At Albuquerque NM

IN THE UNITED STATES DISTRICT COURT

DISTRICT COURT NUV 7 0 2010

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN

UNITED STATES OF AMERICA.

Plaintiff,

VS.

PABLO FERNANDO FUENTES. a/k/a Pablo Esparza, a/ka "Jesus." OSCAR CARRASCO, a/k/a "Gallo." CARMEN CARRASCO, a/k/a Maria Del Carmen Carrasco, JESUS DE LA TORRE, a/k/a "Malinado," a/k/a "Maleno," JESUS LORENZO HOLGUIN-GRADO, a/k/a Jesus Chaparo, a/k/a "Raul," SANDRA HOLGUIN, a/k/a Sandra Holquin Saenz, a/k/a Sandra Ivonne Holguin-Grado, **JAVIER FUENTES,** a/k/a Javier Lopez, a/k/a "Shadow," JESUS M. GANDARILLA, a/k/a Jesus Manuel Hernandez, a/k/a "Maniaco," RODOLFO ROMA LOPEZ, a/k/a "Ramses," JOAQUIN CARRASCO. DANIEL NAVARRO. a/k/a Daniel Olvera, **WILLIE TORRES.** JORGE PEREZ, a/k/a "George" JUAN CARLOS SOTO, a/k/a "Charlie," MARIO DAVID DI FRANCO, LETICIA M. LEYVA-OJEDA a/k/a Margarita Gomez, a/k/a "Letty,"

CLAUDIA RAMIREZ,

CRIMINAL NO. <u>10-</u> 3093

Count 1: 21 U.S.C. § 846: Conspiracy;

Count 2: 21 U.S.C. §§ 841(a)(1) and (b)(1)(B): Possession With Intent to Distribute 500 Grams and More of Cocaine; 18 U.S.C. § 2: Aiding and Abetting;

Count 3: 21 U.S.C. §§ 841(a)(1) and (b)(1)(C): Possession With Intent to Distribute Cocaine; 18 U.S.C. § 2: Aiding and Abetting.

Count 4: 21 U.S.C. §§ 841(a)(1) and (b)(1)(B): Possession With Intent to Distribute 500 Grams and More of Cocaine; 18 U.S.C. § 2: Aiding and Abetting;

Count 5: 21 U.S.C. §§ 841(a)(1) and (b)(1)(B): Possession With Intent to Distribute 500 Grams and More of Cocaine; 18 U.S.C. § 2: Aiding and Abetting;

Count 6: 18 U.S.C. § 1956(a)(1)(A)(i)

Count 7: 18 U.S.C. § 1956(a)(1)(A)(i)

18 U.S.C. § 982 and 21 U.S.C. § 853: Criminal Forfeiture.

a/k/a Claudia Saldana,

JUAN M. MUNOZ,

a/k/a Felipe Rosas,

RUBEN CAMARENA,

a/k/a "Benito,"

a/k/a "Benny,"

SIXTO JUAN AGUIRRE-INFANTE,

MONICA SANCHEZ,

JAIME PEREZ, and

LYDIA ESPARZA FUENTES

Defendants.

INDICTMENT

The Grand Jury charges:

Count 1

From in or about May, 2010, and continuing to on or about November 7, 2010, in Doña Ana County, in the District of New Mexico and elsewhere, the defendants, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," OSCAR CARRASCO, a/k/a "Gallo," CARMEN CARRASCO, a/k/a Maria Del Carmen Carrasco, JESUS DE LA TORRE, a/k/a "Malinado," a/k/a "Maleno," JESUS LORENZO HOLGUIN-GRADO, a/k/a Jesus Chaparo, a/k/a "Raul," SANDRA HOLGUIN, a/k/a Sandra Holguin Saenz, a/k/a Sandra Ivonne Holguin-Grado, JAVIER FUENTES, a/k/a Javier Lopez, a/k/a "Shadow," JESUS M. GANDARILLA, a/k/a Jesus Manuel Hernandez, a/k/a "Maniaco," RODOLFO ROMA LOPEZ, a/k/a "Ramses," JOAQUIN CARRASCO, DANIEL NAVARRO, a/k/a Daniel Olvera, WILLIE TORRES, JORGE PEREZ, a/k/a "George," JUAN CARLOS SOTO, a/k/a "Charlie," MARIO DAVID DI FRANCO, LETICIA M. LEYVA DEJEDA a/k/a Margarita Gomez, a/k/a "Letty," CLAUDIA RAMIREZ, a/k/a Claudia Saldana, JUAN M. MUNOZ, a/k/a Felipe Rosas, RUBEN CAMARENA, a/k/a "Benito," a/k/a "Benny," SIXTO JUAN AGUIRRE-INFANTE, MONICA SANCHEZ, JAMIE PEREZ,

and LYDIA ESPARZA FUENTES, unlawfully, knowingly and intentionally did combine, conspire, confederate and agree with each other and with other persons whose names are known and unknown to the grand jury to commit the following offense against the United States, to wit: possession with intent to distribute 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine, contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Overt Acts

