

“Operation 12-Step”

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SEALED



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

July 2010 Grand Jury

12 CR 0286 L

1 UNITED STATES OF AMERICA,)
2)
3 Plaintiff,)
4)
5 v.)
6)
7 ELISA TURNER (1),)
8 aka Necia,)
9 MANUEL BORBOA (2),)
10 STEVE PADILLA (3),)
11 aka Solo,)
12 SARA PATRICIA MACIAS (4),)
13 NAHUM BARAJAS RAMIREZ (5),)
14 aka Whiskers,)
15 EDWARD WYATT EDWARDS (6),)
16 DANIEL ZAPATA (7),)
17 aka Indio,)
18 DANNY YUHAS (8),)
19 aka Danny Boy,)
20 PEDRO REYES VALENCIA (9),)
21 aka Lobo,)
22 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

Beginning at a date unknown to the grand jury and continuing up to and including December 16, 2011, within the Southern District of California, and elsewhere, defendants ELISA TURNER, aka Necia, MANUEL BORBOA, STEVE PADILLA, aka Solo, SARA PATRICIA MACIAS, NAHUM BARAJAS RAMIREZ, aka Whiskers, EDWARD WYATT EDWARDS, DANIEL ZAPATA, aka Indio, DANNY YUHAS, aka Danny Boy, and PEDRO REYES VALENCIA, aka Lobo,

JDPA:nlv:San Diego
1/23/12

ca

1 knowingly and intentionally conspired together and with each other and
2 with other persons known and unknown to the grand jury including
3 Silvano Hernandez (charged elsewhere) to distribute methamphetamine,
4 a Schedule II Controlled Substance; in violation of Title 21, United
5 States Code, Sections 841(a)(1) and 846.

6 It is further alleged that the amount of methamphetamine (actual)
7 was 5 grams and more.

8 It is further alleged that the amount of methamphetamine (actual)
9 was 50 grams and more.

10 Criminal Forfeiture Allegations

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

15 2. As a result of the commission of the felony offense alleged
16 in Count 1 of this Indictment, said violation being punishable by
17 imprisonment for more than one year and pursuant to Title 21, United
18 States Code, Sections 853(a)(1) and 853(a)(2), defendants ELISA
19 TURNER, aka Necia, MANUEL BORBOA, STEVE PADILLA, aka Solo, SARA
20 PATRICIA MACIAS, NAHUM BARAJAS RAMIREZ, aka Whiskers, EDWARD WYATT
21 EDWARDS, DANIEL ZAPATA, aka Indio, DANNY YUHAS, aka Danny Boy, and
22 PEDRO REYES VALENCIA, aka Lobo, shall, upon conviction, forfeit to the
23 United States all their rights, title and interest in any and all
24 property constituting, or derived from, any proceeds any defendant
25 obtained, directly or indirectly, as the result of the felony offense
26 alleged in this Indictment, and any and all property used or intended
27 to be used in any manner or part to commit and to facilitate the
28 commission of the offense alleged in this indictment.

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SEALED



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

July 2010 Grand Jury

UNITED STATES OF AMERICA,)	Case No. <u>12 CR 0287 L</u>
)	
Plaintiff,)	<u>I N D I C T M E N T</u>
)	
v.)	Title 21, U.S.C., Secs. 841(a)(1)
)	and 846 - Conspiracy to Distribute
MARCELO FONSECA BENITEZ (1),)	Methamphetamine; Title 21, U.S.C.,
aka Manuel,)	Sec. 853 - Criminal Forfeiture
MARTA CECILIA)	
RAMIREZ-CARDENAS (2),)	
MONICA ANN CASTRO (3),)	
YESENIA IVETTE MARTINEZ (4),)	
LARRY JIRO YAFUSO (5),)	
aka The Filipino,)	
JUAN AURELIO LOPEZ (6),)	
ALBERTO BARBA (7),)	
aka Lil Loco,)	
NORA ANGULO (8),)	
aka Lil Rascal,)	
PETER AUZENNE (9),)	
aka Pompita,)	
Defendants.)	

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up to and including December 6, 2011, within the Southern District of California, and elsewhere, defendants MARCELO FONSECA BENITEZ, aka Manuel, MARTA CECILIA RAMIREZ-CARDENAS, MONICA ANN CASTRO, YESENIA IVETTE MARTINEZ, LARRY JIRO YAFUSO, aka The Filipino, JUAN AURELIO LOPEZ, ALBERTO BARBA, aka Lil Loco, NORA ANGULO, aka Lil Rascal, and PETER AUZENNE, aka Pompita, knowingly and intentionally conspired



1 together and with each other and with other persons known and unknown
2 to the grand jury to distribute methamphetamine, a Schedule II
3 Controlled Substance; in violation of Title 21, United States Code,
4 Sections 841(a)(1) and 846.

5 It is further alleged that the amount of methamphetamine (actual)
6 was 5 grams and more.

7 It is further alleged that the amount of methamphetamine (actual)
8 was 50 grams and more.

9 Criminal Forfeiture Allegations

10 1. The allegations contained in Count 1 are realleged and by
11 their 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 Count 1 of this Indictment, said violation being punishable by
16 imprisonment for more than one year and pursuant to Title 21, United
17 States Code, Sections 853(a)(1) and 853(a)(2), defendants MARCELO
18 FONSECA BENITEZ, aka Manuel, MARTA CECILIA RAMIREZ-CARDENAS, MONICA
19 ANN CASTRO, YESENIA IVETTE MARTINEZ, LARRY JIRO YAFUSO, aka The
20 Filipino, JUAN AURELIO LOPEZ, ALBERTO BARBA, aka Lil Loco, NORA
21 ANGULO, aka Lil Rascal, and PETER AUZENNE, aka Pompita, shall, upon
22 conviction, forfeit to the United States all their rights, title and
23 interest in any and all property constituting, or derived from, any
24 proceeds any defendant obtained, directly or indirectly, as the result
25 of the felony offense alleged in this Indictment, and any and all
26 property used or intended to be used in any manner or part to commit
27 and to facilitate the commission of the offense alleged in this
28 indictment.

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SEALED



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

July 2010 Grand Jury

12 CR 0288 L

UNITED STATES OF AMERICA,

Case No.

Plaintiff,

I N D I C T M E N T

v.

Title 21, U.S.C., Secs. 841(a)(1)
and 846 - Conspiracy to Distribute
Methamphetamine; Title 21, U.S.C.,
Sec. 853 - Criminal Forfeiture

FNU LNU (1),
aka Pelon,
aka Morro,
aka Everardo Martinez,
MARCO RAMIREZ (2),
aka Tata,
RUDY VERDUZCO (3),
aka Spooky,

Defendants.

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up to and including December 20, 2011, within the Southern District of California, and elsewhere, defendants FNU LNU, aka Pelon, aka Morro, aka Everardo Martinez, MARCO RAMIREZ, aka Tata, and RUDY VERDUZCO, aka Spooky, knowingly and intentionally conspired together and with each other and with other persons known and unknown to the grand jury to distribute methamphetamine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

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JDPA:nlv:San Diego
1/24/12

CR

1 It is further alleged that the amount of a mixture or substance
2 containing a detectable amount of methamphetamine was 50 grams and
3 more.

