

**SEALED***Case Unsealed*

7-21-11

(LCA)

**FILED**

MAY 13 2011

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY *[Signature]* DEPUTYUNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

July 2010 Grand Jury

**11 CR 1926 H**

UNITED STATES OF AMERICA,

Case No.

Plaintiff,

**I N D I C T M E N T**

v.

VICTOR MANUEL FELIX-FELIX (1),

aka "Raul Castro Rodriguez",

aka "El Senor",

aka "063",

LUIS ROBERTO GARCIA-FIERRO (2),

aka "Arquitecto",

aka "069",

JORGE GUILLERMO

GONZALEZ-CARDENAS (3),

aka "Ingeniero",

RODRIGO COLMENARES Y

SANCHEZ-SOTO (4),

GABRIELA

VAZQUEZ-VILLAVICENCIO (5),

aka "Karla",

aka "Gaby",

aka "Monina",

JESUS RODOLFO

GUAJARDO-FARIAS (6),

aka "Doctor",

OSCAR DOMINGUEZ VILLA-DIAZ (7),

JOSE BENJAMIN VALDEZ-BERNAL (8),

RIGOBERTO DIAS-PANIAGUA (9),

EFRAIN DIAS-PANIAGUA (10),

LUIS HORACIO RAMIREZ

DE ARELLANO-MORALES (11),

MARIA RAQUEL BENITEZ (12),

ADALBERTO URBINA-GOMEZ (13),

CARLOS CAMET-RIVADENEYRA (14),

aka "Guero",

ARIEL JULIAN SAVEIN (15),

JOSE NIEVES

MONTENEGRO-FELIX (16),

aka "Charlie",

JRK:nlv-kst:San Diego  
5/13/1113 *veij*

1 ALEXIS FERNANDO )  
                   VELAZCO-HERRERA (17), )  
 2     aka "Percho", )  
    JUAN J. PIMENTEL (18), )  
 3 MARTIN MORALES-SOTO (19), )  
    JUAN CARLOS ALZATE (20), )  
 4     aka "Guero", )  
    JEFFREY JAMES BROWN (21), )  
 5 LINDA BROWN (22), )  
    aka "Sarah", )  
 6 NORMAN GILDARDO )  
                   CUENCA-HURTADO (23), )  
 7 DARREN P. COMANS (24), )  
    aka "Darren Commons", )  
 8 PATRICIA LOPEZ (25), )  
    aka "Susana", )  
 9 JOSE NICEFORO )  
                   GONZALEZ-RIVERA (26), )  
 10     aka "Raul", )  
    JOSE AUGUSTO )  
 11                   GONZALEZ-ROMAN (27), )  
    RONALD BLOCH (28), )  
 12 OSCAR LNU (29), )  
                   )   
 13                   Defendants. )  
 14                   )

15           The grand jury charges:

16                                   **INTRODUCTORY ALLEGATIONS**

17           1.     At all times pertinent to this indictment, the United States  
 18 Drug Enforcement Administration was conducting an investigation of the  
 19 cocaine trafficking and money laundering activities of individuals  
 20 located in several countries including the United States, Mexico,  
 21 Canada, Ecuador, and Colombia.

22           2.     At all times pertinent to this indictment, a United States  
 23 Drug Enforcement Administration (hereafter "DEA") undercover task  
 24 force officer (hereafter "undercover agent") was posing as a manager  
 25 of a world-wide criminal organization that could transport ton  
 26 quantities of narcotics and move millions of dollars in bulk currency  
 27 on behalf of drug trafficking organizations. Among other things, the  
 28 undercover agent represented to members of drug trafficking

1 organizations (hereafter referred to as "DTO" or "DTOs") that the  
2 agent could transport ton quantities of cocaine on their behalf from  
3 South America, Central America, and Mexico to other countries,  
4 including the United States and Canada. The undercover agent  
5 represented that the agent could assist the DTOs by picking up their  
6 drug trafficking proceeds in the form of bulk currency in the United  
7 States, Canada, and elsewhere, depositing the proceeds into a bank  
8 account located in San Diego, California, and wire transferring the  
9 proceeds (less a commission received by the undercover agent) to bank  
10 accounts specified by the DTOs or by physically delivering the  
11 currency to persons designated by the DTOs. The undercover agent  
12 represented that the agent could make the bank deposits and wire  
13 transfers in such a way as to avoid detection by law enforcement,  
14 thereby concealing the nature, location, source, ownership, and  
15 control of the currency. These activities are generally referred to  
16 at various times in the indictment as "money laundering" activities.

17 **MANNER AND MEANS OF THE CONSPIRACY**

18 1. It was a part of the conspiracy that coconspirators VICTOR  
19 MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez", aka "El Senor",  
20 aka "06B", LUIS ROBERTO GARCIA-FIERRO, aka "Arquitecto", aka "069",  
21 JORGE GUILLERMO GONZALEZ-CARDENAS, aka, "Ingeniero", RODRIGO  
22 COLMENARES Y SANCHEZ-SOTO, GABRIELA VAZQUEZ-VILLAVICENCIO,  
23 aka "Karla", aka "Gaby", aka "Monina", JESUS RODOLFO GUAJARDO-FARIAS,  
24 aka "Doctor", OSCAR DOMINGUEZ VILLA-DIAZ, JOSE BENJAMIN VALDEZ-BERNAL,  
25 RIGOBERTO DIAS-PANIAGUA, EFRAIN DIAS-PANIAGUA, and LUIS HORACIO  
26 RAMIREZ DE ARELLANO-MORALES, all of whom were residents of Mexico, and  
27 MARIA RAQUEL BENITEZ, who was a resident of the United States, would  
28 solicit the undercover DEA agent's assistance in laundering drug

1 proceeds including to arrange for the pick up of United States and  
2 Canadian currency in both the United States and Canada from couriers  
3 working with the DTOs including from couriers located in Monrovia,  
4 California; New York, New York; Chicago, Illinois; Pinkerington, Ohio;  
5 Houston, Texas; Braintree, Massachusetts; Vancouver, British Columbia,  
6 Canada; and Montreal, Quebec, Canada; deposit the currency in an  
7 undercover DEA bank account held in San Diego, California; wire-  
8 transfer the currency from the San Diego account to bank accounts  
9 specified by the coconspirators in New York, Florida, and California;  
10 and transport currency from San Diego to places within and outside the  
11 United States, all for the purpose of facilitating the international  
12 transportation and distribution of cocaine from Colombia and Ecuador  
13 for ultimate importation to the United States and elsewhere.

14       2. It was part of the conspiracy that coconspirators JUAN J.  
15 PIMENTEL, MARTIN MORALES-SOTO, JUAN CARLOS ALZATE, aka "Guero",  
16 JEFFREY JAMES BROWN, LINDA BROWN, aka "Sarah", NORMAN GILDARDO CUENCA-  
17 HURTADO, DARREN P. COMANS, aka "Darren Commons", PATRICIA LOPEZ,  
18 aka "Susana", RONALD BLOCH, and OSCAR LNU, all of whom were residents  
19 of the United States acting on behalf of the Mexico DTOs, delivered  
20 or attempted to deliver United States and/or Canadian currency, which  
21 constituted the proceeds of narcotics distribution, to undercover DEA  
22 agents, police officers, or informants in various cities in the United  
23 States including, Monrovia, California; New York, New York; Chicago,  
24 Illinois; Pinkerington, Ohio; and Braintree, Massachusetts.

25       3. It was part of the conspiracy that coconspirators, ADALBERTO  
26 URBINA-GOMEZ, CARLOS CAMET-RIVADENEYRA, ARIEL JULIAN SAVEIN,  
27 aka "Guero", JOSE AUGUSTO GONZALEZ-ROMAN, and JOSE NICEFORO GONZALEZ-  
28 RIVERA aka "Raul", who were residents of Canada and acting on behalf

1 of the Mexico DTOs, delivered United States and Canadian currency to  
2 undercover police officers in Vancouver, British Columbia, Canada; and  
3 Montreal, Quebec, Canada.

