

**FILED**  
UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

SEP 10 2024

MITCHELL R. ELFERS  
CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA, )

Plaintiff, )

vs. )

**MICAH MAESTAS,** )  
**DOMINIC RAMIREZ,** )  
**DANIEL GARCIA,** )  
**JESUS RUIZ SALMERON, and** )  
**OSCAR RUIZ SALMERON,** )

Defendants. )

CRIMINAL NO. 24-1285DHU

Count 1: 18 U.S.C. § 371: Conspiracy;

Count 2: 18 U.S.C. §§ 922(a)(1)(A) and  
924: Dealing of Firearms Without a  
License; 18 U.S.C. § 2: Aiding and  
Abetting;

Counts 3, 7, 11, 12, 14: 18 U.S.C. §§ 922(o)  
and 924(a)(2): Unlawful Possession and  
Transfer of a Machinegun; 18 U.S.C. § 2:  
Aiding and Abetting;

Counts 4, 8: 21 U.S.C. §§ 841(a)(1),  
(b)(1)(C): Distribution of a Cocaine; 18  
U.S.C. § 2: Aiding and Abetting;

Counts 5, 9: 18 U.S.C. § 924(c)(1)(A)(i):  
Using and Carrying a Firearm During and in  
Relation to a Drug Trafficking Crime, and  
Possessing a Firearm in Furtherance of  
Such Crime; 18 U.S.C. § 2: Aiding and  
Abetting;

Count 6: 18 U.S.C. §§ 933(a)(1), (a)(3), and  
(b): Conspiracy to Commit Trafficking in  
Firearms;

Counts 10 and 13: 18 U.S.C. §§ 933(a)(1)  
and (b): Trafficking Firearms; 18 U.S.C. §  
2: Aiding and Abetting.

INDICTMENT

The Grand Jury charges:

Count 1

1. Beginning on a date unknown, but not later than on or about February 13, 2024, and continuing to in or about July 2024, in Bernalillo County, in the District of New Mexico, the defendants, **MICAH MAESTAS, DOMINIC RAMIREZ, and DANIEL GARCIA**, knowingly, willfully, and unlawfully combined, conspired, confederated, agreed, and acted interdependently with each other and others known and unknown to the Grand Jury, to commit dealing of firearms without a license.

Manner and Means

2. The manner and means by which the defendants, **MICAH MAESTAS, DOMINIC RAMIREZ, and DANIEL GARCIA**, sought to accomplish the objectives of the conspiracy included, among other things, the following:

- a. Using social media such as Instagram and Telegram accounts to advertise weapons they had for sale;
- b. Communicating via social media to negotiate the sale of various firearms, to include machine gun conversion devices;
- c. Transporting the firearms in vehicles to meet up with buyers; and
- d. Completing the sales and receiving cash in exchange for items.

Overt Acts

3. In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the District of New Mexico, and elsewhere:

- a. On March 1, 2024, **DOMINIC RAMIREZ** sent pictures of three different firearms he had for sale via Telegram to an undercover officer;

- b. On March 1, 2024, **DOMINIC RAMIREZ**, drove **MICAH MAESTAS** and **DANIEL GARCIA** to a Burger King to sell a firearm to an undercover officer;
- c. On March 1, 2024, **MICAH MAESTAS** handed the undercover officer a Glock 30 .45 caliber pistol, and advised him the bullets were already in the firearm, and the undercover officer would need to “break in” the machine gun conversion device because it was new;
- d. On March 1, 2024, **MICAH MAESTAS** accepted payment of approximately \$1,200 in U.S. currency from the undercover officer, and handed the payment to **DANIEL GARCIA**;
- e. On May 2, 2024, **DOMINIC RAMIREZ** and **DANIEL GARCIA** sold a Glock 19x with a machine gun conversion device to an undercover officer for approximately \$1,300 in U.S. currency;
- f. On May 9, 2024, **MICAH MAESTAS** and **DOMINIC RAMIREZ** sold a Diamondback firearm 300 blackout caliber rifle to an undercover officer for approximately \$1,100 in U.S. currency;
- g. On July 3, 2024, **MICAH MAESTAS** sold a Glock 19 9mm pistol with a machinegun conversion device to an undercover officer for \$1300.

In violation of 18 U.S.C. § 371.

Count 2

On or about March 1, 2024, and continuing until on or about July 3, 2024, in Bernalillo County, in the District of New Mexico, the defendants, **MICAH MAESTAS**, **DOMINIC RAMIREZ**, and **DANIEL GARCIA**, not being a licensed dealer of firearms within the

meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

In violation of 18 U.S.C. §§ 922(a)(1)(A), 924, and 2.

Count 3

On or about March 1, 2024, in Bernalillo County, in the District of New Mexico, the defendants, **MICAH MAESTAS, DOMINIC RAMIREZ, and DANIEL GARCIA**, knowingly possessed and transferred a machinegun, which the defendants knew to be capable of automatically firing more than one shot, without manual reloading, by a single function of the trigger.

In violation of 18 U.S.C. §§ 922(o), 924(a)(2), and 2.

Count 4

On or about March 1, 2024, in Bernalillo County, in the District of New Mexico, the defendants, **MICAH MAESTAS, DOMINIC RAMIREZ, and DANIEL GARCIA**, unlawfully, knowingly, and intentionally distributed a controlled substance, and the offense involved a mixture and substance containing a detectable amount of cocaine.

In violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 18 U.S.C. § 2.

Count 5

On or about March 1, 2024, in Bernalillo County, in the District of New Mexico, the defendant, **MICAH MAESTAS**, during and in relation to a drug trafficking crime for which the defendants may be prosecuted in a court of the United States, specifically, distribution of cocaine as charged in Count 4 of this indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed said firearm.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2.

