informant 300, and  
17 CONTRERAS submitted the form for supervisory approval knowing that Special Agent TH did not  
18 make the purported payment to confidential informant JAJ.

19 c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
20 Report of Expenditure form dated May 31, 2011, reporting that \$300 was paid to ATF confidential  
21 informant 300 and submitted the form for supervisory approval knowing that the document contained  
22 the falsified signature of Special Agent TH and Special Agent TH did not make the purported payment  
23 to informant 300.

24 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
25 Voucher dated June 1, 2011, accompanied by the Sub-Voucher Log listing the May 31, 2011  
26 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
27 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported May 31,

1 2011 subsistence payment to informant 300 was not made as represented on the required ATF forms and  
2 the forms contained falsified signatures.

3 All in violation of Title 18, United States Code, Section 1001(a)(3).

4 COUNT EIGHTEEN: (18 U.S.C. § 1001(a)(3) – False Statements)

5 43. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
6 reference as if set forth in full herein.

7 44. Beginning on or about June 30, 2011, and continuing through on or about July 1, 2011, in the  
8 Western District of Washington, the defendant,

9 JAMES CONTRERAS,

10 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
11 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
12 executive branch of the government of the United States, that is, in connection with ATF investigation  
13 number 787045-11-0041:

14 a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
15 Request for Advance of Funds form dated June 30, 2011, requesting funds from the Agent Cashier fund  
16 in order to make a \$2,000 subsistence payment to ATF confidential informant 300, and submitted the  
17 form for supervisory approval knowing that the document contained the falsified signature of Special  
18 Agent TH.

19 b. CONTRERAS signed a Payment Receipt falsely showing that on June 30, 2011,  
20 Special Agent TH signed the form as a witness to CONTRERAS's purported payment of \$2,000 to ATF  
21 confidential informant JAJ, also known as informant 300, and CONTRERAS submitted the form for  
22 supervisory approval knowing that Special Agent TH did not sign the form and did not witness  
23 CONTRERAS make the purported payment to confidential informant JAJ.

24 c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
25 Report of Expenditure form dated June 30, 2011, reporting that \$2,000 was paid to ATF confidential  
26 informant 300 and submitted the form for supervisory approval knowing that the document contained  
27 the falsified signature of Special Agent TH and Special Agent TH did not make the purported payment  
28

1 to informant 300.

2 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
3 Voucher dated July 1, 2011, accompanied by the Sub-Voucher Log listing the June 30, 2011 expenditure  
4 from the Agent Cashier fund described above, and falsely certified that the disbursement from the Agent  
5 Cashier fund was correct and proper when, in fact, he knew that the purported June 30, 2011 subsistence  
6 payment to informant 300 was not made as represented on the required ATF forms and the forms  
7 contained falsified signatures.

8 All in violation of Title 18, United States Code, Section 1001(a)(3).

9 COUNT NINETEEN: (18 U.S.C. § 1001(a)(3) – False Statements)

10 45. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
11 reference as if set forth in full herein.

12 46. On or about August 19, 2011, and continuing through on or about September 1, 2011, in the  
13 Western District of Washington, the defendant,

14 JAMES CONTRERAS,

15 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
16 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
17 executive branch of the government of the United States, that is, in connection with ATF investigation  
18 number 787045-11-0051:

19 a. CONTRERAS wrote what purported to be the signature of Special Agent DR on a  
20 Request for Advance of Funds form dated August 19, 2011, requesting funds from the Agent Cashier  
21 fund in order to make a \$700 subsistence payment to ATF confidential informant 298, and submitted the  
22 form for supervisory approval knowing that the document contained the falsified signature of Special  
23 Agent DR.

24 b. CONTRERAS signed a Payment Receipt falsely showing that on August 19, 2011,  
25 Special Agent DR signed the form and paid \$700 to ATF confidential informant JJ, also known as  
26 informant 298, and CONTRERAS submitted the form for supervisory approval knowing that Special  
27 Agent DR did not sign the form and did not make the purported payment to confidential informant JJ.