4 4. It was part of said conspiracy that ALEXIS FERNANDO VELAZCO-  
5 HERRERA, aka "Fercho", a resident of Colombia, would accept delivery  
6 of bulk currency on behalf of the Mexico DTOs in Bogota, Colombia.

7 5. It was part of said conspiracy that JOSE NIEVES MONTENEGRO-  
8 FELIX, aka "Charlie", received currency in San Diego, California,  
9 which constituted the proceeds of narcotics distribution.

10 Count 1

11 **OPERATING A CONTINUING CRIMINAL ENTERPRISE**

12 1. At various times material to this indictment:

13 a. Defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro  
14 Rodriguez", aka "El Senor", aka "063", was the organizer and leader  
15 of a narcotics distribution and money laundering organization based  
16 in Guadalajara, Jalisco, Mexico and in Mexico City, Mexico.

17 (1) Defendant LUIS ROBERTO GARCIA-FIERRO, aka  
18 "Arquitecto", was an associate and personal representative of  
19 defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez",  
20 aka "El Senor", aka "063", and assisted VICTOR MANUEL FELIX-FELIX in  
21 money laundering and narcotics distribution.

22 (2) Defendant JORGE GUILLERMO GONZALEZ-CARDENAS,  
23 aka "Ingeniero", was an associate of defendant VICTOR MANUEL FELIX-  
24 FELIX, aka "Raul Castro Rodriguez", aka "El Senor", aka "063", and  
25 assisted VICTOR MANUEL FELIX-FELIX, in money laundering and narcotics  
26 distribution.

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1 (3) Defendant RODRIGO COLMENARES Y SANCHEZ-SOTO, was  
2 an associate of defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro  
3 Rodriguez", aka "El Senor", aka "063", and assisted VICTOR MANUEL  
4 FELIX-FELIX in money laundering and narcotics distribution.

5 (4) Defendant OSCAR DOMINGUEZ VILLA-DIAZ was an  
6 associate of defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro  
7 Rodriguez", aka "El Senor", aka "063", and assisted VICTOR MANUEL  
8 FELIX-FELIX in money laundering and narcotics distribution.

9 (5) Defendant RIGOBERTO DIAS-PANIAGUA was an associate  
10 of defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez",  
11 aka "El Senor", aka "063", and assisted FELIX-FELIX in money  
12 laundering and narcotics distribution.

13 (6) Defendant EFRAIN DIAS-PANIAGUA was an associate  
14 of defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez",  
15 aka "El Senor", aka "063", and assisted FELIX-FELIX in money  
16 laundering and narcotics distribution.

17 (7) Defendant JOSE NIEVES MONTENEGRO-FELIX was an  
18 associate of defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro  
19 Rodriguez", aka "El Senor", aka "063", and assisted VICTOR MANUEL  
20 FELIX-FELIX in money laundering.

21 (8) Defendant LUIS HORACIO RAMIREZ DE ARELLANO-MORALES  
22 was an associate of VICTOR MANUEL FELIX-FELIX, aka "Raul Castro  
23 Rodriguez", aka "El Senor", aka "063", and assisted VICTOR MANUEL  
24 FELIX-FELIX in money laundering and narcotics distribution.

25 b. JORGE GUILLERMO GONZALEZ-CARDENAS, aka "Ingeniero", was  
26 the organizer and leader of a narcotics distribution and money  
27 laundering organization based in Guadalajara, Jalisco, Mexico and in  
28 Mexico City, Mexico.

1 (1) Defendant GABRIELA VAZQUEZ-VILLAVICENCIO,  
2 aka "Karla", aka "Gaby", aka "Monina", was an associate of JORGE  
3 GUILLERMO GONZALEZ-CARDENAS and assisted JORGE GUILLERMO GONZALEZ-  
4 CARDENAS in money laundering.

5 (2) Defendant JESUS RODOLFO GUAJARDO-FARIAS, aka  
6 "Doctor", was an associate of JORGE GUILLERMO GONZALEZ-CARDENAS and  
7 assisted JORGE GUILLERMO GONZALEZ-CARDENAS in money laundering.

8 (3) Defendant OSCAR DOMINGUEZ VILLA-DIAZ was an  
9 associate of JORGE GUILLERMO GONZALEZ-CARDENAS and assisted JORGE  
10 GUILLERMO GONZALEZ-CARDENAS in money laundering and narcotics  
11 distribution.

12 (4) Defendant RODRIGO COLMENARES Y SANCHEZ-SOTO was  
13 an associate of JORGE GUILLERMO GONZALEZ-CARDENAS and assisted JORGE  
14 GUILLERMO GONZALEZ-CARDENAS in money laundering and narcotics  
15 distribution.

16 (5) Defendant RIGOBERTO DIAS-PANIAGUA was an associate  
17 of JORGE GUILLERMO GONZALEZ-CARDENAS and assisted JORGE GUILLERMO  
18 GONZALEZ-CARDENAS in money laundering and narcotics distribution.

19 (6) Defendant EFRAIN DIAS-PANIAGUA was an associate  
20 of JORGE GUILLERMO GONZALEZ-CARDENAS and assisted JORGE GUILLERMO  
21 GONZALEZ-CARDENAS in money laundering and narcotics distribution.

22 (7) Defendant LUIS HORACIO RAMIREZ DE ARELLANO-MORALES  
23 was an associate of JORGE GUILLERMO GONZALEZ-CARDENAS and assisted  
24 JORGE GUILLERMO GONZALEZ-CARDENAS in money laundering and narcotics  
25 distribution.

26 2. Beginning on or about a date unknown to the grand jury and  
27 continuing up to and including March 18, 2011, within the Southern  
28 District of California, and elsewhere, defendants VICTOR MANUEL FELIX-

1 FELIX, aka "Raul Castro Rodriguez", aka "El Senor", aka "063", and  
2 JORGE GUILLERMO GONZALEZ-CARDENAS, aka "Ingeniero", did knowingly and  
3 intentionally engage in a continuing criminal enterprise by violating  
4 various felony provisions of the Controlled Substance Act (Title 21,  
5 United States Code, Sections 801, et seq.), punishable under Title 21,  
6 United States Code, Sections 841(b)(1)(A) or 960(b)(1)(B), including  
7 but not limited to conspiracy to import cocaine, conspiracy to  
8 distribute cocaine outside the United States, and distribution of  
9 cocaine outside the United States, in violation of Title 21, United  
10 States Code, Sections 841(a)(1), 952, 959, 960, and 963, as alleged in  
11 Counts 45 through 51 of this Indictment (said Counts being  
12 incorporated herein by reference).

13 3. The above-noted Controlled Substance Act violations were a  
14 part of a continuing series of violations of said Act, and were  
15 undertaken by defendants VICTOR MANUEL FELIX-FELIX, aka "Raul Castro  
16 Rodriguez", aka "El Senor", aka "063", and JORGE GUILLERMO GONZALEZ-  
17 CARDENAS, aka "Ingeniero", both of whom occupied positions of  
18 organizer, supervisor, and management, and from such continuing series  
19 of violations, defendants VICTOR MANUEL FELIX-FELIX, aka "Raul Castro  
20 Rodriguez", aka "El Senor", aka "063," and JORGE GUILLERMO GONZALEZ-  
21 CARDENAS, aka "Ingeniero", obtained substantial income and resources.  
22 All in violation of Title 21, United States Code, Section 848(a).

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Count 2

**CONSPIRACY TO LAUNDER MONETARY INSTRUMENTS**

1. The introductory allegations and the manner and means set forth above are incorporated as if set forth in full herein.

