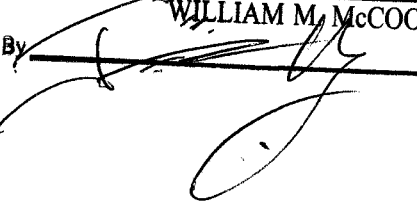


Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

NOVEMBER 21 20 13
WILLIAM M. McCOOL, Clerk
By  Deputy

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

UNITED STATES OF AMERICA, **CR 13** **373 MJP**
Plaintiff,)
v.) INDICTMENT
JAMES CONTRERAS,)
Defendant.)

The Grand Jury charges:

INTRODUCTION

At all times relevant to this indictment:

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

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

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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
28

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).
28

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
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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
28

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.

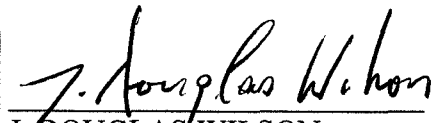
16 All in violation of Title 18, United States Code, Section 641.

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

26 
27 SUSAN E. BADGER
28 Assistant United States Attorney

DEFENDANT STATUS SHEET (One for each defendant)

I. CASE STATUS

NAME OF DEFENDANT JAMES CONTRERAS

USAO# 2012R01211 (NDCA)

 / MAGISTRATE'S NO. _____

 / DOCKET NO. (If Superseding Indictment) CR _____

II. CUSTODIAL STATUS

HAS DEFENDANT HAD INITIAL APPEARANCE IN THIS CASE? / yes X / no

IF YES:

 / DEFENDANT HAS BEEN RELEASED ON THE FOLLOWING CONDITIONS: _____

*** / A DETENTION HEARING HAS BEEN SCHEDULED FOR: _____

 / A DETENTION ORDER HAS BEEN ENTERED.

*** / TEMPORARY DETENTION

*** / PERMANENT DETENTION

 / IF THE DEFENDANT HAS HAD INITIAL APPEARANCE IN ANOTHER DISTRICT, THE ABOVE RELEASE ON CONDITIONS OR DETENTION ORDER WAS ENTERED IN THE _____ DISTRICT OF _____ AND THE DEFENDANT'S FIRST APPEARANCE IN THIS DISTRICT IS EXPECTED TO BE/HAS BEEN SET FOR _____ (Date)

 / DEFENDANT IS IN CUSTODY ON OTHER CHARGES:

 / SERVING A FEDERAL SENTENCE AT _____

 / PENDING FEDERAL CHARGES IN THE _____ DISTRICT OF _____

 / PENDING STATE CHARGES AT _____

III. ARRAIGNMENT

 / WARRANT TO ISSUE. (IF SO, PLEASE COMPLETE REVERSE)

 / SUMMONS TO BE ISSUED FOR APPEARANCE ON _____ CALENDAR. (DEFENDANT'S ADDRESS REQUIRED.)
(Date)

DEFENDANT'S ADDRESS: _____

X / LETTER TO DEFENSE COUNSEL FOR APPEARANCE ON to be determined CALENDAR.
(Date)

DEFENSE ATTORNEY'S NAME: Scott Terry

DEFENSE ATTORNEY'S ADDRESS: 25028 104th Avenue SE, Kent WA 98030

IV. CONDITIONS OF RELEASE

X / NOT PREVIOUSLY SET, SHOULD BE: personal recognizance bond
[e.g., P.R.; BAIL (listing conditions); DETENTION]

 / PREVIOUSLY SET, SHOULD BE:

 / CONTINUE CONDITIONS OF RELEASE

X / CONTINUE DETENTION

 / MODIFIED AS FOLLOWS (state reasons for modifying): _____

HAS THE FPD represented any subject or witness in this case? / Yes X / No

THE ESTIMATED TRIAL TIME IS 5 TRIAL DAYS.

(Date Form filled out)