

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

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Count One
Conspiracy to Distribute and Possess with Intent to
Distribute Controlled Substances
(Violation of 21 U.S.C. § 846)

Beginning on or about a date unknown to the grand jury and continuing until on or about the date of this indictment, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Omar Mendoza**, a/k/a "Big O" and "O," **Sammy Augustin Galan**, a/k/a "Hondu," **Miguel Carrasco**, **Conrad Nava**, a/k/a "Chauncy," **Bobby Holman**, a/k/a "Holmes," **Arcel Vega Martinez**, a/k/a "Chilango," **Floyd Daniel Teafatiller**, **Jesse Herrera Jr.**, **Joey Nicholas Vallejo**, **Traci Michelle Ramos**, **Curtis Gonzales**, **Shannon Drell Harris**, a/k/a "Shawn," and **Thiraphong Vongphrachanh**, defendants, did knowingly and intentionally combine, conspire, confederate, and agree together and with persons known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly and intentionally distribute and possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, a schedule II controlled substance, 50 grams and more of methamphetamine, a schedule II controlled substance, five kilograms and more of cocaine, a schedule II controlled substance, and 280 grams and more of cocaine base, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii), 841(b)(1)(A)(iii), and 841(b)(1)(A)(viii).

All in violation of Title 21, United States Code, Section 846.

Count Two
Distribution and Possession with Intent to Distribute
Five Grams or More of Methamphetamine and Aiding and Abetting
(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii) and 18 U.S.C. § 2)

On or about December 13, 2012, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Traci Michelle Ramos**, defendant, did knowingly and intentionally distribute and possess with intent to distribute five grams and more, but less than fifty grams, of methamphetamine, a schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Three

Distribution and Possession with Intent to Distribute
Five Grams or More of Methamphetamine and Aiding and Abetting
(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii) and 18 U.S.C. § 2)

On or about December 18, 2012, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Traci Michelle Ramos**, defendant, did knowingly and intentionally distribute and possess with intent to distribute five grams and more, but less than fifty grams, of methamphetamine, a schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Four
Distribution and Possession with Intent to Distribute
Five Grams or More of Methamphetamine and Aiding and Abetting
(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii) and 18 U.S.C. § 2)

On or about January 17, 2013, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Traci Michelle Ramos**, defendant, did knowingly and intentionally distribute and possess with intent to distribute five grams and more, but less than fifty grams, of methamphetamine, a schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Five

Distribution and Possession with Intent to Distribute
50 grams or More of Methamphetamine and Aiding and Abetting
(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii) and 18 U.S.C. § 2)

On or about January 17, 2013, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Joey Nicholas Vallejo**, defendant, did knowingly and intentionally distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing of a detectable amount of methamphetamine, a schedule II controlled substance, and five grams and more, but less than fifty grams, of methamphetamine, a schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Six
Distribution and Possession with Intent to Distribute
Five Grams or More of Methamphetamine and Aiding and Abetting
(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii) and 18 U.S.C. § 2)

On or about January 23, 2013, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Traci Michelle Ramos**, defendant, did knowingly and intentionally distribute and possess with intent to distribute five grams and more, but less than fifty grams, of methamphetamine, a schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Seven

Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine and Aiding and Abetting
(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii) and 18 U.S.C. § 2)

On or about January 24, 2013, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Joey Nicholas Vallejo**, defendant, did knowingly and intentionally distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing of a detectable amount of methamphetamine, a schedule II controlled substance, and five grams and more, but less than fifty grams, of methamphetamine, a schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Eight

Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine and Aiding and Abetting
(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii) and 18 U.S.C. § 2)

On or about February 7, 2013, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Joey Nicholas Vallejo**, defendant, did knowingly and intentionally distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing of a detectable amount of methamphetamine, a schedule II controlled substance, and five grams and more, but less than 50 grams, of methamphetamine, a schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Nine

Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine and Aiding and Abetting
(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii) and 18 U.S.C. § 2)

On or about February 14, 2013, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Sammy Agustin Galan**, a/k/a "Hondu," and **Traci Michelle Ramos**, defendants, did knowingly and intentionally distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, a schedule II controlled substance, and five grams and more, but less than 50 grams, of methamphetamine, a schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Ten
Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine and Aiding and Abetting
(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii) and 18 U.S.C. § 2)

