

# “Operation Carnalismo”

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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

July 2010 Grand Jury

12 CR 0290 AJB

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 SALVADORE NICOLA COLABELLA (1), )  
 )  
 aka Sal Diaz, )  
 )  
 aka Tio, )  
 )  
 aka SD, )  
 )  
 aka Scrooge, )  
 )  
 JOSE LUIS MERCADO (2), )  
 )  
 ROBERT MERCADO (3), )  
 )  
 MARIA DE JESUS CLAUDIA )  
 )  
 OCHOA (4), )  
 )  
 aka Mama C, )  
 )  
 RICHARD MORENO QUEVEDO (5), )  
 )  
 aka Chico, )  
 )  
 aka Cheeks, )  
 )  
 aka C, )  
 )  
 ADRIEL MADRIGAL (6), )  
 )  
 aka Angel, )  
 )  
 SILVANO HERNANDEZ, JR. (7), )  
 )  
 aka Junior, )  
 )  
 FNU LNU (8), )  
 )  
 aka Pelon, )  
 )  
 aka Morro, )  
 )  
 aka Everardo Martinez, )  
 )  
 Defendants. )  
 )

Case No. \_\_\_\_\_  
I N D I C T M E N T  
Title 18, U.S.C., Sec. 1962(d) -  
Conspiracy to Conduct Enterprise  
Affairs Through A Pattern of  
Racketeering Activity; Title 18,  
U.S.C., Sec. 1959(a)(3) - Violent  
Crime in Aid of Racketeering -  
Assault with a Dangerous Weapon;  
Title 21, U.S.C., Secs. 841(a)(1)  
and 846 - Conspiracy to Distribute  
Methamphetamine and Heroin;  
Title 21, U.S.C., Sec. 841(a)(1) -  
Distribution of Methamphetamine;  
Title 21, U.S.C., Sec. 841(a)(1) -  
Distribution of Heroin; Title 18,  
U.S.C., Sec. 2 - Aiding and  
Abetting; Title 18, U.S.C.,  
Sec. 1963 - Criminal Forfeiture;  
Title 21, U.S.C., Sec. 853 -  
Criminal Forfeiture

The grand jury charges:

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PJM:lml:San Diego  
1/24/12

CR



1 California communities. The Mexican Mafia was initially formed in the  
2 California state penal system and has been in existence for over  
3 50 years. The Mexican Mafia operates under a hierarchical system  
4 with three basic levels - members, associates, and soldiers. The  
5 Mexican Mafia is further governed by a basic set of rules and  
6 operating procedures which are enforced through discipline, including  
7 acts of violence.

8 3. The Mexican Mafia's primary illegal activities are drug  
9 trafficking, extortion, internal prison discipline, and violent  
10 crimes. Mexican Mafia members and associates control large, violent  
11 criminal gangs that operate outside of the federal and state penal  
12 systems under the general authority of the Mexican Mafia. The Mexican  
13 Mafia exerts significant control over most Southern California  
14 Hispanic street gangs - also known as "Sureno" gangs.

15 4. The highest level of authority in the Mexican Mafia is  
16 membership. Members may also be known as "Brother" or "Carnal" or  
17 "Tio." The Mexican Mafia does not have a single individual who runs  
18 the entire organization. Rather, under the rules of the gang, members  
19 are considered to have equal authority and power within the  
20 organization. There are approximately 200 members of the Mexican  
21 Mafia. New members are elected into the gang through a vote of  
22 existing members. Once inducted into the gang, members are able to  
23 control the criminal activities of Mexican Mafia associates and  
24 soldiers so long as the respective member's actions do not violate the  
25 internal rules of the Mexican Mafia.

26 5. To carry out the illegal activities of the gang, Mexican  
27 Mafia members utilize high-level associates. Members invest these  
28 high-level associates, also known as "camaradas," with authority to

1 oversee Mexican Mafia operations in specific areas, both in penal  
2 facilities and on the street. This oversight includes, but is not  
3 limited to, directing and/or benefitting from the criminal activities  
4 of all others associated with the Mexican Mafia, including members of  
5 Hispanic street gangs, such as Logan Heights, Del Sol, Lomita Village  
6 70s, Shelltown, Southeast Locos, Old Town National City, and  
7 Florencia 13. "Camaradas" also ensure that Mexican Mafia operations  
8 (including extortion and drug trafficking) run smoothly, that Mexican  
9 Mafia rules and authority are enforced, and that the proceeds of  
10 illegal activities are properly distributed, including to the Mexican  
11 Mafia member for whom the associate works.

12         6. A subset of the general category of associates is comprised  
13 of "senoras." Senoras are high-level female associates, who often  
14 have close personal relationships with Mexican Mafia members. Largely  
15 due to their close ties to members, Senoras can have the most  
16 authority amongst non-members. That authority, which is given to them  
17 by a member, often empowers them to speak on the member's behalf and  
18 direct Mexican Mafia business, including ordering murders or assaults.  
19 Senoras, like other associates, will also collect "taxes," or  
20 extortion/protection payments, and distribute drugs.

21         7. The largest subgroup of the Mexican Mafia are the soldiers,  
22 or Sureno gang members. Soldiers are responsible for carrying out the  
23 orders of the Mexican Mafia, enforcing the authority of the Mexican  
24 Mafia, and conducting criminal activity, such as drug trafficking,  
25 extortion, robbery, and money laundering. Soldiers of the Mexican  
26 Mafia will also occasionally interact with members of non-Hispanic  
27 gangs, such as the B-Down Boys and Lincoln Park, for the purposes of  
28 conducting their illegal activities, such as drug trafficking.

1 Soldiers are also tasked with collecting taxes from drug trafficking  
2 activities and through threats of violence or the commission of  
3 violence. And soldiers who are engaged in illegal activities will  
4 also pay taxes to higher-level associates and members themselves.  
5 These tax payments entitle the soldiers to conduct illegal activities  
6 such as the distribution of drugs under the authority of a given  
7 Mexican Mafia member. Having the member's authority protects the  
8 soldier from interference from the given member and from other gang  
9 members. The soldier who pays taxes can also rely on the given member  
10 - or an associate of the member - for assistance (e.g., collection of  
11 outstanding drug debts). This relationship, however, is not optional  
12 - Surenos who commit illegal activities must pay taxes to a Mexican  
13 Mafia member to remain in good standing. Failure to pay taxes can  
14 result in a "green light" (authorization) being placed on that soldier  
15 for others to assault, rob, or murder him.

16 8. Another subset of the general category of associates is  
17 comprised of non-gang affiliated drug dealers. The Mexican Mafia also  
18 exercises control over non-gang affiliated narcotics dealers by taxing  
19 them, either directly by a Mexican Mafia member, such as defendant  
20 SALVADORE NICOLA COLABELLA, aka Sal Diaz, aka Tio, aka SD,  
21 aka Scrooge, or a gang answering to the Mexican Mafia. If the drug  
22 dealers pay taxes, the Mexican Mafia will permit them to sell  
23 narcotics in their designated areas and protect them from rivals  
24 selling narcotics in the same area. As with street-gang members,  
25 however, if a narcotics dealer fails to pay taxes, the Mexican Mafia  
26 will green light violence against the narcotics dealer, or rob the  
27 narcotics dealer of his/her drugs, money, and/or other items of value.

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1           9.    Many Mexican Mafia members are incarcerated.  Incarcerated  
2 Mexican Mafia members use a variety of communications methods,  
3 including telephones, letters, informal notes (known as "kites") and  
4 email to communicate with their out-of-custody associates and other  
5 subordinates who carry out criminal acts on the member's behalf.  
6 Individuals associated with the Mexican Mafia employ slang, coded,  
7 and/or ambiguous language when using the phone and writing letters.  
8 In fact, even when speaking in person, Mexican Mafia affiliates remain  
9 guarded in their use of certain explicit language.

10           10. Mexican Mafia members capture a percentage of the profits  
11 from illegal activities (primarily extortion and drug trafficking)  
12 conducted by Mexican Mafia associates and soldiers under their  
13 influence and control.  The money is transferred to the respective  
14 Mexican Mafia member through a variety of means, including through  
15 cash payments and money orders.  Often higher-level associates or  
16 other designated individuals, such as family members or  
17 "facilitators," will pass the proceeds on to the member on behalf of  
18 the given individual who commits the underlying criminal activity  
19 (e.g. drug trafficking).

20           11. The Mexican Mafia has established a reputation with both law  
21 enforcement and other criminals as being a violent organization.  
22 Numerous members and associates of the Mexican Mafia have been  
23 convicted of violent crimes, including murder, robbery, and assault.  
24 Mexican Mafia members and associates have also committed numerous acts  
25 of violence targeting individuals, both in custody and out-of-custody,  
26 based upon the belief that these individuals were cooperating with law  
27 enforcement.

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1           b.   Members of the Mexican Mafia use the Enterprise to  
2 promote a climate of fear through violence and threats of violence.

3           c.   Members of the Mexican Mafia promulgate certain rules  
4 to be followed by all participants in the Enterprise including the  
5 rule that a participant in the Mexican Mafia not act as an informant  
6 to law enforcement authorities regarding the activities of the  
7 Enterprise.

8           d.   To enforce the rules of the Mexican Mafia, members use  
9 the Enterprise to murder, attempt to murder, assault and threaten  
10 those participants in the Enterprise and others who violate the rules  
11 or pose a threat to the Enterprise.

12          e.   To generate income, participants in the Mexican Mafia  
13 are entitled to conduct, and, in fact, conduct illegal activities  
14 under the protection of the Enterprise.