2. Beginning on a date unknown to the grand jury, and continuing to up to an including March 18, 2011, within the Southern District of California, and elsewhere, defendants VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez", aka "El Senior", aka "063", LUIS ROBERTO GARCIA-FIERRO, aka "Arquitecto", aka "069", JORGE GUILLERMO GONZALEZ-CARDENAS, aka "Ingeniero", RODRIGO COLMENARES Y SANCHEZ-SOTO, GABRIELA VAZQUEZ-VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", JESUS RODOLFO GUAJARDO-FARIAS, aka "Doctor", OSCAR DOMINGUEZ VILLADIAZ, JOSE BENJAMIN VALDEZ-BERNAL, RIGOBERTO DIAS-PANIAGUA, EFRAIN DIAS-PANIAGUA, LUIS HORACIO RAMIREZ DE ARELLANO-MORALES, MARIA RAQUEL BENITEZ, ADALBERTO URBINA-GOMEZ, CARLOS CAMET-RIVADENEYRA, aka "Guero", ARIEL JULIAN SAVEIN, JOSE NIEVES MONTENEGRO-FELIX, aka "Charlie", ALEXIS FERNANDO VELAZCO-HERRERA, aka "Fercho", JUAN J. PIMENTEL, MARTIN MORALES-SOTO, JUAN CARLOS ALZATE, aka "Guero", JEFFREY JAMES BROWN, LINDA BROWN, aka "Sarah", NORMAN GILDARDO CUENCA-HURTADO, DARREN P. COMANS, aka "Darren Commons", PATRICIA LOPEZ, aka "Susana", JOSE NICEFORO GONZALEZ-RIVERA, aka "Raul", JOSE AUGUSTO GONZALEZ-ROMAN, RONALD BLOCH, and OSCAR LNU, did knowingly combine, conspire and agree with each other and with other persons known and unknown to the grand jury to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956(h) and 1957, to wit:

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1           a. knowingly conduct and attempt to conduct financial  
2 transactions affecting interstate and foreign commerce, which involved  
3 the proceeds of specified unlawful activity, that is, narcotics  
4 distribution, with the intent to promote the carrying on of specified  
5 unlawful activity, that is, narcotics distribution, and that while  
6 conducting and attempting to conduct such transactions knew that the  
7 property involved in the financial transaction represented the  
8 proceeds of some form of unlawful activity in violation of Title 18,  
9 United States Code, Section 1956(a)(1)(A)(i); and

10           b. knowingly conduct and attempt to conduct financial  
11 transactions affecting interstate and foreign commerce, which  
12 transactions involved the proceeds of specified unlawful activity,  
13 that is, narcotics distribution, knowing that such transactions were  
14 designed in whole or in part to conceal and disguise the nature,  
15 location, source, ownership, and control of the proceeds of specified  
16 unlawful activity, that is, narcotics distribution, and that while  
17 conducting and attempting to conduct such financial transactions, knew  
18 that the property involved in the financial transactions represented  
19 the proceeds of some form of unlawful activity, in violation of  
20 Title 18, United States Code, Section 1956(a)(1)(B)(i); and

21           c. transport, transmit, and transfer, and attempt to  
22 transport, transmit, and transfer monetary instruments and funds from  
23 a place in the United States to and through a place outside the United  
24 States, with the intent to promote the carrying on of specified  
25 unlawful activity that is, narcotics distribution, in violation of  
26 Title 18, United States Code, Section 1956(a)(2)(A); and

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- 1           2.    On or about March 27, 2009, defendant JESUS RODOLFO  
2               GUAJARDO-FARIAS, aka "Doctor", made a telephone call to the  
3               undercover agent in San Diego, California and said that he  
4               had an operation that involved picking up narcotics proceeds  
5               in Mexico City and transporting the narcotics proceeds to  
6               Colombia.
- 7           3.    On or about April 1, 2009, in Carlsbad, California,  
8               defendant MARIA RAQUEL BENITEZ met with the undercover agent  
9               and informed the agent that she had recently traveled to  
10              Mexico City, Mexico where defendant JESUS RODOLFO GUAJARDO-  
11              FARIAS, aka "Doctor", had agreed to hire her and another  
12              individual to transport \$3 million from Mexico City to  
13              Colombia, but BENITEZ reported that the agreement fell  
14              through due to a dispute between BENITEZ and GUAJARDO-  
15              FARIAS.
- 16          4.    On or about June 3, 2009, in Panama City, Panama, defendants  
17               GABRIELA VAZQUEZ-VILLAVICENCIO, aka "Karla", aka "Gaby",  
18               aka "Monina", JESUS RODOLFO GUAJARDO-FARIAS, aka "Doctor",  
19               and JOSE BENJAMIN VALDEZ-BERNAL met with the undercover  
20               agent and said they were interested in obtaining the agent's  
21               services in picking up more than \$300 million, which they  
22               said was located in New York, New York; Los Angeles,  
23               California; and Houston, Texas, and both transporting the  
24               money by aircraft to Mexico and elsewhere and laundering the  
25               money through the banking system in the United States so  
26               that it could be accessed by the DTOs in Mexico.

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- 1           5.    On or about November 19, 2009, defendant JESUS RODOLFO  
2           GUAJARDO-FARIAS, aka "Doctor", made a telephone call to the  
3           undercover agent in San Francisco, California and asked the  
4           agent if the agent could conduct a bulk money pick up of  
5           \$10 million in New York, New York and \$10 million in  
6           Washington, D.C. and subsequently transport the money to  
7           Mexico City, Mexico.
- 8           6.    On or about November 20, 2009, defendant GABRIELA VAZQUEZ-  
9           VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", sent  
10          the undercover agent in San Francisco, California an instant  
11          text message, reporting that defendant JESUS RODOLFO  
12          GUAJARDO-FARIAS, aka "Doctor" was attempting to contact the  
13          agent because GUAJARDO-FARIAS was with the clients in  
14          New York and Washington, D.C.
- 15          7.    On or about November 25, 2009, defendant GABRIELA VAZQUEZ-  
16          VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", made  
17          a telephone call to the undercover agent in San Diego,  
18          California and reported that the money from Washington, D.C.  
19          had been moved to New York, that there were now \$50 million  
20          in New York, and that VAZQUEZ-VILLAVICENCIO would pay the  
21          agent a 5% commission to move the money to Mexico.
- 22          8.    On or about November 25, 2009, defendant GABRIELA VAZQUEZ-  
23          VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", sent  
24          an instant text message to the undercover agent in  
25          San Diego, California and provided the agent a direct-  
26          connect number for defendant RODRIGO COLMENARES Y SANCHEZ-  
27          SOTO, saying that defendant COLMENARES Y SANCHEZ-SOTO would  
28          be contacting the agent in New York.



- 1           9.     On or about November 25, 2009, defendant RODRIGO COLMENARES  
2           Y SANCHEZ-SOTO, made a telephone call to the undercover  
3           agent in San Diego, California and said there was a  
4           "contract" for the agent to pick up \$50 million and that  
5           COLMENARES Y SANCHEZ-SOTO would meet the agent in New York,  
6           New York on November 30, 2009.
- 7           10.    On or about November 30, 2009, in New York, New York,  
8           defendant RODRIGO COLMENARES Y SANCHEZ-SOTO met with the  
9           undercover agent at a hotel and said he, COLMENARES Y  
10          SANCHEZ-SOTO, and defendant GABRIELA VAZQUEZ-VILLAVICENCIO,  
11          aka "Karla", aka "Gaby", aka "Monina", wanted the agent to  
12          launder \$150 million through the United States banking  
13          system and/or transport the money from New York to Mexico  
14          City.
- 15          11.    On or about December 2, 2009, defendant RODRIGO COLMENARES  
16          Y SANCHEZ-SOTO made a telephone call to the undercover agent  
17          in New York, New York and said that his clients, who were  
18          Colombians, had cancelled the operation to launder and/or  
19          transport \$150 million from New York, New York to Mexico  
20          City.
- 21          12.    On or about December 2, 2009, in New York, New York,  
22          defendant RODRIGO COLMENARES Y SANCHEZ-SOTO, met with the  
23          undercover agent at a hotel and said he was trying to  
24          contact drug trafficking associates, who were from the State  
25          of Michoacan, Mexico who were associated with the La Familia  
26          drug cartel and who operated drug trafficking cells in  
27          New York, New York and Chicago, Illinois, for the purpose of

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1 having the agent launder the associates' narcotics proceeds  
2 from the United States to Mexico.

