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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

20CR00130-AB

UNITED STATES OF AMERICA,

CH. NO.

Plaintiff,

I N F O R M A T I O N

v.

MARK CHAVEZ,

Defendant.

[21 U.S.C. § 846: Conspiracy to Distribute and Possess With Intent to Distribute Methamphetamine and MDMA; 18 U.S.C. § 924(c)(1)(A)(i): Possession of Firearms in Furtherance of a Drug Trafficking Crime]

The United States Attorney charges:

COUNT ONE

[21 U.S.C. § 846]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown and continuing until on or about February 11, 2020, in Los Angeles County, within the Central District of California, defendant MARK CHAVEZ, and others known and unknown to the United States Attorney, conspired with each other to knowingly and intentionally distribute and possess with intent to distribute the following:

1           1.     at least 50 grams of methamphetamine, a Schedule II  
2 controlled substance, in violation of Title 21, United States Code,  
3 Sections 841(a)(1), (b)(1)(A)(viii); and

4           2.     3,4-methylenedioxymethamphetamine ("MDMA"), in violation of  
5 Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

6 B.     MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE  
7         ACCOMPLISHED

8           The objects of the conspiracy were to be accomplished, in  
9 substance, as follows:

10          1.     Defendant CHAVEZ would obtain methamphetamine from sources  
11 of supply.

12          2.     Defendant CHAVEZ would provide methamphetamine to co-  
13 conspirators for distribution by U.S. mail, to customers who ordered  
14 that methamphetamine on the dark web.

15          3.     Defendant CHAVEZ would direct co-conspirators to pick up  
16 drugs, including MDMA, purchased from international wholesale  
17 sellers, for further re-distribution around the world to customers  
18 who ordered those drugs on the dark web.

19 C.     OVERT ACTS

20           In furtherance of the conspiracy and to accomplish the objects  
21 of the conspiracy, on or about the following date, defendant CHAVEZ,  
22 and others known and unknown to the United States Attorney, committed  
23 various overt acts in Los Angeles County, within the Central District  
24 of California, and elsewhere, including, but not limited to, the  
25 following:

26          1.     On December 3, 2019, defendant CHAVEZ directed co-  
27 conspirator #1 to pick up packages containing MDMA that was ordered  
28 from an international wholesale seller of drugs.

1           2.    On January 13, 2020, defendant CHAVEZ met with co-  
2 conspirator #2 to examine drugs packaged for shipment by U.S. mail to  
3 customers who ordered those drugs on the dark web.

4           3.    On February 11, 2020, defendant CHAVEZ possessed, with  
5 intent to distribute, approximately 17.961 kilograms of a mixture and  
6 substance containing a detectable amount of methamphetamine.

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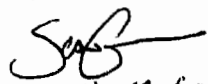
COUNT TWO

[18 U.S.C. § 924(c)(1)(A)(i)]

On or about February 11, 2020, in Los Angeles County, within the Central District of California, defendant MARK CHAVEZ knowingly possessed the following firearms in furtherance of a drug trafficking crime, namely, conspiracy to distribute and possess with intent to distribute methamphetamine, in violation of Title 21, United States Code, Section 846, as charged in Count One of this Information:

- (1) a Glock 23 .40 caliber pistol, bearing serial number NFK708;
- and
- (2) a Luger, model C9, 9 millimeter caliber pistol, with an obliterated serial number.

NICOLA T. HANNA  
United States Attorney

  
Scott M. Garringer  
Deputy Chief, Criminal Division For:

BRANDON D. FOX  
Assistant United States Attorney  
Chief, Criminal Division

CAROL A. CHEN  
Assistant United States Attorney  
Chief, International Narcotics,  
Money Laundering, and  
Racketeering Section

PUNEET V. KAKKAR  
KEITH ELLISON  
Assistant United States Attorneys  
International Narcotics, Money  
Laundering, and Racketeering  
Section