15          f.   To generate income, participants in the Mexican Mafia  
16 engage in the trafficking of controlled substances and collect taxes,  
17 or extortion/protection payments, from narcotics traffickers.

18          g.   To generate income, participants in the Mexican Mafia  
19 collect taxes from street gangs.

20          h.   To generate income, participants in the Mexican Mafia  
21 commit robberies.

22          i.   To generate income, participants in the Mexican Mafia  
23 extort items of value from others.

24          j.   Members of the Mexican Mafia and their associates  
25 distribute and conspire to distribute controlled substances, including  
26 methamphetamine and heroin, in the Southern District of California,  
27 and elsewhere.

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1 k. Members of the Mexican Mafia and their associates  
2 possess, carry, and use firearms and other weapons. These weapons are  
3 possessed, carried, and used for various reasons, including but not  
4 limited to: to protect the Mexican Mafia's narcotics and the proceeds  
5 of drug distribution; to ensure that drug distribution activities are  
6 controlled by the members of the Mexican Mafia and their associates;  
7 to intimidate others from attempting to steal the Mexican Mafia's  
8 narcotics and proceeds from drug distribution; to rob others, to  
9 extort money, items of value, and services from others, and to ensure  
10 the personal safety of members of the Enterprise.

11 Roles of the Defendants

12 14. At various times material to this Indictment, the defendants  
13 had the following roles in the Enterprise:

14 a. Defendant SALVADORE NICOLA COLABELLA, aka Sal Diaz,  
15 aka Tio, aka SD, aka Scrooge, is a validated member of the Mexican  
16 Mafia who is responsible for overseeing Mexican Mafia activities in  
17 San Diego and throughout the Southern District of California and  
18 elsewhere. As a validated member of the Mexican Mafia, COLABELLA has  
19 the right to vote on the induction of proposed members into the  
20 Mexican Mafia, participate in the nomination of new Mexican Mafia  
21 members, and sanction the murder and/or assault of other Mexican Mafia  
22 members, associates, and others, including Hispanic street-gang  
23 members. As a validated member of the Mexican Mafia, COLABELLA is  
24 entitled to receive taxes collected under the authority of the Mexican  
25 Mafia, including a portion of the proceeds from the sale of narcotics  
26 within the geographic area controlled by him and other members of the  
27 Mexican Mafia. At various times material to this Indictment,  
28 COLABELLA has resided in San Diego and has been incarcerated within

1 San Diego Central Jail. COLABELLA is a member of the Logan Heights  
2 street gang, which is based in the Logan Heights neighborhood of San  
3 Diego.

4           b. Defendants JOSE LUIS MERCADO and ROBERT MERCADO are  
5 high-level associates, also referred to as "camaradas," of the Mexican  
6 Mafia who are responsible for coordinating Mexican Mafia activities  
7 throughout San Diego on behalf of COLABELLA. As high-level  
8 associates, JOSE LUIS MERCADO and ROBERT MERCADO are responsible for  
9 arranging the distribution of drugs and taxing individuals operating  
10 within the sphere of Mexican Mafia control. The collection and  
11 passing of taxes from extortion and/or drug trafficking proceeds to  
12 Mexican Mafia members - COLABELLA, in particular - is known as "taking  
13 care of," "kicking up," "paying respects," or "kicking up to the Big  
14 Homie." Defendants JOSE LUIS MERCADO and ROBERT MERCADO have the  
15 authority to participate in, and order, the assault of individuals who  
16 act contrary to the goals and rules of the Mexican Mafia.

17           c. Defendant MARIA DE JESUS CLAUDIA OCHOA, aka Mama C, is  
18 a "senora" within the Enterprise. As such, OCHOA can speak on  
19 COLABELLA's behalf and conduct his illegal operations when given the  
20 authority by COLABELLA to do so. Such activities include the  
21 distribution of drugs and the collection of taxes.

22           d. Defendants RICHARD MORENO QUEVEDO, aka Chico,  
23 aka Cheeks, aka C, ADRIEL MADRIGAL, aka Angel, and SILVANO HERNANDEZ,  
24 JR., aka Junior, are "Surenos," that is, they are members of various  
25 Southern California Hispanic street gangs. They act as Mexican Mafia  
26 "soldiers," who take directions from Mexican Mafia members and  
27 associates, and who are responsible for conducting the day-to-day  
28 operations of the Mexican Mafia, including, but not limited to,

1 conspiring to distribute narcotics, the distribution of narcotics, and  
2 extortion.

3 e. Defendant FNU LNU, aka Pelon, is a Mexican Mafia  
4 associate who traffics drugs under the protection of the Mexican Mafia  
5 and, in particular, COLABELLA. Pelon pays taxes to COLABELLA in  
6 exchange for COLABELLA's protection from interference with gang  
7 members or drug traffickers, as well as for the ability to deal drugs  
8 in areas controlled by COLABELLA and the Mexican Mafia. Pelon can  
9 also request COLABELLA's assistance with problems associated with drug  
10 trafficking, such as the collection of drug debts.

#### 11 The Racketeering Conspiracy

12 15. Beginning at a date unknown to the grand jury, and  
13 continuing up to and including January 2012, within the Southern  
14 District of California and elsewhere, defendants SALVADORE NICOLA  
15 COLABELLA, aka Sal Diaz, aka Tio, aka SD, aka Scrooge, JOSE LUIS  
16 MERCADO, ROBERT MERCADO, MARIA DE JESUS CLAUDIA OCHOA, aka Mama C,  
17 RICHARD MORENO QUEVEDO, aka Chico, aka Cheeks, aka C, ADRIEL MADRIGAL,  
18 aka Angel, SILVANO HERNANDEZ, JR., aka Junior, FNU LNU, aka Pelon,  
19 aka Morro, aka Everardo Martinez, and others known and unknown to the  
20 grand jury, being persons employed by and associated with the Mexican  
21 Mafia, an enterprise that was engaged in, and the activities of which  
22 affected, interstate and foreign commerce, did knowingly and  
23 intentionally conspire with each other, and with other persons known  
24 and unknown to the grand jury, to violate Title 18, United States  
25 Code, Section 1962(c), that is, to conduct and participate, directly  
26 and indirectly, in the conduct of the affairs of that enterprise  
27 through a pattern of racketeering activity, as that term is defined  
28 by Title 18, United States Code, Sections 1961(1) and (5). The

1 pattern of racketeering activity consisted of multiple acts:

2 (a) Involving the distribution and conspiracy to distribute  
3 controlled substances (including methamphetamine and heroin), in  
4 violation of Title 21, United States Code, Sections 841(a)(1) and 846  
5 and Title 18, United States Code, Section 2;

6 (b) Indictable under Title 18, United States Code,  
7 Section 1956(h) (conspiracy to launder monetary instruments);

8 (c) Involving robbery, in violation of California Penal  
9 Code, Sections 182, 211, 212.5 and 664; and

10 (d) Involving extortion, in violation of California Penal  
11 Code, Sections 182, 518, 519, 520 and 664.

12 16. It was a further part of the conspiracy that the defendants  
13 agreed that a conspirator would commit at least two acts of  
14 racketeering activity in the conduct of the affairs of the Enterprise.

15 OVERT ACTS

16 17. In furtherance of the conspiracy and to accomplish the  
17 objects of the conspiracy, the defendants and their coconspirators  
18 committed the following overt acts, among others, in San Diego County,  
19 within the Southern District of California, unless otherwise specified  
20 on or about the dates set forth below:

21 (1) On or about March 5, 2009, defendant SALVADORE  
22 NICOLA COLABELLA met with Confidential Informant-1 (hereinafter  
23 "CI-1"), a senora, and said he would protect the reputation and  
24 standing of "C," a fellow Mexican Mafia member in prison.

25 (2) On or about November 3, 2009, defendant SALVADORE  
26 NICOLA COLABELLA met with CI-1 and promised that he would assist  
27 camaradas and Surenos working under "C" to collect taxes in the  
28 National City area by taking care of any problems that arise.

1           (3)           On or about November 12, 2009, defendant ROBERT  
2 MERCADO met with CI-1 and promised that he would assist "C" with  
3 enforcement operations and the collection of taxes, noting that he has  
4 "love for all them dudes."

5           (4)           On or about January 14, 2010, defendant ADRIEL  
6 MADRIGAL sold 27.6 grams of pure methamphetamine to Confidential  
7 Informant-2 (hereinafter "CI-2") for \$925.

8           (5)           On or about January 22, 2010, defendant ADRIEL  
9 MADRIGAL sold 27.7 grams of pure methamphetamine to CI-2 for \$1,000.

10           (6)           On or about March 1, 2010, defendant ADRIEL  
11 MADRIGAL sold a .223 caliber LAR model M-4 Grizzly rifle, serial  
12 number LX008475 to CI-2 for \$1,500.

13           (7)           On or about April 26, 2010, defendant SALVADORE  
14 NICOLA COLABELLA collected \$300 in taxes from defendant ADRIEL  
15 MADRIGAL.

16           (8)           On or about May 3, 2010, defendants SALVADORE  
17 NICOLA COLABELLA and JOSE LUIS MERCADO collected \$300 in taxes from  
18 defendant ADRIEL MADRIGAL.

19           (9)           On or about May 10, 2010, defendants SALVADORE  
20 NICOLA COLABELLA and JOSE LUIS MERCADO collected \$300 in taxes from  
21 defendant ADRIEL MADRIGAL.

