

**SEALED**

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

2014 JUN -4 PM 12:17

UNITED STATES OF AMERICA

FILED UNDER SEAL NT

v.

NO.

- CESAR IBARRA, aka "BLING" (1)
- HILBERTO IBARRA, aka "GILBERTO" (2)
- ELVA SOFIA IBARRA (3)
- CESAR IBARRA, JR., aka "CHICHO" (4)
- LAURO REYES-SERRANO, aka "WICHO," aka "GORDO" (5)
- NICOLAS MANRIQUEZ (6)
- ANDRES GARCIA, aka "MENTIRAS" (7)
- VICTOR ANDERSON, aka "OLD SCHOOL" (8)
- QUINTON WALKER (9)
- MARK ANTHONY NOLASCO (10)

**3 - 14 CR - 210 - D**

INDICTMENT

The Grand Jury Charges:

Introduction

1. Beginning no later than November 2011 and continuing until on or about June 3, 2014, in the Dallas Division of the Northern District of Texas, defendants and siblings **Cesar Ibarra, aka "Bling," Hilberto Ibarra, aka "Gilberto,"** and **Elva Sofia Ibarra** (collectively the "Ibarra siblings") knowingly and willfully conspired with each other, and with others known and unknown to the Grand Jury, to commit illegal narcotics-trafficking offenses and criminal offenses in furtherance of their drug-trafficking activities, including the commission or planned commission of burglaries,

robberies and other acts of violence. The Ibarra siblings and certain other co-conspirators, including defendant **Lauro Reyes-Serano, aka "Wicho," aka "Gordo"** were historically known as the "Goon Squad."

2. The Goon Squad consisted of numerous individuals, often interchangeable with one another, but was directed, at all times, by defendants **Cesar Ibarra and Hilberto Ibarra**. The Ibarra siblings also involved other family members, including defendant **Cesar Ibarra Jr., aka "Chicho,"** in their drug trafficking-activities.

3. The Goon Squad targeted individuals known to be, or believed to be, drug dealers for burglary, robbery or other acts of violence, because those individuals were likely to possess large quantities of illegal narcotics, U.S. currency, or firearms, and would not be likely to report any offenses by the Goon Squad to law enforcement officials because of their own unlawful activities.

4. The Goon Squad along with other conspirators, including defendants **Cesar Ibarra, Jr., Nicolas Manriquez, Andres Garcia, aka "Mentiras," Victor Anderson, aka "Old School," Quinton Walker, and Mark Anthony Nolasco** engaged in significant drug trafficking of cocaine, methamphetamine, and marijuana.

5. The Goon Squad performed surveillance and reconnaissance on their potential victims and attempted to perform similar surveillance on members of law enforcement, including the taking of photographs and the recordation of vehicle specific information, that they believed were investigating their illicit activities.

#### Defendants

At all times relevant to this Indictment:

6. Defendant **Cesar Ibarra** was a resident of Mansfield, Texas.

7. Defendant **Hilberto Ibarra** was a resident of Mansfield, Texas. Defendant **Hilberto Ibarra** was the brother of defendant **Cesar Ibarra**.

8. Defendant **Elva Sofia Ibarra** was a resident of Dallas, Texas. Defendant **Elva Sofia Ibarra** was the sister of defendants **Cesar Ibarra** and **Hilberto Ibarra**.

9. Defendant **Cesar Ibarra, Jr.** was a resident of Dallas, Texas. Defendant **Cesar Ibarra, Jr.** was defendant **Cesar Ibarra's** son and the nephew of defendants **Hilberto Ibarra** and **Elva Sofia Ibarra**.

10. Defendant **Lauro Reyes-Serrano** was a resident of Dallas, Texas. Defendant **Reyes-Serrano** was defendant **Elva Sofia Ibarra's** boyfriend. Beginning on or about April 30, 2014, defendant **Reyes-Serrano** was incarcerated on state charges in Johnson County, Texas.

11. Defendant **Nicolas Manriquez** was a resident of Duncanville, Texas.

12. Defendant **Andres Garcia** was a resident of Dallas, Texas.

13. Defendant **Victor Anderson** was a resident of Dallas, Texas.

14. Defendant **Quinton Walker** was a resident of Dallas, Texas.

15. Defendant **Mark Anthony Nolasco** was a resident of Dallas, Texas. At times, defendant **Nolasco** also resided in Mansfield, Texas.

