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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2019 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICARDO ALEJANDRO BAZAN,
 aka "Ricky,"
 "Chuco," and
 "Chu,"
 NOEL GRANADOS,
 aka "Noel,"
 "Big Show," and
 "Show,"
 DOROTEO MENDOZA TORREZ,
 aka "Guerro" and
 "Guerito,"
 EDULFO LEYVA PEREZ,
 aka "Gallo,"
 LADELL LAVELL MCPHERSON,
 aka "Dooley,"
 MANUEL IGNACIO RUIZ,
 aka "Manny,"
 "Manual,"
 "Mandy," and
 "Fresh,"
 ESTEVAN ORTIZ,
 aka "Steve,"
 "Stevie,"
 "Wonder," and
 "Little Man,"
 FAUSTO BARRAZA,
 ALBERTO VERDUZCO,
 WILLIAM DENIZ CASTELLANOZ,
 aka "Willy,"

ED CR No. **5:20-cr-00019**

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to Distribute and to Possess with Intent to Distribute Controlled Substances; 21 U.S.C. §§ 841(a)(1), (b)(1)(A), (b)(1)(B), (b)(1)(C): Distribution and Possession with Intent to Distribute of Controlled Substances; 18 U.S.C. § 922(g)(1): Felon in Possession of Ammunition; 18 U.S.C. § 924(d)(1), 21 U.S.C. § 853, 28 U.S.C. § 2461(c): Criminal Forfeiture]

1 "Willo," and
 2 "Fatty,"
 3 REGINALD LOUIS ROBINSON,
 4 aka "El Cagon" and
 5 "Reggie,"
 6 STERLING TORRES-VERDUZCO,
 7 aka "Primo,"
 8 "Fatty's Cousin," and
 9 "Willy's Cousin,"
 10 RAFEAL AKINYEMI FAWEHINMI,
 11 PHILLIP REGINALD HURT,
 12 aka "Dude,"
 13 JOSEPH GEORGE MARTINEZ,
 14 aka "Johnny,"
 15 SHANNON RAY WEBB,
 16 aka "Ray,"
 17 JONATHAN DARNELL CAREY,
 18 CHARLES DWIGHT FINLEY,
 19 aka "Nephew,"
 20 MARGARITO LUJANO, JR.,
 21 aka "Cousin,"
 22 GLENN CHRISTOPHER ESTRADA,
 23 aka "Old Man,"
 24 ENRIQUE GUZMAN ROMERO,
 25 EMANUEL ROBERT MCMEANS, III,
 26 CARLTON TERRELL YOUNG, and
 27 JASON DONNELL BELTON,
 28

Defendants.

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 846]

[ALL DEFENDANTS]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown and continuing until on or about May 24, 2018, in Riverside County and San Bernardino County, each within the Central District of California, and elsewhere, defendants RICARDO ALEJANDRO BAZAN, also known as ("aka") "Ricky," "Chuco," and "Chu"; NOEL GRANADOS, aka "Noel," "Big Show," and "Show"; DOROTEO MENDOZA TORREZ, aka "Guerro" and "Guerito" ("MENDOZA TORREZ"); EDULFO LEYVA PEREZ, aka "Gallo" ("LEYVA PEREZ"); LADELL LAVELL MCPHERSON, aka

1 "Dooley"; MANUEL IGNACIO RUIZ, aka "Manny," "Manual," "Mandy," and
2 "Fresh"; ESTEVAN ORTIZ, aka "Steve," "Stevie," "Wonder," and "Little
3 Man"; FAUSTO BARRAZA; ALBERTO VERDUZCO ("A. VERDUZCO"); WILLIAM DENIZ
4 CASTELLANOZ, aka "Willy," "Willo," and "Fatty"; REGINALD LOUIS
5 ROBINSON, aka "El Cagon" and "Reggie"; STERLING TORRES-VERDUZCO, aka
6 "Primo," "Fatty's Cousin," and "Willy's Cousin" ("S. VERDUZCO");
7 RAFEAL AKINYEMI FAWEHINMI; PHILLIP REGINALD HURT, aka "Dude"; JOSEPH
8 GEORGE MARTINEZ, aka "Johnny"; SHANNON RAY WEBB, aka "Ray"; JONATHAN
9 DARNELL CAREY; CHARLES DWIGHT FINLEY, aka "Nephew"; MARGARITO LUJANO,
10 JR., aka "Cousin"; GLENN CHRISTOPHER ESTRADA, aka "Old Man"; ENRIQUE
11 GUZMAN ROMERO; EMANUEL ROBERT MCMEANS, III; CARLTON TERRELL YOUNG;
12 and JASON DONNELL BELTON, and others known and unknown to the Grand
13 Jury, conspired with each other to knowingly and intentionally
14 distribute and to possess with intent to distribute the following
15 controlled substances:

- 16 1. at least five kilograms of a mixture and substance
17 containing a detectable amount of cocaine, a Schedule II narcotic
18 drug controlled substance, in violation of Title 21, United States
19 Code, Sections 841(a)(1), (b)(1)(A)(ii)(II);
- 20 2. at least 500 grams of a mixture and substance containing a
21 detectable amount of cocaine, a Schedule II narcotic drug controlled
22 substance, in violation of Title 21, United States Code, Sections
23 841(a)(1), (b)(1)(B)(ii)(II);
- 24 3. at least 50 grams of methamphetamine, a Schedule II
25 controlled substance, in violation of Title 21, United States Code,
26 Sections 841(a)(1), (b)(1)(A)(viii);

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1 4. at least five grams of methamphetamine, a Schedule II
2 controlled substance, in violation of Title 21, United States Code,
3 Sections 841(a)(1), (b)(1)(B)(viii);

4 5. at least one kilogram of a mixture and substance containing
5 a detectable amount of heroin, a Schedule I narcotic drug controlled
6 substance, in violation of Title 21, United States Code, Sections
7 841(a)(1), (b)(1)(A)(i);

8 6. at least 100 grams of a mixture and substance containing a
9 detectable amount of heroin, a Schedule I narcotic drug controlled
10 substance, in violation of Title 21, United States Code, Sections
11 841(a)(1), (b)(1)(B)(i); and

12 7. a mixture and substance containing a detectable amount of
13 heroin, a Schedule I narcotic drug controlled substance, in violation
14 of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

15 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
16 ACCOMPLISHED

17 The objects of the conspiracy were to be accomplished, in
18 substance, as follows:

19 1. Defendants MENDOZA TORREZ and LEYVA PEREZ, and others known
20 and unknown, would obtain sources of supply for drugs in Mexico and
21 Colombia, and arrange for the drugs to be delivered to Southern
22 California.