22           (10)           On or about June 30, 2010, defendants JOSE LUIS  
23 MERCADO and ROBERT MERCADO collected \$300 in taxes from defendant  
24 ADRIEL MADRIGAL.

25           (11)           On or about July 12, 2010, defendant SALVADORE  
26 NICOLA COLABELLA collected \$250 from CI-2 as a tribute payment, a  
27 voluntary payment made by a Mexican Mafia associate to a member.

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1 (12) On or about July 29, 2010, defendant ADRIEL  
2 MADRIGAL sold 27.8 grams of pure methamphetamine to CI-2 for \$875.

3 (13) On or about August 4, 2010, defendant SALVADORE  
4 NICOLA COLABELLA authorized CI-2 to "do what you need to do" to a  
5 Logan Heights gang member COLABELLA was trying to extort.

6 (14) On or before August 12, 2010, defendant SALVADORE  
7 NICOLA COLABELLA extorted \$2,000 from the Logan Heights gang member.

8 (15) In and around August 2010, defendant SALVADORE  
9 NICOLA COLABELLA directed defendants ROBERT MERCADO, JOSE LUIS  
10 MERCADO, and ADRIEL MADRIGAL to collect a drug debt; thereafter  
11 ROBERT MERCADO, JOSE LUIS MERCADO, and ADRIEL MADRIGAL took three  
12 vehicles, including a 2005 white BMW (CA License No. 6BNK325), and  
13 \$4,000 from the drug dealer.

14 (16) On or about September 11, 2010, defendant ADRIEL  
15 MADRIGAL sold 27.6 grams of pure methamphetamine to CI-2 for \$875.

16 (17) On or about October 2, 2010, defendant MARIA DE  
17 JESUS CLAUDIA OCHOA provided defendant ROBERT MERCADO with a stack of  
18 United States currency for delivery to defendant SALVADORE NICOLA  
19 COLABELLA.

20 (18) On or about October 22, 2010, defendant MARIA DE  
21 JESUS CLAUDIA OCHOA sold 26.8 grams of pure methamphetamine to  
22 Confidential Informant-3 (hereinafter "CI-3") for \$1,150 at OCHOA's  
23 residence at 2947 Imperial Avenue, San Diego.

24 (19) On or about November 8, 2010, defendant SALVADORE  
25 NICOLA COLABELLA collected a perceived \$200 tax payment from  
26 Confidential Informant-4 (hereinafter "CI-4").

27 (20) On or about November 15, 2010, defendant SALVADORE  
28 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

1 (21) On or about November 15, 2010, defendant SALVADORE  
2 NICOLA COLABELLA met with CI-4 and said he would arrange a meeting  
3 between CI-4 and a methamphetamine dealer (hereinafter  
4 "Methamphetamine Dealer-1").

5 (22) On or about November 22, 2010, defendant SALVADORE  
6 NICOLA COLABELLA told CI-4, "I'll have him [Methamphetamine Dealer-1]  
7 call you tomorrow."

8 (23) On or about November 22, 2010, defendant SALVADORE  
9 NICOLA COLABELLA told CI-4 that Methamphetamine Dealer-1 would provide  
10 CI-4 with "whatever you need, . . . it's pretty good."

11 (24) On or about November 22, 2010, defendant SALVADORE  
12 NICOLA COLABELLA instructed CI-4 to assure customers that the quality  
13 of the methamphetamine was good so charge the customers more, and if  
14 the customers were not interested, tell them to "go get bunk."

15 (25) On or about November 22, 2010, defendant SALVADORE  
16 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

17 (26) On or about November 22, 2010, defendant SALVADORE  
18 NICOLA COLABELLA instructed CI-4 to speak with "Danny" about paying  
19 a \$5,000 tax to COLABELLA.

20 (27) On or about November 29, 2010, defendant SALVADORE  
21 NICOLA COLABELLA directed defendant JOSE LUIS MERCADO to give  
22 Methamphetamine Dealer-1's phone number to CI-4.

23 (28) On or about November 30, 2010, defendant SALVADORE  
24 NICOLA COLABELLA directed CI-4 to call Methamphetamine Dealer-1 to  
25 arrange a methamphetamine deal.

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1           (29)           On or about December 1, 2010, Methamphetamine  
2 Dealer-1 said that he would front CI-4 methamphetamine because of  
3 CI-4's connection to "SD," (defendant SALVADORE NICOLA COLABELLA,  
4 aka Sal Diaz).

5           (30)           On or about December 1, 2010, Methamphetamine  
6 Dealer-1 sold 54.9 grams of pure methamphetamine to CI-4 for \$2,000.

7           (31)           On or about December 2, 2010, defendant JOSE LUIS  
8 MERCADO collected a \$200 tax payment from "Danny" and threatened  
9 "Danny" stating, "To be real with you dog, that ain't my problem" if  
10 Danny could not pay the tax debt immediately.

11           (32)           On or about December 3, 2010, Methamphetamine  
12 Dealer-1 sold 55.1 grams of pure methamphetamine to CI-4 for \$2,000.

13           (33)           On or about December 7, 2010, defendant JOSE LUIS  
14 MERCADO collected a perceived \$200 tax payment from CI-4.

15           (34)           On or about December 9, 2010, defendant SALVADORE  
16 NICOLA COLABELLA collected \$1,000, as a partial payment from CI-4 for  
17 the December 3, 2010 methamphetamine sale.

18           (35)           On or about December 9, 2010, defendant SALVADORE  
19 NICOLA COLABELLA directed CI-4 to change the meeting location with  
20 Methamphetamine Dealer-1 because of possible law enforcement  
21 detection, and said that he (COLABELLA) would kill Methamphetamine  
22 Dealer-1 if Methamphetamine Dealer-1 drew law enforcement attention.

23           (36)           On or about December 9, 2010, defendant SALVADORE  
24 NICOLA COLABELLA collected \$400 from CI-4 as a partial payment on the  
25 tax debt "Danny" owed, telling CI-4, "We are going to pay his ass a  
26 visit and take his shit."

27           (37)           On or about December 17, 2010, defendant JOSE LUIS  
28 MERCADO collected \$1,300 of the tax debt from "Danny."

1           (38)           On or about December 21, 2010, defendants  
2 SALVADORE NICOLA COLABELLA and JOSE LUIS MERCADO collected a perceived  
3 \$200 tax payment from CI-4.

4           (39)           On or about December 28, 2010, defendant JOSE LUIS  
5 MERCADO collected a perceived \$200 tax payment from CI-4.

6           (40)           On or about January 4, 2011, defendant SALVADORE  
7 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

8           (41)           On or about January 10, 2011, defendants SALVADORE  
9 NICOLA COLABELLA and JOSE LUIS MERCADO collected a perceived \$200 tax  
10 payment from CI-4.

11           (42)           On or before January 15, 2011, defendant SALVADORE  
12 NICOLA COLABELLA told Guillermo Chaidez, aka Memo (charged elsewhere),  
13 to take a car and \$4,000 from Ramon Agredano, (charged elsewhere).

14           (43)           Up to and including January 18, 2011, defendant  
15 SALVADORE NICOLA COLABELLA collected approximately \$10,000 from the  
16 sale of the 2005 white BMW that he had ordered taken to satisfy a drug  
17 debt.

18           (44)           On or about January 18, 2011, defendants SALVADORE  
19 NICOLA COLABELLA and JOSE LUIS MERCADO collected a perceived \$200 tax  
20 payment from CI-4.

21           (45)           On or about January 20, 2011, defendant MARIA DE  
22 JESUS CLAUDIA OCHOA sold 41 grams of pure methamphetamine to CI-3 for  
23 \$2,300 at OCHOA's residence at 2947 Imperial Avenue, San Diego.

24           (46)           On or about January 25, 2011, defendant JOSE LUIS  
25 MERCADO collected a perceived \$200 tax payment from CI-4.

26           (47)           On or about February 1, 2011, defendants JOSE LUIS  
27 MERCADO and ROBERT MERCADO collected a perceived \$500 tax payment from  
28 CI-4.

1 (48) On or about February 11, 2011, defendant SALVADORE  
2 NICOLA COLABELLA told CI-4 that defendant RICHARD MORENO QUEVEDO deals  
3 "crystal" and CI-4 should start buying methamphetamine from QUEVEDO.

4 (49) On or about February 12, 2011, defendant SALVADORE  
5 NICOLA COLABELLA directed CI-4 to call defendant RICHARD MORENO  
6 QUEVEDO to facilitate a drug deal.

7 (50) On or about February 12, 2011, RICHARD MORENO  
8 QUEVEDO offered to sell CI-4 pound quantities of methamphetamine for  
9 "13" or higher quality of "chunks" of methamphetamine for \$13,500 per  
10 pound.

11 (51) On or about February 15, 2011, defendant JOSE LUIS  
12 MERCADO collected a perceived \$200 tax payment from CI-4.

13 (52) On or about February 16, 2011, defendant RICHARD  
14 MORENO QUEVEDO texted CI-4, "Wats crakn? R u gona need dat 'corner,'"   
15 meaning a quarter-pound of methamphetamine.

16 (53) On or about February 17, 2011, defendant RICHARD  
17 MORENO QUEVEDO sold 111.3 grams of pure methamphetamine to CI-4 and  
18 collected \$1,000 of a total price of \$3,400.