1 c. CONTRERAS wrote what purported to be the signature of Special Agent DR on a  
2 Report of Expenditure form dated August 19, 2011, reporting that \$700 was paid to ATF confidential  
3 informant 298 and submitted the form for supervisory approval knowing that the document contained  
4 the falsified signature of Special Agent DR and Special Agent DR did not make the purported payment  
5 to informant 298.

6 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
7 Voucher dated September 1, 2011, accompanied by the Sub-Voucher Log listing the August 19, 2011  
8 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
9 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported August  
10 19, 2011 subsistence payment to informant 298 was not made as represented on the required ATF forms  
11 and the forms contained falsified signatures.

12 All in violation of Title 18, United States Code, Section 1001(a)(3).

13 COUNT TWENTY: (18 U.S.C. § 1001(a)(3) – False Statements)

14 47. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
15 reference as if set forth in full herein.

16 48. Beginning on or about October 5, 2011, and continuing through on or about November 2,  
17 2011, in the Western District of Washington, the defendant,

18 JAMES CONTRERAS,

19 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
20 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
21 executive branch of the government of the United States, that is, in connection with ATF investigation  
22 number 787045-11-0057:

23 a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
24 Request for Advance of Funds form dated on or about October 5, 2011, requesting funds from the Agent  
25 Cashier fund in order to make a \$300 subsistence payment to ATF confidential informant 300, and  
26 submitted the form for supervisory approval knowing that the document contained the falsified signature  
27 of Special Agent TH.

1           b. CONTRERAS signed a Payment Receipt falsely showing that on October 5, 2011,  
2 Special Agent TH signed the form and paid \$300 to ATF confidential informant JAJ, also known as  
3 informant 300, and CONTRERAS submitted the form for supervisory approval knowing that Special  
4 Agent TH did not sign the form and did not make the purported payment to confidential informant JAJ.

5           c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
6 Report of Expenditure form dated October 5, 2011, reporting that \$300 was paid to ATF confidential  
7 informant 300 and submitted the form for supervisory approval knowing that the document contained  
8 the falsified signature of Special Agent TH and Special Agent TH did not make the purported payment  
9 to informant 300.

10           d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
11 Voucher dated November 2, 2011, accompanied by the Sub-Voucher Log listing the October 5, 2011  
12 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
13 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported October  
14 5, 2011 subsistence payment to informant 300 was not made as represented on the required ATF forms  
15 and the forms contained falsified signatures.

16           All in violation of Title 18, United States Code, Section 1001(a)(3).

17 COUNT TWENTY-ONE: (18 U.S.C. § 1001(a)(3) – False Statements)

18           49. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
19 reference as if set forth in full herein.

20           50. Beginning on or about October 20, 2011, and continuing through on or about November 2,  
21 2011, in the Western District of Washington, the defendant,

22   JAMES CONTRERAS,

23 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
24 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
25 executive branch of the government of the United States, that is, in connection with ATF investigation  
26 number 787045-11-0057:

27           a. CONTRERAS wrote what purported to be the signature of Special Agent DR on a  
28

1 Request for Advance of Funds form dated October 20, 2011, requesting funds from the Agent Cashier  
2 fund in order to make a \$300 subsistence payment to ATF confidential informant 302, and submitted the  
3 form for supervisory approval knowing that the document contained the falsified signature of Special  
4 Agent DR.

5 b. CONTRERAS submitted a Payment Receipt for supervisory approval knowing that it  
6 falsely showed that on October 20, 2011, Special Agent DR paid \$300 to ATF confidential informant  
7 KS, also known as informant 303, and that it bore the falsified signature of Special Agent TH as a  
8 witness to the payment.

9 c. CONTRERAS wrote what purported to be the signature of Special Agent DR on a  
10 Report of Expenditure form dated November 20, 2011, reporting that on October 20, 2011, \$300 was  
11 paid to ATF confidential informant 302, and submitted the form for supervisory approval knowing that  
12 the document contained the falsified signature of Special Agent DR and Special Agent DR did not make  
13 the purported payment to either informant 302 or 303.