Count One  
Conspiracy to Possess with Intent to Distribute a Controlled Substance  
[Violation of 21 U.S.C. § 846]

16. The allegations contained in paragraphs 1 through 15 are realleged and fully incorporated herein.

The Conspiracy

17. Between in or about November 2011, and on or about June 3, 2014, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **Cesar Ibarra, aka "Bling," Hilberto Ibarra, aka "Gilberto," Elva Sofia Ibarra, Cesar Ibarra, Jr., aka "Chicho," Lauro Reyes-Serrano, aka "Wicho," aka "Gordo," Nicolas Manriquez, Andres Garcia, aka "Metiras," Victor Anderson, aka "Old School," Quinton Walker, and Mark Anthony Nolasco** knowingly and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to commit the following offense against the United States:

- a. to possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A);
- b. to possess with intent to distribute five kilograms or more of a mixture containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A); and
- c. to possess with intent to distribute a mixture and substance containing a detectable

amount of marijuana, a Schedule I controlled substance, in violation of 21 U.S.C.

§ 841(a)(1) and (b)(1)(C);

all in violation of 21 U.S.C. § 846.

Manner and Means of the Conspiracy

It was part of the conspiracy that:

18. Defendants **Cesar Ibarra** and **Hilberto Ibarra** obtained, possessed, and distributed illegal narcotics, including cocaine, methamphetamine, and marijuana, to other individuals.

19. Defendants **Cesar Ibarra** and **Hilberto Ibarra** negotiated drug transactions over their cellular telephones and via text messaging.

20. Defendant **Elva Sofia Ibarra** supplied illegal narcotics to and assisted in finding other sources of illegal narcotics for defendant **Hilberto Ibarra** and assisted defendants **Cesar Ibarra** and **Hilberto Ibarra** with the facilitation of numerous drug sales.

21. Defendant **Cesar Ibarra, Jr.** maintained and operated a stash house of illegal narcotics, including cocaine and marijuana, apart and separate from his residence. Defendant **Cesar Ibarra, Jr.** also packaged illegal narcotics for defendant **Hilberto Ibarra**. **Cesar Ibarra, Jr.** was also instructed by **Hilberto Ibarra** to participate in a planned act of violence utilizing a handgun.

22. Defendant **Lauro Reyes-Serrano** sold and supplied methamphetamine to defendant **Hilberto Ibarra**.

23. Defendant **Nicolas Manriquez** purchased distribution amounts of cocaine

and marijuana from the Ibarra siblings.

24. Defendant **Andres Garcia** purchased distribution amounts of cocaine and marijuana from the Ibarra siblings.

25. Defendant **Victor Anderson** purchased distribution amounts of methamphetamine, cocaine, and marijuana from the Ibarra siblings. Defendant **Anderson** operated a stash house for illegal narcotics apart and separate from his residence.

26. Defendant **Quinton Walker** purchased cocaine from the Ibarra siblings for further distribution. Defendant **Walker** operated a stash house for illegal narcotics apart and separate from his residence.

27. **Mark Anthony Nolasco** sold and supplied cocaine to the Ibarra siblings.

Overt Acts

28. In furtherance of the conspiracy, the defendants, and others known and unknown to the Grand Jury, committed the following overt acts in the Dallas Division of the Northern District of Texas and elsewhere:

a. On or about March 21, 2014, defendant **Cesar Ibarra** sold approximately 29 grams of cocaine to an individual known to the Grand Jury. Defendant **Hilberto Ibarra** was present during this transaction.

b. On or about April 22, 2014, defendant **Hilberto Ibarra** sold approximately 31 grams of cocaine to an individual known to the Grand Jury.

c. On or about May 1, 2014, defendant **Hilberto Ibarra** sold approximately 253 grams of methamphetamine to an individual known to the Grand Jury. Defendant

**Elva Sofia Ibarra** was present at the scene and facilitated the transaction.

d. On or about May 8, 2014, defendant **Hilberto Ibarra** sold approximately 254 grams of methamphetamine to an individual known to the Grand Jury. Defendant **Elva Sofia Ibarra** facilitated the transaction.