In furtherance of the aforesaid conspiracy and to accomplish the objectives thereof, the following overt acts were committed:

Overt Act 1

On or about May 11, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," distributed 177.5 grams of cocaine to a cooperating source at the property located at 718 Applewood Road in Canutillo, Texas.

Overt Act 2

On or about May 25, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," offered to sell up to 1417.5 grams of cocaine to a cooperating source.

Overt Act 3

On or about July 1, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," had 1 kilogram of cocaine from which he distributed 199.7 grams of cocaine to a cooperating source at the property located at 718 Applewood Road in Canutillo, Texas.

On or about July 31, 2010, SIXTO JUAN AGUIRRE-INFANTE was intercepted on a call in which he admonished PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," for not calling sooner to arrange a shipment of cocaine.

Overt Act 5

On or about July 31, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo
Esparza, a/ka "Jesus," OSCAR CARRASCO, a/k/a "Gallo," CARMEN CARRASCO,
a/k/a Maria Del Carmen Carrasco, JESUS DE LA TORRE, a/k/a "Malinado," a/k/a
"Maleno," JAVIER FUENTES, a/k/a Javier Lopez, a/k/a "Shadow," JESUS M.

GANDARILLA, a/k/a Jesus Manuel Hernandez, a/k/a "Maniaco,"

RODOLFO ROMA LOPEZ, a/k/a "Ramses," WILLIE TORRES, JORGE PEREZ, a/k/a
"George," and JUAN CARLOS SOTO, a/k/a "Charlie," met at the property located at
718 Applewood Road in Canutillo, Texas, for "haircuts," which is believed to be code for
a meeting regarding cocaine or drug proceeds. During the initial time these individuals
were meeting, CARMEN CARRASCO, a/k/a Maria Del Carmen Carrasco, delivered
a vehicle loaded with cocaine that was subsequently unloaded at this residence.

Overt Act 6

On or about July 31, 2010, LYDIA ESPARZA FUENTES was present at the property located at 718 Applewood Road in Canutillo, Texas, during the time that cocaine was being unloaded at the property. This property, which is divided into three parcels, is owned in part by LYDIA ESPARZA FUENTES who knowingly made it available and allowed other co-conspirators to store and distribute controlled substances there.

On or about August 5, 2010 agents intercepted calls between PABLO

FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," and DANIEL NAVARRO,

a/k/a Daniel Olvera, made arrangements to meet so that NAVARRO could deliver drug

proceeds to FUENTES and so that NAVARRO could receive additional cocaine.

Overt Act 8

On or about August 5, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," and JORGE PEREZ, a/k/a "George," delivered drug proceeds to a person in El Paso, Texas, who was to further transport those drug proceeds into Mexico. During the time of this delivery, CARMEN CARRASCO, a/k/a Maria Del Carmen Carrasco, communicated about the delivery of the proceeds with an unknown person in Mexico.

Overt Act 9

On or about August 17, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo
Esparza, a/ka "Jesus," distributed 248.9 grams of cocaine to a cooperating source at
the property located at 718 Applewood Road in Canutillo, Texas.

Overt Act 10

On or about August 22, 2010 agents intercepted calls between DANIEL

NAVARRO, a/k/a Daniel Olvera, delivered drug proceeds to PABLO FERNANDO

FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," at the property located at 584 Agua

Marina Clint, Texas.

On or about August 26, 2010, agents intercepted calls in which PABLO
FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," made arrangements to
deliver cocaine and then subsequently intercepted calls indicated that he had delivered
cocaine to LETICIA M. LEYVA OJEDA a/k/a Margarita Gomez, a/k/a "Letty," at a
location in El Paso, Texas.

Over Act 12

On or about August 27, 2010, agents intercepted calls in which PABLO
FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," and CLAUDIA
RAMIREZ, a/k/a Claudia Saldana, made arrangements to travel together to Denver,
Colorado, where FUENTES was to deliver cocaine.

Overt Act 13

On or about August 27, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," CARMEN CARRASCO, a/k/a Maria Del Carmen Carrasco, JESUS DE LA TORRE, a/k/a "Malinado,"a/k/a "Maleno," MARIO DAVID Di FRANCO, JESUS M. GANDARILLA, a/k/a Jesus Manuel Hernandez, a/k/a "Maniaco," and JOAQUIN CARRASCO worked together to package 1959.46 g cocaine for transportation and subsequent distribution. This cocaine was sent to the United States by SIXTO JUAN AGUIRRE-INFANTE.

Overt Act 14

On or about August 29, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," and JESUS M. GANDARILLA delivered drug proceeds to

unknown individuals at a bus station in El Paso, Texas. These individuals were to transport the proceeds to Mexico.

Overt Act 15

On or about September 6, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," was counting drug proceeds at the residence located at 11777 Charter Park, El Paso, Texas, that he sometimes shares with CLAUDIA RAMIREZ, a/k/a Claudia Saldana. During the time FUENTES was counting the proceeds inside the residence, RAMIREZ was present and aware of what was occurring. At approximately 10:00 p.m. LETICIA M. LEYVA OJEDA a/k/a Margarita Gomez, a/k/a "Letty," arrived at the residence and received the proceeds which she was to deliver to another person.

Overt Act 16

On or about September 13, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," delivered 1 kilogram of cocaine to JAVIER FUENTES, a/k/a Javier Lopez, a/k/a "Shadow," at the residence located at the residence located at 11777 Charter Park El Paso, Texas.

Over Act 17

On or about September 13, 2010, CARMEN CARRASCO, a/k/a Maria Del Carmen Carrasco, delivered cocaine to JOAQUIN CARRASCO at the residence located at 7221 Second Street, Canutillo, Texas.

Overt Act 18

On or about September 18, 2010, PABLO FERNANDO FUENTES, a/k/a

Pablo Esparza, a/ka "Jesus," delivered cocaine to JESUS DE LA TORRE, a/k/a

"Malinado,"a/k/a "Maleno," at the property located at 718 Applewood Road in Canutillo, Texas.

Overt Act 19

On or about September 21, 2010, PABLO FERNANDO FUENTES, a/k/a

Pablo Esparza, a/ka "Jesus," received 1 kilogram of cocaine from JESUS

LORENZO HOLGUIN-GRADO, a/k/a Jesus Chaparo, a/k/a "Raul," at the residence located at 11777 Charter Park, El Paso, Texas. Approximately one hour later,

PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," met SANDRA HOLGUIN, a/k/a Sandra Holguin Saenz, a/k/a Sandra Ivonne Holguin-Grado, at another location in El Paso, Texas where FUENTES delivered payment for the cocaine.

Overt Act 20

On or about September 21, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," picked up drug proceeds from JAVIER FUENTES, a/k/a Javier Lopez, a/k/a "Shadow," at a residence located in Sunland Park, New Mexico.

Overt Act 21

On or about September 23, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," distributed approximately 297.6 grams of cocaine to a cooperating source at a location in El Paso, Texas.

Overt Act 22

On or about September 23, 2010, PABLO FERNANDO FUENTES, a/k/a

Pablo Esparza, a/ka "Jesus," negotiated the purchase of cocaine from JESUS

LORENZO HOLGUIN-GRADO, a/k/a Jesus Chaparo, a/k/a "Raul," and SANDRA

HOLGUIN, a/k/a Sandra Holguin Saenz, a/k/a Sandra Ivonne Holguin-Grado.

FUENTES then met SANDRA HOLGUIN, a/k/a Sandra Holguin Saenz, a/k/a Sandra

Ivonne Holguin-Grado and received 1 kilogram of cocaine.

Overt Act 23

On or about September 27, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," picked up of cocaine from JESUS LORENZO HOLGUIN-GRADO, a/k/a Jesus Chaparo, a/k/a "Raul," at a location in El Paso, Texas, and then delivered the cocaine to a location in Las Cruces, New Mexico.

Overt Act 24

On or about September 28, 2010, JAVIER FUENTES, a/k/a Javier Lopez, a/k/a "Shadow," called PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," to say that JAVIER FUENTES, a/k/a Javier Lopez, a/k/a "Shadow," had \$118,000 in drug proceeds that belonged to PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus,", but that the total was \$7,000 short. PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," indicated that he would provide the difference at a later time.