23 2. Defendants BAZAN, GRANADOS, MCPHERSON, RUIZ, ORTIZ, and
24 BARRAZA, and others known and unknown, would arrange to purchase
25 drugs that had been delivered to Southern California from Mexico and
26 Colombia in order to ship the drugs to other states for further
27 distribution.

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1 3. Defendants S. VERDUZCO, FAWEHINMI, and ROMERO, and others
2 known and unknown, would drop off, pick up, and transport drugs
3 within Southern California that had been delivered from Mexico and
4 Colombia.

5 4. Defendant ORTIZ, and others known and unknown, would build
6 hidden compartments in vehicles for the purpose of concealing drugs
7 and drug proceeds that would be transported between Southern
8 California and other states.

9 5. Defendants BAZAN, GRANADOS, MCPHERSON, RUIZ, ORTIZ,
10 BARRAZA, A. VERDUZCO, CASTELLANOZ, ROBINSON, S. VERDUZCO, CAREY,
11 LUJANO, ESTRADA, ROMERO, and MCMEANS, and others known and unknown,
12 would send drugs from Southern California to other states for further
13 distribution, including by shipping parcels containing drugs via
14 United States Postal Service ("USPS") mail, transporting drugs in
15 hidden compartments in vehicles, and arranging for other co-
16 conspirators to do so.

17 6. Defendants HURT, FINLEY, YOUNG, and BELTON, and others
18 known and unknown, would receive drugs sent from Southern California
19 to other states in order to further distribute them.

20 7. Defendants A. VERDUZCO, CASTELLANOZ, FAWEHINMI, HURT,
21 FINLEY, and YOUNG, and others known and unknown, would send proceeds
22 or arrange other co-conspirators to send proceeds from the sales of
23 drugs from other states to Southern California.

24 8. Defendants BAZAN, GRANADOS, MCPHERSON, ORTIZ, BARRAZA, A.
25 VERDUZCO, CASTELLANOZ, ROBINSON, S. VERDUZCO, MARTINEZ, WEBB, CAREY,
26 LUJANO, and ESTRADA, and others known and unknown, would receive
27 proceeds from the sales of drugs sent from other states to Southern
28 California, including by receiving parcels containing drug proceeds

1 via USPS mail, transporting drug proceeds in hidden compartments in
2 vehicles, and arranging other co-conspirators to do so.

3 C. OVERT ACTS

4 In furtherance of the conspiracy and to accomplish its objects,
5 on or about the following dates, defendants BAZAN, GRANADOS, MENDOZA
6 TORREZ, LEYVA PEREZ, MCPHERSON, RUIZ, ORTIZ, BARRAZA, A. VERDUZCO,
7 CASTELLANOZ, ROBINSON, S. VERDUZCO, FAWEHINMI, HURT, MARTINEZ, WEBB,
8 CAREY, FINLEY, LUJANO, ESTRADA, ROMERO, MCMEANS, YOUNG, and BELTON,
9 and others known and unknown to the Grand Jury, committed various
10 overt acts in Riverside County and San Bernardino County, within the
11 Central District of California, and elsewhere, including, but not
12 limited to, the following:

13 1. On or about October 1, 2016, at a post office in Hesperia,
14 California, defendant CAREY mailed a USPS parcel containing
15 approximately 4.995 kilograms of cocaine to Cleveland, Ohio.

16 2. On or about November 30, 2016, at a post office in
17 Hesperia, California, defendant CAREY mailed a USPS parcel containing
18 approximately 6 kilograms of cocaine to Birmingham, Michigan.

19 3. On or about December 19, 2016, at a post office in San
20 Bernardino, California, defendant CAREY mailed a USPS parcel
21 containing approximately 5 kilograms of cocaine to Niagara Falls, New
22 York.

23 4. On or about December 30, 2016, in Victorville, California,
24 defendant CAREY received a USPS parcel containing between
25 approximately \$125,000 and \$200,000 in drug proceeds.

26 5. On or about January 11, 2017, at a post office in Apple
27 Valley, California, defendant CAREY mailed a USPS parcel containing
28 approximately 4.989 kilograms of cocaine to Buffalo, New York.

1 6. On or about January 26, 2017, at a post office in
2 Victorville, California, defendant CAREY mailed a USPS parcel
3 containing approximately 5.012 kilograms of cocaine to New York, New
4 York.

5 7. On or about February 6, 2017, at a post office in San
6 Bernardino, California, defendant ORTIZ received in his P.O. Box a
7 USPS parcel containing drug proceeds.

8 8. On or about February 13, 2017, at a post office in San
9 Bernardino, California, defendant ORTIZ received in his P.O. Box a
10 USPS parcel containing drug proceeds, the return address of which was
11 defendant YOUNG's address.

12 9. On or about February 13, 2017, using coded language in a
13 series of text messages, defendant YOUNG sent a co-conspirator two
14 addresses for the delivery of cocaine parcels ("Address A" and
15 "Address B").

16 10. On or about February 14, 2017, at a post office in
17 Hesperia, California, defendant ORTIZ mailed a USPS parcel containing
18 approximately 2.971 kilograms of cocaine to Address A in Columbia,
19 South Carolina.

20 11. On or about February 14, 2017, at a post office in San
21 Bernardino, California, defendant ORTIZ mailed a USPS parcel
22 containing approximately 3.998 kilograms of cocaine to Address B in
23 Columbia, South Carolina.

24 12. On or about February 16, 2017, in Columbia, South Carolina,
25 defendant YOUNG and a co-conspirator received and possessed with the
26 intent to distribute the USPS parcel mailed by defendant ORTIZ to
27 Address A, which had originally contained approximately 2.971
28 kilograms of cocaine.

1 13. On or about February 16, 2017, in Columbia, South Carolina,
2 defendant BELTON and a co-conspirator received and possessed with the
3 intent to distribute the USPS parcel mailed by defendant ORTIZ to
4 Address B, which had originally contained approximately 3.998
5 kilograms of cocaine.

6 14. On or about March 3, 2017, in Riverside, California,
7 defendant MARTINEZ received a USPS parcel containing approximately
8 \$250,000 in drug proceeds.

9 15. On or about March 31, 2017, in Riverside, California,
10 defendant BAZAN delivered approximately 15.026 kilograms of cocaine
11 to defendant CAREY and a co-conspirator to be mailed to other states.

12 16. On or about April 1, 2017, at a post office in Adelanto,
13 California, defendant CAREY mailed a USPS parcel containing
14 approximately 5.011 kilograms of cocaine to Chattanooga, Tennessee.

15 17. On or about April 4, 2017, in Victorville, California,
16 defendant CAREY received a USPS parcel containing approximately
17 \$185,185 in drug proceeds.

