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JUN 11 2024	
CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	DEPUTY

1 GARY M. RESTAINO  
 2 United States Attorney  
 District of Arizona

3 ADDISON OWEN  
 4 Assistant United States Attorney  
 Arizona State Bar No. 031263  
 5 Two Renaissance Square  
 40 N. Central Ave., Suite 1800  
 Phoenix, Arizona 85004  
 6 Telephone: 602-514-7500  
 Email: addison.owen@usdoj.gov  
 7 Attorneys for Plaintiff

REDACTED FOR PUBLIC DISCLOSURE

8 IN THE UNITED STATES DISTRICT COURT  
 9 FOR THE DISTRICT OF ARIZONA

10 United States of America,  
 11 Plaintiff,

12 vs.

13 Edwin Alexey Gamboa,  
 14  
 15 Defendant.

No. | CR-24-00999-PHX-DWL (ESW)

**INDICTMENT**

VIO: 18 U.S.C. §§ 922(n) and  
 924(a)(1)(D)  
 (Illegal Receipt of a Firearm by a  
 Person Under Indictment)  
 Count 1

21 U.S.C. §§ 841(a)(1) and  
 841(b)(1)(B)(vi)  
 (Possession with Intent to Distribute  
 Fentanyl)  
 Count 2

18 U.S.C. § 924(c)(1)(A)(i)  
 (Possession of a Firearm in  
 Furtherance of/Use of a Firearm  
 During and in Relation to a Drug  
 Trafficking Offense)  
 Count 3

18 U.S.C. §§ 924(d), 981 and 982,  
 21 U.S.C. §§ 853 and 881; and  
 28 U.S.C. § 2461(c)  
 (Forfeiture Allegation)

**THE GRAND JURY CHARGES:**

**COUNT 1**

27 On or between May 31, 2024 and June 2, 2024, in the District of Arizona, Defendant  
 28 EDWIN ALEXEY GAMBOA, who was then under indictment for a crime punishable by

1 imprisonment for a term exceeding one year in United States District Court, District of  
2 Arizona Case No. CR24-00922-TUC-RCC (MSA), did willfully transport and receive two  
3 firearms, that are,

4 (1) a Glock 19X, 9mm, Serial Number (SN): CAHR127, and,

5 (2) a Taurus G3, 9mm, Pistol, SN: ADB950952,

6 both firearms having each been shipped and transported in interstate and foreign  
7 commerce.

8 All in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

9 **COUNT 2**

10 On or about June 2, 2024, in the District of Arizona, Defendant EDWIN ALEXEY  
11 GAMBOA did knowingly and intentionally possess with the intent to distribute 40 grams  
12 or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-  
13 phenylethyl)-4-piperidinyl], propanamide (commonly known as fentanyl), a Schedule II  
14 controlled substance.

15 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
16 841(b)(1)(B)(vi).

17 **COUNT 3**

18 On or about June 2, 2024, in the District of Arizona, Defendant EDWIN ALEXEY  
19 GAMBOA did knowingly carry and use a firearm during and in relation to a drug  
20 trafficking crime, and did knowingly possess a firearm in furtherance of a drug trafficking  
21 crime, that is, Possession with Intent to Distribute Fentanyl, as alleged in Count 2 of this  
22 Indictment, which is a felony prosecutable in a Court of the United States.

23 All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

24 **FORFEITURE ALLEGATION**

25 The Grand Jury realleges and incorporates the allegations of Counts 1 through 3 of  
26 this Indictment, which are incorporated by reference as though fully set forth herein.

27 Pursuant to 18 U.S.C. Sections 924(d), 981 and 982; 21 U.S.C. Sections 853 and  
28 881; and, 28 U.S.C. Section 2461(c), and upon conviction of the offenses alleged in Counts

1 1 through 3 of this Indictment, Defendant shall forfeit to the United States of America all  
2 right, title, and interest in (a) any property constituting, or derived from, any proceeds the  
3 persons obtained, directly or indirectly, as the result of the offense, and (b) any of the  
4 Defendant's property used, or intended to be used, in any manner or part, to commit, or to  
5 facilitate the commission of, such offense as to which property the Defendant is liable,  
6 including, but not limited to, the following property involved and used in the offense:

- 7 (1) a Glock 19X, 9mm, SN: CAHR127,
- 8 (2) a Taurus G3, 9mm, Pistol, SN: ADB950952,
- 9 (3) thirty-five (35) rounds of miscellaneous 9 mm ammunition;
- 10 (4) one (1) round of .22 caliber ammunition; and,
- 11 (5) \$1970.00.

12 If any forfeitable property, as a result of any act or omission of the Defendant:

- 13 (1) cannot be located upon the exercise of due diligence,
- 14 (2) has been transferred or sold to, or deposited with, a third party,
- 15 (3) has been placed beyond the jurisdiction of the court,
- 16 (4) has been substantially diminished in value, or
- 17 (5) has been commingled with other property which cannot be divided without

18 difficulty,

19 it is the intent of the United States to seek forfeiture of any other property of said  
20 Defendant up to the value of the above-described forfeitable property, pursuant to 21  
21 U.S.C. Section 853(p).

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3 All in accordance with Title 18, United States Code, Sections 924(d), 981, and 982;  
4 Title 21, United States Code, Sections 853 and 881; Title 28, United States Code, Section  
5 2461(c); and Rule 32.2, Federal Rules of Criminal Procedure.

6

A TRUE BILL

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/S/

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FOREPERSON OF THE GRAND JURY

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Date: June 11, 2024

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11 GARY M. RESTAINO  
12 United States Attorney  
13 District of Arizona

13 /S/

14 ADDISON OWEN  
15 Assistant U.S. Attorney

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