

UNITED STATES DISTRICT COURT

for the

WESTERN District of TEXAS

FILED

March 04, 2022

CLERK, U.S. DISTRICT COURT WESTERN DISTRICT OF TEXAS

BY: Jackson DEPUTY

United States of America v.

Joshua Christopher RAMIREZ

Case No. SA-22-MJ-00322

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 February 20, 2022 in the county of Bexar in the Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC § 922(g)(1)

Felon In Possession of a Firearm.

Penalties: Up to 10 Years Imprisonment, \$250,000 Fine, 3 Years Supervised Release, \$100 Mandatory Special Assessment

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

ERIC WATKINS

Digitally signed by ERIC WATKINS Date: 2022.03.03 16:01:12 -06'00'

Complainant's signature

Eric A. Watkins / ATF SA

Printed name and title

- Sworn to before me and signed in my presence. Sworn to telephonically and signed electronically.

Date: March 4, 2022

Handwritten signature of Elizabeth S. Chestney

Judge's signature

City and state: San Antonio, Texas

Elizabeth S. Chestney, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Eric Watkins, duly sworn do hereby depose and state:

1. Your affiant has been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives since October 2018. Additionally, between April 2014 and October 2018 your affiant was a sworn ATF Task Force Officer, and therefore, since April 2014, your affiant has participated in investigations concerning violations of Titles 18, 21, and 26.
2. On February 18, 2022, San Antonio Police Department officers responded to a residential address on the 100 block of Dublin Avenue in San Antonio, Texas in reference to the shooting of a child. Officers found a two-year-old female juvenile with a single gunshot to the head. San Antonio FD medical personnel transported the juvenile to a hospital where she eventually died.
3. During the investigation, officers reviewed the 911 call and found that the female caller had reported that her two-year-old daughter, the juvenile, had shot herself with the female's boyfriend's gun. The juvenile's mother (the 911 caller) was also at the residence when officers arrived on February 18. Officers identified the female's boyfriend, who resides at the incident address, as Joshua Christopher RAMIREZ. RAMIREZ was not at the residence when officers arrived.
4. Officers obtained a search warrant for the residence and found a black duffel bag beside the exterior trashcan adjacent to the driveway, which contained a Glock model 35, .40 caliber handgun with SN – BLBT874. The Glock handgun had a single spent shell casing lodged in the firearm's ejection port. Officers also located male clothing, male underwear, and male hygiene products in the same duffel bag as the Glock handgun.
5. During a recorded interview with Child Protective Services, the juvenile's mother admitted that RAMIREZ sells illegal drugs from a hotel because he is not allowed to sell drugs from the Dublin Avenue residence and that RAMIREZ had packed the duffel bag in preparation to travel to the hotel to sell illegal drugs for the evening. During a recorded interview with SAPD, the mother admitted that RAMIREZ is her boyfriend and that the juvenile shot herself with the handgun.
6. On February 20, 2022, RAMIREZ appeared at SAPD for a voluntary interview. During the interview, RAMIREZ admitted that he is a convicted felon but denied possession of the firearm. RAMIREZ initially denied possession of the duffel bag but changed his statement and admitted he and the juvenile's mother owned the bag together. RAMIREZ also admitted to living at the residence and being present at the time of the shooting.
7. SA Watkins reviewed RAMIREZ criminal history and found that on November 18, 2011, RAMIREZ was convicted of Aggravated Assault Against a Public Servant (a First-Degree

Felony Offense).

8. An ATF Interstate Nexus examination revealed the Glock model 35 was not manufactured in the State of Texas, and therefore traveled in interstate and/or foreign commerce.

Based on the above facts, your affiant believes there is probable cause that Joshua Christopher RAMIREZ is a convicted felon who possessed a firearm in violation of 18 U.S.C. §922(g)(1).

ERIC WATKINS Digitally signed by ERIC
WATKINS
Date: 2022.03.03 16:01:38 -06'00'

Special Agent Eric A. Watkins
Bureau of Alcohol, Tobacco, Firearms and
Explosives

SUBSCRIBED AND SWORN TO ME THIS 4th DAY OF MARCH 2022


HONORABLE ELIZABETH S. CHESTNEY
UNITED STATES MAGISTRATE JUDGE