

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America)

v.)

Luis Carlos MARTINEZ-MOJE)

Case No.)

25-3284 MJ)

Defendant(s)

CRIMINAL COMPLAINT

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 August 14, 2025 in the county of Dona Ana in the
 District of New Mexico, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 922(g)(5)(b)

Alien in possession of ammunition

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.


Complainant's signature

Adriana Bauman HSI Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

by telephone. JHR

Date: 08/14/2025


Judge's signature

City and state: Las Cruces, New Mexico

Jerry H. Ritter, United States Magistrate Judge

Printed name and title

United States of America

V.

Luis Carlos Martinez Monge

I, Adriana Bauman, Affiant, being duly sworn, state that the following information is true and correct to the best of my knowledge and belief.

On August 14, 2025, at approximately 12:15 pm, Las Cruces Dona Ana Metro Narcotics Officer L. Rios, conducted a traffic stop of a 2007 Dodge Caravan, traveling Southbound on Interstate 25, mile marker 35, located within the District of New Mexico. The purpose for the traffic stop was for speeding.

Officer Rios approached the vehicle and identified the driver and sole occupant as Luis Carlos Martinez Monge, a Mexican national, and in possession of a valid Driver's License issued by the State of Chihuahua, Mexico and a valid Border Crossing Card issued by the United States. As he was handed the identification documents, Officer Rios noticed that MONGE's hand was shaking and as he began asking MONGE questions, MONGE's breathing became shallow.

MONGE stated to Officer Rios that he was on his way to El Paso. Officer Rios asked MONGE if he was going to declare anything to Customs and Border Protection or Mexican Customs, to which MONGE responded that if he were to stop in El Paso to buy something then he would declare it. Officer Rios asked MONGE, but right now at this moment, do you have anything that you would declare to Customs Officials in the United States or Mexico. MONGE responded by saying that at that moment, if he didn't stop in El Paso and he would exit directly into Mexico, he would not have anything to declare.

Officer Rios was given verbal and written consent by MONGE to search the vehicle. Officer Rios conducted a search of the vehicle and found boxes of ammunition concealed in a non-factory compartment in the back center area underneath the middle seats. The front driver seat and back seats had to be removed to gain full access to the non-factory compartment. MONGE was then transported to the Las Cruces Police Department for further questioning.

HSI El Paso was informed of the seizure and responded. At the police station, MONGE read and signed a Miranda Statement of Rights form in the Spanish language in the presence of HSI Task Force Officer (TFO) Adriana Bauman and HSI Special Agent (SA) Nicolas Pena.

MONGE stated the following information during the post-Miranda debrief.

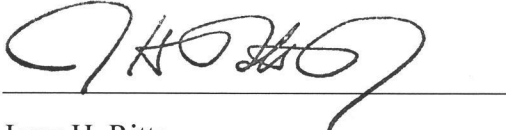
MONGE stated to investigators, he traveled to Albuquerque New Mexico to pick up ammunition at the request of an acquaintance he met in Chihuahua, Mexico, in exchange for money. MONGE further stated to investigators the acquaintance paid him \$1,600 up front for trip expenses and had his hotel accommodation paid. MONGE stated to investigators, he would be receiving \$200 USD per box of ammunition he transported back.

MONGE, a Mexican National, who was admitted into the United States under a nonimmigrant tourist visa, making it unlawful for him to ship, transport, possess, or receive any firearms or ammunition, stated he knew that he would be doing something unlawful when he was asked to travel to Albuquerque. Furthermore, MONGE stated he personally placed the boxes of ammunition into the non-factory compartment, in an effort to conceal the ammunition for his trip back to the El Paso, Texas/ Ciudad Juarez, Chihuahua, Mexico area.

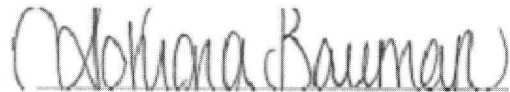
The vehicle was towed by New Mexico State Police. A total of 699 boxes of 7.62x39 high caliber ammunition (13,980 rounds) were found during the search. HSI investigators noticed that 400 boxes (8,000 rounds) were TelaAmmo USA 7.62x39 Full Metal Jacket and 299 boxes (5,980 rounds) are New Republic 7.62x39 ammunition. After further research, HSI Investigators found that TelaAmmo is manufactured in the state of Florida and New Republic Ammunition is manufactured in the European Union. Both brands of ammunition have traveled in interstate or foreign commerce to be present in New Mexico. HSI Investigators seized and took custody of the ammunition, vehicle and \$1,340 USD.

Because this affidavit is being submitted for the purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

I make this affidavit on the basis of my personal knowledge and information furnished to me by other law enforcement TFOs.



Jerry H. Ritter
U. S. Magistrate Judge



Adriana Bauman
HSI Task Force Officer