4 Criminal Forfeiture Allegations

5 1. The allegations contained in Counts 1 and 2 are realleged
6 and by their reference fully incorporated herein for the purpose of
7 alleging forfeiture to the United States of America pursuant to the
8 provisions of Title 21, United States Code, Section 853.

9 2. As a result of the commission of the felony offense alleged
10 in Count 1 of this Indictment, said violation being punishable by
11 imprisonment for more than one year and pursuant to Title 21, United
12 States Code, Sections 853(a)(1) and 853(a)(2), defendants FNU LNU,
13 aka Pelon, aka Morro, aka Everardo Martinez, MARCO RAMIREZ, aka Tata,
14 and RUDY VERDUZCO, aka Spooky, shall, upon conviction, forfeit to the
15 United States all their rights, title and interest in any and all
16 property constituting, or derived from, any proceeds any defendant
17 obtained, directly or indirectly, as the result of the felony offense
18 alleged in this Indictment, and any and all property used or intended
19 to be used in any manner or part to commit and to facilitate the
20 commission of the offense alleged in this indictment.

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

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

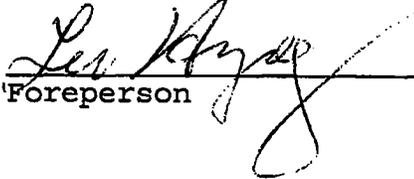
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1 e. has been commingled with other property which cannot
2 be subdivided without difficulty;
3 it is the intent of the United States, pursuant to Title 21,
4 United States Code, Section 853(p), to seek forfeiture of any other
5 property of the defendant up to the value of the said property listed
6 above as being subject to forfeiture.

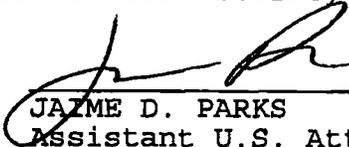
7 All in violation of Title 21, United States Code, Section 853.

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 _____
JAYME D. PARKS
Assistant U.S. Attorney

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

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

25 By  Deputy

12 JAN 24 AM 11:56

SEALED



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

July 2010 Grand Jury

12 CR 0289 L

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
FNU LNU (1),)
)
aka Cabezon,)
FRANCISCO CALDERON (2),)
)
aka Panchito,)
JAVIER RODRIGUEZ HERNANDEZ (3),)
)
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

Beginning at a date unknown to the grand jury and continuing up to and including October 7, 2011, within the Southern District of California, and elsewhere, defendants FNU LNU, aka Cabezon, FRANCISCO CALDERON, aka Panchito, and JAVIER RODRIGUEZ HERNANDEZ, knowingly and intentionally conspired together and with each other and with other persons known and unknown to the grand jury to distribute methamphetamine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

It is further alleged that the amount of methamphetamine (actual) was 5 grams and more.

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JDPA:nlv:San Diego
1/23/12

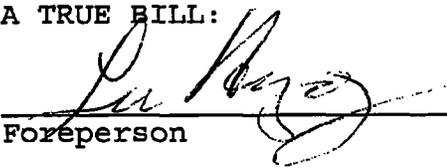
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1 it is the intent of the United States, pursuant to Title 21,
2 United States Code, Section 853(p), to seek forfeiture of any other
3 property of the defendant up to the value of the said property listed
4 above as being subject to forfeiture.

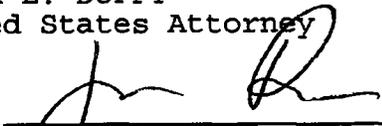
5 All in violation of Title 21, United States Code, Section 853.

6 DATED: January 24, 2012.

7 A TRUE BILL:

8 
9 _____
Foreperson

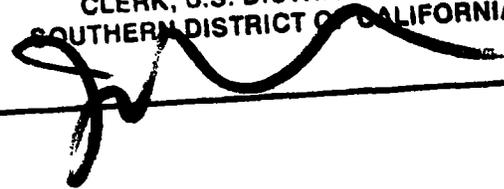
10 LAURA E. DUFFY
11 United States Attorney

12 By: 

13 _____
JAIME D. PARKS
14 Assistant U.S. Attorney

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

25 CLERK, U.S. DISTRICT COURT
26 SOUTHERN DISTRICT OF CALIFORNIA

27 By  _____

28 Deputy

STATEMENT OF FACTS

I, Special Agent Eric Woltz, declare under penalty of perjury, the following is true and correct:

In late March of 2011, a confidential source working with the East County Regional Gang Task Force attempted to make arrangements to purchase methamphetamine from Silvano Hernandez, through Pedro Valencia. Ultimately, however, the source purchased approximately seven grams of methamphetamine from one of Valencia's sources of supply, Christina CAMPAS.

On March 28, 2011, at 12:17 p.m., the confidential source placed a recorded call Valencia to confirm the time the confidential source should arrive at 532 Felicita Avenue, Spring Valley (Valencia's HOME) to purchase methamphetamine. The confidential source and Valencia agreed on 2:00 p.m. After being searched by agents and under constant surveillance the confidential source traveled to Valencia's HOME. The confidential source arrived as scheduled and got into Valencia's green Honda Accord. For the next 1.5 hours, Valencia drove to various locations, with the confidential source as the passenger and under constant surveillance. At 3:30 p.m., law enforcement saw the two arrive at the Mariner Village Apartments at 6847 Potomac Street, San Diego (CAMPAS's apartment complex). A short time after Valencia parked, law enforcement saw CAMPAS arrive in a silver Mazda 4 door sedan, and exited the vehicle. Law enforcement observed Valencia and the confidential source follow CAMPAS into the complex. The confidential source reported that they then entered her apartment.

Based on the recording obtained from the confidential source and source reporting, the source and CAMPAS discussed purchasing an ounce of methamphetamine for \$900. CAMPAS would not sell the confidential source an ounce, but agreed to sell the confidential source seven grams for \$300. According to the confidential source, Campas extracted seven grams from a larger bag containing a white crystallized substance and gave the methamphetamine to the source. According to the source, and captured on the recording, CAMPAS agreed to call the confidential source to discuss the prices of larger amounts of methamphetamine for future purchase. At 3:45 p.m., Valencia and the confidential source left the apartment. Law enforcement saw them exit the complex and get into Valencia's car. Law enforcement followed them as they returned to Valencia's HOME. Shortly thereafter, the confidential source met with agents and turned over the methamphetamine. The substance was submitted to the DEA Laboratory, tested positive for methamphetamine, weighed 6.9 grams, contained 6.7 grams of methamphetamine (actual) and had a 98.5% purity level.

The confidential source has been working with the FBI for several years. To the best of my knowledge the confidential source has always been truthful except with respect to his/her own methamphetamine use. In any event, the transaction was recorded. The recording establishes that it was CAMPAS and not, for example, Valencia, who provided the confidential source with methamphetamine.

DPW

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
2017 JAN 20 PM 4:47

UNITED STATES OF AMERICA,

Plaintiff,

v.

Edgar Alan Sandoval DELTORO,

Defendant.