3 13. On or about January 19, 2010, defendant GABRIELA VAZQUEZ-  
4 VILLAVICENCIO aka "Karla", aka "Gaby", aka "Monina", sent an  
5 instant text message to the undercover agent in San Diego,  
6 California saying that she and others met with "El Senor",  
7 who was based in Guadalajara, Mexico, and that "El Senor"  
8 wanted the agent to pick up \$500,000, which was owned by the  
9 "strongest one from Sinaloa", in Vancouver, Canada.

10 14. On or about, January 27, 2010, defendant GABRIELA VAZQUEZ-  
11 VILLAVICENCIO aka "Karla", aka "Gaby", aka "Monina", sent an  
12 instant text message to the undercover agent in Vancouver,  
13 Canada instructing the agent to deposit money that was to be  
14 picked up in the future in Vancouver to the account of  
15 Vanguardia Casa de Bolsa, held at the Deutsche Bank, in  
16 New York, New York (hereafter "Vanguardia account") with the  
17 beneficiary of the deposit being "Merin Comercializadora."

18 15. On or about January 27, 2010, defendant RODRIGO COLMENARES  
19 Y SANCHEZ-SOTO made a telephone call to the undercover agent  
20 reporting that he would be releasing \$500,000 to defendant  
21 GABRIELA VAZQUEZ-VILLAVICENCIO, aka "Karla", aka "Gaby",  
22 aka "Monina", at the same time that the agent received  
23 \$500,000 in Vancouver.

24 16. On or about February 13, 2010, defendant JESUS RODOLFO  
25 GUAJARDO-FARIAS, aka "Doctor", made a telephone call to the  
26 undercover agent in Southern California and reported that  
27 defendant GABRIELA VAZQUEZ-VILLAVICENCIO, aka "Karla",  
28 aka "Gaby", aka "Monina", was in Spain negotiating a

1 contract to transport between \$360 million and \$400 million  
2 from Mexico to Spain and inquired as to when the agent could  
3 be ready to transport that money.

4 17. On or about February 14, 2010, defendant GABRIELA VAZQUEZ-  
5 VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", made  
6 a telephone call to the undercover agent in Southern  
7 California and reported that she had just returned from  
8 Spain and requested that the agent transport an unspecified  
9 amount of currency from Bogota, Colombia to Spain using the  
10 agent's private aircraft.

11 18. On or about February 15, 2010, defendant GABRIELA VAZQUEZ-  
12 VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", sent  
13 an instant text message to the undercover agent in San  
14 Diego, California, reporting that she wanted the agent to  
15 transport \$400 million, which she stated weighed  
16 approximately 30 tons, from Bogota, Colombia to Spain.

17 19. On or about March 29, 2010, defendant GABRIELA VAZQUEZ-  
18 VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", sent  
19 an instant text message to the undercover agent in  
20 San Diego, California saying she needed the agent to pick up  
21 \$200,000 in the Los Angeles, California area.

22 20. On or about March 29, 2010, defendant GABRIELA VAZQUEZ-  
23 VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", during  
24 a telephone call with the undercover agent in San Diego,  
25 California, instructed the agent to wire transfer the  
26 \$200,000 that the agent was to pick up in Los Angeles,  
27 California to the Vanguardia account.

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- 1           21. On or about March 29, 2010, defendant JESUS RODOLFO  
2           GUAJARDO-FARIAS, aka "Doctor", made a telephone call to the  
3           undercover agent in San Diego, California and told the agent  
4           that "Susana" was ready to deliver the money in Los Angeles,  
5           California.
- 6           22. On or about March 29, 2010, defendant GABRIELA VAZQUEZ-  
7           VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", sent  
8           instant text messages to the undercover agent in San Diego,  
9           California instructing the agent to call "Susana" at a  
10          specified telephone number and informing the agent that the  
11          owner of the money was a client of hers in Guadalajara,  
12          Mexico.
- 13          23. On or about March 30, 2010, in Monrovia, California, acting  
14          on behalf of defendant GABRIELA VAZQUEZ-VILLAVICENCIO,  
15          aka "Karla", aka "Gaby", aka "Monina", defendant PATRICIA  
16          LOPEZ, aka "Susana", delivered approximately \$109,000 in  
17          United States currency to an undercover agent.
- 18          24. On or about March 31, 2010, defendants GABRIELA VAZQUEZ-  
19          VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina",  
20          RODRIGO COLMENARES Y SANCHEZ-SOTO, and JESUS RODOLFO  
21          GUAJARDO-FARIAS, aka "Doctor", each made telephone calls to  
22          the undercover agent in San Diego, California and requested  
23          confirmation that the money picked up in Monrovia,  
24          California had been wire transferred from an account in  
25          San Diego, California to the Vanguardia account.
- 26          25. On or about March 31, 2010, during a telephone conversation  
27          with the undercover agent in San Diego, California,  
28          defendant GABRIELA VAZQUEZ-VILLAVICENCIO, aka "Karla",

1        aka "Gaby", aka "Monina", asked the agent to pick up  
2        \$1 million in New York, New York on behalf of her client in  
3        Guadalajara, Mexico.

4        26. On or about March 31, 2010, defendant GABRIELA VAZQUEZ-  
5        VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", sent  
6        an instant text message to the undercover agent in  
7        San Diego, California saying that the couriers who would be  
8        delivering the \$1 million in New York, New York would call  
9        the agent and would be using the code words, "Calling on  
10       behalf of Regina."

11       27. On or about March 31, 2010, defendant GABRIELA VAZQUEZ-  
12       VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", sent  
13       an instant text message to the undercover agent in  
14       San Diego, California saying that the code words had been  
15       changed from "Calling on behalf of Regina" to "King Crab."

16       28. On or about April 1, 2010, in New York, New York, acting on  
17       behalf of defendant GABRIELA VAZQUEZ-VILLAVICENCIO,  
18       aka "Karla", aka "Gaby", aka "Monina", an unidentified  
19       coconspirator delivered approximately \$199,935 in United  
20       States currency to an undercover agent.

21       29. On or about April 2, 2010, in New York, New York, an  
22       unidentified coconspirator acting on behalf of defendant  
23       GABRIELA VAZQUEZ-VILLAVICENCIO, aka "Karla", aka "Gaby",  
24       aka "Monina", delivered approximately \$200,220 in United  
25       States currency to an undercover agent.

26       30. On or about April 5, 2010, in New York, New York, defendant  
27       DARREN P. COMANS, aka "Darren Commons", acting on behalf of  
28       defendant GABRIELA VAZQUEZ-VILLAVICENCIO, aka "Karla",



1            aka "Gaby", aka "Monina", delivered approximately \$360,190  
2            in United States currency to an undercover agent.

3            31.    On or about April 6, 2010, defendants RODRIGO COLMENARES Y  
4            SANCHEZ-SOTO and JESUS RODOLFO GUAJARDO-FARIAS, aka  
5            "Doctor", made telephone calls to the undercover agent in  
6            San Diego, California and requested confirmation both that  
7            the money had been picked up in New York on April 1, 2010,  
8            April 2, 2010 and April 5, 2010, and that the money had been  
9            wire transferred to the Vanguardia account.