18 18. On or about April 6, 2017, in Riverside, California,
19 defendant BARRAZA received a USPS parcel containing approximately
20 \$96,500 in drug proceeds.

21 19. On or about April 28, 2017, in Riverside, California,
22 defendant MARTINEZ received a USPS parcel containing approximately
23 \$100,000 in drug proceeds.

24 20. On or about April 28, 2017, in San Bernardino, California,
25 defendant S. VERDUZCO received a USPS parcel containing approximately
26 \$110,000 in drug proceeds.

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1 21. On August 8, 2017, in Riverside, California, defendants
2 BAZAN, GRANADOS, and RUIZ met with a co-conspirator from New York
3 (the "New York co-conspirator") to discuss drug trafficking business.

4 22. On or about August 9, 2017, using coded language in a
5 telephone call, the New York co-conspirator told defendant GRANADOS
6 that defendant ORTIZ needed to send the New York co-conspirator
7 documentation for a truck that defendant ORTIZ was going to provide
8 for the purpose of transporting contraband from California to New
9 York.

10 23. On or about August 9, 2017, using coded language in a
11 series of telephone calls, defendant GRANADOS instructed defendant
12 ORTIZ to call the New York co-conspirator about the documentation for
13 the truck, and defendant ORTIZ said he would provide the necessary
14 documentation.

15 24. On or about August 9, 2017, using coded language in a
16 series of telephone calls, defendants ORTIZ and GRANADOS confirmed
17 that defendant ORTIZ had built a hidden compartment for drugs in the
18 truck that the New York co-conspirator would pick up and drive.

19 25. On or about August 11, 2017, in Riverside, California,
20 defendant MARTINEZ received a USPS parcel containing approximately
21 \$100,000 in drug proceeds.

22 26. On or about August 14, 2017, using coded language in a
23 series of telephone calls, defendant GRANADOS instructed defendant
24 FAWEHINMI to go to defendant LEYVA PEREZ's shop in San Jacinto,
25 California to deliver drugs and asked how much defendant GRANADOS
26 owed defendant FAWEHINMI.

27 27. On or about August 14, 2017, using coded language in a
28 telephone call, defendant FAWEHINMI told defendant GRANADOS that

1 defendant LEYVA PEREZ had paid him \$400 less than owed for the drugs
2 and accepted defendant GRANADOS's offer to pay the remainder.

3 28. On or about August 16, 2017, using coded language in a
4 telephone call, defendant MCPHERSON asked defendant GRANADOS if
5 defendant BAZAN had drug proceeds to give to defendant MCPHERSON.

6 29. On or about August 16, 2017, in Moreno Valley, California,
7 defendants MCPHERSON, GRANADOS, and RUIZ met to discuss drug
8 trafficking business.

9 30. On or about August 19, 2017, using coded language in a
10 telephone call, defendant BAZAN asked defendant GRANADOS if defendant
11 LUJANO was on his way back to California with drug proceeds.

12 31. On or about August 19, 2017, using coded language in a
13 three-way telephone call, defendants GRANADOS and ORTIZ and a co-
14 conspirator discussed defendant ORTIZ attempting to contact defendant
15 HURT and defendant HURT's wife for drug trafficking business, at
16 defendant GRANADOS's direction.

17 32. On or about August 20, 2017, using coded language in a
18 series of telephone calls, defendant RUIZ informed defendant GRANADOS
19 that he was unsuccessful in contacting defendant ROBINSON to arrange
20 a drug transaction.

21 33. On or about August 20, 2017, using coded language in a
22 telephone call, defendant ROBINSON told defendant GRANADOS that he
23 would arrive at his meeting with defendant RUIZ in a few minutes to
24 conduct a drug transaction.

25 34. On or about August 20, 2017, using coded language in a
26 telephone call, defendant RUIZ confirmed to defendant GRANADOS that
27 he had met with defendant ROBINSON earlier that day to conduct a drug
28 transaction.

1 35. On or about September 1, 2017, using coded language in a
2 telephone call, a co-conspirator told defendant GRANADOS that
3 defendant MENDOZA TORREZ wanted to speak to defendant GRANADOS about
4 drug trafficking business.

5 36. On or about September 1, 2017, using coded language in a
6 telephone call, defendant MENDOZA TORREZ told defendant GRANADOS that
7 he needed to meet with defendant GRANADOS to give defendant GRANADOS
8 information about a shipment of drugs from Mexico or Colombia.

9 37. On or about September 1, 2017, using coded language in a
10 telephone call, defendant GRANADOS told defendant BAZAN that he had
11 spoken to defendant MENDOZA TORREZ and had good news about a shipment
12 of drugs from Mexico or Colombia.

13 38. Between on or about September 3, 2017 and September 10,
14 2017, defendant MENDOZA TORREZ traveled to Colombia and Mexico to
15 arrange a shipment of drugs to the United States.

16 39. On or about September 10, 2017, using coded language in a
17 telephone call, defendant MENDOZA TORREZ told defendant GRANADOS that
18 he wanted to meet in person the following day to discuss drug
19 trafficking business.

20 40. On or about September 11, 2017, using coded language in a
21 telephone call, defendant GRANADOS told defendant BAZAN that
22 defendant MENDOZA TORREZ had returned to the United States and wanted
23 to talk to them about drug trafficking business.

24 41. On or about September 11, 2017, in Rialto, California,
25 defendants BAZAN, GRANADOS, MENDOZA TORREZ, and a co-conspirator met
26 to discuss drug trafficking business.

27 42. On or about September 15, 2017, using coded language in a
28 telephone call, defendant GRANADOS asked defendant MENDOZA TORREZ if

1 defendant GRANADOS's courier could deliver U.S. currency to defendant
2 MENDOZA TORREZ the following day, to which defendant MENDOZA TORREZ
3 agreed.

4 43. On or about October 10, 2017, using coded language in a
5 telephone call, defendant MARTINEZ informed defendant GRANADOS that
6 law enforcement seized a parcel containing drug proceeds that co-
7 conspirators had sent to defendant MARTINEZ, and that defendant
8 MARTINEZ was not worried because no criminal charges had been brought
9 yet.

10 44. On or about October 10, 2017, using coded language in a
11 telephone call, defendant RUIZ asked defendant GRANADOS what to do
12 with one unit of drugs that had not been shipped, and defendant
13 GRANADOS replied that he would ask if the New York co-conspirator
14 wanted the drugs.