14 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
15 Voucher dated November 2, 2011, accompanied by the Sub-Voucher Log listing the October 20, 2011  
16 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
17 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported October  
18 20, 2011 subsistence payment to either informant 302 or 303 was not made as represented on the  
19 required ATF forms and the forms contained falsified signatures.

20 All in violation of Title 18, United States Code, Section 1001(a)(3).

21 COUNT TWENTY-TWO: (18 U.S.C. § 1001(a)(3) – False Statements)

22 51. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
23 reference as if set forth in full herein.

24 52. Beginning on or about January 21, 2012 and continuing through on or about January 31,  
25 2011, in the Western District of Washington, the defendant,

26 JAMES CONTRERAS,

27 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
28

1 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
2 executive branch of the government of the United States, that is, in connection with ATF investigation  
3 number 787045-11-0057:

4 a. CONTRERAS wrote what purported to be the signature of Special Agent DR on a  
5 Request for Advance of Funds form dated January 26, 2012, requesting funds from the Agent Cashier  
6 fund in order to make a \$600 subsistence payment to ATF confidential informant 298, and submitted the  
7 form for supervisory approval knowing that the document contained the falsified signature of Special  
8 Agent DR.

9 b. CONTRERAS signed a Payment Receipt falsely showing that on January 26, 2012,  
10 Special Agent DR paid \$600 to ATF confidential informant JJ, also known as informant 298, and  
11 CONTRERAS submitted the form for supervisory approval knowing that Special Agent DR did not  
12 make the purported payment to confidential informant JJ.

13 c. CONTRERAS wrote what purported to be the signature of Special Agent DR on a  
14 Report of Expenditure form dated January 26, 2012, reporting that \$600 was paid to ATF confidential  
15 informant 298 and submitted the form for supervisory approval knowing that the document contained  
16 the falsified signature of Special Agent DR and Special Agent DR did not make the purported payment  
17 to informant 298.

18 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
19 Voucher dated January 21, 2011 (for the period January 1, 2012 through January 31, 2012),  
20 accompanied by the Sub-Voucher Log listing the January 26, 2012 expenditure from the Agent Cashier  
21 fund described above, and falsely certified that the disbursement from the Agent Cashier fund was  
22 correct and proper when, in fact, he knew that the purported January 26, 2012 subsistence payment to  
23 informant 298 was not made as represented on the required ATF forms and the forms contained falsified  
24 signatures.

25 All in violation of Title 18, United States Code, Section 2001(a)(1).

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1 COUNT TWENTY-THREE: (18 U.S.C. § 1001(a)(3) – False Statements)

2 53. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
3 reference as if set forth in full herein.

4 54. Beginning on or about January 21, 2012, and continuing through on or about January 31,  
5 2012, in the Western District of Washington, the defendant,

6 JAMES CONTRERAS,

7 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
8 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
9 executive branch of the government of the United States, that is, in connection with ATF investigation  
10 number 787045-11-0057:

11 a. CONTRERAS wrote what purported to be the signature of Special Agent DR on a  
12 Request for Advance of Funds form dated January 29, 2012, requesting funds from the Agent Cashier  
13 fund in order to make a \$200 subsistence payment to ATF confidential informant 292, and submitted the  
14 form for supervisory approval knowing that the document contained the falsified signature of Special  
15 Agent DR.

16 b. CONTRERAS signed a Payment Receipt falsely showing that on January 29, 2012,  
17 Special Agent DR paid \$200 to ATF confidential informant MG, also known as informant 282, and  
18 CONTRERAS submitted the form for supervisory approval knowing that Special Agent DR did not  
19 make the purported payment to confidential informant MG.