On or about February 20, 2013, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Joey Nicholas Vallejo**, defendant, did knowingly and intentionally distribute and possess with intent to distribute 50 grams and more of methamphetamine, a schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Eleven

Possession with Intent to Distribute 50 Grams or More
of Methamphetamine and Aiding and Abetting
(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii) and 18 U.S.C. § 2)

On or about August 24, 2013, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Jessie Herrera Jr.**, defendant, did knowingly and intentionally possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, a schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Twelve

Possession with Intent to Distribute Methamphetamine and Aiding and Abetting
(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C. § 2)

On or about August 27, 2013, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Thiraphong Vongphrachanh**, defendant, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a schedule II controlled substance.

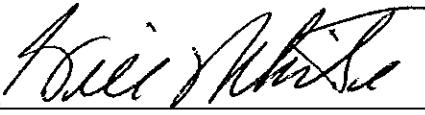
In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Thirteen
Possession of a Firearm in Furtherance of a Drug
Trafficking Crime and Aiding and Abetting
(Violation of 18 U.S.C. §§ 924(c) and 2)

On or about August 27, 2013, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Thiraphong Vongphrachanh**, defendant, did knowingly possess a firearm, to wit: a Glock, Model 23, .40 caliber semi-automatic pistol, serial number PY456US, in furtherance of a drug trafficking crime, that is, Possession with Intent to Distribute Methamphetamine, as charged in count twelve of this indictment, an offense for which he may be prosecuted in a Court of the United States.

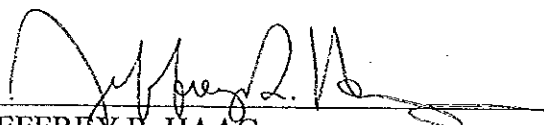
In violation of Title 18, United States Code, Sections 924(c) and 2.

A TRUE BILL:



FOREMAN

SARAH R. SALDAÑA
UNITED STATES ATTORNEY


JEFFREY R. HAAG

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

THE UNITED STATES OF AMERICA

v.

OMAR MENDOZA (1)
a/k/a "Big O" and "O"
SAMMY AUGUSTIN GALAN (2)
a/k/a "Hondu"
MIGUEL CARRASCO (3)
CONRAD NAVA (4)
a/k/a "Chauncy"
BOBBY HOLMAN (5)
a/k/a "Holmes"
ARCEL VEGA MARTINEZ (6)
a/k/a "Chilango"
FLOYD DANIEL TEAFATILLER (7)
JESSIE HERRERA JR. (8)
JOEY NICHOLAS VALLEJO (9)
TRACI MICHELLE RAMOS (10)
CURTIS GONZALES (11)
SHANNON DRELL HARRIS (12)
a/k/a "Shawn"
THIRAPHONG VONGPHRACHANH (13)

INDICTMENT

COUNT 1: CONSPIRACY TO DISTRIBUTE AND POSSESS WITH INTENT
TO DISTRIBUTE CONTROLLED SUBSTANCES
Title 21, United States Code, Section 846.

COUNTS 2-9, 11 DISTRIBUTION AND POSSESSION WITH INTENT TO
DISTRIBUTE METHAMPHETAMINE 5-50, 50-500
Title 21, United States Code, Sections 841(a)(1), (b)(1)(B)(viii).

COUNT 10: DISTRIBUTION AND POSSESSION WITH INTENT TO
DISTRIBUTE METHAMPHETAMINE 500 or more, 50 or more
Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii).

COUNT 12:

POSSESSION WITH INTENT TO DISTRIBUTE
METHAMPHETAMINE

Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C).

COUNT 13:

POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG
TRAFFICKING CRIME

Title 18, United States Code, Section 924(c)

(13 COUNTS)

A true bill rendered:

Lubbock

Bill White

Foreperson

Filed in open court this 11th day of September
A.D. 2013.

Clerk

SEALED ARREST WARRANTS TO ISSUE AS TO EACH DEFENDANT

Chang M. Kueing
UNITED STATES MAGISTRATE JUDGE