15 45. On or about October 11, 2017, using coded language in a
16 telephone call, a co-conspirator asked defendant MENDOZA TORREZ if he
17 wanted to purchase a portion of a large shipment of drugs that was
18 scheduled to come across the United States-Mexico border for
19 \$100,000; defendant MENDOZA TORREZ replied that he would check
20 whether he had sufficient funds to purchase the drugs.

21 46. On or about October 11, 2017, using coded language in a
22 telephone call, defendant GRANADOS told defendant LUJANO to purchase
23 a burner phone and to send defendant GRANADOS the phone number using
24 a code.

25 47. On or about October 11, 2017, using coded language in a
26 telephone call, defendant GRANADOS told the New York co-conspirator
27 that he had one unit of drugs remaining and asked the New York co-
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1 conspirator to send defendant GRANADOS the address to which the drugs
2 should be mailed.

3 48. On or about October 11, 2017, using coded language in a
4 telephone call, defendant GRANADOS told defendant RUIZ to prepare a
5 unit of drugs to be mailed to the New York co-conspirator.

6 49. On or about October 11, 2017, using coded language in a
7 telephone call, defendant RUIZ told defendant GRANADOS that the unit
8 of drugs was ready to be mailed to the New York co-conspirator and
9 defendant RUIZ was just waiting for the shipping address from
10 defendant GRANADOS.

11 50. On or about October 12, 2017, at a post office in
12 Riverside, California, a co-conspirator mailed a USPS parcel
13 containing drugs to New York, New York.

14 51. On or about October 12, 2017, using coded language in a
15 telephone call, defendant RUIZ told defendant GRANADOS to let the New
16 York co-conspirator know that the drug parcel would arrive the
17 following day.

18 52. On or about October 13, 2017, using coded language in a
19 telephone call, defendant GRANADOS told defendant BARRAZA to call
20 defendant BARRAZA's drug courier in New York to confirm that the drug
21 parcel would be timely delivered to the New York co-conspirator.

22 53. On or about October 13, 2017, using coded language in a
23 telephone call, defendant BARRAZA told defendant GRANADOS that he had
24 contacted his drug courier in New York and confirmed that the drug
25 parcel would be there by noon.

26 54. On or about October 13, 2017, using coded language in a
27 telephone call, defendant GRANADOS told defendant LUJANO that a drug
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1 transaction would take place in Ohio and ordered defendant LUJANO to
2 purchase a burner phone to use during the transaction.

3 55. On or about October 13, 2017, using coded language in a
4 telephone call, defendant LUJANO told defendant GRANADOS that he had
5 purchased a burner phone to use during a drug transaction.

6 56. On or about October 13, 2017, using coded language in a
7 telephone call, defendant HURT told defendant GRANADOS that he had
8 already collected \$70,000 in drug proceeds for defendant GRANADOS and
9 was working on collecting more, to which defendant GRANADOS replied
10 that defendant LUJANO was ready to pick up the drug proceeds from
11 defendant HURT in Ohio.

12 57. On or about October 17, 2017, using coded language in a
13 telephone call, defendant HURT told defendant GRANADOS that he had
14 collected \$170,000 in drug proceeds for defendant GRANADOS.

15 58. On or about October 18, 2017, using coded language in a
16 telephone call, defendant HURT told defendant GRANADOS that he now
17 had collected \$175,000 in drug proceeds and agreed to get a burner
18 phone for defendant FINLEY so that defendant FINLEY could communicate
19 with defendant LUJANO.

20 59. On or about October 19, 2017, using coded language in a
21 telephone call, defendant GRANADOS told defendant ROBINSON that he
22 would arrange a drug transaction between defendant ROBINSON and a co-
23 conspirator for the following morning.

24 60. On or about October 19, 2017, using coded language in a
25 telephone call, defendant ROBINSON told defendant GRANADOS that a co-
26 conspirator called him to arrange a drug transaction, but that
27 defendant ROBINSON did not understand the location.

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1 61. On or about October 19, 2017, using coded language in a
2 telephone call, defendant GRANADOS told defendant ROBINSON that
3 defendant GRANADOS spoke to the co-conspirator and that defendant
4 ROBINSON would receive the time and location for the drug transaction
5 before the meeting.

6 62. On or about October 20, 2017, using coded language in a
7 telephone call, defendant RUIZ asked defendant GRANADOS if defendant
8 MENDOZA TORREZ had not come through with the drugs because defendant
9 ROBINSON had called defendant RUIZ multiple times; defendant GRANADOS
10 replied that he had just spoken to defendant MENDOZA TORREZ and the
11 drug transaction would take place later that day.

12 63. On or about October 20, 2017, using coded language in a
13 telephone call, defendant ROBINSON told defendant GRANADOS that a co-
14 conspirator asked defendant ROBINSON if he was coming to pick up the
15 drugs, but told defendant ROBINSON that he had to bring money to pay
16 for the drugs.

17 64. On or about October 20, 2017, using coded language in a
18 telephone call, defendant GRANADOS told defendant MENDOZA TORREZ that
19 the drug transaction had to be cancelled because the co-conspirators
20 were asking for the full payment up-front.

21 65. On or about October 20, 2017, using coded language in a
22 telephone call, defendant GRANADOS told defendant ROBINSON that
23 defendant MENDOZA TORREZ had changed the terms of the drug
24 transaction.

25 66. On or about October 20, 2017, using coded language in a
26 telephone call, defendant MENDOZA TORREZ told defendant GRANADOS that
27 he had to let other co-conspirators know if defendant GRANADOS was
28 able to purchase the drugs; defendant GRANADOS replied that the price

1 was too high, but asked if defendant MENDOZA TORREZ could give just
2 one type of drug to defendant ROBINSON, and defendant MENDOZA TORREZ
3 agreed.

4 67. On or about October 20, 2017, using coded language in a
5 telephone call, defendant GRANADOS told defendant ROBINSON that he
6 would receive at least one type of drug from defendant MENDOZA
7 TORREZ's associate.

8 68. On or about October 20, 2017, using coded language in a
9 telephone call, defendant MENDOZA TORREZ asked defendant ROBINSON if
10 he was ready to pick up the drugs, to which defendant ROBINSON
11 replied that he was.

12 69. On or about October 21, 2017, using coded language in a
13 telephone call, defendant ROBINSON told defendant GRANADOS that they
14 (defendant MENDOZA TORREZ and others) did not have all of the drugs,
15 but may get them later that day or the following day.

16 70. On or about October 21, 2017, using coded language in a
17 text message, defendant MENDOZA TORREZ told defendant GRANADOS to
18 tell defendant ROBINSON that he would receive samples of two
19 different types of drugs.

