

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**25-CR-20246-WILLIAMS/GOODMAN**  
CASE NO. \_\_\_\_\_

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(e)(1)

18 U.S.C. § 924(d)(1)

UNITED STATES OF AMERICA

v.

JUAN CARLOS RODRIGUEZ,

Defendant.



**INDICTMENT**

The Grand Jury charges that:

On or about May 16, 2025, in Miami-Dade County, in the Southern District of Florida, the defendant,

**JUAN CARLOS RODRIGUEZ,**

knowingly possessed a firearm and ammunition in and affecting interstate commerce, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(g)(1).

Pursuant to Title 18, United States Code, Section 924(e)(1), it is further alleged that the defendant, **JUAN CARLOS RODRIGUEZ**, has three previous convictions by any court referred to in Section 922(g)(1) of Title 18 for a violent felony or a serious drug offense, or both, committed on occasions different from one another.

**FORFEITURE ALLEGATIONS**

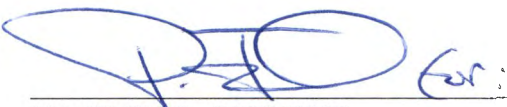
1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **JUAN CARLOS RODRIGUEZ**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 922(g), as alleged in this Indictment, the defendant shall forfeit to the United States any firearm and ammunition involved in or used in the commission of such offense, pursuant to Title 18, United States Code, Section 924(d)(1).

All pursuant to Title 18, United States Code, Section 924(d)(1) and the procedures set forth at Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

  
HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY

  
BRIANNA COAKLEY  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.: 25-CR-20246-WILLIAMS/GOODMAN

v.

JUAN CARLOS RODRIGUEZ,

## CERTIFICATE OF TRIAL ATTORNEY

## Court Division (select one)

- ☒ Miami      ☐ Key West      ☐ FTP  
☐ FTL      ☐ WPB

## Superseding Case Information:

New Defendant(s) (Yes or No) \_\_\_\_\_

Number of New Defendants \_\_\_\_\_

Total number of new counts \_\_\_\_\_

I do hereby certify that:

1. I have carefully considered the allegations of the Indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No  
List language and/or dialect: \_\_\_\_\_
4. This case will take 3 days for the parties to try.
5. Please check appropriate category and type of offense listed below:  

(Check only one)	(Check only one)
I <input checked="" type="checkbox"/> 0 to 5 days	<input type="checkbox"/> Petty
II <input type="checkbox"/> 6 to 10 days	<input type="checkbox"/> Minor
III <input type="checkbox"/> 11 to 20 days	<input type="checkbox"/> Misdemeanor
IV <input type="checkbox"/> 21 to 60 days	<input checked="" type="checkbox"/> Felony
V <input type="checkbox"/> 61 days and over	
6. Has this case been previously filed in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
7. Has a complaint been filed in this matter? (Yes or No) Yes  
If yes, Judge Lisette M. Reid Magistrate Case No. 25-MJ-03000
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
9. Defendant(s) in federal custody as of 05/16/2025
10. Defendant(s) in state custody as of N/A
11. Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? (Yes or No) No
14. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
15. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
16. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

By: \_\_\_\_\_

  
Brianna Coakley

Assistant United States Attorney

SDFL Court ID No. A5503184

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** JUAN CARLOS RODRIGUEZ

**Case No:** \_\_\_\_\_

Count #: 1

Possession of a Firearm and Ammunition by a Convicted Felon

Title 18, United States Code, Sections 922(g)(1) and 924(e)(1)

\* **Max. Term of Imprisonment:** Life

\* **Mandatory Min. Term of Imprisonment (if applicable):** 15 years

\* **Max. Supervised Release:** 5 years

\* **Max. Fine:** \$250,000

---

\*Refers only to possible term of incarceration, supervised release, and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-mj-03000-Reid

FILED BY TS D.C.

**May 19, 2025**

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - Miami

UNITED STATES OF AMERICA

v.

JUAN CARLOS RODRIGUEZ,

Defendant.

**CRIMINAL COVER SHEET**

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
2. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
3. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
4. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

Respectfully submitted,

HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY

By: /s/ Brianna Coakley  
BRIANNA COAKLEY  
Assistant United States Attorney  
Court ID No. A5503184  
United States Attorney's Office  
99 Northeast Fourth Street  
Miami, Florida 33132-2111  
Tel: 305-961-9127  
Email: Brianna.coakley@usdoj.gov

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Southern District of Florida

United States of America  
v.  
JUAN CARLOS RODRIGUEZ,

Case No. 25-mj-03000-Reid

*Defendant.*

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 16, 2025, in the county of Miami-Dade in the  
Southern District of Florida, the defendant(s) violated:

*Code Section*

18 U.S.C. § 922(g)(1)

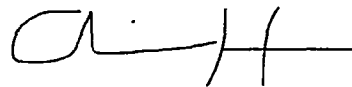
*Offense Description*

Felon in Possession of a Firearm and Ammunition

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.