20 c. CONTRERAS wrote what purported to be the signature of Special Agent DR on a  
21 Report of Expenditure form dated January 29, 2012, reporting that \$200 was paid to ATF confidential  
22 informant 292 and submitted the form for supervisory approval knowing that the document contained  
23 the falsified signature of Special Agent DR and Special Agent DR did not make the purported payment  
24 to informant 292 or 282.

25 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
26 Voucher dated January 21, 2011 (for the period January 1, 2012 through January 31, 2012),  
27 accompanied by the Sub-Voucher Log listing the January 29, 2012 expenditure from the Agent Cashier  
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1 fund described above, and falsely certified that the disbursement from the Agent Cashier fund was  
2 correct and proper when, in fact, he knew that the purported January 29, 2012 subsistence payment to  
3 either informant 292 or 282 was not made as represented on the required ATF forms and the forms  
4 contained falsified signatures.

5 All in violation of Title 18, United States Code, Section 1001(a)(3).

6 COUNT TWENTY-FOUR: (18 U.S.C. § 1001(a)(3) – False Statements)

7 55. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
8 reference as if set forth in full herein.

9 56. Beginning on or about August 31, 2011, and continuing through on or about September 1,  
10 2011, in the Western District of Washington, the defendant,

11 JAMES CONTRERAS,

12 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
13 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
14 executive branch of the government of the United States, that is, in connection with ATF investigation  
15 number 787045-11-0058:

16 a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
17 Request for Advance of Funds form dated August 31, 2011, requesting funds from the Agent Cashier  
18 fund in order to make a \$1,000 subsistence payment to ATF confidential informant 303, and submitted  
19 the form for supervisory approval knowing that the document contained the falsified signature of Special  
20 Agent TH.

21 b. CONTRERAS signed a Payment Receipt falsely showing that on August 31, 2011,  
22 Special Agent TH signed the form and paid \$1,000 to ATF confidential informant KS, also known as  
23 informant 303, and CONTRERAS submitted the form for supervisory approval knowing that Special  
24 Agent TH did not sign the form and did not make the purported payment to confidential informant KS.

25 c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
26 Report of Expenditure form dated August 31, 2011, reporting that \$1,000 was paid to ATF confidential  
27 informant 303 and submitted the form for supervisory approval knowing that the document contained  
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1 the falsified signature of Special Agent TH and Special Agent TH did not make the purported payment  
2 to informant 303.

3 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
4 Voucher dated September 1, 2011, accompanied by the Sub-Voucher Log listing the August 31, 2011  
5 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
6 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported August  
7 31, 2011 subsistence payment to informant 303 was not made as represented on the required ATF forms  
8 and the forms contained falsified signatures.

9 All in violation of Title 18, United States Code, Section 1001(a)(3).

10 COUNT TWENTY-FIVE: (18 U.S.C. § 1001(a)(3) – False Statements)

11 57. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
12 reference as if set forth in full herein.

13 58. Beginning on or about November 15, 2011, and continuing through on or about  
14 November 30, 2011, in the Western District of Washington, the defendant,

15 JAMES CONTRERAS,

16 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
17 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
18 executive branch of the government of the United States, that is, in connection with ATF investigation  
19 number 787045-12-0003:

20 a. CONTRERAS wrote what purported to be the signature of Special Agent DR on a  
21 Request for Advance of Funds form dated November 15, 2011, requesting funds from the Agent Cashier  
22 fund in order to make a \$300 subsistence payment to ATF confidential informant 303, and submitted the  
23 form for supervisory approval knowing that the document contained the falsified signature of Special  
24 Agent DR.

25 b. CONTRERAS signed a Payment Receipt falsely showing that on November 15,  
26 2011, Special Agent DR signed the form and paid \$300 to ATF confidential informant KS, also known  
27 as informant 303, and CONTRERAS submitted the form for supervisory approval knowing that Special  
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1 Agent DR did not sign the form and did not make the purported payment to confidential informant KS.