10          32.    On or about April 8, 2010, during an internet telephone  
11          call, defendant GABRIELA VAZQUEZ-VILLAVICENCIO, aka "Karla",  
12          aka "Gaby", aka "Monina", asked the undercover agent in  
13          San Diego, California, to pick up an unknown amount of  
14          currency in New York, New York and provided the agent with  
15          the telephone number for a courier who would be using the  
16          name of "Sarah."

17          33.    On or about April 8, 2010, in New York, New York, acting on  
18          behalf of defendant GABRIELA VAZQUEZ-VILLAVICENCIO, aka  
19          "Karla", aka "Gaby", aka "Monina", defendants LINDA BROWN  
20          aka "Sarah", and JEFFREY JAMES BROWN delivered approximately  
21          \$543,841 in United States currency to an undercover agent.

22          34.    On or about April 13, 2010, in Bogota, Colombia defendants  
23          GABRIELA VAZQUEZ-VILLAVICENCIO, aka "Karla", aka "Gaby",  
24          aka "Monina", and JOSE BENJAMIN VALDEZ-BERNAL met with the  
25          undercover agent to discuss arrangements for future currency  
26          pickups.

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- 1        35. On or about April 13, 2010, during the meeting in Bogota,  
2        Colombia, defendant GABRIELA VAZQUEZ-VILLAVICENCIO,  
3        aka "Karla", aka "Gaby", aka "Monina", directed the  
4        undercover agent to wire transfer the money previously  
5        delivered in New York, New York on April 8, 2010, which  
6        GABRIELA VAZQUEZ-VILLAVICENCIO said belonged to "Chapo",  
7        namely, Joaquin Guzman-Loera, aka Gilberto Osuna, aka Max  
8        Aregon, aka "El Chapo", the leader of the Sinaloa drug  
9        cartel (charged elsewhere), to the Vanguardia account.
- 10       36. On or about April 15, 2010, in San Diego, California,  
11       defendant RODRIGO COLMENARES Y SANCHEZ-SOTO met with the  
12       undercover agent and solicited the agent's assistance in  
13       transporting cocaine from Peru, to New York, New York on  
14       behalf of defendant JORGE GUILLERMO GONZALEZ-CARDENAS,  
15       aka "Ingeniero", and JORGE GUILLERMO GONZALEZ-CARDENAS' boss  
16       in Guadalajara, Mexico namely, defendant VICTOR MANUEL  
17       FELIX-FELIX, aka "Raul Castro Rodriguez", aka "El Senor",  
18       aka "063."
- 19       37. On or about April 16, 2010, in Vancouver, Canada, acting on  
20       behalf of defendant RODRIGO COLMENARES Y SANCHEZ-SOTO,  
21       defendant ARIEL JULIAN SAVEIN delivered approximately  
22       \$811,850 in Canadian currency and \$100 in United States  
23       currency to an undercover Vancouver police officer.
- 24       38. On or about May 1, 2010, during a telephone conversation  
25       with the undercover agent in San Diego, California,  
26       defendant RODRIGO COLMENARES Y SANCHEZ-SOTO requested that  
27       the undercover agent transport ton quantities of cocaine  
28       from Ecuador to Mexicali, Baja California, Mexico on behalf

1 of defendants VICTOR MANUEL FELIX-FELIX, aka "Raul Castro  
2 Rodriguez", aka "El Senor", aka "063", and JORGE GUILLERMO  
3 GONZALEZ-CARDENAS, aka "Ingeniero."

4 39. On or about May 5, 2010, in San Jose, Costa Rica, Central  
5 America, defendants RODRIGO COLMENARES Y SANCHEZ-SOTO, JORGE  
6 GUILLERMO GONZALEZ-CARDENAS, aka "Ingeniero", and OSCAR  
7 DOMINGUEZ VILLA-DIAZ met with the undercover agent and asked  
8 the agent to transport ton quantities of cocaine from  
9 Ecuador to Mexicali, Mexico with subsequent shipments to be  
10 made from Ecuador to the United States.

11 40. On or about May 8, 2010, during a telephone conversation  
12 with the undercover agent in San Diego, California,  
13 defendant RODRIGO COLMENARES Y SANCHEZ-SOTO requested that  
14 the agent quote a price for the transportation of two to  
15 three tons of cocaine from Ecuador to Los Angeles,  
16 California.

17 41. On or about May 18, 2010, during a telephone conversation  
18 with the undercover agent in San Diego, California,  
19 defendant RODRIGO COLMENARES Y SANCHEZ-SOTO requested that  
20 the agent pick up approximately \$970,000 in Canadian  
21 currency in Vancouver, Canada.

22 42. On or about May 19, 2010, in Vancouver, Canada, acting on  
23 behalf of defendant RODRIGO COLMENARES Y SANCHEZ-SOTO,  
24 defendant CARLOS CAMET-RIVADENEYRA, aka "Guero", delivered  
25 approximately \$968,105 in Canadian currency and \$175 in  
26 United States currency to an undercover Vancouver police  
27 officer.

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1       43. On or about May 21, 2010, in San Diego, California,  
2       defendant RODRIGO COLMENARES Y SANCHEZ-SOTO met with the  
3       undercover agent and informed the agent that he was ready to  
4       proceed with the operation to transport ton quantities of  
5       cocaine from Ecuador.

6       44. On or about May 27, 2010, during a telephone conversation  
7       with the undercover agent in San Diego, California defendant  
8       RODRIGO COLMENARES Y SANCHEZ-SOTO requested that the agent  
9       pick up \$500,000 in Houston, Texas.

10      45. On or about May 31, 2010, during a telephone conversation  
11      with the undercover agent in San Diego, California,  
12      defendant RODRIGO COLMENARES Y SANCHEZ-SOTO requested that  
13      the agent pick up \$399,000 in Vancouver, Canada, on behalf  
14      of defendants VICTOR MANUEL FELIX-FELIX, aka "Raul Castro  
15      Rodriguez", aka "El Senor", aka "063", and JORGE GUILLERMO  
16      GONZALEZ-CARDENAS, aka "Ingeniero."

17      46. On or about June 1, 2010, in Houston, Texas, acting on  
18      behalf of defendant RODRIGO COLMENARES Y SANCHEZ-SOTO,  
19      coconspirator Joel Pena Perez (charged elsewhere) delivered  
20      approximately \$524,820 to a confidential informant.

21      47. On or about June 3, 2010, in Vancouver, Canada, acting on  
22      behalf of defendant RODRIGO COLMENARES Y SANCHEZ-SOTO,  
23      defendant CARLOS CAMET-RIVADENEYRA, aka "Guero", delivered  
24      approximately \$394,900 in Canadian currency to an undercover  
25      Vancouver police officer.

26      48. On or about June 9, 2010, during a telephone conversation  
27      with the undercover agent in San Diego, California,  
28      defendant RODRIGO COLMENARES Y SANCHEZ-SOTO requested that

1 the agent pick up \$500,000 in Canadian currency in  
2 Vancouver, Canada and an unspecified amount of currency in  
3 New York, New York.

4 49. On or about June 15, 2010, in Montreal, Canada, acting on  
5 behalf of defendant RODRIGO COLMENARES Y SANCHEZ-SOTO,  
6 defendants JOSE NICEFORO GONZALEZ-RIVERA and JOSE AUGUSTO  
7 GONZALEZ-ROMAN delivered approximately \$785,180 in Canadian  
8 currency and \$178,501 in United States currency to  
9 undercover Quebec police officers.