e. On or about May 23, 2014, defendant **Hilberto Ibarra** sold approximately 255 grams of methamphetamine to an individual known to the Grand Jury.

f. Between on or about April 28, 2014, and May 21, 2014, defendant **Elva Sofia Ibarra** facilitated and provided illegal narcotics for numerous narcotics transactions, including, but not limited to: approximately 252 grams of methamphetamine and approximately 9 kilograms of marijuana on or about April 28, 2014; approximately 252 grams of methamphetamine on or about May 1, 2014; approximately 252 grams of methamphetamine between on or about May 5, 2014, and on or about May 8, 2014; approximately 14 grams of methamphetamine on or about May 13, 2014; approximately 500 grams of cocaine on or about May 14, 2014; approximately 28 grams of methamphetamine on or about May 16, 2014; and approximately one kilogram of methamphetamine on or about May 20, 2014.

g. Between on or about April 18, 2014, and on or about May 16, 2014, defendants **Cesar Ibarra, Jr.** assisted **Hilberto Ibarra** in the sale of numerous multi-kilogram quantities of marijuana. For example, on or about April 22, 2014, defendant **Cesar Ibarra, Jr.** packaged illegal narcotics for defendant **Hilberto Ibarra**.

h. On or about April 28, 2014, defendants **Lauro Reyes-Serrano** and **Hilberto Ibarra** negotiated a transaction involving approximately 168 grams of

methamphetamine.

i. On or about April 1, 2014, defendants **Nicolas Manriquez** and **Cesar Ibarra** negotiated a transaction involving approximately one kilogram of cocaine. Defendants **Nicolas Manriquez** and **Cesar Ibarra** negotiated numerous additional transactions including, but not limited to: approximately three kilograms of cocaine on or about April 7, 2014; approximately 500 grams of cocaine on or about April 9, 2014; approximately 446 grams of cocaine and approximately 2.2 kilograms of marijuana on or about April 18, 2014; approximately 6.8 kilograms of marijuana on or about April 18, 2014; approximately two kilograms of cocaine on or about April 22, 2014, approximately 1.5 kilograms of cocaine on or about April 23, 2014; approximately 1.5 kilograms of cocaine on or about May 5, 2014; and approximately one kilogram of cocaine on or about May 13, 2014. In addition to the above listed calls, between on or about March 21, 2014, and on or about May 16, 2014, defendants **Nicolas Manriquez** and **Cesar Ibarra** negotiated numerous additional transactions involving multi-kilogram quantities of marijuana.

j. Between on or about March 14, 2014 and March 21, 2014, defendants **Andres Garcia** and **Cesar Ibarra** negotiated a transaction involving approximately 112 grams of cocaine. Defendants **Andres Garcia** and **Cesar Ibarra** negotiated numerous additional transactions including, but not limited to: approximately 112 grams of cocaine on or about March 27, 2014; and approximately 56 grams of cocaine and approximately eight kilograms of marijuana on or about April 16, 2014.

k. On or about May 13, 2014, defendants **Victor Anderson** and **Hilberto**



**Ibarra** negotiated a transaction involving approximately 14 grams of cocaine and approximately 14 grams of methamphetamine. Between on or about April 12, 2014, and May 13, 2014, defendants **Victor Anderson** and **Hilberto Ibarra** negotiated numerous additional transactions involving multi-kilogram quantities of marijuana.

l. On or about April 17, 2014, defendants **Quinton Walker** and **Hilberto Ibarra** negotiated a transaction involving approximately 500 grams of cocaine. On or about May 14, 2014, defendants **Quinton Walker** and **Hilberto Ibarra** negotiated an additional transaction involving approximately 500 grams of cocaine.

m. On or about April 1, 2014, defendants **Mark Anthony Nolasco** and **Hilberto Ibarra** negotiated a transaction involving approximately three kilograms of cocaine.

n. As discussed in greater detail below in paragraphs 29 through 35 (which are incorporated herein), defendants **Cesar Ibarra**, **Hilberto Ibarra**, **Elva Sofia Ibarra**, and **Lauro Reyes-Serrano** and others known and unknown to the Grand Jury (acting as the Goon Squad) planned and performed the commission of robberies in furtherance of their drug-trafficking activities.

o. In May 2014, defendants **Cesar Ibarra** and **Hilberto Ibarra** identified a warehouse as a target for a burglary. The Goon Squad believed that the warehouse contained a large quantity of illegal narcotics. In or about May 2014, defendants **Cesar Ibarra** and **Hilberto Ibarra**, and others known and unknown to the Grand Jury, performed reconnaissance and surveillance of the warehouse and planned a robbery of the warehouse.