20 71. On or about October 21, 2017, using coded language in a
21 telephone call, defendant GRANADOS told defendant HURT that defendant
22 LUJANO was in Akron, Ohio, and instructed defendant HURT to call
23 defendant LUJANO to schedule a time to deliver drug proceeds to
24 defendant LUJANO.

25 72. On or about October 21, 2017, in Wadsworth, Ohio, defendant
26 FINLEY, acting on behalf of defendant HURT, delivered to defendant
27 LUJANO approximately \$174,480 in drug proceeds, which were intended
28 for defendant GRANADOS.

1 73. On or about October 21, 2017, in Washington Township, Ohio,
2 defendant LUJANO possessed approximately \$174,480 in drug proceeds,
3 which were intended for defendant GRANADOS.

4 74. On or about October 22, 2017, using coded language in a
5 telephone call, defendant ROBINSON told defendant MENDOZA TORREZ that
6 he had received samples of drugs and asked when he would the
7 remainder of the drugs; defendant MENDOZA TORREZ replied that it
8 would not be that day.

9 75. On or about October 24, 2017, at a post office in San
10 Bernardino, California, defendant S. VERDUZCO mailed a USPS parcel
11 containing approximately 4.814 kilograms of methamphetamine to
12 Yonkers, New York.

13 76. On or about October 28, 2017, using coded language in a
14 telephone call, defendant ROBINSON told defendant GRANADOS that
15 defendant ESTRADA would be in Ohio in about three hours to accept
16 drug proceeds on behalf of defendant GRANADOS.

17 77. On or about October 28, 2017, using coded language in a
18 telephone call, defendant ROBINSON told defendant GRANADOS that
19 defendant ESTRADA was already in Ohio and that defendant HURT, or his
20 courier, should deliver drug proceeds to defendant ESTRADA.

21 78. On or about October 28, 2017, using coded language in a
22 telephone call, defendant GRANADOS told defendant HURT to deliver
23 drug proceeds to defendant ESTRADA.

24 79. On or about October 28, 2017, in Seville, Ohio, defendant
25 FINLEY, acting on behalf of defendant HURT, met with defendant
26 ESTRADA to conduct a drug transaction.

27 80. On or about October 29, 2017, in Seville, Ohio, defendant
28 FINLEY, acting on behalf of defendant HURT, delivered to defendant

1 ESTRADA approximately \$142,900 in drug proceeds, which were intended
2 for defendant GRANADOS.

3 81. On or about October 29, 2017, using coded language in a
4 telephone call, defendant HURT told defendant GRANADOS that the drug
5 proceeds had been delivered to defendant ESTRADA earlier that day and
6 that defendant HURT would send another \$90,000 in drug proceeds to
7 defendant GRANADOS the following day.

8 82. On or about October 30, 2017, using coded language in a
9 telephone call, defendant GRANADOS asked defendant ROBINSON if
10 defendant ESTRADA was still in Ohio to pick up additional drug
11 proceeds from defendant HURT, to which defendant ROBINSON replied
12 that he would tell defendant ESTRADA to wait for defendant HURT.

13 83. On or about October 30, 2017, in Cuyahoga County, Ohio,
14 defendant ESTRADA possessed approximately \$142,900 in drug proceeds,
15 which were intended for defendant GRANADOS.

16 84. On or about October 30, 2017, using coded language in a
17 telephone call, defendant ROBINSON told defendant GRANADOS that law
18 enforcement seized the drug proceeds from defendant ESTRADA.

19 85. On or about October 30, 2017, using coded language in a
20 telephone call, defendant GRANADOS told defendant HURT that law
21 enforcement had seized the drug proceeds from defendant ESTRADA and
22 that he believed law enforcement had followed defendant FINLEY after
23 he delivered the drug proceeds to defendant ESTRADA.

24 86. On or about October 31, 2017, in Beachwood, Ohio, defendant
25 HURT possessed approximately \$86,921 in drug proceeds, two digital
26 scales, and drug ledgers.

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1 87. On or about October 31, 2017, in Cleveland, Ohio, defendant
2 FINLEY possessed with the intent to distribute approximately 961.7
3 grams of heroin.

4 88. On or about November 1, 2017, in Riverside, California,
5 defendant MCPHERSON received a USPS parcel containing approximately
6 \$107,000 in drug proceeds.

7 89. On or about December 14, 2017, using coded language in a
8 telephone call, a co-conspirator told defendant MENDOZA TORREZ that
9 they would start transporting drugs from Colombia to the United
10 States again in January, and that defendants MENDOZA TORREZ and a co-
11 conspirator should travel to Colombia to help arrange the
12 transportation; defendant MENDOZA TORREZ said that he and the co-
13 conspirator would travel to Colombia by the second week of January.

14 90. On or about February 7, 2018, using coded language in a
15 telephone call, defendant MENDOZA TORREZ asked a co-conspirator if he
16 had any drugs for sale in Southern California.

17 91. On or about February 7, 2018, using coded language in a
18 telephone call, defendant MENDOZA TORREZ told a co-conspirator that
19 he could distribute all of the heroin that the co-conspirator had for
20 sale in Chicago, and they discussed the price and quality of the
21 heroin.

22 92. On or about February 8, 2018, using coded language in a
23 telephone call, defendant MENDOZA TORREZ told a co-conspirator to
24 update defendant MENDOZA TORREZ as soon as he knew whether a shipment
25 of drugs would be delivered to Southern California that day.

26 93. On or about February 9, 2018, using coded language in a
27 telephone call, defendant MENDOZA TORREZ told a co-conspirator that
28 defendant MENDOZA TORREZ wanted to speak to a third party about

1 transporting drugs from Central or South America to the United States
2 on maritime vessels, and that defendant MENDOZA TORREZ was resuming
3 his drug trafficking activities after taking a break in January.

4 94. On or about February 13, 2018, using coded language in a
5 telephone call, defendant MENDOZA TORREZ told a co-conspirator that
6 he would call when he was getting ready to leave the United States so
7 that defendant MENDOZA TORREZ could arrange a meeting with a third
8 party about transporting drugs from Central or South America to the
9 United States on maritime vessels.

10 95. On or about February 27, 2018, in Birmingham, Alabama, a
11 co-conspirator mailed a USPS parcel containing approximately \$80,020
12 in drug proceeds to defendant MCPHERSON.

13 96. On or about March 2, 2018, using coded language in a
14 telephone call, defendant GRANADOS told defendant ORTIZ that a co-
15 conspirator in Illinois (the "Illinois co-conspirator") had been
16 released from jail, but had not yet called defendant GRANADOS, and
17 suggested they (defendants GRANADOS and ORTIZ) may need to travel to
18 Illinois to discuss drug trafficking business with the Illinois co-
19 conspirator.