19 (54) On or about February 22, 2011, defendant SALVADORE  
20 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

21 (55) On or about February 22, 2011, defendant SALVADORE  
22 NICOLA COLABELLA explained to CI-4 that defendant RICHARD MORENO  
23 QUEVEDO sold high-quality methamphetamine, but that if a redistributor  
24 were to "step the fuck out of it, it's not going to be no good."

25 (56) On or about February 24, 2011, defendant RICHARD  
26 MORENO QUEVEDO collected \$1,200 from CI-4 as partial payment for the  
27 February 17, 2011 methamphetamine sale.

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1 (57) On or about February 24, 2011, defendant RICHARD  
2 MORENO QUEVEDO said that he would set aside "a quarter or two," (a  
3 quarter-pound or a half-pound of methamphetamine) for CI-4 to buy.

4 (58) On or about February 24, 2011, defendant RICHARD  
5 MORENO QUEVEDO told CI-4 that he would "do what [he] got to do" if he  
6 saw CI-2 who was suspected of cooperating with law enforcement.

7 (59) On or about March 1, 2011, defendants SALVADORE  
8 NICOLA COLABELLA and JOSE LUIS MERCADO collected a perceived \$300 tax  
9 payment from CI-4.

10 (60) On or about March 1, 2011, defendant SALVADORE  
11 NICOLA COLABELLA told CI-4 that the methamphetamine defendant RICHARD  
12 MORENO QUEVEDO sells would "move itself."

13 (61) On or about March 9, 2011, defendant SALVADORE  
14 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

15 (62) On or about March 10, 2011, defendant RICHARD  
16 MORENO QUEVEDO sold 111.7 grams of pure methamphetamine to CI-4 for  
17 \$3,250, and agreed CI-4 could pay later.

18 (63) On or about March 10, 2011, defendant RICHARD  
19 MORENO QUEVEDO collected \$1,200 from CI-4 as the final payment for the  
20 February 17, 2011 methamphetamine sale.

21 (64) On or about March 10, 2011, defendants JOSE LUIS  
22 MERCADO, ROBERT MERCADO, and Marco Ramirez aka Tata (charged  
23 elsewhere), confronted a heroin trafficker (hereinafter "Heroin  
24 Dealer-1") because Heroin Dealer-1 was not properly paying taxes.

25 (65) On or about March 10, 2011, defendant JOSE LUIS  
26 MERCADO threatened to rob Heroin Dealer-1 if he did not pay taxes.

27 (66) On or about March 10, 2011, defendant ROBERT  
28 MERCADO stabbed Heroin Dealer-1 and threatened to kill him.

1           (67)           On or about March 10, 2011, defendants JOSE LUIS  
2 MERCADO and ROBERT MERCADO sent Marco Ramirez, aka Tata (charged  
3 elsewhere), to the Logan Heights Family Health Center with Heroin  
4 Dealer-1 to make sure Heroin Dealer-1 did not talk to the police.

5           (68)           On or about March 10, 2011, defendants JOSE LUIS  
6 MERCADO and ROBERT MERCADO demanded a car (a white Honda) from Heroin  
7 Dealer-1, which Heroin Dealer-1 delivered after leaving the Logan  
8 Heights Family Health Center.

9           (69)           On or about March 14, 2011, defendant JOSE LUIS  
10 MERCADO collected a perceived \$200 tax payment from CI-4.

11          (70)           On or about March 22, 2011, defendant SALVADORE  
12 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

13          (71)           On or about March 22, 2011, Jorge Moreno,  
14 aka Clumsy (charged elsewhere), collected \$1,500 from CI-4 as partial  
15 payment for the March 10, 2011 methamphetamine sale.

16          (72)           On or about March 26, 2011, defendants SALVADORE  
17 NICOLA COLABELLA and ADRIEL MADRIGAL discussed what MADRIGAL owed  
18 COLABELLA from a prior a drug deal between MADRIGAL and defendant JOSE  
19 LUIS MERCADO.

20          (73)           On or about April 4, 2011, defendant SALVADORE  
21 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

22          (74)           On or about April 4, 2011, defendant RICHARD  
23 MORENO QUEVEDO collected \$1,100 from CI-4 as a partial payment for the  
24 March 10, 2011 methamphetamine sale.

25          (75)           On or about April 11, 2011, defendant SALVADORE  
26 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

27          (76)           On or about April 19, 2011, defendant SALVADORE  
28 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

1 (77) On or about April 19, 2011, defendant RICHARD  
2 MORENO QUEVEDO directed CI-4 to pay \$600 to Jorge Moreno, aka Clumsy  
3 (charged elsewhere), as the final payment for the March 10, 2011  
4 methamphetamine sale.

5 (78) On or about April 26, 2011, defendant SALVADORE  
6 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

7 (79) On or about May 2, 2011, defendant JOSE LUIS  
8 MERCADO collected a perceived \$200 tax payment from CI-4.

9 (80) On or about May 10, 2011, defendant SALVADORE  
10 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

11 (81) On or about May 17, 2011, defendant JOSE LUIS  
12 MERCADO collected a perceived \$200 tax payment from CI-4.

13 (82) On or about May 17, 2011, defendant JOSE LUIS  
14 MERCADO promised to set up CI-4 with Heroin Dealer-1 in order to  
15 purchase heroin.

16 (83) On or about May 23, 2011, defendant JOSE LUIS  
17 MERCADO texted CI-4 that Heroin Dealer-1 would sell a "pedaso"  
18 (slightly less than one ounce of heroin) for \$700.

19 (84) On or about May 24, 2011, defendant JOSE LUIS  
20 MERCADO collected a perceived \$200 tax payment from CI-4.

21 (85) On or about May 24, 2011, defendant JOSE LUIS  
22 MERCADO said that he would get "a little off the top" from the planned  
23 heroin deal he was coordinating for CI-4 with Heroin Dealer-1.

24 (86) On or about May 24, 2011, defendant JOSE LUIS  
25 MERCADO gave CI-4 Heroin Dealer-1's phone number.

26 (87) On or about June 1, 2011, defendant JOSE LUIS  
27 MERCADO collected a perceived \$200 tax payment from CI-4.

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1 (88) On or about June 6, 2011, defendant JOSE LUIS  
2 MERCADO collected a perceived \$200 tax payment from CI-4.

3 (89) On or about June 9, 2011, defendant JOSE LUIS  
4 MERCADO texted CI-4 "that grub is bak on it's ready" to inform CI-4  
5 that the heroin was ready for purchase.

6 (90) On or about June 9, 2011, defendant JOSE LUIS  
7 MERCADO asked via text whether CI-4 wanted "one or two" ounces of  
8 heroin.

9 (91) On or about June 10, 2011, Heroin Dealer-1 sold  
10 approximately 25 grams of heroin to CI-4 for \$700.

11 (92) On or about June 10, 2011, defendant JOSE LUIS  
12 MERCADO told CI-4 to call MERCADO if Heroin Dealer-1 gave CI-4 any  
13 problems.

14 (93) On or about June 13, 2011, defendant SALVADORE  
15 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

16 (94) On or about June 20, 2011, defendant RICHARD  
17 MORENO QUEVEDO sold 55.9 grams of pure methamphetamine to CI-4 and  
18 collected \$850 of a total price of \$1,700.

19 (95) On or about June 27, 2011, defendant JOSE LUIS  
20 MERCADO collected a perceived \$200 tax payment from CI-4.

21 (96) On or about June 30, 2011, defendant SILVANO  
22 HERNANDEZ, JR. requested that defendant RICHARD MORENO QUEVEDO tell  
23 defendant SALVADORE NICOLA COLABELLA that George Chavez, aka Pops  
24 (charged elsewhere), was on "his team."

25 (97) On or about June 30, 2011, defendants RICHARD  
26 MORENO QUEVEDO and SILVANO HERNANDEZ, JR. met with George Chavez,  
27 aka Pops (charged elsewhere), to discuss Chavez's collecting drug  
28 debts by claiming COLABELLA's authority.

1           (98)           On or about July 1, 2011, defendant SALVADORE  
2 NICOLA COLABELLA met defendant RICHARD MORENO QUEVEDO to collect  
3 \$1,200 in taxes and to discuss Chavez's collection of drug debts using  
4 COLABELLA's authority.

5           (99)           On or about July 1, 2011, defendant RICHARD MORENO  
6 QUEVEDO collected \$850 from CI-4 as a partial payment for the June 20,  
7 2011 methamphetamine sale.

8           (100)          On or about July 4, 2011, defendant RICHARD MORENO  
9 QUEVEDO texted defendant SILVANO HERNANDEZ, JR.: "Can u put 1  
10 (approximately one pound of methamphetamine) to da side 4me i got  
11 anotha 3gs (\$3,000) 4u," to which HERNANDEZ responded, "Yes."

12          (101)          On or about July 4, 2011, defendant RICHARD MORENO  
13 QUEVEDO texted defendant SILVANO HERNANDEZ, JR., "Will have mo paper  
14 (money) 2morrow morning."

15          (102)          On or about July 5, 2011, defendant RICHARD MORENO  
16 QUEVEDO texted defendant SILVANO HERNANDEZ, JR.: "I got paper 4u," to  
17 which HERNANDEZ responded, "Im on my wayZ."

18          (103)          On or about July 5, 2011, defendant RICHARD MORENO  
19 QUEVEDO texted defendant SILVANO HERNANDEZ, JR. that defendant  
20 SALVADORE NICOLA COLABELLA would collect a \$1,500 tax payment from  
21 QUEVEDO and HERNANDEZ next month.

22          (104)          On or about July 5, 2011, defendant JOSE LUIS  
23 MERCADO collected a perceived \$200 tax payment from CI-4.