10 50. On or about June 16, 2010, in New York, New York, acting on  
11 behalf of defendant RODRIGO COLMENARES Y SANCHEZ-SOTO,  
12 defendant JUAN CARLOS ALZATE, aka "Guero", delivered  
13 approximately \$389,580 in Canadian Currency and  
14 approximately \$360 in United States currency to an  
15 undercover detective.

16 51. On or about June 16, 2010, in Vancouver, Canada, acting on  
17 behalf of RODRIGO COLMENARES Y SANCHEZ-SOTO, defendants  
18 CARLOS CAMET-RIVADENEYRA, aka "Guero", and ADALBERTO URBINA-  
19 GOMEZ, delivered approximately \$524,020 in Canadian currency  
20 to an undercover Vancouver police officer.

21 52. On or about August 16, 2010, during a telephone conversation  
22 with the undercover agent in San Diego, California,  
23 defendant JORGE GUILLERMO GONZALEZ-CARDENAS, aka "Ingeniero"  
24 requested that the undercover agent pick up \$300,000 in  
25 Vancouver, Canada.

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1       53. On or about August 17, 2010, during a telephone conversation  
2       with the undercover agent in San Diego, California,  
3       defendant RODRIGO COLMENARES Y SANCHEZ-SOTO requested that  
4       the agent pick up \$500,000 in New York, New York.

5       54. On or about August 19, 2010, in New York, New York, acting  
6       on behalf of defendant RODRIGO COLMENARES Y SANCHEZ-SOTO,  
7       defendant NORMAN GILDARDO CUENCA-HURTADO carried a back pack  
8       containing approximately \$250,000 in United States currency  
9       to a meeting place where the money was seized by law  
10      enforcement officers.

11      55. On or about September 2, 2010, in Vancouver, Canada, acting  
12      on behalf of defendant JORGE GUILLERMO GONZALEZ-CARDENAS,  
13      aka "Ingeniero", two unidentified coconspirators delivered  
14      approximately \$175,410 in Canadian currency to an undercover  
15      Vancouver police officer.

16      56. On or about September 14, 2010, in Santo Domingo, Dominican  
17      Republic, defendants JORGE GUILLERMO GONZALEZ-CARDENAS, aka  
18      "Ingeniero", LUIS ROBERTO GARCIA-FIERRO, aka "Arquitecto",  
19      and RIGOBERTO DIAS-PANIAGUA met with the undercover agent,  
20      and during the meeting, LUIS ROBERTO GARCIA-FIERRO agreed to  
21      pay the agent \$4,000 per kilogram to transport a minimum of  
22      2,000 kilograms of cocaine from Ecuador to Mexico City (that  
23      is, \$8 million), or to pay the agent \$4,500 per kilogram to  
24      transport a minimum of 2,000 kilograms of cocaine from  
25      Ecuador to Los Angeles (that is, \$9 million).

26      57. On or about September 29, 2010, during a telephone  
27      conversation with the undercover agent in San Diego,  
28      California, defendant JORGE GUILLERMO GONZALEZ-CARDENAS,

1        aka "Ingeniero" told the agent that JORGE GUILLERMO  
2        GONZALEZ-CARDENAS would send a "trusted" person to meet with  
3        the agent in San Diego and that the "trusted" person would  
4        arrange for the delivery of \$3 million to the agent as a  
5        down payment for the agent's services in transporting  
6        2,000 kilograms of cocaine from Ecuador.

7        58. On or about October 1, 2010, in Del Mar, California, acting  
8        on behalf of defendant JORGE GUILLERMO GONZALEZ-CARDENAS,  
9        aka "Ingeniero", defendants EFRAIN DIAS-PANIAGUA and LUIS  
10       HORACIO RAMIREZ DE ARELLANO-MORALES met with the undercover  
11       agent and agreed to arrange for delivery of a \$3 million  
12       down payment to the agent for the agent's services in  
13       transporting at least 2,000 kilograms of cocaine from  
14       Ecuador to Mexico.

15       59. On or about October 4, 2010, defendant RODRIGO COLMENARES Y  
16       SANCHEZ-SOTO sent an email message to the undercover agent  
17       in San Diego, California, in which RODRIGO COLMENARES Y  
18       SANCHEZ-SOTO provided the names of individuals who would be  
19       delivering the \$3 million down payment to the agent.

20       60. On or about October 6, 2010, in Vancouver, Canada, acting on  
21       behalf of defendants JORGE GUILLERMO GONZALEZ-CARDENAS,  
22       aka "Ingeniero", and RODRIGO COLMENARES Y SANCHEZ-SOTO,  
23       defendant CARLOS CAMET-RIVADENEYRA, aka "Guero", delivered  
24       approximately \$3,291,970 in Canadian currency and \$8,060 in  
25       United States currency to an undercover Vancouver police  
26       officer.

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- 1           61. On or about November 4, 2010, in Guayaquil, Ecuador,  
2           defendants JORGE GUILLERMO GONZALEZ-CARDENAS, aka  
3           "Ingeniero", and LUIS ROBERTO GARCIA-FIERRO,  
4           aka "Arquitecto", met with the undercover agent and made  
5           arrangements to deliver two tons of cocaine to the agent.
- 6           62. On or about November 6, 2010, acting on behalf of defendants  
7           VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez",  
8           aka "El Senor", aka "063", LUIS ROBERTO GARCIA-FIERRO,  
9           aka "Arquitecto", JORGE GUILLERMO GONZALEZ-CARDENAS,  
10          aka "Ingeniero", RODRIGO COLMENARES Y SANCHEZ-SOTO, OSCAR  
11          DOMINGUEZ VILLA-DIAZ, RIGOBERTO DIAS-PANIAGUA, and EFRAIN  
12          DIAS-PANIAGUA, an unindicted coconspirator drove a cargo  
13          truck containing approximately 2,513 kilograms of cocaine  
14          from a location in Ecuador to a location outside of  
15          Guayaquil, Ecuador where it was seized by Ecuadorian  
16          National Police.
- 17          63. On or about November 10, 2010, during a telephone  
18          conversation with the undercover agent in San Diego,  
19          California, defendant RODRIGO COLMENARES Y SANCHEZ-SOTO,  
20          requested that the agent pick up \$500,000 in United States  
21          currency in Columbus, Ohio.
- 22          64. On or about November 16, 2010, in Pinkerington, Ohio, acting  
23          on behalf of defendant RODRIGO COLMENARES Y SANCHEZ-SOTO,  
24          defendant MARTIN MORALES-SOTO delivered \$429,830 in United  
25          States currency to a confidential informant.
- 26          65. On or about November 16, 2010, in a telephone conversation  
27          with the undercover agent in San Diego, California,  
28          defendant RODRIGO COLMENARES Y SANCHEZ-SOTO requested the

1 agent pick up \$500,000 in currency in New York, New York the  
2 next day.

3 66. On or about November 17, 2010, during a telephone  
4 conversation with the undercover agent in San Diego,  
5 California, defendant VICTOR MANUEL FELIX-FELIX, aka "Raul  
6 Castro Rodriguez", aka "El Senor", aka "063", requested that  
7 the agent coordinate the pick up of \$1 million in Canadian  
8 currency in Vancouver, Canada and transport it to Bogota,  
9 Colombia.

10 67. On or about November 17, 2010, during a telephone  
11 conversation with the undercover agent in San Diego,  
12 California, defendant RODRIGO COLMENARES Y SANCHEZ-SOTO  
13 agreed to pick up at least \$1 million in Vancouver, Canada,  
14 which constituted the currency to be delivered on behalf of  
15 VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez",  
16 aka "El Senor", aka "063", to the agent.

17 68. On or about November 18, 2010, acting on behalf of defendant  
18 RODRIGO COLMENARES Y SANCHEZ-SOTO, defendant JUAN J.  
19 PIMENTEL drove a vehicle containing approximately \$499,655  
20 in United States currency to a location in New York, New  
21 York for delivery to an undercover police officer.

22 69. On or about November 23, 2010, in Vancouver, Canada, acting  
23 on behalf of defendants VICTOR MANUEL FELIX-FELIX, aka "Raul  
24 Castro Rodriguez", aka "El Senor", aka "063", and RODRIGO  
25 COLMENARES Y SANCHEZ-SOTO, defendant CARLOS CAMET-  
26 RIVADENEYRA, aka "Guero", delivered \$998,910 in Canadian  
27 currency and \$20 in United States currency to an undercover  
28 Vancouver police officer.

- 1       70. On or about December 1, 2010, defendant VICTOR MANUEL FELIX-  
2       FELIX, aka "Raul Castro Rodriguez", aka "El Senor",  
3       aka "063", sent an email message to the undercover agent in  
4       Tampa, Florida containing the telephone number for "Fercho",  
5       who would coordinate the delivery of \$998,910, (less a  
6       "commission" charged by the undercover agent) in Bogota,  
7       Colombia.
- 8       71. On or about December 3, 2010, in Bogota, Colombia, acting on  
9       behalf of defendant VICTOR MANUEL FELIX-FELIX, aka "Raul  
10      Castro Rodriguez", aka "El Senor", aka "063", defendant  
11      ALEXIS FERNANDO VELAZCO-HERRERA, aka "Fercho", took delivery  
12      of \$846,600 from a confidential informant.
- 13      72. On or about December 3, 2010, defendant ALEXIS FERNANDO  
14      VELAZCO-HERRERA, aka "Fercho", transported \$346,600 in  
15      United States Currency and 96.95 million in Colombian pesos  
16      from Bogota, Colombia to Cali, Colombia where the money was  
17      seized by Colombian National Police.
- 18      73. On or about December 4, 2010, defendant GABRIELA VAZQUEZ-  
19      VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", sent  
20      an instant text message to the undercover agent in  
21      San Diego, California inquiring as to whether the agent  
22      could transport 500 kilograms of cocaine to Los Angeles,  
23      California.
- 24      74. On or about January 4, 2011, defendant RODRIGO COLMENARES Y  
25      SANCHEZ-SOTO made a telephone call to the undercover agent  
26      in San Diego, California and requested the agent pick up  
27      \$500,000 in Chicago, Illinois.

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- 1       75. On or about January 6, 2011, in Chicago, Illinois, acting on  
2       behalf of defendant RODRIGO COLMENARES Y SANCHEZ-SOTO,  
3       defendant OSCAR LNU delivered \$498,710 to an undercover  
4       officer.
- 5       76. On or about January 14, 2011, in Chicago, Illinois, acting  
6       on behalf of defendant RODRIGO COLMENARES Y SANCHEZ-SOTO,  
7       defendant OSCAR LNU delivered \$289,955 to an undercover  
8       officer.
- 9       77. On or about January 17, 2011, defendant VICTOR MANUEL FELIX-  
10      FELIX, aka "Raul Castro Rodriguez", aka "El Senior",  
11      aka "063", sent an email to the undercover agent in San  
12      Diego, California confirming that VICTOR MANUEL FELIX-FELIX  
13      would be arranging for the delivery of approximately 2,000  
14      kilograms of cocaine to the agent in Guayaquil, Ecuador.
- 15      78. On or about January 20, 2011, acting on behalf of defendant  
16      VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez",  
17      aka "El Senior", aka "063", an unindicted coconspirator  
18      delivered approximately 500 kilograms of cocaine to a  
19      confidential informant in Guayaquil, Ecuador.
- 20      79. On or about January 21, 2011, acting on behalf of defendant  
21      VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez", aka  
22      "El Senior", aka "063", an unindicted coconspirator  
23      delivered approximately 340 kilograms of cocaine to a  
24      confidential informant in Guayaquil, Ecuador.
- 25      80. On or about February 14, 2011, defendant JORGE GUILLERMO  
26      GONZALEZ-CARDENAS, aka "Ingeniero", made a telephone call to  
27      the undercover agent in San Diego, California and said that  
28      defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro

Rodriguez", aka "El Senior", aka "063" wanted the agent to transport an additional 200 kilograms of cocaine to Los Angeles, California in exchange for payment of an additional \$3 million to the agent upon arrival of the cocaine in Los Angeles.

81. On or about February 14, 2011, during a telephone conversation with the undercover agent in San Diego, California, defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez", aka "El Senior", aka "063" agreed to pay an additional down payment of \$1 million to the undercover agent for the agent's services in transporting approximately 1,040 kilograms of cocaine from Ecuador to Mexico.

82. On or about February 18, 2011, defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez", aka "El Senior", aka "063", sent an email to the undercover agent in San Diego, California containing both the phone number of the person who would deliver \$1,144,000 to the agent and instructions for the agent to use the code words, "Looking for Ernie on behalf of Bert."

83. On or about February 19, 2011, in Braintree, Massachusetts, acting on behalf of defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez", aka "El Senior", aka "063", defendant RONALD BLOCH delivered \$1,143,875 in United States currency to an undercover officer.

84. On or about February 19, 2011, defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez", aka "El Senior", aka "063", made a telephone call to the undercover agent in San Diego, California, confirmed the delivery of

1 approximately \$1.4 million in Braintree, Massachusetts, and  
2 requested that the agent deliver approximately \$144,000 of  
3 those funds to "Alex" in San Diego, California.

4 85. On or about February 21, 2011, defendant VICTOR MANUEL  
5 FELIX-FELIX, aka "Raul Castro Rodriguez", aka "El Senior",  
6 aka "063", made a telephone call to the undercover agent in  
7 San Diego, California and instructed him to deliver \$134,000  
8 to "Alex" in San Diego and transport \$10,000 to Ecuador for  
9 payment of the truck driver who delivered the cocaine in  
10 Guayaquil, Ecuador on January 20 and 21, 2011.

11 86. On or about February 22, 2011, defendant VICTOR MANUEL  
12 FELIX-FELIX, aka "Raul Castro Rodriguez", aka "El Senior",  
13 aka "063", sent an email to the undercover agent in  
14 San Diego, California instructing the agent to contact  
15 "Charlie" at a San Diego, California telephone number for  
16 the purpose of the agent delivering approximately \$134,000  
17 to "Charlie."

18 87. On or about February 23, 2011, in La Jolla, California,  
19 defendant JOSE NIEVES MONTENEGRO-FELIX, aka "Charlie", met  
20 with an undercover agent and took delivery of approximately  
21 \$133,875 from the agent.

22 88. On or about March 7, 2011, defendant VICTOR MANUEL FELIX-  
23 FELIX, aka "Raul Castro Rodriguez", aka "El Senior",  
24 aka "063", sent an email to the undercover agent in  
25 San Diego, California, reporting that he was ready to  
26 deliver an additional 770 kilograms of cocaine to the agent  
27 in Guayaquil, Ecuador.

28 //

1 89. On or about March 13, 2011, acting on behalf of defendant  
2 VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez",  
3 aka "El Senior", aka "063", an unindicted coconspirator  
4 delivered approximately 340 kilograms of cocaine to a  
5 confidential informant in Guayaquil, Ecuador.

6 90. On or March 13, 2011, defendant VICTOR MANUEL FELIX-FELIX,  
7 aka "Raul Castro Rodriguez", aka "El Senior", aka "063",  
8 sent an email to the undercover agent in Guayaquil, Ecuador  
9 confirming that the 340 kilograms of cocaine were delivered.

10 91. On or about March 17, 2011, in Guayaquil, Ecuador, acting on  
11 behalf of behalf of defendant VICTOR MANUEL FELIX-FELIX,  
12 aka "Raul Castro Rodriguez", aka "El Senior", aka "063", an  
13 unindicted coconspirator drove a truck containing  
14 approximately 430 kilograms of cocaine from a warehouse near  
15 Guayaquil, Ecuador where it was seized by Ecuadorian  
16 National Police officers.

