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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

LUIS SALAS-FERRER and
JOSE VARGAS-RON, aka "Orlando"

No. **1:25-cr-00421**
Judge Rebecca R. Pallmeyer
Magistrate Judge Young B. Kim
RANDOM / Cat. 4

Violations: Title 18, United
States Code, Sections 371 and
922(a)(1)(A)

UNDER SEAL

COUNT ONE

The SPECIAL JUNE 2024 GRAND JURY charges:

1. At times material to this indictment:

a. Federal law required that a firearms dealer engaged in the business of dealing in firearms be licensed by the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF").

b. Defendant SALAS-FERRER did not possess an ATF license to engage in the business of dealing in firearms.

c. Defendant VARGAS-RON did not possess an ATF license to engage in the business of dealing in firearms.

2. Beginning no later than May 2025, and continuing until the present, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LUIS SALAS-FERRER,
and JOSE VARGAS-RON, aka "Orlando,"

defendants herein, who were not licensed firearms dealers, manufacturers, importers, or collectors within the meaning of Chapter 44, Title 18, United States

Code, did conspire with each other and others known and unknown to the grand jury to willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Section 922(a)(1).

3. It was part of the conspiracy that defendants SALAS-FERRER and VARGAS-RODRIQUEZ obtained and caused to be obtained firearms.

4. It was further part of the conspiracy that defendants SALAS-FERRER and VARGAS-RODRIQUEZ distributed firearms to others in Illinois for profit.

5. It was further part of the conspiracy that defendants SALAS-FERRER and VARGAS-RODRIQUEZ did conceal and hide, and cause to be concealed and hidden, the existence of and acts done in furtherance of the conspiracy.

Overt Acts

6. In furtherance of the conspiracy and to accomplish the objectives of the conspiracy, defendants committed one or more overt acts in the Northern District of Illinois, and elsewhere, which overt acts included but were not limited to the following:

a. On or about May 27, 2025, defendant SALAS-FERRER communicated with defendant VARGAS-RODRIQUEZ to discuss the price that he was willing to authorize VARGAS-RODRIQUEZ to accept for a Taurus model PT111G2 9mm firearm, bearing serial number TKS50461.

b. On or about May 27, 2025, defendant VARGAS-RODRIQUEZ sold a loaded Taurus model PT111G2 9mm firearm, bearing serial number TKS50461.

c. On or about May 28, 2025, defendant SALAS-FERRER sold an Intratec model AB10 9mm handgun, bearing serial number A016474, with an extended magazine, and a Beretta model 92FS 9mm handgun bearing serial number BER388164Z.

d. On or about June 10, 2025, defendant SALAS-FERRER sold a Taurus model PT92AFS 9mm pistol bearing serial number TOF94365.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL JUNE 2024 GRAND JURY further charges:

Beginning no later than on or about May 2025, and continuing until the present, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LUIS SALAS-FERRER,

defendant herein, not being a licensed dealer within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms;

In violation of Title 18, United States Code, Section 922(a)(1)(A).

COUNT THREE

The SPECIAL JUNE 2024 GRAND JURY further charges:

Beginning no later than on or about May 2025, and continuing until the present, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOSE VARGAS-RON, aka “Orlando,”

defendant herein, not being a licensed dealer within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms;

In violation of Title 18, United States Code, Section 922(a)(1)(A).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY