

1 MARIO ALONZO HERRERA,)
DAVID JOE MORENO,)
2 aka DJ,)
JACQUELINE NUNEZ,)
3 aka Jackie,)
LUIS OCTAVIO ORTIZ,)
4 aka Chino,)
GAVINO HERRERA ORTEGA,)
5 JUAN PARRA,)
ELBERT ERIC PETERSON,)
6 aka Eric,)
OSCAR RAMIREZ,)
7 aka Negro,)
PETER REYNA,)
8 SUSANA RIOS,)
aka Suzie,)
9 REFUGIO CORTEZ RIVAS,)
aka Snoopy,)
10 MARISELA ROBLES,)
RICHARD RODRIGUEZ,)
11 IVAN RUEDA,)
ELIAZAR RUIZ SANCHEZ,)
12 RICHARD SANDOVAL,)
aka Beno,)
13 YSIDRO SOTO,)
aka Chilo,)
14 ERNIE VALADEZ,)
aka Ernie,)
15 RASHAD EDMUND WHITE,)
aka Hooty, and)
16 CLARENCE WILBUR WHITE, JR.,)
aka Skip,)
17)
Defendants.)
18)
19)

20 The Grand Jury charges:
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1 ("RODRIGUEZ"), IVAN RUEDA ("RUEDA"), ELIAZAR RUIZ SANCHEZ
2 ("SANCHEZ"), RICHARD SANDOVAL, aka Beno ("SANDOVAL"), YSIDRO
3 SOTO, aka Chilo ("SOTO"), ERNIE VALADEZ, aka Ernie ("VALADEZ"),
4 RASHAD EDMUND WHITE, aka Hooty ("R. WHITE"), and CLARENCE WILBUR
5 WHITE, JR., aka Skip ("C. WHITE"), and others known and unknown
6 to the Grand Jury, conspired and agreed with each other to
7 knowingly and intentionally commit the following offenses defined
8 in 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A) namely:

9 1. distribution of 500 grams or more of a mixture or
10 substance containing a detectable amount of methamphetamine, a
11 schedule II controlled substance;

12 2. distribution of 50 grams or more of a mixture or
13 substance containing a detectable amount of cocaine base in the
14 form of crack cocaine ("crack cocaine"), a schedule II narcotic
15 drug controlled substance; and

16 3. distribution of five kilograms or more of a mixture or
17 substance containing a detectable amount of cocaine ("powder
18 cocaine"), a schedule II narcotic drug controlled substance.

19 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
20 ACCOMPLISHED

21 The objects of the conspiracy were to be accomplished in
22 substance as follows:

23 1. Defendants CORTES, ORTEGA, and SOTO would supply
24 co-conspirator Vasquez with methamphetamine and cocaine for
25 further distribution.

26 2. Defendants CORTES and SOTO would supply defendant
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1 SANCHEZ with methamphetamine for further distribution.

2 3. Defendant REYNA would assist defendants CORTES and SOTO
3 by attempting to retrieve currency from their narcotics stash
4 location.

5 4. Defendant RIVAS would broker methamphetamine
6 transactions for co-conspirator Vasquez.

7 5. Defendants DELACRUZ, ENRIQUEZ, HERNANDEZ, RAMIREZ,
8 SANDOVAL, VALADEZ, C. WHITE, and R. WHITE would obtain
9 methamphetamine, crack cocaine, and powder cocaine from
10 co-conspirator Vasquez for further distribution.

11 6. Defendant ENRIQUEZ would distribute methamphetamine to
12 co-conspirator Vasquez.

13 7. Defendants NUNEZ, A. GARCIA, M. GARCIA, PETERSON, and
14 RODRIGUEZ would sell methamphetamine, crack cocaine, and powder
15 cocaine for further distribution on behalf of co-conspirator
16 Vasquez.

17 8. Defendant PETERSON would transport methamphetamine,
18 crack cocaine, and powder cocaine and store firearms for
19 co-conspirator Vasquez.

20 9. Defendants ALCANTAR, DE SPAIN, ESPINO, HERRERA, and
21 ORTIZ would obtain methamphetamine, crack cocaine, and powder
22 cocaine from co-conspirator J. Gonzalez for further distribution.

23 10. Defendant CASTRO would operate co-conspirator J.
24 Gonzalez's drug distribution operation after his arrest.

25 11. Defendants HERRERA and ESPINO would obtain
26 methamphetamine, crack cocaine, and powder cocaine from

1 co-conspirator N. Gonzalez for further distribution.

2 12. Defendant ESPINO would distribute methamphetamine,
3 crack cocaine, and powder cocaine to defendants J. CRUZ and
4 RUEDA.

5 13. Defendants RUEDA and ESPINO would distribute
6 methamphetamine, crack cocaine, and powder cocaine to unindicted
7 co-conspirators.

8 14. Defendant ROBLES would broker methamphetamine
9 transactions for co-conspirator N. Gonzalez.

10 15. Defendants DE SPAIN, BARRIENTOS, DELACRUZ, ENRIQUEZ,
11 ESPINO, and PARRA would obtain methamphetamine, crack cocaine,
12 and powder cocaine from co-conspirator Hernandez for further
13 distribution.

14 16. Defendant A. CRUZ would transport controlled substances
15 for co-conspirator Hernandez and obtain firearms from
16 co-conspirator Hernandez.

17 17. Defendant PARRA would obtain firearms for
18 co-conspirator Hernandez.

19 18. Defendant BARRIENTOS would transport methamphetamine
20 for co-conspirator Jaime Ortiz.

21 19. Defendant MORENO would transport crack and powder
22 cocaine for co-conspirator Hernandez.