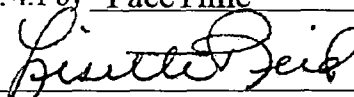
*Complainant's signature*

Adrian Halley, Special Agent ATF

*Printed name and title*

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by FaceTime

Date: May 17, 2025



*Judge's signature*

City and state: Miami, Florida

Honorable Lisette M. Reid, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Adrian Halley, being first duly sworn, hereby depose and state as follows::

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") and have been so since February 2008. I have received training and participated in investigations related to firearms, narcotics, violent crimes, drug, and violent crime street organizations. I am currently assigned to the ATF High Intensity Drug Trafficking Area Task Force. I have personally been involved in numerous investigations concerning the possession, violations of federal firearms laws.

2. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7). I have attended multiple courses on conducting criminal investigations and have authored multiple electronic search warrants and complaints during my time with the ATF. During my law enforcement career, I have participated in multiple investigations involving violations of federal firearms in violation of Title 18, United States Code, possession of a firearm and ammunition by a convicted felon, in violation of Title 18, United States Code, Sections 922(g).

3. I submit this Affidavit in support of a criminal complaint charging **Juan Carlos RODRIGUEZ**, whose date of birth is February 9, 1979, and whose social security number ends in 5426, with: Possession of a Firearm and Ammunition by a Convicted Felon, in violation of Title 18, United States Code, Sections 922(g)(1).

4. This Affidavit is based on my personal investigation and investigation by others, including federal and local law enforcement officials whom I know to be reliable and trustworthy. The facts and information contained in this Affidavit are based on my personal knowledge and

observation, as well as information received in my official capacity from other individuals, including other law enforcement officers involved in this investigation, as well as my review of records, documents, and other physical items obtained during the course of this investigation. This Affidavit does not include every fact known to me about this investigation, but rather only those facts sufficient to establish probable cause.

**PROBABLE CAUSE**

5. As part of the investigation, law enforcement is working with a confidential informant (the "CI"),<sup>1</sup> who met with ATF agents regarding **RODRIGUEZ**, a multi-time convicted felon involved in various types of criminal activity, including narcotics trafficking and firearm possession.

6. ATF intelligence analysis, along with queries of state and local databases, was conducted on RODRIGUEZ. A photograph of RODRIGUEZ from a law enforcement database was shown to the CI, who confirmed his identity. RODRIGUEZ is a multi-convicted felon with the following prior felony convictions in the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida that include, but are not limited to, (a) strongarm robbery, in violation of Florida Statute 812.13(2) in Case No. F02-031621, (b) battery of a law enforcement officer, in violation of Florida Statute 784.07(2)(B), in Case No. F05-025569. Each of these crimes of conviction are punishable by more than one year imprisonment.

---

<sup>1</sup> The CI is cooperating with law enforcement for financial means. The CI has been cooperating with law enforcement since approximately 2012. To the best of my knowledge, over the course of the CI's cooperation with law enforcement, the CI has provided reliable information.



***RODRIGUEZ Discusses Providing Armed Security Services***

7. According to CI, the CI first met RODRIGUEZ at a bar in the Allapattah area of Miami, Florida. During the meeting, RODRIGUEZ informed the CI that he sold fentanyl and marijuana and that he had access to firearms. RODRIGUEZ provided a telephone number of 786-560-6975 to the CI.

8. On or about May 10, 2025, the CI again met with RODRIGUEZ, this time Miami Beach, Florida, near the area of 4th Street and Washington Avenue. According to the CI, RODRIGUEZ claimed that he and an unknown associate were security guards and would conduct security for high level narcotics traffickers and celebrities. RODRIGUEZ stated he and his associate were in prison for a significant amount of time and was very cautious when meeting new people. RODRIGUEZ claimed to have been in prison for approximately 17 years. According to RODRIGUEZ, he was armed while conducting security and at times would use a “dirty”<sup>2</sup> machine gun as his security weapon.

9. On or about May 14, 2025, the CI communicated with RODRIGUEZ by text message and introduced him to persons who were in fact ATF undercover agents (the “UCs”) that the CI represented to be interested in hiring RODRIGUEZ for armed security.

10. In the text communications, RODRIGUEZ agreed to meet the UCs and the CI at an ATF controlled location in Miami that same day. The meeting ultimately did not take place, however, RODRIGUEZ agreed to meet the following day.