24          (105)          On or about July 6, 2011, defendant SILVANO  
25 HERNANDEZ, JR. picked up a drug payment from defendant RICHARD MORENO  
26 QUEVEDO.

27          (106)          On or about July 11, 2011, defendant JOSE LUIS  
28 MERCADO collected a perceived \$200 tax payment from CI-4.

1 (107) On or about July 18, 2011, defendant JOSE LUIS  
2 MERCADO collected a perceived \$200 tax payment from CI-4.

3 (108) On or before July 18, 2011, defendant JOSE LUIS  
4 MERCADO took \$5,000 and a 1989 BMW (CA License No. 4NXE322) from  
5 Heroin Dealer-1.

6 (109) On or about July 18, 2011, defendant SILVANO  
7 HERNANDEZ, JR. told defendant RICHARD MORENO QUEVEDO that he would  
8 have a "shoe box" (one pound of methamphetamine) delivered to  
9 QUEVEDO's stash house.

10 (110) On or about July 18, 2011, defendant RICHARD  
11 MORENO QUEVEDO texted defendant SILVANO HERNANDEZ, JR., "I got more  
12 paper."

13 (111) On or about July 18, 2011, defendant SILVANO  
14 HERNANDEZ, JR. ordered his courier, Charles Monroe, aka Killer  
15 (charged elsewhere), to deliver a pound of methamphetamine to  
16 defendant RICHARD MORENO QUEVEDO's stash house.

17 (112) On or about July 20, 2011, Heroin Dealer-1 sold  
18 approximately 50.3 grams of heroin to CI-4 for \$1,400.

19 (113) On or before July 21, 2011, defendant SALVADORE  
20 NICOLA COLABELLA provided defendant MARIA DE JESUS CLAUDIA OCHOA with  
21 a phone to be used only for business.

22 (114) On or about July 26, 2011, defendant SALVADORE  
23 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

24 (115) On or before July 29, 2011, defendant JOSE LUIS  
25 MERCADO demanded that Heroin Dealer-1 sell a piece of heroin to CI-4  
26 for \$700 rather than \$750.

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1           (116)       On or before August 4, 2011, defendant SILVANO  
2 HERNANDEZ, JR. purchased a 2011 Lincoln MKZ (CA License No. 6PVM813)  
3 for \$50,000 in his aunt's name to conceal his ownership of the  
4 vehicle.

5           (117)       On or about August 6, 2011, defendant SILVANO  
6 HERNANDEZ, JR. directed Jose Pedro Covarrubias, aka Pete (charged  
7 elsewhere), to deliver approximately one pound of methamphetamine to  
8 John Atkinson, aka John Anderson (charged elsewhere).

9           (118)       On or about August 8, 2011, defendants JOSE LUIS  
10 MERCADO and ROBERT MERCADO collected a perceived \$200 tax payment from  
11 CI-4.

12           (119)       On or about August 8, 2011, defendant RICHARD  
13 MORENO QUEVEDO sold 28.1 grams of pure methamphetamine to CI-4 for  
14 \$850.

15           (120)       On or about August 9, 2011, a methamphetamine  
16 trafficker asked defendant SILVANO HERNANDEZ, JR. to help her collect  
17 an outstanding drug debt.

18           (121)       On or about August 9, 2011, defendant FNU LNU, aka  
19 Pelon, met defendant SALVADORE NICOLA COLABELLA to pay taxes.

20           (122)       On or about August 15, 2011, defendant SALVADORE  
21 NICOLA COLABELLA collected taxes from defendant FNU LNU, aka Pelon at  
22 the La Casa Liquor Store in National City.

23           (123)       On or about August 15, 2011, defendants SALVADOR  
24 NICOLA COLABELLA and JOSE LUIS MERCADO collected a perceived \$200 tax  
25 payment from CI-4.

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1 (124) On or before August 15, 2011, defendants JOSE LUIS  
2 MERCADO and ROBERT MERCADO took a 1991 black Lincoln Continental (CA  
3 License No. 3VPV374) (hereinafter "the Lincoln Continental") from  
4 Guillermo Chaidez, aka Memo (charged elsewhere), who owed a drug debt  
5 to defendant RICHARD MORENO QUEVEDO.

6 (125) On or about August 17, 2011, defendants JOSE LUIS  
7 MERCADO and ROBERT MERCADO collected a perceived \$200 tax payment from  
8 CI-4.

9 (126) On or about August 20, 2011, defendant SILVANO  
10 HERNANDEZ, JR. directed Charles Monroe, aka Killer (charged  
11 elsewhere), to deliver a "box," (approximately one pound of  
12 methamphetamine) to John Atkinson, aka John Anderson (charged  
13 elsewhere).

14 (127) On or about August 22, 2011, defendants SALVADORE  
15 NICOLA COLABELLA and JOSE LUIS MERCADO collected a perceived \$200 tax  
16 payment from CI-4.

17 (128) On or about August 24, 2011, defendant SALVADORE  
18 NICOLA COLABELLA sold the Lincoln Continental to CI-4 and collected  
19 \$1,500 of a total sale price of \$2,000.

20 (129) On or about August 25, 2011, defendant SALVADORE  
21 NICOLA COLABELLA promised to give defendant RICHARD MORENO QUEVEDO  
22 \$800 from the proceeds of the sale of the Lincoln Continental.

23 (130) On or before August 25, 2011, defendant ROBERT  
24 MERCADO took a 1993 Toyota pickup truck (CA License No. 4S97926) from  
25 Heroin Dealer-1.

26 (131) On or about August 25, 2011, defendant SILVANO  
27 HERNANDEZ, JR. arranged a methamphetamine deal with Jose Esparza,  
28 aka Listo (charged elsewhere).

1           (132)       On or about August 25, 2011, Jose Esparza, aka  
2 Listo (charged elsewhere), drove his pick up truck that contained  
3 447.7 grams of pure methamphetamine concealed in a black box.

4           (133)       On or before August 29, 2011, defendant SALVADORE  
5 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

6           (134)       On or about August 31, 2011, defendant SILVANO  
7 HERNANDEZ, JR. picked up approximately 12 pounds of methamphetamine  
8 from an unknown associate of Alfredo Bazurto, aka Freddy (charged  
9 elsewhere), behind a Popeye's fast-food restaurant in National City.

10          (135)       On or about August 31, 2011, defendant SILVANO  
11 HERNANDEZ, JR. agreed to sell methamphetamine to John Atkinson, aka  
12 John Anderson (charged elsewhere).

13          (136)       On or about August 31, 2011, defendant SILVANO  
14 HERNANDEZ, JR. directed Jose Pedro Covarrubias, aka Pete (charged  
15 elsewhere), to deliver a pound of methamphetamine to John Atkinson,  
16 aka John Anderson (charged elsewhere).

17          (137)       On or about August 31, 2011, Jose Pedro  
18 Covarrubias, aka Pete (charged elsewhere), drove his Dodge Intrepid  
19 that contained 446.7 grams of pure methamphetamine concealed in a  
20 black box and 13.1 grams of pure methamphetamine in eight bindles.

21          (138)       On or about August 31, 2011, defendant SILVANO  
22 HERNANDEZ, JR. directed John Atkinson, aka John Anderson (charged  
23 elsewhere), to inform "Travis", one of his customers, that if "Travis"  
24 did not pay a \$3,000 debt, HERNANDEZ's people would collect the debt  
25 and "whatever happens, . . . happens" because HERNANDEZ's people  
26 "don't give a fuck."

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1 (139) On or about September 5, 2011, defendant SILVANO  
2 HERNANDEZ, JR. gave defendant RICHARD MORENO QUEVEDO a tax payment  
3 intended for defendant SALVADORE NICOLA COLABELLA.

4 (140) On or about September 5, 2011, defendant RICHARD  
5 MORENO QUEVEDO paid defendant SALVADORE NICOLA COLABELLA \$1,500 in  
6 taxes.

7 (141) On or about September 5, 2011, defendant SALVADORE  
8 NICOLA COLABELLA possessed the \$1,500 tax payment, all of which were  
9 \$100 bills.

10 (142) On or about September 6, 2011, defendant SALVADORE  
11 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

12 (143) On or about September 13, 2011, defendant  
13 SALVADORE NICOLA COLABELLA collected a perceived \$200 tax payment from  
14 CI-4.

15 (144) On or about September 13, 2011, defendant  
16 SALVADORE NICOLA COLABELLA collected \$200 from CI-4 as a partial  
17 payment for the Lincoln Continental.

18 (145) On or about September 19, 2011, defendants JOSE  
19 LUIS MERCADO and ROBERT MERCADO collected a perceived \$200 tax payment  
20 from CI-4.

21 (146) On or about September 26, 2011, defendant  
22 SALVADORE NICOLA COLABELLA collected \$100 from CI-4 as a partial  
23 payment for the sale of the Lincoln Continental.

24 (147) On or about October 3, 2011, defendant SALVADORE  
25 NICOLA COLABELLA collected a perceived \$200 tax payment from CI-4.

26 (148) On or about October 3, 2011, defendant SALVADORE  
27 NICOLA COLABELLA collected \$200 from CI-4 as the final payment for the  
28 sale of the Lincoln Continental.

1           (149)       On or about October 11, 2011, defendants SALVADORE  
2 NICOLA COLABELLA and JOSE LUIS MERCADO collected a perceived \$200 tax  
3 payment from CI-4.