23 20. Defendant FACUNDO would obtain powder cocaine from
24 co-conspirator Arturo Cruz for further distribution.

25 21. Defendant FACUNDO would distribute telephones to
26 co-conspirator Arturo Cruz.

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1 that sales of crack and powder cocaine were very slow at J.
2 Gonzalez's sales location.

3 10. On April 13, 2005, using coded language in a telephone
4 conversation, defendant ROBLES asked co-conspirator N. Gonzalez
5 for the price of one eighth of an ounce of methamphetamine and N.
6 Gonzalez replied that it was \$90.

7 11. On April 12, 2005, using coded language in a telephone
8 conversation, defendant ORTIZ ordered six ounces of powder
9 cocaine from co-conspirator J. Gonzalez for \$450 per ounce.

10 12. On April 13, 2005, using coded language in a telephone
11 conversation, defendant ESPINO asked co-conspirator N. Gonzalez
12 to set aside one ounce of methamphetamine for him.

13 13. On April 14, 2005, using coded language in a telephone
14 conversation, defendant ORTIZ asked co-conspirator J. Gonzalez to
15 sell him one quarter ounce of methamphetamine.

16 14. On April 15, 2005, using coded language in a telephone
17 conversation, defendant DE SPAIN told co-conspirator J. Gonzalez
18 that he had made \$150 selling methamphetamine, advised J.
19 Gonzalez that it would be better if J. Gonzalez obtained higher
20 quality methamphetamine, and thanked J. Gonzalez for letting him
21 sell methamphetamine.

22 15. On April 16, 2005, using coded language in a telephone
23 conversation, defendant ESPINO told co-conspirator N. Gonzalez
24 that the crack cocaine he was manufacturing was not finished.

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1 narcotics storage location following the execution of a search
2 warrant at the storage location.

3 23. On May 11, 2005, using coded language in a telephone
4 conversation, defendant CASTRO agreed to prepare two quarter
5 ounce packages of crack cocaine for co-conspirator N. Gonzalez.

6 24. On May 11, 2005, using coded language in a telephone
7 conversation, defendant CASTRO agreed to deliver a quarter ounce
8 of crack cocaine to defendant ESPINO for co-conspirator N.
9 Gonzalez.

10 25. On May 11, 2005, using coded language in a telephone
11 conversation, defendant CASTRO agreed with co-defendant N.
12 Gonzalez to prepare six quarter ounce packages of powder cocaine
13 and make methamphetamine available for pick up by defendant
14 ESPINO.

15 26. On May 11, 2005, using coded language in a telephone
16 conversation, defendant CASTRO advised co-conspirator N. Gonzalez
17 that they had 10 quarter ounce packages of crack cocaine
18 available and that defendant RUEDA would buy the crack cocaine
19 and two ounces of powder cocaine.

20 27. On May 16, 2005, using coded language in a telephone
21 conversation, defendant ROBLES and co-conspirator N. Gonzalez
22 discussed the fact that an unidentified narcotics customer owed
23 them \$1,900.

24 28. On May 18, 2005, using coded language in a telephone
25 conversation, defendant ROBLES agreed to pick up narcotics scales
26 at co-conspirator N. Gonzalez's narcotics sales location on 69th
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1 Street in Los Angeles and take them to co-conspirator N.
2 Gonzalez's narcotics stash location on Miramonte Boulevard in Los
3 Angeles.

4 29. On May 25, 2005, using coded language in a telephone
5 conversation, defendant CASTRO agreed to deliver one quarter
6 ounce of crack cocaine to co-defendant N. Gonzalez.

7 30. On May 25, 2005, using coded language in a telephone
8 conversation, defendant CASTRO agreed to pick up narcotics from
9 co-conspirator N. Gonzalez's narcotics storage location on
10 Miramonte Street in Los Angeles, California.

11 31. On May 25, 2005, using coded language in a telephone
12 conversation, defendant CASTRO informed co-conspirator N.
13 Gonzalez that she had delivered a narcotics scale to his
14 narcotics storage location on Miramonte Boulevard in Los Angeles,
15 California.

16 32. On May 26, 2005, co-conspirator N. Gonzalez possessed
17 approximately six grams of actual methamphetamine, 154 grams of
18 crack cocaine, 101 grams of powder cocaine, and several firearms
19 at his narcotics sales location on Miramonte Boulevard in Los
20 Angeles, California.

21 33. On May 30, 2005, using coded language in a telephone
22 conversation, defendant HERRERA asked co-conspirator J. Gonzalez
23 if it was okay for him to only pay for a portion of the half
24 ounce of methamphetamine that he received from J. Gonzalez.

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1 that she left \$1,260 for him and ordered two quarter ounce
2 packages of methamphetamine.

3 47. On June 23, 2005, using coded language in a telephone
4 conversation, defendant A. CRUZ told co-conspirator Hernandez
5 that he needed the magazine and ammunition for a firearm, but
6 that he already had the firearm itself.

7 48. On June 23, 2005, using coded language in a telephone
8 conversation, defendant BARRIENTOS agreed to pick up one quarter
9 ounce of methamphetamine from co-conspirator Hernandez for her
10 boyfriend, co-conspirator Jaime Ortiz.

11 49. On June 23, 2005, using coded language in a telephone
12 conversation, defendant DELACRUZ ordered one ounce of crack
13 cocaine from co-conspirator Hernandez.

14 50. On June 23, 2005, using coded language in a telephone
15 conversation, defendant MORENO told co-conspirator Hernandez that
16 their new powder cocaine was high quality and agreed to bring
17 Hernandez a firearm.