Overt Act 25

On or about September 28, 2010, PABLO FERNANDO FUENTES, a/k/a

Pablo Esparza, a/ka "Jesus," traveled through New Mexico to deliver 4 kilograms of cocaine to RUBEN CAMARENA, a/k/a "Benito," a/k/a "Benny," in or near Denver, Colorado.

On or about October 1, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," and JESUS LORENZO HOLGUIN-GRADO, a/k/a Jesus Chaparo, a/k/a "Raul," discussed the delivery of drug proceeds, via bank deposit or money transfer, to JESUS LORENZO HOLGUIN-GRADO, a/k/a Jesus Chaparo, a/k/a "Raul," from PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," who was at that time located in Denver, Colorado.

Overt Act 27

On or about October 1, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," who was at that time in Denver, Colorado, made arrangements for JAVIER FUENTES, a/k/a Javier Lopez, a/k/a "Shadow," to receive cocaine from CLAUDIA RAMIREZ, a/k/a Claudia Saldana, at the residence located at 11777 Charter Park, El Paso, Texas, which later occurred at approximately 12:00 p.m. on this same day.

Overt Act 28

On or about October 2, 2010, JAVIER FUENTES, a/k/a Javier Lopez, a/k/a "Shadow," picked up additional cocaine from CLAUDIA RAMIREZ, a/k/a Claudia Saldana, at the residence located at 11777 Charter Park, El Paso, Texas.

Overt Act 29

On or about October 9, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," OSCAR CARRASCO, a/k/a "Gallo," JAVIER FUENTES, a/k/a Javier Lopez, a/k/a "Shadow," and JORGE PEREZ, a/k/a "George" met at the

property located at 718 Applewood Road in Canutillo, Texas, for "haircuts," which is believed to be code for a meeting regarding cocaine or drug proceeds.

Overt Act 30

On or about October 10, 2010, JESUS DE LA TORRE, a/k/a "Malinado,"a/k/a "Maleno" called CARMEN CARRASCO, a/k/a, Maria Del Carmen to arrange to send a man he called "the painter" to pick up cocaine at their residence located at 7221 Second Street, Canutillo, Texas. Subsequent to this call, agents saw a man, believed to be "the painter," arrive at this residence and briefly meet with CARMEN CARRASCO, a/k/a Maria Del Carmen Carrasco.

Overt Act 31

On or about October 11, 2010, MONICA SANCHEZ called CARMEN

CARRASCO, a/k/a Maria Del Carmen Carrasco to inquire about receiving cocaine.

CARMEN CARRASCO, a/k/a Maria Del Carmen Carrasco told MONICA SANCHEZ that she was out of cocaine at that time, but that she receives cocaine on Tuesdays and Fridays.

Overt Act 32

On or about October 12, 2010, CLAUDIA RAMIREZ, a/k/a Claudia Saldana delivered drug proceeds, previously stored at the residence located at 11777 Charter Park, El Paso, Texas, to PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus" in Sunland Park, New Mexico.

On or about October 12, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus" delivered 85.05 grams of cocaine to RODOLFO ROMA LOPEZ, a/k/a "Ramses" at an unknown location.

Overt Act 34

On or about October 12, 2010, JAIME PEREZ delivered cocaine to CARMEN CARRASCO, a/k/a Maria Del Carmen Carrasco and then to MONICA SANCHEZ.

October 12, 2010 was a Tuesday, consistent with CARMEN CARRASCO, a/k/a Maria Del Carmen Carrasco's prior statement that she receives cocaine on Tuesdays and Fridays.

Overt Act 35

On or about October 14, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus" sent CLAUDIA RAMIREZ, a/k/a Claudia Saldana the property located at 718 Applewood Road in Canutillo, Texas in order to meet JAVIER FUENTES, a/k/a Javier Lopez, a/k/a "Shadow" who delivered drug proceeds believed to total \$6,500.

Overt Act 36

On or about October 14, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus" and JAVIER FUENTES, a/k/a Javier Lopez, a/k/a "Shadow" had several telephone conversations in which they discussed JAVIER FUENTES', a/k/a Javier Lopez, a/k/a "Shadow" outstanding drug debt of "21-50," which is believed to be a total of \$21,500.

On or about October 15, 2010, MONICA SANCHEZ ordered "15 burritos" from CARMEN CARRASCO, a/k/a Maria Del Carmen Carrasco. "15 burritos" is believed to be code for 15 ounces, or 425.25 grams, of cocaine.

Overt Act 38

On or about October 26, 2010, **JESUS LORENZO HOLGUIN-GRADO**, a/k/a **Jesus Chaparo**, a/k/a "Raul" delivered 1 kilogram of cocaine to **JUAN M. MUNOZ**, a/k/a Felipe Rosas, in Las Cruces, New Mexico.