Count Two

Conspiracy to Commit Robbery Affecting Interstate and Foreign Commerce  
[Violation of 18 U.S.C. § 1951(a)]

29. The allegations contained in paragraphs 1 through 28 are realleged and fully incorporated herein.

30. Between in or about November 2011, and on or about June 3, 2014, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **Cesar Ibarra, aka “Bling,” Hilberto Ibarra, aka “Gilberto,” Elva Sofia Ibarra, Lauro Reyes-Serrano, aka “Wicho,” aka “Gordo,” and Victor Anderson, aka “Old School”** knowingly conspired with each other, and with others known and unknown to the Grand Jury to obstruct, delay, and affect interstate and foreign commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in interstate and foreign commerce, by robbery, in that the defendants and their co-conspirators knowingly conspired to unlawfully take and obtain personal property, including controlled substances, firearms, and United States currency, from the person and presence of others, against their will, and by means of actual and threatened force, violence, and fear of immediate injury to their persons and property and to the persons and property of anyone in their company at the time of the taking and obtaining.

Manner and Means of the Conspiracy

It was part of the conspiracy that:

31. The Ibarra siblings identified other drug dealers for robberies and other violent offenses in furtherance of their drug-trafficking activities.

32. The Ibarra siblings recruited other individuals to identify additional targets for robberies and other violent offenses in furtherance of their drug-trafficking activities.

33. Once a target had been identified, defendants **Cesar Ibarra, Hilberto Ibarra, Lauro Reyes-Serrano, and Victor Anderson** along with other individuals known and unknown to the Grand Jury, performed surveillance and reconnaissance of the targets. This surveillance and reconnaissance often took several days and included the use of electronic devices to track the identified targets.

34. After the Goon Squad had finished the surveillance and reconnaissance to its satisfaction, and after it had determined that the target would be in possession of sufficient illegal narcotics, U.S. currency, or firearms, the Goon Squad agreed to perform a robbery or other act of violence in order to steal and/or illegally acquire illegal narcotics, U.S. currency, or firearms from the target.

35. Defendants **Cesar Ibarra and Hilberto Ibarra** were the leaders and organizers of the robberies or other acts of violence and personally participated in such illegal activities.

#### Overt Acts

36. In furtherance of the conspiracy, the defendants, and others known and unknown to the Grand Jury, committed the following overt acts in the Dallas Division of the Northern District of Texas and elsewhere:

a. In or about March 2014, defendants **Cesar Ibarra, Hilberto Ibarra, and Elva Sofia Ibarra** identified an individual known to the Grand Jury as a target for robbery. The Goon Squad believed that this individual was in possession of a large

quantity of narcotics. In or about March 2014, defendants **Cesar Ibarra, Hilberto Ibarra, Lauro Reyes-Serrano**, and others known and unknown to the Grand Jury performed reconnaissance and surveillance of this individual. The planned robbery of this individual ultimately did not occur, however, because of the intervention of law enforcement.

b. In or about May 2014, defendant **Victor Anderson** identified an individual for robbery by the Goon Squad. Defendant **Anderson** performed surveillance and reconnaissance of this target and conveyed information regarding the target to defendant **Hilberto Ibarra**. The planned robbery of this individual ultimately did not occur because of the attention that the Goon Squad was receiving from law enforcement.

c. In or about May 2014, defendant **Elva Sofia Ibarra** identified an individual for robbery and attempted to convince defendant **Hilberto Ibarra** to perform the robbery. Defendant **Elva Sofia Ibarra** believed that this individual was in possession of a large quantity of narcotics and United States currency. The planned robbery of this individual ultimately did not occur, because defendant **Hilberto Ibarra** did not believe that the individual was in possession of sufficient quantities of illegal narcotics to perform the robbery.