18 51. On June 24, 2005, using coded language in a telephone
19 conversation, defendant ESPINO ordered an ounce of powder cocaine
20 from co-conspirator Hernandez.

21 52. On June 24, 2005, using coded language in a telephone
22 conversation, defendant DELACRUZ ordered two ounces of crack
23 cocaine from co-conspirator Hernandez.

24 53. On June 25, 2005, using coded language in a telephone
25 conversation, defendant A. CRUZ told co-conspirator Hernandez
26 that he had a firearm, but asked to borrow one from Hernandez.

1 she received on June 30, 2005 and ordered two ounces of crack
2 cocaine.

3 61. On July 1, 2005, using coded language in a telephone
4 conversation, defendant MORENO agreed to make two deliveries of
5 nine ounces of powder cocaine each for co-conspirator Hernandez.

6 62. On July 2, 2005, using coded language in a telephone
7 conversation, defendant BARRIENTOS ordered a half an ounce of
8 methamphetamine for an identified co-conspirator from
9 co-conspirator Hernandez.

10 63. On July 5, 2005, using coded language in a telephone
11 conversation, defendant MORENO told co-conspirator Hernandez that
12 he had delivered four and a half ounces of crack cocaine to an
13 unidentified co-conspirator and co-conspirator Hernandez told
14 defendant MORENO that the unindicted co-conspirator already
15 ordered an additional four and a half ounces of powder cocaine.

16 64. On July 5, 2005, using coded language in a telephone
17 conversation, defendant MORENO told co-conspirator Hernandez that
18 he had delivered the additional four and a half ounces of powder
19 cocaine to the unindicted co-conspirator.

20 65. On July 5, 2005, using coded language in a telephone
21 conversation, defendant A. CRUZ agreed to deliver eight grams of
22 crack cocaine to an unindicted co-conspirator for co-conspirator
23 Hernandez.

24 66. On July 5, 2005, using coded language in a telephone
25 conversation, defendant A. CRUZ agreed to deliver a half ounce of
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1 crack cocaine and two quarter ounce packages of powder cocaine
2 for co-conspirator Hernandez.

3 67. On July 6, 2005, using coded language in a telephone
4 conversation, defendant MORENO agreed to deliver four and a half
5 ounces of powder cocaine to an unidentified co-conspirator at the
6 Gage apartments in Los Angeles and deliver two ounces of powder
7 cocaine to 78th Street and Central Avenue in Los Angeles for
8 co-conspirator Hernandez.

9 68. On July 6, 2005, using coded language in a telephone
10 conversation, defendant A. CRUZ agreed to deliver a quarter ounce
11 of powder cocaine for co-conspirator Hernandez.

12 69. On July 7, 2005, using coded language in a telephone
13 conversation, defendant MORENO told co-conspirator Hernandez that
14 he was in possession of co-conspirator Hernandez's firearm.

15 70. On July 9, 2005, using coded language in a telephone
16 conversation, defendant DE SPAIN told co-conspirator Hernandez
17 that he had a customer who wanted to buy a half ounce of
18 methamphetamine and Hernandez said he would give it to defendant
19 DE SPAIN for \$240.

20 71. On July 9, 2005, using coded language in a telephone
21 conversation, defendant RIOS agreed to advise an unindicted
22 co-conspirator to obtain a firearm for co-conspirator Hernandez.

23 72. On July 19, 2005, using coded language in a telephone
24 conversation, defendant ENRIQUEZ told co-conspirator Hernandez
25 that she had delivered one ounce of methamphetamine to
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1 Hernandez's narcotics customer but he was not paying for the
2 methamphetamine.

3 73. On July 23, 2005, using coded language in a telephone
4 conversation, defendant DE SPAIN ordered an eighth ounce of
5 methamphetamine from co-conspirator Hernandez for \$76.

6 74. On July 25, 2005, using coded language in a telephone
7 conversation, defendant DE SPAIN asked co-conspirator Hernandez
8 about the status of his order for an ounce of powder cocaine.

9 75. On July 25, 2005, using coded language in a telephone
10 conversation, defendant DE SPAIN ordered an eighth ounce of
11 methamphetamine from co-conspirator Hernandez.

12 76. On July 27, 2005, using coded language in a telephone
13 conversation, defendant GUEVARA told co-conspirator Arturo Cruz
14 that the ounce of methamphetamine he previously provided was of
15 poor quality and ordered an additional ounce of methamphetamine
16 from Arturo Cruz to be delivered by a courier.

17 77. On July 28, 2005, using coded language in a telephone
18 conversation, defendant FACUNDO agreed to pay co-conspirator
19 Arturo Cruz the next day for one and a half ounces of powder
20 cocaine he received from Arturo Cruz.

21 78. On July 29, 2005, using coded language in a telephone
22 conversation, defendant FACUNDO told co-conspirator Arturo Cruz
23 that he would leave \$1,000 for Arturo Cruz and owed him \$250.

24 79. On July 29, 2005, using coded language in a telephone
25 conversation, defendant CUEVA agreed to purchase methamphetamine
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1 from co-conspirator Arturo Cruz, in order to sell the
2 methamphetamine for profit.

3 80. On August 1, 2005, using coded language in a telephone
4 conversation, defendant CUEVA agreed to give co-conspirator
5 Arturo Cruz a nine millimeter firearm.

6 81. On August 2, 2005, using coded language in a telephone
7 conversation, defendant CUEVA told co-conspirator Arturo Cruz
8 that he was ready to start selling methamphetamine, that he was
9 letting potential customers know this, and that he would obtain a
10 telephone subscribed to a female.