Overt Act 39

On or about October 30, 2010, **SANDRA HOLGUIN**, **a/k/a Sandra Holguin Saenz**, **a/k/a Sandra Ivonne Holguin-Grado** picked up \$2,800 in drug proceeds from a person in Las Cruces, New Mexico, which she then took to El Paso, Texas, where she delivered the drug proceeds to a man known only as "Chava."

Overt Act 40

On or about November 4, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus" agreed that on November 11, 2010, he would sell 1 kilogram of cocaine to a cooperating source for \$16,500.

Overt Act 41

On or about November 6, 2010, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus" made arrangements for JAVIER FUENTES, a/k/a Javier Lopez, a/k/a "Shadow," to receive cocaine from CLAUDIA RAMIREZ, a/k/a Claudia Saldana, at the residence located at 11777 Charter Park, El Paso, Texas, which later occurred that same day.

On or about November 7, 2010, JESUS LORENZO HOLGUIN-GRADO, a/k/a

Jesus Chaparo, a/k/a "Raul" picked up an unknown amount of drug proceeds from

JUAN M. MUNOZ, a/k/a Felipe Rosas, in Las Cruces, New Mexico, which he then
took to El Paso, Texas, where he delivered the drug proceeds to a man known only as

"Chava."

Overt Act 43

On or about November 7, 2010, JESUS LORENZO HOLGUIN-GRADO, a/k/a

Jesus Chaparo, a/k/a "Raul" picked up \$3,000 in drug proceeds from a man known
only as "Malandro" in Las Cruces, New Mexico, which he then took to El Paso, Texas,
where he delivered the drug proceeds to a man known only as "Chava."

In violation of 21 U.S.C. § 846.

Count 2

On or about August 27, 2010, in Otero County, in the District of New Mexico and elsewhere, the defendants, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," CARMEN CARRASCO, a/k/a Maria Del Carmen Carrasco, JESUS DE LA TORRE, a/k/a "Malinado," a/k/a "Maleno," MARIO DAVID Di FRANCO, and SIXTO JUAN AGUIRRE-INFANTE, unlawfully, knowingly and intentionally did possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of cocaine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 3

On or about September 27, 2010, in Doña Ana County, in the District of New Mexico and elsewhere, the defendants, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," and JESUS LORENZO HOLGUIN-GRADO, a/k/a Jesus Chaparo, a/k/a "Raul," unlawfully, knowingly and intentionally did possess with intent to a mixture and substance containing a detectable amount of cocaine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 4

On or about September 28, 2010, in Doña Ana County, in the District of New Mexico and elsewhere, the defendants, PABLO FERNANDO FUENTES, a/k/a Pablo Esparza, a/ka "Jesus," and unlawfully, knowingly and intentionally did possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of cocaine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 5

On or about October 26, 2010, in Doña Ana County, in the District of New Mexico and elsewhere, the defendants, JESUS LORENZO HOLGUIN-GRADO, a/k/a Jesus Chaparo, a/k/a "Raul" and JUAN M. MUNOZ, a/k/a Felipe Rosas unlawfully, knowingly and intentionally did possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of cocaine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 6

On or about October 30, 2010, in Doña Ana County, in the District of New Mexico and elsewhere, the defendant, SANDRA HOLGUIN, a/k/a Sandra Holguin

Saenz, a/k/a Sandra Ivonne Holguin-Grado did knowingly and willfully conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: the transfer of currency which was the proceeds of a specified unlawful activity, that is, possession with intent to distribute cocaine, with the intent to promote the carrying on of such specified unlawful activity, and that while conducting and attempting to conduct the financial transaction, knew that the currency involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of 18 U.S.C. §§ 1956(a)(1)(A)(i).

Count 7

On or about November 7, 2010, in Doña Ana County, in the District of New Mexico and elsewhere, the defendant, JESUS LORENZO HOLGUIN-GRADO, a/k/a Jesus Chaparo, a/k/a "Raul" did knowingly and willfully conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: the transfer of currency which was the proceeds of a specified unlawful activity, that is, possession with intent to distribute cocaine, with the intent to promote the carrying on of such specified unlawful activity, and that while conducting and attempting to conduct the financial transaction, knew that the currency involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of 18 U.S.C. §§ 1956(a)(1)(A)(i).

FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in Counts 1 through 7 of this Superseding Indictment, the defendants PABLO FERNANDO FUENTES, a/k/a

Pablo Esparza, a/ka "Jesus," OSCAR CARRASCO, a/k/a "Gallo," CARMEN

CARRASCO, a/k/a Maria Del Carmen Carrasco, JESUS DE LA TORRE, a/k/a "Malinado," a/k/a "Maleno," JESUS LORENZO HOLGUIN-GRADO, a/k/a Jesus Chaparo, a/k/a "Raul," SANDRA HOLGUIN, a/k/a Sandra Holguin Saenz, a/k/a Sandra Ivonne Holguin-Grado, JAVIER FUENTES, a/k/a Javier Lopez, a/k/a "Shadow," JESUS M. GANDARILLA, a/k/a Jesus Manuel Hernandez, a/k/a "Maniaco," RODOLFO ROMA LOPEZ, a/k/a "Ramses," JOAQUIN CARRASCO, DANIEL NAVARRO, a/k/a Daniel Olvera, WILLIE TORRES, JORGE PEREZ, a/k/a "George," JUAN CARLOS SOTO, a/k/a "Charlie," MARIO DAVID Di FRANCO, LETICIA M. LEYVA-OJEDA a/k/a Margarita Gomez, a/k/a "Letty," CLAUDIA RAMIREZ, a/k/a Claudia Saldana, JUAN M. MUNOZ, a/k/a Felipe Rosas, RUBEN CAMARENA, a/k/a "Benito," a/k/a "Benny," SIXTO JUAN AGUIRRE-INFANTE, MONICA SANCHEZ, JAMIE PEREZ, and LYDIA ESPARZA FUENTES shall forfeit to the United States pursuant to 21 U.S.C. § 853 any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of each offense in violation of 21 U.S.C. §§ 841, or 846 for which the defendants are convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offenses, and shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(1) all property, real and personal, involved in each offense in violation of 18 U.S.C. § 1956, or conspiracy to commit such offense, for which the defendants are convicted, and all property traceable to such property, including but not limited to the following:

1. MONEY JUDGMENT

A sum of money equal to at least \$256,500.00 United States currency, representing the amount of money derived from or involved in the offenses, for which the defendants are jointly and severally liable.

2. REAL PROPERTY

a. 548 AGUA MARINA, CLINT TX 79836:

LOT 61, BLOCK 9, AGUA DULCE UNIT FOUR SUBDIVISION, AN ADDITION TO EL PASOCOUNTY, TEXAS, ACCORDING TO THE MAP THEREOF ON FILE IN BOOK 62, PAGE 66, PLAT RECORDS OF EL PASO COUNTY, TEXAS.

b. 718 APPLEWOOD ROAD, CANUTILLO TX 79835:

LOT 5, BLOCK 8, WESTWAY ADDITION, UNIT 1, AN ADDITION TO THE COUNTY OF EL PASO, TEXAS, ACCORDING TO THE MAP AND PLAT THEREOF ON FILE IN VOLUME 2, PAGE 30, PLAT RECORDS OF EL PASO COUNTY, TEXAS; AND

LOT 6, BLOCK 8, WESTWAY ADDITION, UNIT 1, AN ADDITION TO THE COUNTY OF EL PASO, TEXAS, ACCORDING TO THE MAP AND PLAT THEREOF ON FILE IN VOLUME 2, PAGE 30, PLAT RECORD'S FILED IN THE OFFICE OF THE COUNTY CLERK, EL PASO COUNTY, TEXAS; AND

LOT 7, BLOCK 8, WESTWAY ADDITION, UNIT 1, AN ADDITION TO THE COUNTY OF EL PASO, TEXAS, ACCORDING TO THE MAP AND PLAT THEREOF ON FILE IN VOLUME 2, PAGE 30, PLAT RECORDS FILED IN THE OFFICE OF THE COUNTY CLERK, EL PASO COUNTY, TEXAS.

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value;

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above, including but not limited to the following:

1. REAL PROPERTY

a. 7123 WESTOVER, CANUTILLO TX 79835, which is more particularly described as follows:

LOT 32, BLOCK 7, OF SIERRA HILLS UNIT TWO, AN ADDITION TO THE CITY OF EL PASO, EL PASO COUNTY, TEXAS, ACCORDING TO THE PLAT THEREOF RECORDED IN VOLUME 69, PAGE 28, OF THE PLAT RECORDS OF EL PASO COUNTY, TEXAS.

A TRUE BILL:

/s/				
FOREPERSON	OF THE	GR/	AND	JURY

Assistant United States Attorney

11/10/10 10:05am