Magistrate Docket No. [redacted] DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

COMPLAINT FOR VIOLATION OF:

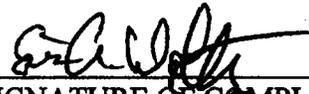
Title 21, U.S.C., Section 841(a)(1) and 846
Conspiracy to Distribute
Methamphetamine

72MJ0227

The undersigned complainant, being duly sworn, states:

Beginning at a date unknown and continuing up to and including December 5, 2011, within the Southern District of California and elsewhere, defendant Edgar Alan Sandoval DELTORO did knowingly and intentionally conspire with others including Marcelo Fonseca Benitez, to distribute methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and 846.

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.


SIGNATURE OF COMPLAINANT
ERIC WOLTZ
SPECIAL AGENT, FBI

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 20th DAY OF JANUARY, 2012.


HON. MITCHELL D. DEMBIN
UNITED STATES MAGISTRATE JUDGE

STATEMENT OF FACTS

I, Special Agent Eric Woltz, declare under penalty of perjury, the following is true and correct:

The East County Regional Gang Task Force has been conducting a drug trafficking investigation into Marcelo Fonseca Benitez. During the course of that investigation, which involved court-authorized wiretap interceptions, DELTORO was identified as one of Fonseca's methamphetamine sub-distributors. Intercepted calls suggest that DELTORO received multiple pounds of methamphetamine per week from Fonseca. DELTORO was intercepted in approximately 81 pertinent calls. Some of those telephone calls are summarized below. Quoted portions were translated by Spanish language monitors. To the extent that DELTORO and Fonseca used coded or veiled language, I have included my interpretation in brackets. My interpretation is based on my training and experience as well as the opinions of the linguists who have been listening to Fonseca's telephone calls for several months.

On October 29, 2011, Fonseca called DELTORO at IMSI 31601016896904 over Fonseca TT#11 (9236). Fonseca asked, "What's up?" DELTORO responded, "Hey, I'm measuring that [methamphetamine]. I'm missing sixty-one [61 grams]." Fonseca replied, "I will give them [the missing grams of methamphetamine] to you man. I'll bring them to you. Don't worry about that. I'll give you seventy points [70 grams]." Fonseca said, "I told you it was around two [2 ounces of methamphetamine]. The two are fifty-six [two ounces is equal to 56 grams], but no I'll bring them [the methamphetamine] to you." Fonseca advised DELTORO, "When I go over there during the week, I'll give them [the methamphetamine] to you when we see each other, or when you come." DELTORO replied, "Yes, cause one is four thirty eight [438 grams] and the other one is three, nine, seven" [397 grams]. Fonseca told DELTORO, "I'll bring you the sixty five points" [65 grams]. DELTORO said, "Okay."

On November 4, 2011 at 3:17 p.m., DELTORO called Fonseca at Fonseca TT#11 (9236) over IMSI 316010168986904. Fonseca asked DELTORO what time he was leaving and DELTORO said he was taking off then. Fonseca told DELTORO he should have told Fonseca sooner so that DELTORO could have taken the "candies" [methamphetamine]. Fonseca asked how much [narcotics proceeds] DELTORO got together and DELTORO replied "six or seven" [\$6-7,000]. Fonseca said he was eating at the moment, but needed to go to San Ysidro for that "thing" [methamphetamine]. At 3:48 p.m., DELTORO called Fonseca at Fonseca TT#11 (9236) over IMSI 316010168986904. Fonseca asked DELTORO if he should take "them" [methamphetamine] to DELTORO. DELTORO agreed and told Fonseca to go to his house so Fonseca could get the cash. Fonseca asked DELTORO to give him some time because he was just getting "the stuff" [methamphetamine] in San Ysidro. The two continued to exchange telephone calls to coordinate a meeting location. Law enforcement subsequently observed Fonseca and DELTORO driving their respective vehicles. The vehicles parked near each other at a gas station. Presumably, DELTORO and Fonseca met at the gas station. Several hours later, law enforcement saw Fonseca's truck leave DELTORO's residence. DELTORO was standing outside and law enforcement was able to identify him based on his California Department of Motor Vehicles photograph. DELTORO's name is also on the property records for the residence where he was surveilled. Agents were able to compare his voice from the November 4, 2011 calls to other calls that were not accompanied by surveillance.

On December 2, 2011, Fonseca and DELTORO discussed the importation of methamphetamine. Fonseca indicated that he could not cross the methamphetamine "whole" [in one pound units] but would instead use "the girls" [Yesenia Martinez and Karlina Gaskill]. Four days later, Fonseca was arrested in possession of approximately one pound of methamphetamine, divided in smaller packages, that Martinez and Gaskill had imported into the United States. The "girls" concealed the packages internally, explaining Fonseca's inability to import the methamphetamine in "whole" one-pound packages.

On December 5, 2011, Fonseca and DELTORO were intercepted discussing "two balls" [two 1/8th ounce units - "balls" or 8-balls are a unit of measure almost always associated with methamphetamine]. In another call the same day, Fonseca told DELTORO that [the methamphetamine] is "100%" and "not cut or anything" [has not been mixed with another substance].

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JAN 20 2012
CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Jesus Antonio Lopez SIQUEIROS,

Defendant.

Magistrate Docket No. 12 MJ0220

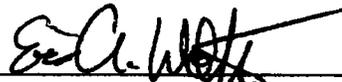
COMPLAINT FOR VIOLATION OF:

Title 21, U.S.C., Section 841(a)(1) and 846
Conspiracy to Distribute
Methamphetamine

The undersigned complainant, being duly sworn, states:

Beginning at a date unknown and continuing up to and including October 31, 2011, within the Southern District of California and elsewhere, defendant Jesus Lopez SIQUEIROS did knowingly and intentionally conspire with others including Marcelo Fonseca Benitez, to distribute methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and 846.

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.


SIGNATURE OF COMPLAINANT
ERIC WOLTZ
SPECIAL AGENT, FBI

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 20th DAY OF JANUARY, 2012.


HON. MITCHELL D. DEMBIN
UNITED STATES MAGISTRATE JUDGE

STATEMENT OF FACTS

I, Special Agent Eric Woltz, declare under penalty of perjury, the following is true and correct:

The East County Regional Gang Task Force has been conducting a drug trafficking investigation into Marcelo Fonseca Benitez. During the course of that investigation, which involved court-authorized wiretap interceptions, SIQUEIROS was identified as one of Fonseca's methamphetamine sub-distributors. SIQUEIROS was intercepted speaking with Fonseca. Some of those telephone calls are summarized below. Quoted portions were translated by Spanish language monitors. To the extent that SIQUEIROS and Fonseca used coded or veiled language, I have included my interpretation in brackets. My interpretation is based on my training and experience as well as the opinions of the linguists who have been listening to Fonseca's telephone calls for several months.