11 82. On August 2, 2005, using coded language in a telephone
12 conversation, defendant CUEVA agreed to purchase seven grams of
13 methamphetamine from co-conspirator Arturo Cruz.

14 83. On August 2, 2005, using coded language in a telephone
15 conversation, defendant GUEVARA told co-conspirator Arturo Cruz
16 to send him an ounce of crack cocaine instead of methamphetamine.

17 84. On August 5, 2005, using coded language in a telephone
18 conversation, defendant BARRIENTOS ordered a half ounce of
19 methamphetamine from co-conspirator Hernandez.

20 85. On August 6, 2005, using coded language in a telephone
21 conversation, defendant GUEVARA ordered crack cocaine from
22 co-conspirator Arturo Cruz and told Arturo Cruz to instruct the
23 courier to deliver \$1,500 to Arturo Cruz's house.

24 86. On August 8, 2005, using coded language in a telephone
25 conversation, defendant FACUNDO told co-conspirator Arturo Cruz
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1 that he owed Arturo Cruz \$750 because he had taken delivery of
2 another ounce of powder cocaine.

3 87. On August 10, 2005, using coded language in a telephone
4 conversation, defendant ESPINO ordered nine ounces of
5 methamphetamine from co-conspirator Hernandez.

6 88. On August 11, 2005, using coded language in a telephone
7 conversation, defendant PARRA ordered a quarter ounce of
8 methamphetamine from co-conspirator Hernandez.

9 89. On August 17, 2005, using coded language in a telephone
10 conversation, defendant FACUNDO told co-conspirator Arturo Cruz
11 that he would deliver \$500 that he owed Arturo Cruz and agreed to
12 disconnect service for a cellular telephone he had previously
13 provided to Arturo Cruz.

14 90. On August 28, 2005, using coded language in a telephone
15 conversation, co-conspirator Arturo Cruz directed defendant RIOS
16 to deliver a quarter ounce of crack cocaine and an ounce of
17 methamphetamine to an unindicted co-conspirator.

18 91. On August 28, 2005, using coded language in a telephone
19 conversation, defendant RIOS agreed to bring co-conspirator
20 Arturo Cruz bundles of cash stored at Arturo Cruz's stash
21 location on 83rd Street in Los Angeles.

22 92. On August 29, 2005, using coded language in a telephone
23 conversation, defendant RIOS agreed with co-conspirator Hernandez
24 to go to co-conspirator Arturo Cruz's stash location on 83rd
25 Street in Los Angeles, prepare a bag containing four and a
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1 quarter ounces of powder cocaine, and deliver it to an unindicted
2 co-conspirator.

3 93. On August 30, 2005, using coded language in a telephone
4 conversation, defendant RIOS told co-conspirator Hernandez that
5 she had hidden \$5,000 or \$6,000 at his mother's house.

6 94. On August 30, 2005, co-conspirators Arturo Cruz and
7 Hernandez possessed approximately 266 grams of actual
8 methamphetamine, 140 grams of powder cocaine, 397 grams of crack
9 cocaine, \$58,125 in U.S. currency, and two firearms at his
10 narcotics and narcotics proceeds stash location on 83rd Street in
11 Los Angeles, California.

12 95. On August 30, 2005, defendant GONSALES assisted
13 co-conspirator Arturo Cruz by advising law enforcement agents
14 that he lived at Arturo Cruz's stash location on 83rd Street in
15 Los Angeles and stating that he was the owner of the
16 methamphetamine, powder cocaine, crack cocaine, currency, and
17 firearms found at the house.

18 96. On August 30, 2005, using coded language in a telephone
19 conversation, defendant PARRA and co-conspirator Hernandez
20 discussed the execution of search warrants at various stash
21 locations.

22 97. On November 3, 2005, using coded language in a
23 telephone conversation, defendant VALADEZ told co-conspirator
24 Vasquez that he had payment for co-conspirator Vasquez from a
25 prior narcotics deal and ordered one ounce of methamphetamine and
26 one ounce of crack cocaine.

1 98. On November 3, 2005, using coded language in a
2 telephone conversation, defendant A. GARCIA told co-conspirator
3 Vasquez to send \$6,300 for a pound of methamphetamine once
4 defendant A. GARCIA had the methamphetamine.

5 99. On November 4, 2005, in a drug transaction brokered by
6 an unindicted co-conspirator, defendant ORTEGA agreed to supply
7 co-conspirator Vasquez and defendant M. GARCIA with crack cocaine
8 and methamphetamine.

9 100. On November 4, 2005, using coded language in a
10 telephone conversation, defendant M. GARCIA told defendant CORTES
11 that the quality of narcotics defendant CORTES recently provided
12 was poor and that customers were not buying it.

13 101. On November 4, 2005, using coded language in a
14 telephone conversation, defendant M. GARCIA told co-conspirator
15 Vasquez that the drug deal with defendant ORTEGA had been
16 completed.

17 102. On November 4, 2005, using coded language in a
18 telephone conversation, defendant M. GARCIA and co-conspirator
19 Vasquez spoke with defendant CORTES about getting Vasquez's money
20 back or exchanging low quality narcotics they had received from
21 defendant ORTEGA.

22 103. On November 4, 2005, using coded language in a
23 telephone conversation, defendant ORTEGA told co-conspirator
24 Vasquez that he wanted to work with Vasquez to resolve problems
25 they were having with the poor quality of narcotics in their
26 recent deal.

1 transaction and ask for a sample so he could determine whether
2 the methamphetamine was worth \$3,500 for a half pound.

3 134. On November 22, 2005, using coded language in a
4 telephone conversation, defendant NUNEZ advised co-conspirator
5 Vasquez that a supplier could give her high quality
6 methamphetamine for \$3,200 for a half pound and that he only had
7 two and a half pounds left. Vasquez told defendant NUNEZ that
8 they would need to conduct their deal the next day because it was
9 late.