2 c. CONTRERAS wrote what purported to be the signature of Special Agent DR on a  
3 Report of Expenditure form dated November 15, 2011, reporting that \$300 was paid to ATF confidential  
4 informant 303 and submitted the form for supervisory approval knowing that the document contained  
5 the falsified signature of Special Agent DR and Special Agent DR did not make the purported payment  
6 to informant 303.

7 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
8 Voucher dated November 30, 2011, accompanied by the Sub-Voucher Log listing the November 15,  
9 2011 expenditure from the Agent Cashier fund described above, and falsely certified that the  
10 disbursement from the Agent Cashier fund was correct and proper when, in fact, he knew that the  
11 purported November 15, 2011 subsistence payment to informant 303 was not made as represented on the  
12 required ATF forms and the forms contained falsified signatures.

13 All in violation of Title 18, United States Code, Section 1001(a)(3).

14 COUNT TWENTY-SIX: (18 U.S.C. § 1001(a)(3) – False Statements)

15 59. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
16 reference as if set forth in full herein.

17 60. Beginning on or about December 13, 2011, and continuing through on or about  
18 December 30, 2011, in the Western District of Washington, the defendant,

19 JAMES CONTRERAS,

20 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
21 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
22 executive branch of the government of the United States, that is, in connection with ATF investigation  
23 number 787045-12-0003:

24 a. CONTRERAS wrote what purported to be the signature of Special Agent DR on a  
25 Request for Advance of Funds form dated December 13, 2011, requesting funds from the Agent Cashier  
26 fund in order to make a \$300 subsistence payment to ATF confidential informant 303, and submitted the  
27 form for supervisory approval knowing that the document contained the falsified signature of Special  
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1 Agent DR.

2 b. CONTRERAS submitted a Payment Receipt for supervisory approval knowing that it  
3 falsely showed that on December 13, 2011, Special Agent DR witnessed CONTRERAS pay \$300 to  
4 ATF confidential informant KS, also known as informant 303, and that it bore the falsified signature of  
5 Special Agent DR as a witness to the payment.

6 c. CONTRERAS wrote what purported to be the signature of Special Agent DR on a  
7 Report of Expenditure form dated December 13, 2011, reporting that \$300 was paid to ATF confidential  
8 informant 303 and submitted the form for supervisory approval knowing that the document contained  
9 the falsified signature of Special Agent DR and Special Agent DR did not witness the purported  
10 payment to informant 303.

11 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
12 Voucher dated December 30, 2011, accompanied by the Sub-Voucher Log listing the December 13,  
13 2011 expenditure from the Agent Cashier fund described above, and falsely certified that the  
14 disbursement from the Agent Cashier fund was correct and proper when, in fact, he knew that the  
15 purported December 13, 2011 subsistence payment to informant 303 was not made as represented on the  
16 required ATF forms and the forms contained falsified signatures.

17 All in violation of Title 18, United States Code, Section 1001(a)(3).

18 COUNT TWENTY-SEVEN: (18 U.S.C. § 1001(a)(3) – False Statements)

19 61. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
20 reference as if set forth in full herein.

21 62. Beginning on or about February 16, 2012, and continuing through on or about  
22 February 29, 2012, in the Western District of Washington, the defendant,

23 JAMES CONTRERAS,

24 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
25 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
26 executive branch of the government of the United States, that is, in connection with ATF investigation  
27 number 787045-12-0024:

1 a. CONTRERAS wrote what purported to be the signature of Special Agent DR on a  
2 Request for Advance of Funds form dated February 16, 2012, requesting funds from the Agent Cashier  
3 fund in order to make a \$600 subsistence payment to ATF confidential informant 292, and submitted the  
4 form for supervisory approval knowing that the document contained the falsified signature of Special  
5 Agent DR.

6 b. CONTRERAS signed a Payment Receipt falsely showing that on February 16, 2012,  
7 Special Agent DR signed the form and paid \$600 to ATF confidential informant JJ, also known as  
8 informant 298, and CONTRERAS submitted the form for supervisory approval knowing that Special  
9 Agent DR did not sign the form and did not make the purported payment to confidential informant JJ.