Count 6

Beginning in or about May, 2024, and continuing to in or about July 2024, in Bernalillo County, in the District of New Mexico, the defendants, **MICAH MAESTAS, DOMINIC RAMIREZ, DANIEL GARCIA,** and **OSCAR RUIZ SALMERON**, knowingly combined, conspired, confederated, agreed, and acted interdependently with each other and others known and unknown to the Grand Jury, to ship, transport, transfer, cause to be transported, and otherwise dispose of one and more firearms to another person, in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony as defined in 18 U.S.C. § 932(a).

In violation of 18 U.S.C. §§ 933(a)(1), (a)(3), and (b).

Count 7

On or about May 3, 2024, in Bernalillo County, in the District of New Mexico, the defendants, **DOMINIC RAMIREZ,** and **DANIEL GARCIA,** knowingly possessed and transferred a machinegun, which the defendants knew to be capable of automatically firing more than one shot, without manual reloading, by a single function of the trigger.

In violation of 18 U.S.C. §§ 922(o), 924(a)(2), and 2.

Count 8

On or about May 3, 2024, in Bernalillo County, in the District of New Mexico, the defendants, **DOMINIC RAMIREZ,** and **DANIEL GARCIA,** unlawfully, knowingly, and intentionally distributed a controlled substance, and the offense involved a mixture and substance containing a detectable amount of cocaine.

In violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 18 U.S.C. § 2

Count 9

On or about May 3, 2024, in Bernalillo County, in the District of New Mexico, the defendants, **DOMINIC RAMIREZ**, and **DANIEL GARCIA**, during and in relation to a drug trafficking crime for which the defendants may be prosecuted in a court of the United States, specifically, distribution of cocaine as charged in Count 8 of this indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed said firearm.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2.

Count 10

On or about May 9, 2024, in Bernalillo County, in the District of New Mexico, the defendants, **MICAH MAESTAS**, **DOMINIC RAMIREZ** and **OSCAR RUIZ SALMERON**, transported, transferred, caused to be transported, and otherwise disposed of a firearm, to another person in and otherwise affecting commerce, knowing and having reasonable cause to believe that the use, carrying and possession of the firearm by this person would constitute a felony.

In violation of 18 U.S.C. §§ 933(a)(1), (b), and 2.

Count 11

On or about May 9, 2024, in Bernalillo County, in the District of New Mexico, the defendants, **MICAH MAESTAS**, **DOMINIC RAMIREZ**, and **OSCAR RUIZ SALMERON**, knowingly possessed and transferred a machinegun, which the defendants knew to be capable of automatically firing more than one shot, without manual reloading, by a single function of the trigger.

In violation of 18 U.S.C. §§ 922(o), 924(a)(2), and 2.

Count 12

On or between July 18, 2020, and June 13, 2024, in Bernalillo County, in the District of New Mexico, the defendant, **JESUS RUIZ SALMERON**, knowingly possessed and transferred

a machinegun, which the defendant knew to be capable of automatically firing more than one shot, without manual reloading, by a single function of the trigger.

In violation of 18 U.S.C. §§ 922(o), 924(a)(2) and 2.

Count 13

On or about July 3, 2024, in Bernalillo County, in the District of New Mexico, the defendant, **MICAH MAESTAS**, transported, transferred, caused to be transported, and otherwise disposed of a firearm, to another person in and otherwise affecting commerce, knowing and having reasonable cause to believe that the use, carrying and possession of the firearm by this person would constitute a felony.

In violation of 18 U.S.C. §§ 933(a)(1), (b), and 2.

Count 14

On or about July 3, 2024, in Bernalillo County, in the District of New Mexico, the defendant, **MICAH MAESTAS**, knowingly possessed a machinegun, which the defendant knew to be capable of automatically firing more than one shot, without manual reloading, by a single function of the trigger.

In violation of 18 U.S.C. §§ 922(o), 924(a)(2), and 2.

FORFEITURE ALLEGATIONS

Upon conviction of any offense in violation of 18 U.S.C. § 922, the defendants, **MICAH MAESTAS, DOMINIC RAMIREZ, DANIEL GARCIA, JESUS RUIZ SALMERON**, and **OSCAR RUIZ SALMERON**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to:

- a. a Glock 30, .45 caliber pistol, bearing serial number MCF005, and its attached machinegun conversion device;

- b. a Glock 19x bearing serial number AGKA188 on the frame, and BYFR904 on the slide, and its attached machinegun conversion device;
- c. a Diamondback firearm 300 blackout caliber rifle bearing serial number DB2180406,;
- d. a Glock 19 9mm pistol bearing serial number BKKV311 in the slide and BXYR392, and its attached machinegun conversion device;
- e. all accompanying ammunition.

Upon conviction of any offense in violation of 21 U.S.C. § 841, the defendants, **MICAH MAESTAS, DOMINIC RAMIREZ and DANIEL GARCIA**, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of each offense for which the defendant is convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense(s) of conviction.

The property to be forfeited to the United States includes, but is not limited to, the following:

- a. a Glock 30, .45 caliber pistol, bearing serial number MCF005, and its attached machinegun conversion device;
- b. a Glock 19x bearing serial number AGKA188 on the frame, and BYFR904 on the slide, and its attached machinegun conversion device;
- c. a Diamondback firearm 300 blackout caliber rifle bearing serial number DB2180406;
- d. a Glock 19 9mm pistol bearing serial number BKKV311 in the slide and BXYR392 and its attached machinegun conversion device;
- e. all accompanying ammunition.



MONEY JUDGEMENT

A sum of money representing property involved in the offenses set forth in Counts 10 and 13, and any property traceable to such property.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

RC Sumner  
Assistant United States Attorney