10 135. On November 23, 2005, using coded language in a
11 telephone conversation, defendant NUNEZ advised co-conspirator
12 Vasquez that she wanted to send an unidentified co-conspirator a
13 quarter ounce of crack cocaine and Vasquez agreed.

14 136. On November 23, 2005, using coded language in a
15 telephone conversation, defendant DELACRUZ ordered a half ounce
16 of methamphetamine from co-conspirator Vasquez.

17 137. On November 23, 2005, using coded language in a
18 telephone conversation, defendant RODRIGUEZ asked co-conspirator
19 Vasquez to advance him a quarter ounce of powder cocaine and
20 Vasquez agreed.

21 138. On November 23, 2005, using coded language in a
22 telephone conversation, defendant RODRIGUEZ told co-conspirator
23 Vasquez that he did not owe Vasquez any money because he had
24 already paid for a quarter ounce package of powder cocaine and a
25 half ounce package of powder cocaine.

1 he had methamphetamine, but was only selling it in gram
2 quantities.

3 152. On November 26, 2005, using coded language in a
4 telephone conversation, defendant ESPINO told defendant RUEDA
5 that he needed some crack cocaine because a customer was asking
6 for it.

7 153. On November 26, 2005, using coded language in a
8 telephone conversation, defendant ESPINO directed defendant J.
9 CRUZ to go to defendant RUEDA's house in order to pick up an
10 ounce of powder cocaine.

11 154. On November 26, 2005, using coded language in a
12 telephone conversation, defendant ESPINO agreed to deliver a gram
13 of crack cocaine to an unidentified co-conspirator.

14 155. On November 27, 2005, using coded language in a
15 telephone conversation, defendant ENRIQUEZ told co-conspirator
16 Vasquez that her supplier had good quality methamphetamine
17 available for \$7,000 per pound.

18 156. On November 27, 2005, using coded language in a
19 telephone conversation, defendant ESPINO agreed to deliver two
20 grams of crack cocaine to an unidentified co-conspirator.

21 157. On November 27, 2005, using coded language in a
22 telephone conversation, defendant ESPINO agreed to deliver one
23 and a half grams of crack cocaine to an unidentified
24 co-conspirator.

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1 171. On December 3, 2005, using coded language in a
2 telephone conversation, defendant C. WHITE asked co-conspirator
3 Vasquez about the status of his gun delivery and Vasquez said
4 that he would work on getting the gun to him.

5 172. On December 3, 2005, using coded language in a
6 telephone conversation, defendant C. WHITE told co-conspirator
7 Vasquez that he would be available to receive a Glock nine
8 millimeter handgun when the courier arrived in approximately 45
9 minutes.

10 173. On December 3, 2005, using coded language in a
11 telephone conversation, co-conspirator Vasquez gave defendant C.
12 WHITE his courier's telephone number to coordinate the delivery
13 of the firearm.

14 174. On December 4, 2005, using coded language in a
15 telephone conversation, defendant NUNEZ agreed with co-
16 conspirator Vasquez to give defendant PETERSON a package of
17 methamphetamine.

18 175. On December 4, 2005, using coded language in a
19 telephone conversation, defendant GUEVARA ordered two ounces of
20 powder cocaine from co-conspirator Vasquez for \$475 per ounce.

21 176. On December 5, 2005, using coded language in a
22 telephone conversation, defendant A. GARCIA told defendant M.
23 GARCIA that he could give co-conspirator Vasquez a half pound of
24 methamphetamine for \$4,000 and another half pound for \$3,900.

25 177. On December 6, 2005, using coded language in a
26 telephone conversation, defendant GUEVARA and defendant M. GARCIA

1 discussed the fact that defendant M. GARCIA and an unidentified
2 co-conspirator dropped off payment for a prior drug deal.

3 178. On December 6, 2005, using coded language in a
4 telephone conversation, defendant DELACRUZ ordered a half ounce
5 of methamphetamine from co-conspirator Vasquez and stated that
6 she owed him payment for a quarter ounce of methamphetamine.

7 179. On December 6, 2005, using coded language in a
8 telephone conversation, defendant ENRIQUEZ asked defendant M.
9 GARCIA whether she had any methamphetamine available for sale.

10 180. On December 7, 2005, using coded language in a
11 telephone conversation, defendant C. WHITE advised co-conspirator
12 Vasquez that he was in the process of establishing himself in the
13 neighborhood as a drug trafficker and that it would take him a
14 few more months to get established.

15 181. On December 8, 2005, using coded language in a
16 telephone conversation, defendant RIVAS told co-conspirator
17 Vasquez that he could get a pound of methamphetamine for Vasquez
18 for \$6,500.

19 182. On December 8, 2005, using coded language in a
20 telephone conversation, defendant RIVAS left a message for
21 co-conspirator Vasquez that he had a supplier who could provide
22 Vasquez with methamphetamine the next day.

23 183. On December 10, 2005, using coded language in a
24 telephone conversation, defendant RODRIGUEZ told co-conspirator
25 Vasquez that an unidentified co-conspirator offered to exchange
26 title to his vehicle for nine ounces of crack cocaine.

1 Vasquez if he had enough money to split a pound of powder
2 cocaine.

3 191. On December 11, 2005, using coded language in a
4 telephone conversation, defendant C. WHITE agreed to pay
5 co-conspirator Vasquez \$75 for a drug delivery and stated that he
6 still owed Vasquez \$235.