10 c. CONTRERAS submitted a Report of Expenditure form dated February 16, 2012,  
11 reporting that \$600 was paid to ATF confidential informant 298 and submitted the form for supervisory  
12 approval knowing that Special Agent DR and Special Agent DR did not make the purported payment to  
13 informant 298.

14 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
15 Voucher dated February 29, 2012, accompanied by the Sub-Voucher Log listing the February 16, 2012  
16 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
17 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported February  
18 16, 2012 subsistence payment to informant 298 was not made as represented on the required ATF forms  
19 and the forms contained falsified signatures.

20 All in violation of Title 18, United States Code, Section 1001(a)(3).

21 COUNT TWENTY-EIGHT: (18 U.S.C. § 1001(a)(3) – False Statements)

22 63. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
23 reference as if set forth in full herein.

24 64. Beginning on or about March 29, 2012, and continuing through on or about March 31, 2012,  
25 in the Western District of Washington, the defendant,

26 JAMES CONTRERAS,

27 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
28

1 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
2 executive branch of the government of the United States, that is, in connection with ATF investigation  
3 number 787045-12-0025:

4 a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
5 Request for Advance of Funds form dated March 29, 2012, requesting funds from the Agent Cashier  
6 fund in order to make a \$300 subsistence payment to ATF confidential informant 298, and submitted the  
7 form for supervisory approval knowing that the document contained the falsified signature of Special  
8 Agent TH.

9 b. CONTRERAS signed a Payment Receipt falsely showing that on March 29, 2012,  
10 Special Agent TH signed the form and paid \$300 to ATF confidential informant JJ, also known as  
11 informant 298, and CONTRERAS submitted the form for supervisory approval knowing that Special  
12 Agent TH did not sign the form and did not make the purported payment to confidential informant JJ.

13 c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
14 Report of Expenditure form dated March 29, 2012, reporting that \$300 was paid to ATF confidential  
15 informant 298 and submitted the form for supervisory approval knowing that the document contained  
16 the falsified signature of Special Agent TH and Special Agent TH did not make the purported payment  
17 to informant 298.

18 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
19 Voucher dated March 31, 2012, accompanied by the Sub-Voucher Log listing the March 29, 2012  
20 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
21 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported March 29,  
22 2012 subsistence payment to informant 298 was not made as represented on the required ATF forms and  
23 the forms contained falsified signatures.

24 All in violation of Title 18, United States Code, Section 1001(a)(3).

25 COUNT TWENTY-NINE: (18 U.S.C § 1001(a)(3) – False Statements)

26 65. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
27 reference as if set forth in full herein.

1 66. Beginning on or about April 4, 2012, and continuing through on or about April 30, 2012, in  
2 the Western District of Washington, the defendant,

3 JAMES CONTRERAS,

4 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
5 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
6 executive branch of the government of the United States, that is, in connection with ATF investigation  
7 number 787045-12-0025:

8 a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
9 Request for Advance of Funds form dated April 4, 2012, requesting funds from the Agent Cashier fund  
10 in order to make a \$300 subsistence payment to ATF confidential informant 298, and submitted the form  
11 for supervisory approval knowing that the document contained the falsified signature of Special Agent  
12 TH.

13 b. CONTRERAS signed a Payment Receipt falsely showing that on April 4, 2012,  
14 Special Agent TH signed the form and paid \$300 to ATF confidential informant JJ, also known as  
15 informant 298, and CONTRERAS submitted the form for supervisory approval knowing that Special  
16 Agent TH did not sign the form and did not make the purported payment to confidential informant JJ.

17 c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
18 Report of Expenditure form dated April 4, 2012, reporting that on \$300 was paid to ATF confidential  
19 informant 298, and submitted the form for supervisory approval knowing that the document contained  
20 the falsified signature of Special Agent TH and Special Agent TH did not make the purported payment  
21 to informant 298.

22 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
23 Voucher dated April 30, 2012, accompanied by the Sub-Voucher Log listing the April 4, 2012  
24 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
25 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported April 4,  
26 2012 subsistence payment to informant 298 was not made as represented on the required ATF forms and  
27 the forms contained falsified signatures.

1 All in violation of Title 18, United States Code, Section 1001(a)(3).

2 COUNT THIRTY: (18 U.S.C. § 1001(a)(1) – False Statements)

3 67. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
4 reference as if set forth in full herein.

5 68. On or about April 30, 2012, in the Western District of Washington, the defendant,

6 JAMES CONTRERAS,

7 did knowingly and willfully make and use a false writing and document knowing the same to contain a  
8 materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the  
9 executive branch of the government of the United States, that is, in connection with ATF investigation  
10 number 787045-12-0025:

11 a. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
12 Request for Advance of Funds form dated April 30, 2012, requesting funds from the Agent Cashier fund  
13 in order to make a \$800 subsistence payment to ATF confidential informant 298, and submitted the form  
14 for supervisory approval knowing that the document contained the falsified signature of Special Agent  
15 TH.

16 b. CONTRERAS signed a Payment Receipt falsely showing that on April 30, 2012,  
17 Special Agent TH signed the form and paid \$800 to ATF confidential informant JJ, also known as  
18 informant 298, and CONTRERAS submitted the form for supervisory approval knowing that Special  
19 Agent TH did not make the purported payment to confidential informant JJ.

20 c. CONTRERAS wrote what purported to be the signature of Special Agent TH on a  
21 Report of Expenditure form dated April 30, 2012, reporting that \$800 was paid to ATF confidential  
22 informant 298 and submitted the form for supervisory approval knowing that the document contained  
23 the falsified signature of Special Agent TH and Special Agent TH did not make the purported payment  
24 to confidential informant JJ.

25 d. CONTRERAS signed and submitted for supervisory review a Cash Reimbursement  
26 Voucher dated April 30, 2012, accompanied by the Sub-Voucher Log listing the April 30, 2012  
27 expenditure from the Agent Cashier fund described above, and falsely certified that the disbursement  
28

1 from the Agent Cashier fund was correct and proper when, in fact, he knew that the purported April 30,  
2 2012 subsistence payment to informant 298 was not made as represented on the required ATF forms and  
3 the forms contained falsified signatures.

4 All in violation of Title 18, United States Code, Section 1001(a)(3).

5 COUNT THIRTY-ONE: (18 U.S.C § 641 – Embezzlement of Public Money in Excess of \$1,000)

6 69. Paragraphs 1 through 8 of this Indictment are hereby re-alleged and incorporated by  
7 reference as if set forth in full herein.

8 70. Beginning no later than on or about March 12, 2010, and continuing through on or about  
9 April 30, 2012, in the Western District of Washington, the defendant,

10 JAMES CONTRERAS,

11 did knowingly embezzle and convert to his own use and that of another, and did without authority  
12 convey and dispose of, money in excess of \$1,000 belonging to the United States and a department and  
13 agency thereof, that is, money in the ATF Agent Cashier fund, and said money had come into the  
14 possession and under the care of CONTRERAS by virtue of his employment as a Special Agent with the  
15 ATF, United States Department of Justice.

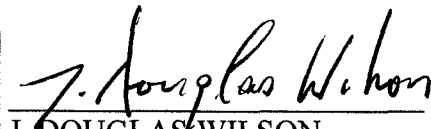
16 All in violation of Title 18, United States Code, Section 641.

17 A TRUE BILL:

18 DATED: 11/21/13

19 *Signature redacted pursuant to the policy*  
20 *Of the Judicial Conference of the United States*

21 \_\_\_\_\_  
22 FOREPERSON

22 

23 J. DOUGLAS WILSON  
24 Chief, Criminal Division  
25 For MELINDA HAAG  
26 United States Attorney  
27 Northern District of California

28   
SUSAN E. BADGER  
Assistant United States Attorney