20 97. On or about March 2, 2018, using coded language in a
21 telephone call, defendant GRANADOS told a co-conspirator that the
22 Illinois co-conspirator told defendant GRANADOS that law enforcement
23 had seized all of their drug proceeds, and defendant GRANADOS
24 admitted that part of the drug proceeds belonged to defendant
25 GRANADOS.

26 98. On or about March 5, 2018, in Philadelphia, Pennsylvania, a
27 co-conspirator mailed a USPS parcel containing approximately \$223,890
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1 in drug proceeds, which had been packaged by defendant CASTELLANOZ,
2 to defendant S. VERDUZCO.

3 99. On or about March 23, 2018, using coded language in a
4 telephone call, defendant FAWEHINMI asked defendant GRANADOS what
5 class mail a co-conspirator should use to send drug proceeds, to
6 which defendant GRANADOS replied that he should use "rush" mail.

7 100. On or about March 26, 2018, using coded language in a
8 telephone call, defendant FAWEHINMI told defendant GRANADOS that a
9 USPS parcel containing drug proceeds was scheduled to be delivered
10 that day.

11 101. On or about March 26, 2018, using coded language in a
12 telephone call, defendant GRANADOS told defendant BARRAZA to call
13 defendant WEBB because the USPS parcel containing drug proceeds from
14 defendant FAWEHINMI was scheduled to be delivered that day.

15 102. On or about March 26, 2018, in Moreno Valley, California,
16 defendant WEBB received a USPS parcel containing approximately
17 \$50,000 in drug proceeds.

18 103. On or about March 26, 2018, in Riverside, California,
19 defendant WEBB delivered the USPS parcel containing approximately
20 \$50,000 in drug proceeds to defendant BARRAZA.

21 104. On or about April 6, 2018, using coded language in a
22 telephone call, defendant BAZAN asked defendant GRANADOS for a status
23 update on defendant LEYVA PEREZ's anticipated arrangement of a
24 cocaine delivery.

25 105. On or about April 6, 2018, using coded language in a
26 telephone call, defendant LEYVA PEREZ told defendant BAZAN that the
27 cocaine delivery would take place the following day.

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1 106. On or about April 6, 2018, using coded language in a
2 telephone call, defendant RUIZ told defendant GRANADOS that he sent
3 the price for cocaine to make sure that the cocaine was delivered.

4 107. On or about April 7, 2018, in Riverside, California,
5 defendants BAZAN and LEYVA PEREZ met to discuss the exchange of
6 approximately 19 kilograms of cocaine.

7 108. On or about April 7, 2018, using coded language in a
8 telephone call, defendant LEYVA PEREZ told defendant GRANADOS that he
9 was waiting for defendant S. VERDUZCO to arrive at defendant LEYVA
10 PEREZ's shop to pick up approximately 19 kilograms of cocaine.

11 109. On or about April 7, 2018, using coded language in a
12 telephone call, defendant BAZAN told defendant GRANADOS that
13 defendant S. VERDUZCO was already at defendant LEYVA PEREZ's shop to
14 pick up approximately 19 kilograms of cocaine.

15 110. On or about April 7, 2018, in San Jacinto, California,
16 defendant LEYVA PEREZ loaded approximately 18.977 kilograms of
17 cocaine into defendant S. VERDUZCO's car and delivered the car and
18 cocaine to defendant S. VERDUZCO.

19 111. On or about April 7, 2018, using coded language in a
20 telephone call, defendant LEYVA PEREZ told defendant GRANADOS that he
21 had delivered the cocaine to defendant S. VERDUZCO and that defendant
22 GRANADOS owed him \$50,000 for the cocaine.

23 112. On or about April 7, 2018, in San Jacinto, California,
24 defendant LEYVA PEREZ possessed approximately \$18,308 in drug
25 proceeds, a firearm, and approximately 220 rounds of ammunition.

26 113. On or about April 7, 2018, using coded language in a
27 telephone call, defendant GRANADOS instructed a co-conspirator to get
28 a new telephone number to evade law enforcement because defendant

1 GRANADOS believed law enforcement may be investigating their drug
2 trafficking organization.

3 114. On or about April 7, 2018, using coded language in a
4 telephone call, defendant GRANADOS told a co-conspirator that he
5 wanted to travel to Illinois because he was stressed out about the
6 seizure from the Illinois co-conspirator.

7 115. On or about April 9, 2018, using coded language in a
8 telephone call, defendant GRANADOS told a co-conspirator who was in
9 Illinois that the Illinois co-conspirator would meet her at 2:00 p.m.
10 to conduct a transaction involving drug proceeds.

11 116. On or about April 10, 2018, using coded language in a
12 telephone call, defendant GRANADOS told defendant ORTIZ he believed
13 defendant LEYVA PEREZ was cooperating with law enforcement, to which
14 defendant ORTIZ agreed.

15 117. On or about April 11, 2018, in Calimesa, California,
16 defendant MCPHERSON and a co-conspirator met with defendant MCMEANS
17 to conduct a drug transaction.

18 118. On or about April 11, 2018, in Banning, California,
19 defendant MCMEANS possessed with the intent to distribute
20 approximately 8.924 kilograms of methamphetamine and 3.934 kilograms
21 of cocaine.

22 119. On or about May 3, 2018, in Moreno Valley, California,
23 defendant WEBB received a USPS parcel containing drug proceeds.

24 120. On or about May 14, 2018, using coded language in a
25 telephone call, a co-conspirator asked defendant BARRAZA if a drug
26 courier could go to a stash house to pick up drugs, to which
27 defendant BARRAZA replied that he would pass the address of the stash
28 house to defendant ROMERO.

1 121. On or about May 14, 2018, using coded language in a
2 telephone call, defendant BARRAZA told defendant ROMERO that he would
3 send defendant ROMERO a phone number for the stash house operator so
4 that defendant ROMERO could pick up drugs, to which defendant ROMERO
5 agreed.

6 122. On or about May 14, 2018, using coded language in a series
7 of text messages, defendant BARRAZA sent a phone number and code name
8 for the stash house operator to defendant ROMERO.

9 123. On or about May 14, 2018, using coded language in a
10 telephone call, defendant ROMERO told defendant BARRAZA that he had
11 spoken to the stash house operator and was waiting for the stash
12 house operator to send defendant ROMERO the address for the drug
13 pick-up.

14 124. On or about May 14, 2018, using coded language in a
15 telephone call, defendant BARRAZA told defendant ROMERO that the
16 stash house operator was waiting for defendant ROMERO, to which
17 defendant ROMERO replied that he would leave soon to pick up the
18 drugs.