7 192. On December 12, 2005, using coded language in a
8 telephone conversation, defendant ENRIQUEZ agreed to provide
9 co-conspirator Vasquez with a half pound of methamphetamine and
10 Vasquez agreed to drop off the money to her.

11 193. On December 14, 2005, using coded language in a
12 telephone conversation, co-conspirator Vasquez ordered a Glock
13 .40 caliber handgun for \$450 from an unindicted co-conspirator
14 who obtained firearms from Las Vegas, Nevada and stated that he
15 would send a female to pick up the firearm.

16 194. On December 14, 2005, using coded language in a
17 telephone conversation, defendant NUNEZ agreed to pick up a
18 firearm from an unindicted co-conspirator for co-conspirator
19 Vasquez and deliver it to defendant A. GARCIA.

20 195. On December 14, 2005, using coded language in a
21 telephone conversation, co-conspirator Vasquez thanked an
22 unindicted co-conspirator for delivering the firearm.

23 196. On December 14, 2005, using coded language in a
24 telephone conversation, defendant NUNEZ advised co-conspirator
25 Vasquez that an unidentified co-conspirator would sell them a
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1 pound of methamphetamine for \$7,000, but they needed to do the
2 deal that day.

3 197. On December 14, 2005, using coded language in a
4 telephone conversation, defendant NUNEZ advised co-conspirator
5 Vasquez that an unidentified co-conspirator bought a half ounce
6 of methamphetamine for \$425.

7 198. On December 15, 2005, using coded language in a
8 telephone conversation, defendant C. WHITE ordered an ounce of
9 crack cocaine from co-conspirator Vasquez and said he would pay
10 Vasquez \$400 that day.

11 199. On December 15, 2005, using coded language in a
12 telephone conversation, defendant A. GARCIA told co-conspirator
13 Vasquez that he had a supplier who could sell them a pound of
14 methamphetamine for \$9,000 and Vasquez stated that the price was
15 too high.

16 200. On December 15, 2005, using coded language in a
17 telephone conversation, defendant NUNEZ told co-conspirator
18 Vasquez that she would pick up \$3,500 from him and another \$3,500
19 from defendant PETERSON in order to buy a pound of
20 methamphetamine.

21 201. On December 17, 2005, using coded language in a
22 telephone conversation, defendant GUEVARA asked co-conspirator
23 Vasquez about the status of a drug shipment and Vasquez stated
24 that he sent it two days earlier.

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1 Vasquez that defendant C. WHITE had given her \$220 and he would
2 provide her with the rest later.

3 215. On February 8, 2006, using coded language in a
4 telephone conversation, defendant HERNANDEZ asked co-conspirator
5 Vasquez if he had a pound of powder cocaine available to
6 purchase.

7 216. On February 10, 2006, using coded language in a
8 telephone conversation, defendant HERNANDEZ asked co-conspirator
9 Vasquez the price for nine ounces of powder cocaine for possible
10 delivery the next day.

11 217. On February 14, 2006, using coded language in a
12 telephone conversation, defendant ENRIQUEZ told co-conspirator
13 Vasquez that she had delivered \$2,220 to him and that she would
14 deliver the remaining \$150 that week.

15 218. On February 16, 2005, using coded language in a
16 telephone conversation, co-conspirator Vasquez told defendant M.
17 GARCIA that a narcotics customer would be coming by to pick up
18 narcotics.

19 219. On February 16, 2006, using coded language in a
20 telephone conversation, defendant A. GARCIA agreed to supply
21 co-conspirator Vasquez with seven grams of powder cocaine and
22 asked Vasquez to send him an ounce of crack cocaine, but Vasquez
23 was unable to do so.

24 220. On February 17, 2006, using coded language in a
25 telephone conversation, defendant HERNANDEZ ordered four and a
26 half ounces of powder cocaine from co-conspirator Vasquez.

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1 because she had returned them and agreed to deliver two one-ounce
2 packages of crack cocaine to an unidentified co-conspirator.

3 233. On February 18, 2006, using coded language in a
4 telephone conversation, defendant PETERSON advised co-conspirator
5 Vasquez that defendant NUNEZ had given him \$650 in drug proceeds
6 and that they were in possession of 140 grams of powder cocaine.

7 234. On February 18, 2006, using coded language in a
8 telephone conversation, defendant PETERSON advised co-conspirator
9 Vasquez that he made 14 seven-gram packages of powder cocaine and
10 10-seven gram packages of crack cocaine and that he had
11 distributed one seven-gram package of crack cocaine to an
12 unidentified co-conspirator.

13 235. On February 19, 2006, using coded language in a
14 telephone conversation, defendant A. GARCIA told co-conspirator
15 Vasquez that he was sending \$2,200 to him as payment for prior
16 drug deals.

17 236. On February 19, 2006, using coded language in a
18 telephone conversation, defendant NUNEZ told co-conspirator
19 Vasquez that she had already sold an unidentified co-conspirator
20 a half ounce of narcotics and Vasquez instructed defendant NUNEZ
21 to pick up defendant PETERSON and drive him to his mother's house
22 when a customer wanted narcotics.

23 237. On February 19, 2006, using coded language in a
24 telephone conversation, defendant SANDOVAL told co-conspirator
25 Vasquez that he had \$1,000 with him to pay Vasquez for a prior
26 drug deal.

1 PETERSON told co-conspirator Vasquez that he had prepared eight
2 ounces of crack cocaine, two of which he delivered to defendant
3 NUNEZ.