11. On or about May 15, 2025, at approximately 3:26 p.m., RODRIGUEZ arrived in a silver four-door BMW passenger vehicle at the ATF controlled location. RODRIGUEZ entered

---

<sup>2</sup> “Dirty” is a slang term for a firearm that was previously used in a crime or that was stolen.

the location and introduced himself as "Juan Carlos." RODRIGUEZ then informed the UCs he was a bodyguard and previously worked with "Rosalia" a famous Spanish singer and for rich Russians. According to RODRIGUEZ, he has conducted security details in Los Angeles, San Diego, San Francisco, Mexico City and Europe. RODRIGUEZ explained he would escort his clients, conduct perimeter checks, look out for stalkers and always be on alert.

12. RODRIGUEZ then inquired about the "lick" (plan). The UCs explained they were looking for an armed security detail to move some "work" (narcotics) scheduled for the following day. They further informed RODRIGUEZ that they did not trust the prospective buyers because on a previous occasion they had arrived armed.

13. The UCs complimented RODRIGUEZ on being a "big dude" and explained it was only three (3) of them and they needed additional help. They explained the prospective buyers arrived with five (5) individuals just to pick up one (1) kilo. RODRIGUEZ inquired if the buyers had rifles or visible firearms. The UCs explained one (1) subject was holding a pistol by his side and other subjects were standing around with their hands by their waistbands indicating they were possibly armed. The UCs also informed RODRIGUEZ that they would rely on his expertise to decide if the security detail would need additional people or just him.

14. RODRIGUEZ stated he would charge the UCs a "stack" (i.e., \$1,000) and everyone will go home safe. RODRIGUEZ then asked the UCs what kind of firearms they had, which he was informed they had pistols. RODRIGUEZ stated he had a Glock. The UC asked RODRIGUEZ if could obtain any "heavy shit" (i.e., rifles). In response, RODRIGUEZ stated he would call a friend and attempt to get an AR (rifle) or something (another type of firearm) and also noted that

he had spent 17 years in prison. RODRIGUEZ explained how he would intimidate the buyers by standing with his hand on his firearm.

15. RODRIGUEZ and the UCs agreed to meet the following day at 1:00 p.m. RODRIGUEZ would provide the UCs with armed security during a narcotics transaction for \$1,000. RODRIGUEZ subsequently left the ATF undercover location.

#### *The May 16 Arrest*

16. On May 16, 2025, RODRIGUEZ arrived at the same Miami ATF undercover location as the previous day, this time at approximately 1:02pm. RODRIGUEZ was seen by surveillance unit as he arrived and exited his vehicle, wearing a black security shirt and holding a rolling suitcase.

17. RODRIGUEZ entered inside the ATF undercover location and met with the UCs and CI. During the meeting RODRIGUEZ opened the rolling suitcase and presented an American Tactical Omni Hybrid Multi caliber rifle, along with a Ruger LCPII .380 caliber pistol. RODRIGUEZ then returned to his vehicle and retrieved a Glock 22 Gen5, .40 caliber pistol, which he also presented to the UC, upon return to the ATF undercover location.

18. After UCs inspected all three firearms, the UCs provided RODRIGUEZ with \$500.00 of prerecorded ATF funds, which was provided as partial payment for the armed security detail RODRIGUEZ intended to do. Shortly thereafter, RODRIGUEZ was apprehended and taken into ATF custody without incident.


19. All three firearms were loaded. The American Tactical Omni Hybrid Multi caliber rifle was fitted with a high capacity magazine. The firearms and ammunition were taken into evidence. Both the firearms and ammunition were all manufactured outside the State of Florida.

20. After RODRIGUEZ's arrest, while obtaining biographical information, RODRIGUEZ confirmed he was previously incarcerated for 17 years and was a convicted felon.

**CONCLUSION**

21. Based on the foregoing, I respectfully submit that there is probable cause to support a criminal complaint charging **Juan Carlos RODRIGUEZ**, whose date of birth is February 9, 1979, and whose social security number ends in 5426, with: Possession of a Firearm and Ammunition by a Convicted Felon, in violation of Title 18, United States Code, Section 922(g)(1).

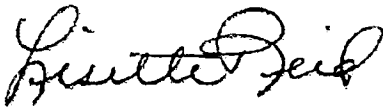
**FURTHER AFFIANT SAYETH NAUGHT.**



---

ADRIAN HALLEY  
SPECIAL AGENT  
BUREAU OF ALCOHOL, TOBACCO,  
FIREARMS AND EXPLOSIVES

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1  
by Face Time this 17th day of May 2025.



---

HONORABLE LISETTE M. REID  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF FLORIDA