19 125. On or about May 14, 2018, in Perris, California, defendant
20 ROMERO met with a co-conspirator to pick up drugs on behalf of
21 defendant BARRAZA.

22 126. On or about May 14, 2018, in Moreno Valley, California,
23 defendant ROMERO possessed with intent to distribute approximately
24 97.4 grams of heroin and 106.3 grams of fentanyl.

25 127. On or about May 17, 2018, using coded language in a
26 telephone call, defendant MCPHERSON told defendant BAZAN that he was
27 at a truck stop and that a drug transaction was going well.

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1 128. On or about May 23, 2018, using coded language in a
2 telephone call, defendant A. VERDUZCO told defendant BAZAN that he
3 was waiting for defendant ORTIZ to pick up drug proceeds.

4 129. On or about May 23, 2018, using coded language in a
5 telephone call, defendant A. VERDUZCO told defendant BAZAN that he
6 was going to deliver drug proceeds to defendant ORTIZ the previous
7 day, but he was short \$80,000, and defendant CASTELLANOZ told
8 defendant A. VERDUZCO not to deliver the money.

9 130. On or about May 23, 2018, using coded language in a
10 telephone call, defendant BAZAN instructed defendant A. VERDUZCO to
11 give whatever drug proceeds he had to defendant ORTIZ, to which
12 defendant A. VERDUZCO agreed.

13 131. On or about May 23, 2018, using coded language in a
14 telephone call, defendant BAZAN asked defendant A. VERDUZCO if he was
15 still short \$80,000 on the drug proceeds he had collected, to which
16 defendant A. VERDUZCO replied that he was and explained that he was
17 attempting to collect additional drug proceeds from a third party.

18 132. On or about May 23, 2018, using coded language in a
19 telephone call, defendant BAZAN said that defendant S. VERDUZCO told
20 him all of the drug proceeds were ready, but defendant A. VERDUZCO
21 repeated that he was short \$80,000.

22 133. On or about May 24, 2018, in Conshohocken, Pennsylvania,
23 defendant ORTIZ possessed approximately \$397,735 in drug proceeds,
24 which he had received from defendant A. VERDUZCO.

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COUNT TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)(II)]

[DEFENDANT CAREY]

On or about November 30, 2016, in San Bernardino County, within the Central District of California, defendant JONATHAN DARNELL CAREY knowingly and intentionally distributed at least five kilograms, that is, approximately six kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)(II)]

[DEFENDANT CAREY]

On or about December 19, 2016, in San Bernardino County, within the Central District of California, defendant JONATHAN DARNELL CAREY knowingly and intentionally distributed at least five kilograms, that is, approximately five kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

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COUNT FOUR

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(ii)(II)]

[DEFENDANT CAREY]

On or about January 11, 2017, in San Bernardino County, within the Central District of California, defendant JONATHAN DARNELL CAREY knowingly and intentionally distributed at least 500 grams, that is, approximately 4.989 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)(II)]

[DEFENDANT CAREY]

On or about January 26, 2017, in San Bernardino County, within the Central District of California, defendant JONATHAN DARNELL CAREY knowingly and intentionally distributed at least five kilograms, that is, approximately 5.012 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

COUNT SIX

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(ii)(II)]

[DEFENDANT ORTIZ]

On or about February 14, 2017, in San Bernardino County, within the Central District of California, defendant ESTEVAN ORTIZ, also known as "Steve," "Stevie," "Wonder," and "Little Man," knowingly and intentionally distributed at least 500 grams, that is, approximately 2.971 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

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COUNT SEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(ii)(II)]

[DEFENDANT ORTIZ]

On or about February 14, 2017, in San Bernardino County, within the Central District of California, defendant ESTEVAN ORTIZ, also known as "Steve," "Stevie," "Wonder," and "Little Man," knowingly and intentionally distributed at least 500 grams, that is, approximately 3.998 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

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COUNT EIGHT

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)(II)]

[DEFENDANT BAZAN]

On or about March 31, 2017, in Riverside County, within the Central District of California, defendant RICARDO ALEJANDRO BAZAN, also known as "Ricky," "Chuco," and "Chu," knowingly and intentionally distributed at least five kilograms, that is, approximately 15.026 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

COUNT NINE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)(II)]

[DEFENDANT CAREY]

On or about April 1, 2017, in San Bernardino County, within the Central District of California, defendant JONATHAN DARNELL CAREY knowingly and intentionally distributed at least five kilograms, that is, approximately 5.011 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

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COUNT TEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

[DEFENDANT S. VERDUZCO]

On or about October 24, 2017, in San Bernardino County, within the Central District of California, defendant STERLING TORRES-VERDUZCO, also known as "Primo," "Fatty's Cousin," and "Willy's Cousin," knowingly and intentionally distributed at least 50 grams, that is, approximately 4.814 kilograms, of methamphetamine, a Schedule II controlled substance.

COUNT ELEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)(II)]

[DEFENDANT LEYVA PEREZ]

On or about April 7, 2018, in Riverside County, within the Central District of California, defendant EDULFO LEYVA PEREZ, also known as "Gallo," knowingly and intentionally distributed at least 5 kilograms, that is, approximately 18.977 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

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COUNT TWELVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)(II); 18 U.S.C. § 2(a)]

[DEFENDANTS BAZAN, GRANADOS, AND S. VERDUZCO]

On or about April 7, 2018, in San Bernardino County, within the Central District of California, defendants RICARDO ALEJANDRO BAZAN, also known as ("aka") "Ricky," "Chuco," and "Chu"; NOEL GRANADOS, aka "Noel," "Big Show," and "Show"; and STERLING TORRES-VERDUZCO, aka "Primo," "Fatty's Cousin," and "Willy's Cousin," aiding and abetting each other, knowingly and intentionally possessed with the intent to distribute at least five kilograms, that is, approximately 18.977 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

COUNT THIRTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

[DEFENDANT MCMEANS]

On or about April 11, 2018, in Riverside County, within the Central District of California, defendant EMANUEL ROBERT MCMEANS, III knowingly and intentionally possessed with the intent to distribute at least 50 grams, that is, approximately 8.924 kilograms, of methamphetamine, a Schedule II controlled substance.

COUNT FOURTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(ii)(II)]

[DEFENDANT MCMEANS]

On or about April 11, 2018, in Riverside County, within the Central District of California, defendant EMANUEL ROBERT MCMEANS, III knowingly and intentionally possessed with the intent to distribute at least 500 grams, that is, approximately 3.934 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

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COUNT FIFTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

[DEFENDANTS BARRAZA AND ROMERO]

On or about May 14, 2018, in Riverside County, within the Central District of California, defendants FAUSTO BARRAZA and ENRIQUE GUZMAN ROMERO, aiding and abetting each other, knowingly and intentionally possessed with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

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COUNT SIXTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

[DEFENDANTS BARRAZA AND ROMERO]

On or about May 14, 2018, in Riverside County, within the Central District of California, defendants FAUSTO BARRAZA and ENRIQUE GUZMAN ROMERO, aiding and abetting each other, knowingly and intentionally possessed with the intent to distribute fentanyl, a Schedule II narcotic drug controlled substance.