4 243. On February 23, 2006, using coded language in a
5 telephone conversation, defendant PETERSON told co-conspirator
6 Vasquez that he would give defendant NUNEZ seven grams of
7 methamphetamine and seven grams of crack cocaine, advised co-
8 conspirator Vasquez that defendant NUNEZ had delivered payment
9 for prior narcotics deals, and told co-conspirator Vasquez that
10 he had already delivered seven grams of methamphetamine to
11 defendant A. GARCIA.

12 244. On February 23, 2006, using coded language in a
13 telephone conversation, defendant PETERSON told co-conspirator
14 Vasquez that he would distribute two eighth ounce packages of
15 powder cocaine to unidentified co-conspirators and one eighth
16 ounce package of crack cocaine to defendant CORTES. In the same
17 conversation, defendant PETERSON advised co-conspirator Vasquez
18 that he would not give defendant NUNEZ any more narcotics until
19 she paid for prior deliveries of cocaine.

20 245. On February 23, 2006, using coded language in a
21 telephone conversation, defendant PETERSON told co-conspirator
22 Vasquez that he would deliver two more packages of crack cocaine
23 to defendant NUNEZ and advised co-conspirator Vasquez that he had
24 written down the quantities of all the narcotics he had given
25 defendant NUNEZ that day.

1 269. On March 4, 2006, using coded language in a telephone
2 conversation, defendant CORTES ordered an eighth ounce of
3 methamphetamine from co-conspirator Vasquez.

4 270. On March 4, 2006, using coded language in a telephone
5 conversation, defendant CORTES and co-conspirator Vasquez
6 discussed defendant CORTES's arrest on March 3, 2006 and
7 defendant CORTES told Vasquez that she was in possession of
8 narcotics for sale.

9 271. On March 7, 2006, defendant PETERSON possessed
10 approximately 102 grams of powder cocaine, seven grams of crack
11 cocaine, 100 grams of a mixture or substance containing a
12 detectable amount of methamphetamine, narcotics distribution
13 paraphernalia, two .40 caliber handgun magazines, and one box of
14 .40 caliber ammunition at his residence on West 76th Street in
15 Los Angeles, California.

1 violation of Title 18, United States Code, Section
2 1956(a)(1)(A)(i), knowing that property involved in financial
3 transactions represented the proceeds of some form of unlawful
4 activity, and which property was, in fact, the proceeds of said
5 specified unlawful activity.

6 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
7 ACCOMPLISHED

8 The object of the conspiracy was to be accomplished in
9 substance as follows:

10 1-26. The Grand Jury re-alleges and incorporates by
11 reference paragraphs 1 through 26 of Section B of Count One
12 setting forth the means of the conspiracy charged in Count One.

13 C. OVERT ACTS

14 In furtherance of the conspiracy, and to accomplish the
15 object of the conspiracy, defendants and others known and unknown
16 to the Grand Jury committed various overt acts, within the
17 Central District of California and elsewhere, including but not
18 limited to the following:

19 1-271. The Grand Jury re-alleges and incorporates by
20 reference paragraphs 1 through 271 of Section C of Count One
21 setting forth the overt acts of the conspiracy charged in Count
22 One.

COUNT THREE

[21 U.S.C. § 841(a)(1)]

On or about November 25, 2005, in Los Angeles County, within the Central District of California, defendant MANUEL ESPINO, also known as Caps, knowingly and intentionally possessed with intent to distribute approximately .32 grams of a mixture or substance containing a detectable amount of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.

COUNT FOUR

[21 U.S.C. § 841(a)(1)]

On or about November 30, 2005, in Los Angeles County, within the Central District of California, defendants MANUEL ESPINO, also known as Caps, and IVAN RUEDA, knowingly and intentionally possessed with intent to distribute approximately two grams of a mixture or substance containing a detectable amount of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.

COUNT FIVE

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

On or about February 17, 2006, in Los Angeles County, within the Central District of California, defendant ALFONSO GARCIA, also known as Dier, knowingly and intentionally possessed with intent to distribute 50 grams or more, that is, approximately 210 grams, of a mixture or substance containing a detectable amount of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.

COUNT SIX

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

On or about February 17, 2006, in Los Angeles County, within the Central District of California, defendant ALFONSO GARCIA, also known as Dier, knowingly and intentionally possessed with intent to distribute 50 grams or more, that is, approximately 83 grams, of a mixture or substance containing a detectable amount of methamphetamine, a schedule II controlled substance.

COUNT SEVEN

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

On or about February 17, 2006, in Los Angeles County, within the Central District of California, defendant ALFONSO GARCIA, also known as Dier, knowingly and intentionally possessed with intent to distribute 500 grams or more, that is, approximately 731 grams, of a mixture or substance containing a detectable amount of cocaine, a schedule II narcotic drug controlled substance.

COUNT NINE

[18 U.S.C. § 924(c)]

On or about February 17, 2006, in Los Angeles County, within the Central District of California, defendant ALFONSO GARCIA, also known as Dier, knowingly used and carried a firearm, namely, a firearm, namely, a .40 caliber Glock, model 23C semi-automatic pistol, serial number DYZ077US, during and in relation to a drug trafficking crime, namely, possession with intent to distribute controlled substances, in violation of 21 U.S.C. § 841(a)(1).

COUNT TEN

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

On or about March 3, 2006, in Los Angeles County, within the Central District of California, defendant ELIAZAR RUIZ SANCHEZ knowingly and intentionally possessed with intent to distribute 50 grams or more, that is, approximately 259 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT ELEVEN

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

On or about March 3, 2006, in Los Angeles County, within the Central District of California, defendants SINTHIA CORTES, also known as ("aka") Cindy, and YSIDRO SOTO, aka Chilo, knowingly and intentionally distributed 50 grams or more, that is, approximately 259 grams, of actual methamphetamine, a schedule II controlled substance.