4           (150)       On or about October 11, 2011, defendant SALVADORE  
5 NICOLA COLABELLA gave CI-4 the phone number for defendant FNU LNU, aka  
6 Pelon, to arrange a heroin deal, and ordered CI-4 and Pelon to "do it  
7 right now."

8           (151)       On or about October 17, 2011, defendants JOSE LUIS  
9 MERCADO and ROBERT MERCADO collected a perceived \$200 tax payment from  
10 CI-4.

11           (152)       On or before October 17, 2011, defendant SALVADORE  
12 NICOLA COLABELLA placed defendant ROBERT MERCADO in charge of a  
13 portion of COLABELLA's illegal operations while COLABELLA was in  
14 custody.

15           (153)       On or about October 19, 2011, defendant ROBERT  
16 MERCADO provided CI-4 a new phone number for defendant FNU LNU,  
17 aka Pelon in order to do a heroin deal.

18           (154)       On or about October 19, 2011, defendant FNU LNU,  
19 aka Pelon, sold 99.3 grams of heroin to CI-4 for \$3,200.

20           (155)       On or before October 19, 2011, defendant FNU LNU,  
21 aka Pelon, gave defendant SALVADORE NICOLA COLABELLA a "picture"  
22 (sample) of heroin.

23           (156)       On or before October 19, 2011, defendant SALVADORE  
24 NICOLA COLABELLA appointed defendant MARIA DE JESUS CLAUDIA OCHOA to  
25 supervise the collection of taxes while COLABELLA was in custody.

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1 (157) On or before October 26, 2011, defendant FNU LNU,  
2 aka Pelon, provided defendants JOSE LUIS MERCADO and ROBERT MERCADO  
3 with heroin to be smuggled into jail on behalf of defendant SALVADORE  
4 NICOLA COLABELLA.

5 (158) On or about October 26, 2011, defendant FNU LNU,  
6 aka Pelon, sold 24.5 grams of heroin to CI-4 for \$800.

7 (159) On or about October 26, 2011, defendant ROBERT  
8 MERCADO collected a perceived \$200 tax payment from CI-4.

9 (160) On or about November 3, 2011, defendant ROBERT  
10 MERCADO collected a perceived \$200 tax payment from CI-4.

11 (161) On or about November 3, 2011, defendant ROBERT  
12 MERCADO instructed CI-4 to meet with defendant MARIA DE JESUS CLAUDIA  
13 OCHOA because CI-4 had not made a recent "tax" payment.

14 (162) On or about November 29, 2011, defendant ROBERT  
15 MERCADO asked CI-4 for a gun to threaten and tax "Pelon's cousin."

16 (163) On or about November 29, 2011, defendant ROBERT  
17 MERCADO told CI-4 he would split the proceeds of his planned taxing  
18 of "Pelon's cousin" with defendants SALVADORE NICOLA COLABELLA and FNU  
19 LNU, aka Pelon.

20 (164) On or about January 18, 2012, defendant MARIA DE  
21 JESUS CLAUDIA OCHOA sold 113.7 grams of methamphetamine to CI-3 for  
22 \$4,050 at OCHOA's residence at 2947 Imperial Avenue, San Diego.

23 (165) On or about January 19, 2012, defendant SALVADORE  
24 NICOLA COLABELLA collected a perceived \$280 tax payment from CI-4.

25 **Notice of Special Sentencing Factors**

26 18. Beginning on a date unknown to the grand jury and continuing  
27 up to and including January 24, 2012, within the Southern District of  
28 California, and elsewhere, defendants SALVADORE NICOLA COLABELLA,

1 aka Sal Diaz, aka Tio, aka SD, aka Scrooge, JOSE LUIS MERCADO, ROBERT  
2 MERCADO, MARIA DE JESUS CLAUDIA OCHOA, aka Mama C, RICHARD MORENO  
3 QUEVEDO, aka Chico, aka Cheeks, aka C, ADRIEL MADRIGAL, aka Angel,  
4 SILVANO HERNANDEZ, JR., aka Junior, and FNU LNU, aka Pelon, aka Morro,  
5 aka Everado Martinez, did knowingly and intentionally conspire  
6 together and with each other and with other persons known and unknown  
7 to the grand jury to distribute 50 grams and more of methamphetamine  
8 (actual), a Schedule II Controlled Substance, and 100 grams and more  
9 of heroin, a Schedule I Controlled Substance; all in violation of  
10 Title 21, United States Code, Section 841(a)(1) and 846.

11 19. On or about February 17, 2011, within the Southern District  
12 of California, defendants SALVADORE NICOLA COLABELLA, aka Sal Diaz,  
13 aka Tio, aka SD, aka Scrooge, and RICHARD MORENO QUEVEDO, aka Chico,  
14 aka Cheeks, aka C, did knowingly and intentionally distribute,  
15 50 grams and more, to wit: approximately 111.3 grams of  
16 methamphetamine (actual), a Schedule II Controlled Substance; in  
17 violation of Title 21, United States Code, Section 841(a)(1), and  
18 Title 18, United States Code, Section 2.

19 20. On or about March 10, 2011, within the Southern District of  
20 California, defendants SALVADORE NICOLA COLABELLA, aka Sal Diaz,  
21 aka Tio, aka SD, aka Scrooge, and RICHARD MORENO QUEVEDO, aka Chico,  
22 aka Cheeks, aka C, did knowingly and intentionally distribute,  
23 50 grams and more, to wit: approximately 111.7 grams of  
24 methamphetamine (actual), a Schedule II Controlled Substance; in  
25 violation of Title 21, United States Code, Sections 841(a)(1), and  
26 Title 18, United States Code, Section 2.

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Count 4

DISTRIBUTION OF METHAMPHETAMINE

26. On or about January 14, 2010, within the Southern District of California, defendant ADRIEL MADRIGAL, aka Angel, did knowingly and intentionally distribute, 5 grams and more, to wit: approximately 27.6 grams of methamphetamine (actual), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1).

Count 5

DISTRIBUTION OF METHAMPHETAMINE

27. On or about January 22, 2010, within the Southern District of California, defendant ADRIEL MADRIGAL, aka Angel, did knowingly and intentionally distribute, 5 grams and more, to wit: approximately 27.7 grams of methamphetamine (actual), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1).

Count 6

DISTRIBUTION OF METHAMPHETAMINE

28. On or about July 29, 2010, within the Southern District of California, defendant ADRIEL MADRIGAL, aka Angel, did knowingly and intentionally distribute, 5 grams and more, to wit: approximately 27.8 grams of methamphetamine (actual), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1).

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Count 7

DISTRIBUTION OF METHAMPHETAMINE

29. On or about September 11, 2010, within the Southern District of California, defendant ADRIEL MADRIGAL, aka Angel, did knowingly and intentionally distribute, 5 grams and more, to wit: approximately 27.6 grams of methamphetamine (actual), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a) (1).

Count 8

DISTRIBUTION OF METHAMPHETAMINE

30. On or about October 22, 2010, within the Southern District of California, defendant MARIA DE JESUS CLAUDIA OCHOA, aka Mama C, did knowingly and intentionally distribute, 5 grams and more, to wit: approximately 26.8 grams of methamphetamine (actual), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a) (1).

Count 9

DISTRIBUTION OF METHAMPHETAMINE

31. On or about January 20, 2011, within the Southern District of California, defendant MARIA DE JESUS CLAUDIA OCHOA, aka Mama C, did knowingly and intentionally distribute, 5 grams and more, to wit: approximately 41 grams of methamphetamine (actual), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a) (1).

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Count 10

DISTRIBUTION OF METHAMPHETAMINE

32. On or about February 17, 2011, within the Southern District of California, defendants SALVADORE NICOLA COLABELLA, aka Sal Diaz, aka Tio, aka SD, aka Scrooge, and RICHARD MORENO QUEVEDO, aka Chico, aka Cheeks, aka C, did knowingly and intentionally distribute, 50 grams and more, to wit: approximately 111.3 grams of methamphetamine (actual), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Count 11

DISTRIBUTION OF METHAMPHETAMINE

33. On or about March 10, 2011, within the Southern District of California, defendants SALVADORE NICOLA COLABELLA, aka Sal Diaz, aka Tio, aka SD, aka Scrooge, and RICHARD MORENO QUEVEDO, aka Chico, aka Cheeks, aka C, did knowingly and intentionally distribute, 50 grams and more, to wit: approximately 111.7 grams of methamphetamine (actual), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Count 12

DISTRIBUTION OF METHAMPHETAMINE

34. On or about June 20, 2011, within the Southern District of California, defendants SALVADORE NICOLA COLABELLA, aka Sal Diaz, aka Tio, aka SD, aka Scrooge, and RICHARD MORENO QUEVEDO, aka Chico, aka Cheeks, aka C, did knowingly and intentionally distribute, 50 grams and more, to wit: approximately 55.9 grams of methamphetamine (actual), a Schedule II Controlled Substance; in violation of

1 Title 21, United States Code, Section 841(a)(1), and Title 18, United  
2 States Code, Section 2.

3 Count 13

4 DISTRIBUTION OF METHAMPHETAMINE

5 35. On or about August 8, 2011, within the Southern District of  
6 California, defendants SALVADORE NICOLA COLABELLA, aka Sal Diaz,  
7 aka Tio, aka SD, aka Scrooge, and RICHARD MORENO QUEVEDO, aka Chico,  
8 aka Cheeks, aka C, did knowingly and intentionally distribute, 5 grams  
9 and more, to wit: 28.1 grams of methamphetamine (actual), a  
10 Schedule II Controlled Substance; in violation of Title 21, United  
11 States Code, Section 841(a)(1), and Title 18, United States Code,  
12 Section 2.