COUNT SEVENTEEN

[18 U.S.C. § 922(g)(1)]

[DEFENDANT LEYVA PEREZ]

On or about April 7, 2018, in Riverside County, within the Central District of California, defendant EDULFO LEYVA PEREZ, also known as "Gallo," knowingly possessed the following ammunition, in and affecting interstate and foreign commerce:

(a) Fifty rounds of Winchester .40 caliber ammunition;

(b) One hundred-fifty rounds of Federal .223 caliber ammunition; and

(d) Twenty rounds of Mesko Spolka Akcyjna 5.56mm caliber ammunition.

Defendant LEYVA PEREZ possessed such ammunition knowing that he had previously been convicted of a felony crime punishable by a term of imprisonment exceeding one year, namely, Transportation or Sale of Marijuana, in violation of California Health and Safety Code Section 11360(a), in the Superior Court of the State of California, County of Riverside, case number HEF970151, on or about April 10, 1997.

SENTENCING ALLEGATIONS

[21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A), (b)(1)(B)]

[DEFENDANTS GRANADOS AND HURT]

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4 1. Defendant NOEL GRANADOS, also known as ("aka") "Noel," "Big
5 Show," and "Show," prior to committing the offenses alleged in Counts
6 One and Twelve of this Indictment, had been finally convicted of the
7 following serious drug felony as that term is defined and used in
8 Title 21, United States Code, Sections 802(57), 841, and 851:
9 Conspiracy to Distribute Cocaine, in violation of Title 21, United
10 States Code, Section 846, in the United States District Court for the
11 Central District of California, case number SA CR 10-00041-CJC, on or
12 about February 7, 2011, for which defendant GRANADOS served a term of
13 imprisonment of more than 12 months. Defendant GRANADOS was released
14 from a term of imprisonment for that offense within 15 years of the
15 commencement of the offenses alleged in Counts One and Twelve of this
16 Indictment.

17 2. Defendant PHILLIP REGINALD HURT, aka "Dude," prior to
18 committing the offense alleged in Count One of this Indictment, had
19 been finally convicted of the following serious drug felony as that
20 term is defined and used in Title 21, United States Code, Sections
21 802(57), 841, and 851: Conspiracy to Distribute and to Possess with
22 Intent to Distribute Cocaine, in violation of Title 21, United States
23 Code, Section 846, in the United States District Court for the
24 Northern District of Ohio, case number 1:10CR178, on or about May 12,
25 2011, for which defendant HURT served a term of imprisonment of more
26 than 12 months. Defendant HURT was released from a term of
27 imprisonment for that offense within 15 years of the commencement of
28 the offense alleged in Count One of this Indictment.

FORFEITURE ALLEGATION ONE

[21 U.S.C. § 853]

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3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Section 853 and Title 28, United States Code,
7 Section 2461(c), in the event of any defendant's conviction of the
8 offenses set forth in any of Counts One through Sixteen of this
9 Indictment.

10 2. Any defendant so convicted shall forfeit to the United
11 States of America the following:

12 (a) All right, title and interest in any and all property,
13 real or personal, constituting or derived from, any proceeds which
14 the defendant obtained, directly or indirectly, from any such
15 offense, including but not limited to the following:

16 i. \$185,185 in U.S. currency seized by law
17 enforcement officials on or about April 4, 2017;

18 ii. \$174,480 in U.S. currency seized by law
19 enforcement officials on or about October 21, 2017;

20 iii. \$142,900 in U.S. currency seized by law
21 enforcement officials on or about October 30, 2017;

22 iv. \$80,020 in U.S. currency seized by law
23 enforcement officials on or about March 1, 2018;

24 v. \$223,890 in U.S. currency seized by law
25 enforcement officials on or about March 6, 2018; and

26 vi. \$18,308 in U.S. currency seized by law
27 enforcement officials on or about April 7, 2018.

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1 (b) All right, title and interest in any and all property,
2 real or personal, used, or intended to be used, in any manner or
3 part, to commit, or to facilitate the commission of any such offense;
4 and

5 (c) To the extent such property is not available for
6 forfeiture, a sum of money equal to the total value of the property
7 described in subparagraphs (a) and (b).

8 3. Pursuant to Title 21, United States Code, Section 853(p),
9 any defendant so convicted, shall forfeit substitute property if, by
10 any act or omission of said defendant, the property described in the
11 preceding paragraph, or any portion thereof: (a) cannot be located
12 upon the exercise of due diligence; (b) has been transferred, sold
13 to, or deposited with a third party; (c) has been placed beyond the
14 jurisdiction of the court; (d) has been substantially diminished in
15 value; or (e) has been commingled with other property that cannot be
16 divided without difficulty.

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FORFEITURE ALLEGATION TWO

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

1 Pursuant to Rule 32.2 of the Federal Rules of Criminal
2 Procedure, notice is hereby given that the United States of America
3 will seek forfeiture as part of any sentence, pursuant to Title 18,
4 United States Code, Section 924(d)(1), and Title 28, United States
5 Code, Section 2461(c), in the event of any defendant's conviction of
6 the offense set forth in Count Seventeen of this Indictment.
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9 2. Any defendant so convicted shall forfeit to the United
10 States of America the following:

11 (a) All right, title, and interest in any firearm or
12 ammunition involved in or used in such offense; and

13 (b) To the extent such property is not available for
14 forfeiture, a sum of money equal to the total value of the property
15 described in subparagraph (a).

16 3. Pursuant to Title 21, United States Code, Section 853(p),
17 as incorporated by Title 28, United States Code, Section 2461(c), any
18 defendant so convicted shall forfeit substitute property, up to the
19 value of the property described in the preceding paragraph if, as the
20 result of any act or omission of said defendant, the property
21 described in the preceding paragraph or any portion thereof (a)
22 cannot be located upon the exercise of due diligence; (b) has been
23 transferred, sold to, or deposited with a third party; (c) has been

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1 placed beyond the jurisdiction of the court; (d) has been
2 substantially diminished in value; or (e) has been commingled with
3 other property that cannot be divided without difficulty.

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6 A TRUE BILL

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9 Foreperson

10 NICOLA T. HANNA
11 United States Attorney

12 *Brandon Fox*

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