COUNT TWELVE

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

On or about March 3, 2006, in Los Angeles County, within the Central District of California, defendants SINTHIA CORTES, also known as ("aka") Cindy, and YSIDRO SOTO, aka Chilo, knowingly and intentionally possessed with intent to distribute 500 grams or more, that is, approximately 1,668 grams, of a mixture or substance containing a detectable amount of methamphetamine, a schedule II controlled substance.

COUNT THIRTEEN

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

On or about March 3, 2006, in Los Angeles County, within the Central District of California, defendants SINTHIA CORTES, also known as ("aka") Cindy, and YSIDRO SOTO, aka Chilo, knowingly and intentionally possessed with intent to distribute five grams or more, that is approximately 11 grams, of a mixture or substance containing a detectable amount of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.

COUNT FOURTEEN

[21 U.S.C. § 841(a)(1)]

On or about March 3, 2006, in Los Angeles County, within the Central District of California, defendants SINTHIA CORTES, also known as ("aka") Cindy, and YSIDRO SOTO, aka Chilo, knowingly and intentionally possessed with intent to distribute approximately 26 grams of a mixture or substance containing a detectable amount of cocaine, a schedule II narcotic drug controlled substance.

COUNT FIFTEEN

[21 U.S.C. § 841(a)(1)]

On or about March 3, 2006, in Los Angeles County, within the Central District of California, defendants SINTHIA CORTES, also known as ("aka") Cindy, and YSIDRO SOTO, aka Chilo, knowingly and intentionally possessed with intent to distribute approximately 10,908 grams of marijuana, a schedule I controlled substance.

COUNT SIXTEEN

[18 U.S.C. § 922(g)(1)]

On or about March 3, 2006, in Los Angeles County, within the Central District of California, defendant YSIDRO SOTO, also known as Chilo, knowingly possessed firearms, namely, a 9 millimeter Taurus, model PT92 semi-automatic pistol, serial number TIC76835, and a .45 caliber Fabrica Militar De Armas, model Portatiles, serial number 10551, in and affecting interstate and foreign commerce.

Such possession occurred after defendant SOTO had been convicted of at least one of the following felonies, each punishable by a term of imprisonment exceeding one year:

(1) Possession of Marijuana/Hashish for Sale, in violation of California Health and Safety Code Section 11359, in the Superior Court of Los Angeles County, Case Number VA049132, on or about February 13, 1998;

(2) Possession of Marijuana/Hashish for Sale, in violation of California Health and Safety Code Section 11359, in the Superior Court of Los Angeles County, Case Number TA100448, on or about March 24, 1999; and

(3) Possession of Cocaine Base for Sale, in violation of California Health and Safety Code Section 11351.5, Possession of a Controlled Substance for Sale, in violation of California Health and Safety Code Section 11351, Felon in Possession of a Firearm, in violation of California Penal Code Section 12021(a)(1), and Possession of Marijuana/Hashish for Sale, in

1 violation of California Health and Safety Code Section 11359, in
2 the Superior Court of Los Angeles County, Case Number VA063479,
3 on or about December 5, 2003.

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COUNT SEVENTEEN

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

On or about March 7, 2006, in Los Angeles County, within the Central District of California, defendant ELBERT ERIC PETERSON, also known as Eric, knowingly and intentionally possessed with intent to distribute 50 grams or more, that is, approximately 100 grams, of a mixture or substance containing a detectable amount of methamphetamine, a schedule II controlled substance.

COUNT EIGHTEEN

[21 U.S.C. § 841(a)(1)]

On or about March 7, 2006, in Los Angeles County, within the Central District of California, defendant ELBERT ERIC PETERSON, also known as Eric, knowingly and intentionally possessed with intent to distribute approximately 102 grams of a mixture or substance containing a detectable amount of cocaine, a schedule II narcotic drug controlled substance.

COUNT NINETEEN

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

On or about March 7, 2006, in Los Angeles County, within the Central District of California, defendant ELBERT ERIC PETERSON, also known as Eric, knowingly and intentionally possessed with intent to distribute five grams or more, that is, approximately seven grams, of a mixture or substance containing a detectable amount of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance.

COUNT TWENTY

[21 U.S.C. § 843(b)]

On or about November 3, 2005, in Los Angeles County, within the Central District of California, defendant ERNIE VALADEZ, also known as Ernie, knowingly and intentionally used a communication facility, to wit, a telephone, in committing and causing and facilitating the commission of a felony drug offense, namely, conspiracy to distribute a mixture or substance containing a detectable amount of cocaine base in the form of crack cocaine, a schedule II narcotic drug controlled substance, in violation of 21 U.S.C. § 841(a)(1).

1 the value of the amount described in paragraph 1, if, as a result
2 of any act or omission of said defendant, the property described
3 in paragraph 1, or any portion thereof, cannot be located upon
4 the exercise of due diligence; has been transferred, sold to, or
5 deposited with a third party; has been placed beyond the
6 jurisdiction of this court; has been substantially diminished in
7 value; or has been commingled with other property which cannot be
8 divided without difficulty.

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1 the jurisdiction of this court; has been substantially diminished
2 in value; or has been commingled with other property which cannot
3 be divided without difficulty.

4 A TRUE BILL

5
6 _____
7 Foreperson

8 GEORGE S. CARDONA
9 United States Attorney

10
11 THOMAS P. O'BRIEN
12 Assistant United States Attorney
13 Chief, Criminal Division

14 KEVIN S. ROSENBERG
15 PETER A. HERNANDEZ
16 Assistant United States Attorneys
17 Organized Crime Drug Enforcement
18 Task Force
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