Forfeiture Notice

[21 U.S.C. § 853(a); 18 U.S.C. § 981(a)(1)(C) and 18 U.S.C. § 2461(c); 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c); 18 U.S.C. § 3665]

37. The allegations contained in paragraphs 1 through 36 are realleged and fully incorporated herein.

38. Upon conviction for the offense alleged in Count One of this Indictment and pursuant to 21 U.S.C. § 853(a), the defendants, **Cesar Ibarra, aka “Bling,” Hilberto Ibarra, aka “Gilberto,” Elva Sofia Ibarra, Cesar Ibarra, Jr., aka “Chicho,” Lauro Reyes-Serrano, aka “Wicho,” aka “Gordo,” Nicholas Manriquez, Andres Garcia, aka “Mentiras,” Victor Anderson, aka “Old School,” Quinton Walker, and Mark Anthony Nolasco**, shall forfeit to the United States of America all property, real or personal, constituting, or derived from, the proceeds obtained, directly or indirectly, as a result of the offense; and any property, real or personal, used or intended to be used, in any manner or part, to commit or facilitate the commission of the offense.

39. Upon conviction for the offense alleged in Count Two of this Indictment and pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), the defendants, **Cesar Ibarra, aka “Bling,” Hilberto Ibarra, aka “Gilberto,” Elva Sofia Ibarra, Lauro Reyes-Serrano, aka “Wicho,” aka “Gordo,” and Victor Anderson, aka “Old School,”** shall forfeit to the United States of America any property, real or personal, constituting or derived from proceeds traceable to the offense.

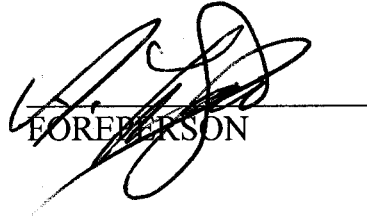
40. Upon conviction for the offense alleged in Count Two of the Indictment and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the defendants, **Cesar Ibarra, aka “Bling,” Hilberto Ibarra, aka “Gilberto,” Elva Sofia Ibarra, Lauro**

**Reyes-Serrano, aka “Wicho,” aka “Gordo,” and Victor Anderson, aka “Old School,”** shall forfeit to the United States of America all firearms and ammunition involved or used in the commission of the offense.

41. Upon conviction for the offense alleged in Count Two of the Indictment and pursuant to 18 U.S.C. § 3665, the defendants, **Cesar Ibarra, aka “Bling,” Hilberto Ibarra, aka “Gilberto,” Elva Sofia Ibarra, Lauro Reyes-Serrano, aka “Wicho,” aka “Gordo,” and Victor Anderson, aka “Old School,”** shall forfeit to the United States of America all firearms and ammunition found in their possession or under their immediate control at the time of their respective arrests.

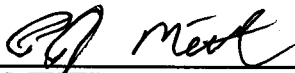
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A TRUE BILL



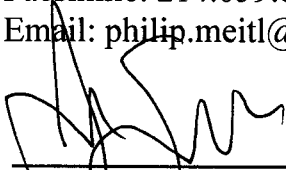
EOREPERSON

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FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

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HILBERTO IBARRA, aka "GILBERTO" (2)  
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LAURO REYES-SERRANO, aka "WICHO," aka "GORDO" (5)  
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VICTOR ANDERSON, aka "OLD SCHOOL" (8),  
QUINTON WALKER (9), MARK ANTHONY NOLASCO (10)

SEALED INDICTMENT

21 U.S.C. § 846

Conspiracy to Possess with Intent to Distribute a Controlled Substance

18 U.S.C. § 1951(a)

Conspiracy to Commit Robbery Affecting Interstate and Foreign Commerce

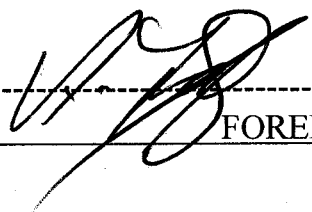
21 U.S.C. § 853(a); 18 U.S.C. § 981(a)(1)(C) and 18 U.S.C. § 2461(c); 18 U.S.C. §  
924(d) and 28 U.S.C. § 2461(c); 18 U.S.C. § 3665

Forfeiture

2 Counts

A true bill rendered

DALLAS



FOREPERSON

Filed in open court this 4th day of June, 2014.

Clerk

Warrants to be issued for all defendants

UNITED STATES DISTRICT/MAGISTRATE JUDGE

No Magistrate Complaint Pending