13 Count 14

14 DISTRIBUTION OF HEROIN

15 36. On or about October 19, 2011, within the Southern District  
16 of California, defendants SALVADORE NICOLA COLABELLA, aka Sal Diaz,  
17 aka Tio, aka SD, aka Scrooge, and FNU LNU, aka Pelon, aka Morro,  
18 aka Everardo Martinez, did knowingly and intentionally distribute  
19 heroin, a Schedule I Controlled Substance; in violation of Title 21,  
20 United States Code, Section 841(a)(1), and Title 18, United States  
21 Code, Section 2.

22 Count 15

23 DISTRIBUTION OF HEROIN

24 37. On or about October 26, 2011, within the Southern District  
25 of California, defendants SALVADORE NICOLA COLABELLA, aka Sal Diaz,  
26 aka Tio, aka SD, aka Scrooge, and FNU LNU, aka Pelon, aka Morro,  
27 aka Everardo Martinez, did knowingly and intentionally distribute  
28 heroin, a Schedule I Controlled Substance; in violation of Title 21,

1 United States Code, Section 841(a)(1), and Title 18, United States  
2 Code, Section 2.

3 Count 16

4 DISTRIBUTION OF METHAMPHETAMINE

5 38. On or about January 18, 2012, within the Southern District  
6 of California, defendant MARIA DE JESUS CLAUDIA OCHOA, aka Mama C, did  
7 knowingly and intentionally distribute, 50 grams and more, to wit:  
8 approximately 113.7 grams, of a mixture and substance containing a  
9 detectable amount of methamphetamine, a Schedule II Controlled  
10 Substance; in violation of Title 21, United States Code,  
11 Section 841(a)(1).

12 Criminal Forfeiture Allegations

13 RICO Forfeiture - 18 U.S.C. § 1963

14 39. The allegations contained in Count 1 are realleged and by  
15 its reference fully incorporated herein for the purpose of alleging  
16 forfeiture to the United States of America pursuant to the provisions  
17 of Title 18, United States Code, Section 1963.

18 40. Upon conviction of the offense set forth in Count 1,  
19 Defendants SALVADORE NICOLA COLABELLA, aka Sal Diaz, aka Tio, aka SD,  
20 aka Scrooge, JOSE LUIS MERCADO, ROBERT MERCADO, MARIA DE JESUS CLAUDIA  
21 OCHOA, aka Mama C, RICHARD MORENO QUEVEDO, aka Chico, aka Cheeks,  
22 aka C, ADRIEL MADRIGAL, aka Angel, SILVANO HERNANDEZ, JR., aka Junior,  
23 and FNU LNU, aka Pelon, aka Morro, aka Everado Martinez, shall forfeit  
24 to the United States of America, pursuant to Title 18, United States  
25 Code, Section 1963(a) and Rule 32.2, Fed. R. Crim. P.:

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1 (c) One 2006 Cadillac two-door sedan, CA License  
2 No. 5SRZ891, VIN: 1G6DP577660163003;

3 (d) One 2006 Honda Odyssey, CA License No. 6GGV045,  
4 VIN: 2HKRL1864YH588092;

5 (e) One 2007 GMC Yukon, CA License No. 6LZH250,  
6 VIN: 1GKFC13C47R351310;

7 (f) One residential real property bearing street address  
8 2947 Imperial Avenue, San Diego, CA, 92102, APN 545-362-08-00, legally  
9 described as: the west ten feet of lot 13 and all of lots 14 and 15  
10 in block 77 of seaman and Choate's addition in the City of San Diego,  
11 according to map no. 300, filed 7/14/1986.

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

- 14 a. cannot be located upon the exercise of due diligence;
- 15 b. has been transferred or sold to, or deposited with, a  
16 third person;
- 17 c. has been placed beyond the jurisdiction of the Court;
- 18 d. has been substantially diminished in value; or
- 19 e. has been commingled with other property which cannot  
20 be subdivided without difficulty,

21 it is the intent of the United States, pursuant to Title 18,  
22 United States Code, Section 1963(m), to seek forfeiture of any other  
23 property of said defendants up to the value of the above forfeitable  
24 property.

25 All pursuant to Title 18, United States Code, Section 1963.

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1 a. any interests acquired or maintained in violation of  
2 section 1962, which interests are subject to forfeiture to the  
3 United States pursuant to Title 18, United States Code,  
4 Section 1963(a)(1);

5 b. any interest in, security of, claims against, and  
6 property and contractual rights which afford a source of influence  
7 over, the enterprise described above which the defendants established,  
8 operated, controlled, conducted, and participated in the conduct of,  
9 in violation of Title 18, United States Code, Section 1962, which  
10 interests, securities, claims, and rights are subject to forfeiture  
11 to the United States pursuant to Title 18, United States Code,  
12 Section 1963(a)(2); and

13 c. any property constituting and derived from proceeds  
14 obtained, directly and indirectly, from the racketeering activity  
15 described in this Indictment, in violation of Title 18, United States  
16 Code, Section 1962, which property is subject to forfeiture to the  
17 United States pursuant to Title 18, United States Code,  
18 Section 1963(a)(3).

19 41. The United States alleges that the following specific  
20 properties are subject to forfeiture to the United States of America  
21 upon the Defendants convictions on Count 1 of the Indictment, pursuant  
22 to Paragraph 42 of the Forfeiture allegation above and pursuant to  
23 Title 18, United States Code, Section 1963(a):

24 (a) One 2011 Lincoln MKZ, CA License No. 6PVM813,  
25 VIN: 3LNLDL2L34BR756942;

26 (b) One 2003 GMC truck, CA License No. ZEXYTRK,  
27 VIN: 1GTGC13U73F119305;

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1 (d) One 2006 Honda Odyssey, CA License No. 6GGV045,  
2 VIN: 2HKRL1864YH588092;

3 (e) One 2007 GMC Yukon, CA License No. 6LZH250,  
4 VIN: 1GKFC13C47R351310;

5 (f) One residential real property bearing street address  
6 2947 Imperial Avenue, San Diego, CA, 92102, APN 545-362-08-00, legally  
7 described as: the west ten feet of lot 13 and all of lots 14 and 15  
8 in block 77 of seaman and Choate's addition in the City of San Diego,  
9 according to map no. 300, filed 7/14/1986.

10 45. If any of the above-described forfeitable property, as a  
11 result of any act or omission of the defendant:

12 (a) cannot be located upon the exercise of due diligence;

13 (b) has been transferred or sold to, or deposited with, a  
14 third party;

15 (c) has been placed beyond the jurisdiction of the Court;

16 (d) has been substantially diminished in value; or

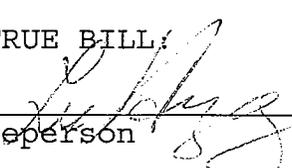
17 (e) has been commingled with other property which cannot  
18 be subdivided without difficulty;

19 it is the intent of the United States, pursuant to Title 21,  
20 United States Code, Section 853(p), to seek forfeiture of any other  
21 property of the defendant up to the value of the said property listed  
22 above as being subject to forfeiture.

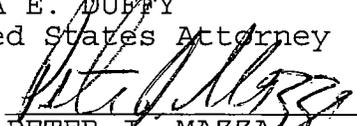
23 All in violation of Title 21, United States Code, Section 853.

24 DATED: January 24, 2012.

25 A TRUE BILL

26   
Foreperson

27 LAURA E. DUFFY  
United States Attorney

28 By:   
PETER J. MAZZA  
Assistant U.S. Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

July 2010 Grand Jury

12 CR 0291 AJB

UNITED STATES OF AMERICA, )  
 )  
 ) Plaintiff, )  
 )  
 ) v. )  
 )  
 ) RAMON AGREDANO (1), )  
 ) RICARDO CORNEJO (2), )  
 ) aka Richie, )  
 ) DAVID YORK (3), )  
 ) GUILLERMO CHAIDEZ (4), )  
 ) aka Memo, )  
 ) DAVID GARCIA (5), )  
 ) aka Chato, )  
 ) ADRIAN DOMINGUEZ (6), )  
 ) aka Solo, )  
 ) KIRK BORJA (7), )  
 ) aka Kirkie, )  
 ) CHARLES SMITH (8), )  
 ) PATRICK BERARDINI (9), )  
 ) ANNA SHENEMAN (10), )  
 ) ESTEBAN RODRIGUEZ (11), )  
 )  
 ) Defendants. )  
 )  
 )

Case No. \_\_\_\_\_  
I N D I C T M E N T  
Title 21, U.S.C., Secs. 841(a)(1)  
and 846 - Conspiracy to Distribute  
Methamphetamine

The grand jury charges:

CONSPIRACY TO DISTRIBUTE METHAMPHETAMINE

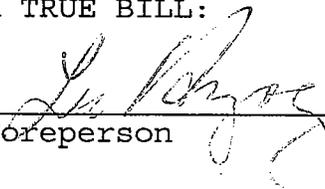
Beginning on a date unknown to the grand jury and continuing up to and including January 24, 2012, within the Southern District of California, and elsewhere, defendants RAMON AGREDANO, RICARDO CORNEJO, aka Richie, DAVID YORK, GUILLERMO CHAIDEZ, aka Memo, DAVID GARCIA, aka Chato, ADRIAN DOMINGUEZ, aka Solo, KIRK BORJA, aka Kirkie, CHARLES

CR

1 SMITH, PATRICK BERARDINI, ANNA SHENEMAN, and ESTEBAN RODRIGUEZ, did  
2 knowingly and intentionally conspire together and with each other,  
3 with Adriel Madrigal, aka Angel (charged elsewhere), and with other  
4 persons known and unknown to the grand jury to distribute 50 grams and  
5 more of methamphetamine (actual), a Schedule II Controlled Substance;  
6 in violation of Title 21, United States Code, Sections 841(a)(1) and  
7 846.