On October 31, 2011 at 9:50 a.m., Fonseca called SIQUEIROS at 125*147*6266 over Fonseca TT#11 (9236). SIQUEIROS asked if there was "anything good [methamphetamine]." Fonseca said he was glad he called because he had "something really good [methamphetamine]" for SIQUEIROS. Fonseca said he was still in Tijuas [Tijuana] and asked what time SIQUEIROS got off work. SIQUEIROS said he got off work after 1:00 and that was why he was called him, to see what was up. Fonseca said he should be over there [U.S.] by that time and asked SIQUEIROS to call him at 1:00 or 1:30 so SIQUEIROS wouldn't have to go over there [Mexico] and for SIQUEIROS to take "that" [methamphetamine]. Fonseca again said he had "something really good [methamphetamine]." SIQUEIROS said he didn't want to struggle because there's a lot of "competition" [from other narcotics distributors]. Fonseca said he wouldn't have to struggle with "this one" [methamphetamine] because "it'll sell quickly."

At 12:26 p.m., Fonseca called his girlfriend and stash-house operator Marta Cecilia Ramirez Cardenas and instructed her to "prepare one [ounce of methamphetamine]" for "Cora" [unknown, possibly SIQUEIROS]. Fonseca told Ramirez it should weigh "29" [29 grams or one ounce] and should have "more rocks" than "powder" [more of the methamphetamine should be in crystalline form than powder form].

At 12:51 p.m., Fonseca called SIQUEIROS at 125*147*6266 over Fonseca TT#11 (9236). SIQUEIROS asked what time they could meet. Fonseca asked what time SIQUEIROS would get off [of work]. SIQUEIROS said he got off at 11:00 and he wanted to know what was up. Fonseca asked if SIQUEIROS was home. SIQUEIROS said he was home but it would only take him 20 minutes to get there. FONSECA said he would be on the other side [U.S.] in about a half hour, then Fonseca would call him and they could meet at the "fish" [fish stand] like before. SIQUEIROS asked Fonseca to call and he would head over there. Fonseca said he would call SIQUEIROS as soon as he got across and he added that his wife [Ramirez] already had "that" [methamphetamine] with her.

At 1:36 p.m., Fonseca called SIQUEIROS at 125*147*6266 over Fonseca TT#11 (9236). FONSECA said he was "up there" [across the border, in the U.S.] and added that they could meet at 2:15 or 2:20 at the fish place where they always meet. SIQUEIROS said he would see him there. Fonseca said he was on his way.

Following these telephone calls, on October 31, 2011, law enforcement watched two body couriers (Yesenia Martinez and Karlina Gaskill) meet with Fonseca and Marta Ramirez-Cardenas at the McDonald's near the Otay Mesa Port of Entry around 1:40 p.m. to transfer methamphetamine to Fonseca and Ramirez. TECS records, intercepted calls, physical surveillance, the post-arrest admissions of Fonseca and Ramirez, and the admissions of one of the body couriers during her guilty plea all confirm that these events took place. They are also corroborated by the December 6, 2011 seizure of one pound of methamphetamine from Fonseca, Ramirez, and Martinez and Gaskill following a similar importation event.

After receiving a quantity of methamphetamine from the body couriers, Fonseca and Ramirez drove to Mariscos El Pescador, a seafood stand in Chula Vista. At 2:15 p.m., law enforcement observed Fonseca and

SIQUEIROS meeting at the fish stand. Based on the intercepted calls, I believe Fonseca transferred methamphetamine to SIQUEIROS.

SIQUEIROS was identified by law enforcement during the October 31, 2011 surveillance based on his California Department of Motor Vehicle photograph. The surveillance corresponded to intercepted calls. Agents were able to compare his voice from those calls to other calls that were not accompanied by surveillance. SIQUEIROS also provided his intercepted number to law enforcement officials on 11/07/2010.

STATEMENT OF FACTS

I, Special Agent Eric Woltz, declare under penalty of perjury, the following is true and correct:

The East County Regional Gang Task Force has been conducting a drug trafficking investigation into Monica Castro. During the course of that investigation, which involved court-authorized wiretap interceptions, MCCUSKER was identified as a sub-distributor for Castro. Based on intercepted calls, I believe MCCUSKER distributed methamphetamine with Castro and used Castro's telephone on numerous occasions to arrange methamphetamine transactions. MCCUSKER was intercepted in approximately 40 pertinent calls with Castro or with other methamphetamine customers using Castro's telephone between October 1, 2011 and December 14, 2011. She was intercepted using two different telephones, one of which was subscribed to her residence and in her father's name. The other telephone was subscribed in a false name. Castro addressed MCCUSKER by her first name in intercepted calls over both telephones. Some of those telephone calls are summarized below. To the extent that the intercepted parties used coded or veiled language, I have included my interpretation in brackets. My interpretation is based on my training and experience as well as the opinions of other agents who have been listening to Castro's telephone calls for several months.

On October 1, 2011 at 11:35 p.m., Bernardo Cardoza called MCCUSKER at Castro's telephone over 619-719-0957. Based on intercepted calls and some surveillance operations, I believe Cardoza purchased an "8-ball" [1/8th ounce of methamphetamine] from Castro approximately three times a week. MCCUSKER would periodically take these orders. On this occasion, Cardoza was attempting to put another customer in contact with MCCUSKER. Cardoza said, "Michelle [narcotics customer Michelle Bolden] just called me right now, um your friend Michelle, um, she's trying to find you cause she wants to get a seven [seven grams, or 1/4 ounce of methamphetamine] ... I've got her number here, do you want it?" MCCUSKER responded "I got it."

On October 2, 2011 at 11:07 a.m. Michelle Bolden called Castro's telephone and asked, "Is Lisa around?" MCCUSKER responded. "This is me." Bolden said, "I need, uh, the same thing I got from you [seven grams of methamphetamine] the other day." Bolden continued, "can you please make it happen, pretty please?" MCCUSKER agreed to call her back. Castro's telephone missed at least six calls from Bolden's number between 11:00 a.m. and 6:00 p.m. At 6:48 p.m. Bolden reached Castro. Castro said that she would have MCCUSKER return the call. MCCUSKER reached Bolden at 7:34 p.m. At that time, both women said they were enroute to each others houses. MCCUSKER directed Bolden to go to Bolden's house and indicated that she would meet her there. Bolden said, "go to my house though because I have my client [methamphetamine purchaser] with me. Bolden called Castro again at 7:54 p.m. to check on MCCUSKER's whereabouts. Castro said MCCUSKER was not at home. Bolden did not try to call Castro or MCCUSKER again supporting my belief that MCCUSKER delivered the requested quantity of methamphetamine to Bolden and her narcotics client.

On October 6, 2011 at 1:19 p.m., Cardoza called Castro at Castro's telephone over 619-719-0957. Cardoza advised that he had all of Castro's money and needed "to get another one [probably 1/8th ounce of methamphetamine]." Cardoza asked if Castro could come to him, but when she said that it would be a little while, Cardoza said he would try to find a ride. Cardoza called Castro two more times around 4:15 p.m. He told Castro that he made a wrong turn and would be right there.

At 4:16 p.m. law enforcement saw Arturo Gomez, with Cardoza as a passenger, park his van near MCCUSKER and Castro's residence on 36th Street. Law enforcement saw Cardoza, MCCUSKER and Castro meet near the parked van. Cardoza and Castro then walked into the gate surrounding MCCUSKER's yard and out of view of law enforcement. Moments later, at 4:18 p.m., agents saw an unidentified Hispanic male (UHM) leave MCCUSKER's residence and walk over to Gomez and MCCUSKER. The three spoke briefly until Cardoza returned to Gomez' vehicle at 4:20 p.m. Cardoza spoke briefly with MCCUSKER and the UHM before leaving in the van with Gomez. MCCUSKER was identified by law enforcement during this surveillance based on her California Department of Motor Vehicles photograph.

On October 10, 2011 at 9:48 p.m., Rachel Sanchez called MCCUSKER on Castro's telephone and asked, "It's 50 for a half [\$50 for a half a "teener" or 1/32nd ounce of methamphetamine] right?" MCCUSKER's response was unclear and Sanchez repeated, "50 for a half right [\$50 for 1/32nd ounce of methamphetamine]?" MCCUSKER answered, "Yep." Sanchez said, "Can he [unknown] get a half?" MCCUSKER said, "alright." Sanchez said, "I'm going to call you when he's outside."

On October 14, 2011 at 6:20 p.m., MCCUSKER called Castro at Castro's telephone over 619-255-3014. Castro said, "What up, hey some dude..." MCCUSKER interrupted and said, "I know, I met him around the corner right here At the market right here and he had some bomb ass weed [marijuana].- And I know him from the hood [neighborhood] though, he's from the 5/9 Brims [a criminal street gang]." MCCUSKER continued, "he wanted some shit [methamphetamine] and I told him, well um, you gotta call ... my home girl [Castro], I don't got it [MCCUSKER does not have methamphetamine to sell]." Castro responded, "how much [methamphetamine] does he want?" MCCUSKER asked, "How, what did he tell you?" CASTRO said, "he didn't tell me nothing, he just said for you [MCCUSKER] to call him." MCCUSKER responded, "I don't even know his number dog, alright." Based on other intercepted calls following this one, I believe Castro was supposed to deliver methamphetamine to MCCUSKER and the 5/9 Brim purchasers. The following day, on October 15, 2011 at 10:27 a.m., Castro called MCCUSKER. During the call MCCUSKER advised, "this dude's still waiting for some shit [methamphetamine] over here." Castro said, "Ok, how much?" MCCUSKER indicated that he wanted "50, 250 not 50" [\$250 worth of methamphetamine, possibly 7 grams of methamphetamine]. Castro responded, "ok, 50?" [\$50 worth of methamphetamine.] MCCUSKER's response was unclear. Castro said, "Ok, well you know what, I'll be up there."

SEALED

FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA 12 JAN 23 AM 9:00

UNITED STATES OF AMERICA,

Plaintiff,

v.

Timothy Joseph COSTELLO,

Defendant.

Magistrate Docket No. ^{FILED} U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

12 MJ 0230

COMPLAINT FOR VIOLATION OF ^{DEPUTY}

Title 21, U.S.C., Section 841(a)(1) and 846
Conspiracy to Distribute
Methamphetamine

The undersigned complainant, being duly sworn, states:

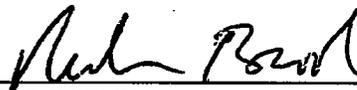
Beginning at a date unknown and continuing up to and including December 16, 2011, within the Southern District of California and elsewhere, defendant Timothy Joseph COSTELLO did knowingly and intentionally conspire with others including Elisa Turner, to distribute methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and 846.

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.



SIGNATURE OF COMPLAINANT
ERIC WOLTZ
SPECIAL AGENT, FBI

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 23rd DAY OF JANUARY, 2012.



HON. RUBEN B. BROOKS
UNITED STATES MAGISTRATE JUDGE

STATEMENT OF FACTS

I, Special Agent Eric Woltz, declare under penalty of perjury, the following is true and correct:

The East County Regional Gang Task Force has been conducting a drug trafficking investigation into Silvano Hernandez and Elisa Turner. During the course of that investigation, which involved court-authorized wiretap interceptions, COSTELLO was identified as a sub-distributor for Turner. COSTELLO was intercepted in at least 43 pertinent calls between November 26, 2011 and December 16, 2011. He was intercepted over Turner's telephone using a telephone subscribed in his own name. Turner also addressed COSTELLO by his first name (Tim) during intercepted calls. Some of those telephone calls are summarized below. To the extent that the intercepted parties used coded or veiled language, I have included my interpretation in brackets. My interpretation is based on my training and experience as well as the opinions of other agents who have been listening to Turner's telephone calls for several months.

On December 9, 2011 at 9:12 a.m., COSTELLO called Turner. Turner told COSTELLO that she was already ready. COSTELLO said, "Wow, by nine o'clock, huh, that's good." Turner replied, "Nine o'clock I'm ready, you know why?" Turner continued, "because I gotta go pick up [methamphetamine to deliver to others]." Turner said the words "pick up" very slowly and with emphasis. COSTELLO responded, "Crystal" [crystal methamphetamine], mimicking her tone. COSTELLO asked if it was going to take her all day. Turner said it wasn't going to take her all day to pick up, but that "it's always an all day thing" [distributing the methamphetamine takes her all day]. COSTELLO asked, "Did you finish that [methamphetamine], what you got last night, or no?" TURNER replied, "Yes, yes, I just gave it to Wyatt [Turner's sub-distributor Wyatt Edwards]."

On December 10, 2011, Turner and one of her sub-distributors, Steve Padilla, aka "Solo" exchanged several intercepted calls during which Turner indicated that she would resupply Padilla with "two" or "two and a half" [2-2.5 ounces of methamphetamine]. Ultimately, Turner directed Padilla to a gas station next to the hotel where she was living in Chula Vista. At 8:55 p.m., COSTELLO called Turner. Turner said "gas station." COSTELLO replied, "he's at the gas station?" Turner responded affirmatively and COSTELLO replied, "ok, bye." At 8:59 p.m. COSTELLO reported back to Turner that Padilla was not there. Turner then called Padilla and figured out that he was at the wrong location. Turner gave him additional directions and then at 9:00 p.m. called COSTELLO and explained what happened. Turner told COSTELLO to "call Solo [Padilla] and see where he's at" and then "come on back to the apartment [hotel where Turner was living]." At 9:02 p.m. law enforcement saw COSTELLO's truck (this truck is registered to his brother, who was in custody at the time, but COSTELLO has been seen driving it) arrive at the hotel. An individual I believe was COSTELLO went into Turner's room at the hotel. At 9:10 p.m., Padilla called Turner and reported that he was there [at the nearby gas station]. Turner directed Padilla to come to the hotel and park next to her car. Shortly thereafter, law enforcement saw a black Nissan pull into the parking lot. Law enforcement saw the same male, presumably COSTELLO, leave Turner's room and walk into the parking lot. He returned to Turner's room one minute later. The black Nissan then left the parking lot. Padilla was identified as the passenger during a traffic stop shortly thereafter. Although Padilla provided a false name, law enforcement was able to identify him from a photograph. The officers who conducted the traffic stop did not recover any narcotics.

On December 12, 2011, at approximately 1:49 p.m., COSTELLO placed a call to Turner. COSTELLO asked Turner what she was going to do, and Turner said, "Get ready, and um, I gotta collect money from everybody. In a little bit, I'll call you so you can see where you're at." Turner asked, "Are you going to work today?", COSTELLO replied, "No, yeah, call me cause I need to make some money so I can fuckin' pay for my bill before, um, before uh, tomorrow, so it don't get turned off." Turner asked, "Oh, you want some bomb [bomb is a slang word for methamphetamine] to sell or what do you mean?" No, I mean, no, but I mean I could do whatever, driving [deliver methamphetamine to Turner's buyers], whatever." Turner said ok, and then asked, "Do you want to sell [methamphetamine] or do you want like a job, like run[deliver methamphetamine]."

COSTELLO replied, "Either or." Turner said, "Alright, I got you." Turner said she would call COSTELLO in a little bit.

On December 13, 2011, law enforcement conducted surveillance at Turner's residence/hotel. At 8:09 a.m., law enforcement saw COSTELLO arrive in the same truck he was driving on December 10, 2011. At 8:20 a.m., he delivered what appeared to be Turner's laundry and left shortly thereafter. COSTELLO was identified this day based on his California Department of Motor Vehicles photograph. After COSTELLO left, Hernandez arrived and went inside Turner's room at the hotel. Surveillance was discontinued. Based on intercepted calls, it appears that Hernandez left shortly thereafter without delivering any methamphetamine. At approximately, 10:09 a.m., Turner called COSTELLO and said, "I need a p [methamphetamine pipe]." COSTELLO agreed to bring the "p" [pipe], some cigarettes, a dollar hamburger, and some alcohol. Turner then advised COSTELLO that "homeboy [Hernandez] came right and he didn't have nothing [methamphetamine]." COSTELLO replied, "He didn't?!" Turner said, "No, but he's [Hernandez is] coming right back [with the methamphetamine]." COSTELLO asked, "is it cool if I'm there?" Turner explained "he's going to come drop it off and leave" and indicated that she was not going to tell Hernandez that COSTELLO might be there.

On December 13, 2011, at 6:52 p.m., COSTELLO called Turner. Turner asked COSTELLO, "can you bring me Solo's money [Padilla's narcotics proceeds, based on calls intercepted between Turner and Padilla]?" Turner also directed COSTELLO to "give the toy [a firearm] to the Chino [Yeng Yang]." She continued, "The Chino [Yeng Yang] has to go do something for me." Turner promised to get "the toy" [firearm] back later that night. COSTELLO and Turner continued to discuss the collection of narcotics proceeds from various sub-distributors including "Little Whiskers" [Najum Barajas] and "Solo" [Padilla]. Yeng Yang was arrested the following day in one quarter-pound of methamphetamine and a firearm. Based on intercepted calls, however, it appears that the firearm came from Padilla. It is unclear who delivered the firearm. On December 14, 2011, at 9:49 p.m., Turner called Sara Macias (another sub-distributor) and advised, "That one fool Trigger [Yeng Yang], fucking, got busted [arrested] and he had Solo's fucking toy [handgun] too." Turner indicated that she was going to need to replace Padilla's firearm and discussed possibly giving Padilla the firearm that Macias had. Turner directed Macias to put money on Eddie's [a Turner associate in custody for murder] and Chino's [Yeng Yang] books [prison accounts].

SEALED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED

12 JAN 23 AM 9:05

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
12 MJ 0231
DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Harold Hughes WILLIAMS,

Defendant.

Magistrate Docket No.

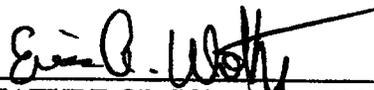
COMPLAINT FOR VIOLATION OF:

Title 21, U.S.C., Section 841(a)(1) and 846
Conspiracy to Distribute
Methamphetamine

The undersigned complainant, being duly sworn, states:

Beginning at a date unknown and continuing up to and including December 16, 2011, within the Southern District of California and elsewhere, defendant Harold Hughes WILLIAMS did knowingly and intentionally conspire with others including Elisa Turner, to distribute methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and 846.

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.



SIGNATURE OF COMPLAINANT
ERIC WOLTZ
SPECIAL AGENT, FBI

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 23rd DAY OF JANUARY, 2012.



HON. RUBEN B. BROOKS
UNITED STATES MAGISTRATE JUDGE

STATEMENT OF FACTS

I, Special Agent Eric Woltz, declare under penalty of perjury, the following is true and correct:

The East County Regional Gang Task Force has been conducting a drug trafficking investigation into Silvano Hernandez and Elisa Turner. During the course of that investigation, which involved court-authorized wiretap interceptions, WILLIAMS was identified as a sub-distributor for Turner. WILLIAMS was intercepted in approximately 19 pertinent calls between November 19, 2011 and December 16, 2011. All of the telephone calls took place with Turner over her intercepted line. WILLIAMS was intercepted using a telephone number subscribed in WILLIAMS' name at his residence. Turner also addressed WILLIAMS by his first name in numerous intercepted calls. Some of those telephone calls are summarized below. To the extent that WILLIAMS and Turner used coded or veiled language, I have included my interpretation in brackets. My interpretation is based on my training and experience as well as the opinions of other agents who have been listening to Turner's telephone calls for several months.

On December 4, 2011, at 11:43 a.m. Turner called WILLIAMS and asked him what was going on. WILLIAMS asked, "Are you working?" [Does Turner have methamphetamine to sell]? Turner said she did have work, but she just got back from Vegas. Turner told WILLIAMS to let her get settled and asked, "how much [methamphetamine] is it that you need, or what?" WILLIAMS responded, "a whole one" [one ounce of methamphetamine]. WILLIAMS asked when she could deliver it. TURNER told him she could do it within a couple of hours.

On December 4, 2011, at 5:43 p.m. WILLIAMS called Turner. During the conversation, Turner asked if WILLIAMS could give her some more time because she needed to collect some more money before she saw her "people" [her source of supply of methamphetamine]. WILLIAMS said he needed "one and a half now" [one and a half ounces of methamphetamine], and he could probably move "it" [his order] up to "two" [two ounces of methamphetamine], but "if it takes too much longer they'll [narcotics customers will] all be gone." Turner said she would call WILLIAMS back.

On December 8, 2011, at 6:27 p.m. WILLIAMS called Turner and ordered methamphetamine. Specifically, he said, "I could use a half [1/2 ounce of methamphetamine] if you, if I can get it here within [not] too much time." Turner agreed to resupply him, once she finished her makeup. Following that call, law enforcement observed Turner arrive at WILLIAMS' residence and enter the stairwell that leads to his apartment (and one other apartment).

On December 9, 2011, at 12:12 p.m. Turner called WILLIAMS and said she was trying to "get everybody while it's still early" [she was taking orders for methamphetamine after she got re-supplied from her source of methamphetamine], and asked if WILLIAMS needed "anything" [methamphetamine] that she could drop off to him. WILLIAMS said that he didn't have the money. Turner said that it was okay and she would drop it off anyway. WILLIAMS said he could use a "half" [half ounce of methamphetamine], and he could get "rid of it [sell the methamphetamine] by tomorrow." Turner asked, "If I gave you a whole one [one ounce of methamphetamine], could you get rid of it [sell it] within like two days?" WILLIAMS said he could, "For sure." Turner said, "Alright then, I got you, I'm going to drop off a whole one" [one ounce of methamphetamine]. WILLIAMS said, "Alright."

On December 9, 2011, at approximately 1:40 p.m. law enforcement conducted a traffic stop on Wyatt Edwards, another sub-distributor for Turner. Following the traffic stop, at 5:47 p.m. Edwards was intercepted telling Turner "the story" of the "really fucking close call" he had with law enforcement. Edwards said, "I got it [one ounce of methamphetamine] in my pocket and I'm trying to stash it in my waistband without him [the uniformed detective] seeing ... shit [methamphetamine] is all dangling down ... in front of my pants." Edwards continued, "I can't believe I pulled it off ... hanging out of my pants in plain [sight]." At the end of the call,

Turner instructed Edwards to go ahead and "give that [one ounce of methamphetamine] to Harold [WILLIAMS]." Turner advised Edwards that WILLIAMS was at home.

Later on December 9, 2011, at 7:51 p.m., Turner called WILLIAMS and said "I have a runner [Wyatt Edwards] going to you [WILLIAMS] right now." WILLIAMS responded, "he's here right now ... Wyatt's here."

On December 10, 2011, at 4:18 p.m., Turner called WILLIAMS. WILLIAMS advised her, "I got that if you want to come get it." Turner said, "I'm on my way right now." Based on calls Turner placed to other sub-distributors on the same day I believe WILLIAMS was advising Turner that he had narcotics proceeds available for her to pick-up.

STATEMENT OF FACTS

I, Special Agent Eric Woltz, declare under penalty of perjury, the following is true and correct:

The East County Regional Gang Task Force has been conducting a drug trafficking investigation into Silvano Hernandez and Elisa Turner. During the course of that investigation, which involved court-authorized wiretap interceptions, MARTINEZ was identified as a sub-distributor for Turner. MARTINEZ was intercepted in approximately 68 pertinent calls between October 8, 2011 and December 16, 2011. She was principally intercepted over Turner and Danny Yuhas's telephones. Both Yuhas and Turner addressed MARTINEZ by her first name during intercepted calls. Some of those telephone calls are summarized below. To the extent that the intercepted parties used coded or veiled language, I have included my interpretation in brackets. My interpretation is based on my training and experience as well as the opinions of other agents who have been listening to Turner and Yuhas's telephone calls for several months.

On October 17, 2011, at 1:38 p.m., Yuhas called Turner. Turner advised Yuhas that she would be on her way [to resupply him with methamphetamine] as soon as she finished getting ready. The two exchanged another call at 2:51 p.m. where Turner advised that she was not ready yet. At 4:11 p.m., Yuhas called Turner and asked for her "ETA" [estimated time of arrival]. Turner said that she was in Spring Valley [her supplier, Hernandez lives in Spring Valley]. Yuhas requested "half a loaf of bread" [1/2 ounce of methamphetamine]. Turner indicated that she was on her way. At 4:56 p.m., Yuhas called Turner's telephone and spoke with MARTINEZ. MARTINEZ gave Yuhas directions to a fast-food restaurant in Spring Valley off Interstate 94 and Sweetwater Springs Boulevard. At 5:35 p.m., MARTINEZ called Yuhas using Turner's telephone. MARTINEZ confirmed that they [MARTINEZ and Turner] were meeting Yuhas off the freeway. At 5:55 p.m. Yuhas called back and told Turner that he was inside the fast-food restaurant. At 6:02 p.m. Yuhas arrived at the restaurant, followed by Turner and MARTINEZ. Yuhas and Turner parked next to each other. MARTINEZ got out of Turner's Expedition and spoke to Yuhas while Turner got into the passenger seat of Yuhas' Explorer. Moments later Turner returned to her Expedition. Two minutes after the two vehicles first arrived in the parking lot, they departed. Turner and MARTINEZ left the area. Yuhas, however, exited the parking lot and returned a few moments later. Yuhas parked, got out of his Explorer, concealed an item [presumably, the 1/2 ounce of methamphetamine he ordered from Turner] in the driver's side front fender area [Yuhas has previously been seen taking something out this area of his vehicle immediately prior to selling methamphetamine to a confidential source]. Yuhas then went into the restaurant and surveillance was terminated. MARTINEZ was identified by law enforcement from her California Department of Motor Vehicles photograph during this surveillance. She was also captured on video meeting with Yuhas.

On December 15, 2011, at 9:07 p.m. Turner called MARTINEZ and asked if MARTINEZ had "given anything [methamphetamine] to Norman [Norman Norris, a methamphetamine customer of Turner's based on other intercepted calls and surveillance]." MARTINEZ said, "no, I haven't even touched it [the methamphetamine]." Turner explained that Norris was "stalking me" because "he's desperate ... needing bomb [methamphetamine]." MARTINEZ asked, "What do you want me to do?" Turner told MARTINEZ not to "give him shit [methamphetamine] because he's hounding all my people [sub-distributors]." MARTINEZ and Turner discussed whether MARTINEZ should deliver something to Turner's residence. MARTINEZ said, "I have it [methamphetamine] right now, so ..." Turner replied, "If you want, come over, if not, I don't care." Turner then asked "who are you trying to get rid of those two [ounces of methamphetamine] for?" MARTINEZ said she wasn't trying to get rid of any of it, and asked if it might be "the stuff [methamphetamine] that Wankel [unknown] has." Turner told her "nevermind."

On December 14, 2011, at 6:17 p.m., Turner called MARTINEZ and said, "some Asian guy named Jay, he, he needs a seven [seven grams of methamphetamine], can you get a seven ready for him?" MARTINEZ replied, "okay, okay, yeah." MARTINEZ said that she was with "Wankel," but would be home in about 20 minutes. Turner told MARTINEZ to take her time, but to let her know when she was ready so that Turner could send Jay "towards her way" [to MARTINEZ's house]. Turner then told MARTINEZ that if she had \$40, and

still wanted to get that "40" [\$40 worth of methamphetamine] that she could weigh herself out "half a T" [1/32nd ounce of methamphetamine]. MARTINEZ said "okay." Based on this telephone call, and others, I believe MARTINEZ was selling Turner's methamphetamine to others, like Jay, as instructed by Turner. In this case, Turner was also offering MARTINEZ methamphetamine for her own purchase and use.

SEALED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED

12 JAN 23 AM 9:14

Magistrate Docket No. 12 MJ 0233
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Mona Dennise LUERA,

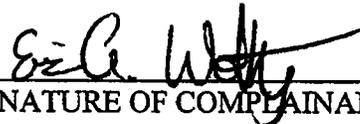
Defendant.