8 DATED: January 24, 2012.

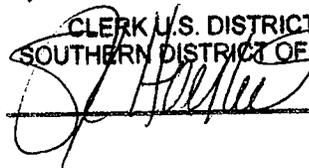
9 A TRUE BILL:

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11 \_\_\_\_\_  
Foreperson

12 LAURA E. DUFFY  
13 United States Attorney

14 By:   
15 PETER J. MAZZA  
Assistant U.S. Attorney

16 I hereby attest and certify on 1.24.12  
17 That the foregoing document is a full, true and correct  
18 copy of the original on file in my office and in my legal  
19 custody.

20 CLERK U.S. DISTRICT COURT  
21 SOUTHERN DISTRICT OF CALIFORNIA  
22 By  Deputy  
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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

July 2010 Grand Jury

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UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JUAN GUERRERO (1),  
    aka Buddha,  
JORGE MORENO (2),  
    aka Clumsy,  
FNU LNU (3),  
    aka Tony,  
ANTHONY BASCOS (4),  
    aka Looney,  
GILBERT MARIN (5),  
ALLEN MUNDELL (6),  
    aka Corn,  
BRETT YOUKEL (7),  
LACY McELROY (8),  
  
Defendants.

Case No. 12 CR 0292 AJB  
  
I N D I C T M E N T  
  
Title 21, U.S.C., Secs. 841(a)(1)  
and 846 - Conspiracy to Distribute  
Methamphetamine

The grand jury charges:

CONSPIRACY TO DISTRIBUTE METHAMPHETAMINE

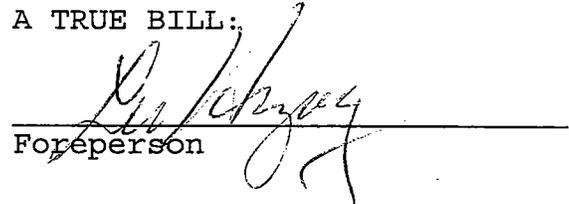
Beginning on a date unknown to the grand jury and continuing up to and including January 24, 2012, within the Southern District of California, and elsewhere, defendants JUAN GUERRERO, aka Buddha, JORGE MORENO, aka Clumsy, FNU LNU, aka Tony, ANTHONY BASCOS, aka Looney, GILBERT MARIN, ALLEN MUNDELL, aka Corn, BRETT YOUKEL, and LACY McELROY, did knowingly and intentionally conspire together and with each other and with Richard Moreno Quevedo, aka Chico, aka Cheeks,

PJM:nlv(lml):San Diego  
1/23/12

1 aka C, and Silvano Hernandez, Jr., aka Junior (both charged  
2 elsewhere), and other persons known and unknown to the grand jury to  
3 distribute 50 grams and more of methamphetamine (actual), a  
4 Schedule II Controlled Substance; in violation of Title 21, United  
5 States Code, Sections 841(a)(1) and 846.

6 DATED: January 24, 2012.

7 A TRUE BILL:

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9   
Foreperson

10 LAURA E. DUFFY  
United States Attorney

11  
12 By:   
13 PETER J. MAZZA  
Assistant U.S. Attorney

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21 I hereby attest and certify on 1/24/2012  
22 That the foregoing document is a full, true and correct  
copy of the original on file in my office and in my legal  
custody.

23 CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

24 By PHILIP V. MAI Deputy

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

July 2010 Grand Jury

12 CR 0293 AJB

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ALFREDO BAZURTO (1),  
aka Freddy,  
CHARLES MONROE (2),  
aka Killer,  
JOSE PEDRO COVARRUBIAS (3),  
aka Pete,  
aka P,  
GEORGE CHAVEZ (4),  
aka Pops,  
aka P,  
JOSE ESPARZA (5),  
aka Listo,  
JOHN ATKINSON (6),  
aka John Anderson,  
ANNABEL VASQUEZ (7),  
DELEAL FANTAJAMARIE  
CAJMERE (8),  
  
Defendants.

Case No. \_\_\_\_\_  
**I N D I C T M E N T**  
Title 21, U.S.C., Secs. 841(a)(1)  
and 846 - Conspiracy to Distribute  
Methamphetamine; Title 21, U.S.C.,  
Sec. 853 - Criminal Forfeiture

The grand jury charges:

Count 1

CONSPIRACY TO DISTRIBUTE METHAMPHETAMINE

Beginning on a date unknown to the grand jury and continuing up  
to and including January 24, 2012, within the Southern District of  
California, and elsewhere, defendants ALFREDO BAZURTO, aka Freddy,  
CHARLES MONROE, aka Killer, JOSE PEDRO COVARRUBIAS, aka Pete, aka P,

PJM:lml:San Diego  
1/23/12

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1 GEORGE CHAVEZ, aka Pops, aka P, JOSE ESPARZA, aka Listo, JOHN  
2 ATKINSON, aka John Anderson, ANNABEL VASQUEZ, and DELEAL FANTAJAMARIE  
3 CAJMERE, did knowingly and intentionally conspire together and with  
4 each other, with Silvano Hernandez, Jr., aka Junior (charged  
5 elsewhere), and with other persons known and unknown to the grand jury  
6 to distribute 50 grams and more of methamphetamine (actual), a  
7 Schedule II Controlled Substance; in violation of Title 21,  
8 United States Code, Sections 841(a)(1) and 846.

9 Criminal Forfeiture Allegation

10 1. The allegation contained in Count 1 is realleged and by its  
11 reference fully incorporated herein for the purpose of alleging  
12 forfeiture to the United States of America pursuant to the provisions  
13 of Title 21, United States Code, Section 853.

14 2. As a result of the commission of the felony offense alleged  
15 in this Indictment, said violation being punishable by imprisonment  
16 for more than one year and pursuant to Title 21, United States Code,  
17 Section 853(a)(1) and 853(a)(2), defendants ALFREDO BAZURTO,  
18 aka Freddy, CHARLES MONROE, aka Killer, JOSE PEDRO COVARRUBIAS,  
19 aka Pete, aka P, GEORGE CHAVEZ, aka Pops, aka P, JOSE ESPARZA,  
20 aka Listo, JOHN ATKINSON, aka John Anderson, ANNABEL VASQUEZ, and  
21 DELEAL FANTAJAMARIE CAJMERE shall, upon conviction, forfeit to the  
22 United States all rights, title and interest in any and all property  
23 constituting, or derived from, any proceeds the defendants obtained,  
24 directly or indirectly, as the result of the offense, and any and all  
25 property used or intended to be used in any manner or part to commit  
26 and to facilitate the commission of the violation alleged in this  
27 indictment including, but not limited to: One 2004 GMC pickup truck,  
28 California license plate number 7J59092, and VIN 1GTHK23U14F124725.

1 3. If any of the above-described forfeitable property, as a  
2 result of any act or omission of the defendant:

3 (a) cannot be located upon the exercise of due diligence;

4 (b) has been transferred or sold to, or deposited with, a  
5 third party;

6 (c) has been placed beyond the jurisdiction of the Court;

7 (d) has been substantially diminished in value; or

8 (e) has been commingled with other property which cannot  
9 be subdivided without difficulty;

10 it is the intent of the United States, pursuant to Title 21, United  
11 States Code, Section 853(p), to seek forfeiture of any other property  
12 of the defendants up to the value of the said property listed above  
13 as being subject to forfeiture.

14 All in violation of Title 21, United States Code, Section 853.

15 DATED: January 24, 2012.

A TRUE BILL:

  
Foreperson

19 LAURA E. DUFFY  
20 United States Attorney

21 By:   
22 PETER J. MAZZA  
23 Assistant U.S. Attorney

I hereby attest and certify on 1/24/2012  
That the foregoing document is a full, true and correct  
copy of the original on file in my office and in my legal  
custody.

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
PHILIP V. MAI

By: \_\_\_\_\_ Deputy

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

July 2010 Grand Jury

UNITED STATES OF AMERICA,	)	Case No. <u>'12 CR 0294 MMA</u>
	)	
Plaintiff,	)	<u>I N D I C T M E N T</u>
	)	
v.	)	Title 21, U.S.C., Sec. 841(a) (1) -
	)	Distribution of Methamphetamine
CARLOS LOZANO,	)	
	)	
Defendant.	)	

The grand jury charges:

On or about September 29, 2009, within the Southern District of California, defendant CARLOS LOZANO did knowingly and intentionally distribute, 50 grams and more, to wit: approximately 90.6 grams of methamphetamine (actual), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a) (1).

DATED: January 24, 2012.

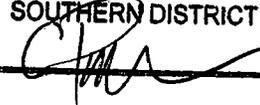
A TRUE BILL:

  
Foreperson

LAURA E. DUFFY  
United States Attorney

I hereby attest and certify on 1/24/12  
That the foregoing document is a full, true and correct copy of the original on file in my office and in my legal custody.

By:   
PETER J. MAZZA  
Assistant U.S. Attorney

CLERK U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
By  Deputy

PJM:lml:San Diego  
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