Magistrate Docket No. 12 MJ 0233
COMPLAINT FOR VIOLATION OF: DEPUTY
Title 21, U.S.C., Section 841(a)(1) and 846
Conspiracy to Distribute
Methamphetamine

The undersigned complainant, being duly sworn, states:

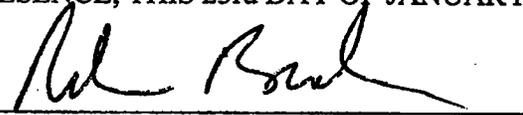
Beginning at a date unknown and continuing up to and including December 16, 2011, within the Southern District of California and elsewhere, defendant Mona Dennise LUERA did knowingly and intentionally conspire with others including Danny Yugas, to distribute methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and 846.

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.



SIGNATURE OF COMPLAINANT
ERIC WOLTZ
SPECIAL AGENT, FBI

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 23rd DAY OF JANUARY, 2012.



HON. RUBEN B. BROOKS
UNITED STATES MAGISTRATE JUDGE

STATEMENT OF FACTS

I, Special Agent Eric Woltz, declare under penalty of perjury, the following is true and correct:

The East County Regional Gang Task Force has been conducting a drug trafficking investigation into Daniel Yuhás. During the course of that investigation, which involved court-authorized wiretap interceptions, LUERA was identified as a sub-distributor for Yuhás. LUERA was intercepted in approximately 154 pertinent calls and text messages between September 30, 2011 and December 16, 2011. All of the telephone calls and text messages took place with Yuhás over his intercepted line. LUERA was intercepted using a telephone number subscribed in LUERA's name and to her residence. LUERA previously provided her intercepted telephone number to her parole officer on July 25, 2011. She also reported the subscriber address as her residence (and her mother's residence) in April 2011. Yuhás also addressed LUERA by her first and middle name in numerous intercepted calls (her name is not the same as her mother's name). Some of those telephone calls are summarized below. To the extent that LUERA and Yuhás used coded or veiled language, I have included my interpretation in brackets. My interpretation is based on my training and experience as well as the opinions of other agents who have been listening to Yuhás's telephone calls for several months.

On October 5, 2011, at 2:03 p.m., LUERA called Yuhás. During the conversation, LUERA said she was staying at her mother's house because she was afraid "they" were going to go by her house. Yuhás asked who she meant and LUERA responded, "them, TJ, I don't know. I still gotta pay them that money ..." [unidentified narcotics traffickers in Tijuana]. Yuhás asked, "When was the last time you paid them?" LUERA responded, "The last time I paid them was a week ago ... I don't have any more money to give them." Yuhás advised LUERA to pay the girl "that crossed it [imported methamphetamine] ... that took it [the methamphetamine] from homeboy's hands." At 9:03 p.m. LUERA and Yuhás discussed her narcotics debt again. LUERA was concerned, "I have to send my car ... they're fucking on me." Yuhás gave LUERA advice about how to handle the situation. He said, "whatever you have, you send. As long as they get some money, they're ok." Later he said, "as long as you're bringing that cuenta [bill] down, that's all that matters." Yuhás also recommended that she complain about the quality of the narcotics, "the work wasn't 100%" He advised her not to run and "not to bullshit them." Yuhás offered to intervene on her behalf and said, "they might even know who I am already ... I've been doing a lot of things with those guys in TJ." LUERA and Yuhás discussed selling additional methamphetamine to pay off the debt. LUERA said, "He [unknown] wants to send me more [methamphetamine]." Yuhás asked, "is it [the methamphetamine] good?" LUERA responded, "I don't know, the other one [the previous order of methamphetamine that LUERA owes the debt on] was ... it was decent, it was very good actually." Yuhás said, "it [the methamphetamine] kept you up all night, huh?" LUERA continued, "the stuff that I showed you, that when you shook it and the shards [methamphetamine crystals] fell out." Yuhás asked LUERA, "how much did he sell that [methamphetamine] to you for?" LUERA responded, "700 an ounce ... seven an ounce [\$700 per ounce of methamphetamine]." Yuhás said, "Tell them to send you another two [ounces of methamphetamine]." LUERA explained, "they want to send me a whole quarter [1/4 pound of methamphetamine]. Yuhás asked how much that would cost and LUERA said, "56 for the half ... half a pound [1/2 pound of methamphetamine]." Yuhás suggested, "tell him he's fucking nuts...that's too much" LUERA explained that the price included "the transport." Yuhás did not understand what she meant so LUERA explained, "for them to bring it [for the methamphetamine to be imported across the border]." Yuhás said, "that makes sense...that's ok ..." LUERA explained "the deal was that ... if I paid on time or whatever, the deal was that the next half would be half that price, total. So it would be, 56 [\$5600] would be for a whole half, a half a pound of meat [1/2 pound of methamphetamine]." Ultimately, Yuhás suggests that LUERA have them send "another two" [two ounces of methamphetamine] and he will help her sell it. LUERA agreed.

On October 6, 2011 at 7:24 p.m., LUERA called Yuhás and explained that she had spoken with the guy [the Tijuana methamphetamine distributor] and "he's going to give me a cheaper ticket [price] at five-hundred [\$500 per ounce of methamphetamine] ... good quality." LUERA continued, "cheaper ticket, that way I help him and he helps me." LUERA is explaining that getting the methamphetamine at a lower price benefits her supplier as well because LUERA can pay back her debt faster. Yuhás responded, "that will work, five [\$500

per ounce of methamphetamine] is good, that's a good price, and we can do something with that [sell the methamphetamine]. Tell him he'll have his money [that LUERA owes him] real quick."

Additional telephone calls were intercepted between Yuhas and LUERA on October 8 and October 9, 2011. According to those calls, LUERA had negotiated to purchase three ounces of methamphetamine but the suppliers only sent one [ounce of methamphetamine] with a courier through the pedestrian lanes at the San Ysidro Port of Entry.

On October 10, 2011, at 1:13 p.m., Yuhas called LUERA. LUERA explained a conversation she had with the unidentified Tijuana-based supplier about the methamphetamine pricing on future orders. She said that "yesterday" [the October 8-9, 2011 delivery of one ounce of methamphetamine] had been "a favor" because "I [the supplier] can't pay for them [couriers] to bring it [import the methamphetamine] to you, he said, at that price" [\$500 per ounce]. LUERA explained that "7" [\$700 per ounce] included "transportation" [the cost of importing the methamphetamine into the United States].

October 17, 2011 at 10:37 p.m., LUERA called Yuhas. YUHAS answered and said, "hey, yes or no?" LUERA responded affirmatively and said, "I'll just drop it [methamphetamine] off and get the money [narcotics proceeds]. YUHAS said, "go get the money." LUERA said, "no, I gotta go take the product [methamphetamine]." YUHAS asked, "you have to go get it baby?" LUERA responded, "well yeah I got to pick that up from you and then go take it [deliver the methamphetamine]." YUHAS counseled, "Yeah, they gotta bring the money girl. I don't want you to get burned [provide methamphetamine on credit and not get paid back]. LUERA reassured him, "I'm not going to get burned. I promise you. This is my cousin." In another call that day, at 5:07 p.m. LUERA called Yuhas and asked if he could "have something [methamphetamine], um, ready cause my cousin wants something [methamphetamine]. Yuhas asked, "what does he want?" LUERA responded, "just thirty [30 dollars worth of methamphetamine]." YUHAS said, "I'll be right there, bye."