17 92. On or about March 17, 2011, defendant VICTOR MANUEL FELIX-  
18 FELIX, aka "Raul Castro Rodriguez", aka "El Senior",  
19 aka "063", sent an email to the undercover agent in  
20 Guayaquil, Ecuador to confirm the delivery of 430 kilograms  
21 of cocaine in which VICTOR MANUEL FELIX-FELIX said that the  
22 "contract had been signed."

23 All in violation of Title 18, United States Code, Section 1956(h).

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Counts 3 Through 24

**LAUNDERING OF MONETARY INSTRUMENTS**

1. The introductory allegations and the manner and means set forth above are incorporated as if set forth in full herein.

2. On or about the dates set forth below within the Southern District of California and elsewhere, the defendants JORGE GUILLERMO GONZALEZ-CARDENAS, aka "Ingeniero" (hereafter referred to as "GONZALEZ"), RODRIGO COLMENARES Y SANCHEZ-SOTO (hereafter referred to as "COLMENARES"), GABRIELA VAZQUEZ-VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina" (hereafter referred to as "VAZQUEZ"), and JESUS RODOLFO GUAJARDO-FARIAS, aka "Doctor" (hereafter referred to as "GUAJARDO"), did knowingly conduct and attempt to conduct the following financial transactions affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity, that is, narcotics distribution, (a) with the intent to promote the carrying on of said specified unlawful activity, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity; and (b) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity:

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<u>COUNT</u>	<u>DEFENDANT</u>	<u>DATE</u>	<u>MONETARY TRANSACTION</u>
3	VAZQUEZ COLMENARES GUAJARDO	March 30, 2010	\$102,460 Wire Transfer from the Bank of America, San Diego, California to a bank account held at Deutsche Bank, New York, New York
4	VAZQUEZ COLMENARES GUAJARDO	April 1, 2010	\$185,964.55 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
5	VAZQUEZ COLMENARES GUAJARDO	April 5, 2010	\$334,976.70 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
6	VAZQUEZ COLMENARES GUAJARDO	April 5, 2010	\$186,204.60 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
7	VAZQUEZ COLMENARES GUAJARDO	April 9, 2010	\$505,772.13 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
8	COLMENARES	April 21, 2010	\$500,000 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
9	COLMENARES	April 26, 2010	\$251,692.05 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
10	COLMENARES	May 21, 2010	\$450,744 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
11	COLMENARES	May 21, 2010	\$358,222.12 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York



<u>COUNT</u>	<u>DEFENDANT</u>	<u>DATE</u>	<u>MONETARY TRANSACTION</u>
12	COLMENARES	June 2, 2010	\$490,864.15 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
13	COLMENARES	June 8, 2010	\$330,428.63 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
14	COLMENARES	June 17, 2010	\$205,000 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
15	COLMENARES	June 22, 2010	\$244,949.31 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
16	GONZALEZ	September 8, 2010	\$108,577.84 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
17	COLMENARES	October 22, 2010	\$30,850 Wire Transfer from Bank of America, San Diego, California to Citibank, New York, New York
18	COLMENARES	November 19, 2010	\$402,000 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
19	COLMENARES	December 1, 2010	\$9,041.16 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
20	COLMENARES	December 1, 2010	\$3,830 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York

<u>COUNT</u>	<u>DEFENDANT</u>	<u>DATE</u>	<u>MONETARY TRANSACTION</u>
21	GONZALEZ	December 8, 2010	\$8,466 Wire Transfer from Bank of America, San Diego, California to Banco Nacional de Mexico, Mexico City, Mexico
22	COLMENARES	January 10, 2011	\$463,800.30 Wire Transfer from Bank of America, San Diego, California to Bank of America, Miami, Florida
23	COLMENARES	January 20, 2011	\$254,955 Wire Transfer from Bank of America, San Diego, California to Bank of America, Miami, Florida
24	COLMENARES	February 1, 2011	\$9,987.10 Bank Transfer from Bank of America, San Diego, California to Bank of America, Cambria, California

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), (a)(1)(B)(i), and 2.

Counts 25 through 42

**MONETARY TRANSACTIONS GREATER THAN \$10,000**

1. The introductory allegations and the manner and means set forth above are incorporated as if set forth in full herein.

2. On or about the dates set forth below, within the Southern District of California and elsewhere, defendants GABRIELA VAZQUEZ-VILLAVICENCIO, aka, "Karla", aka "Gaby", aka "Monina", (hereafter referred to as "VAZQUEZ"), RODRIGO COLMENARES Y SANCHEZ-SOTO (hereafter referred to as "COLMENARES"), and JESUS RODOLFO GUAJARDO-FARIAS, aka, "Doctor" (hereafter referred to as "GUAJARDO"), did knowingly engage and attempt to engage, in monetary transactions, by, through, and to a financial institution, affecting interstate and

1 foreign commerce, in criminally derived property of a value greater  
 2 than \$10,000, that is, transfer of monetary instruments, such property  
 3 having been derived from a specified unlawful activity, that is,  
 4 narcotics distribution:

5	<u>COUNT</u>	<u>DEFENDANT</u>	<u>DATE</u>	<u>MONETARY TRANSACTION</u>
6	25	VAZQUEZ	March 30, 2010	\$102,460 Wire Transfer
7		COLMENARES		from the Bank of America,
8		GUAJARDO		San Diego, California to
9	26	VAZQUEZ	April 1, 2010	\$185,964.55 Wire Transfer
10		COLMENARES		from Bank of America,
11		GUAJARDO		San Diego, California to
12	27	VAZQUEZ	April 5, 2010	\$344,976.70 Wire Transfer
13		COLMENARES		from Bank of America,
14		GUAJARDO		San Diego, California to
15	28	VAZQUEZ	April 5, 2010	\$186,204.60 Wire Transfer
16		COLMENARES		from Bank of America,
17		GUAJARDO		San Diego, California to
18	29	VAZQUEZ	April 9, 2010	\$505,772.13 Wire Transfer
19		COLMENARES		from Bank of America,
20		GUAJARDO		San Diego, California to
21	30	COLMENARES	April 21, 2010	\$500,000 Wire Transfer
22				from Bank of America,
23				San Diego, California to
24	31	COLMENARES	April 26, 2010	\$251,692.05 Wire Transfer
25				from Bank of America,
26				San Diego, California to
27	32	COLMENARES	May 21, 2010	\$450,744.00 Wire Transfer
28				from Bank of America,
				San Diego, California to
				Deutsche Bank, New York,
				New York

<u>COUNT</u>	<u>DEFENDANT</u>	<u>DATE</u>	<u>MONETARY TRANSACTION</u>
33	COLMENARES	May 21, 2010	\$358,222.12 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
34	COLMENARES	June 2, 2010	\$490,864.15 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
35	COLMENARES	June 8, 2010	\$330,428.63 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
36	COLMENARES	June 17, 2010	\$205,000 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
37	COLMENARES	June 22, 2010	\$244,949.31 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
38	GONZALEZ	September 8, 2010	\$108,577.84 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
39	COLMENARES	October 22, 2010	\$30,850 Wire Transfer from Bank of America, San Diego, California to Citibank, New York, New York
40	COLMENARES	November 19, 2010	\$402,000 Wire Transfer from Bank of America, San Diego, California to Deutsche Bank, New York, New York
41	COLMENARES	January 10, 2011	\$463,800.30 Wire Transfer from Bank of America, San Diego, California to Bank of America, Miami, Florida

<u>COUNT</u>	<u>DEFENDANT</u>	<u>DATE</u>	<u>MONETARY TRANSACTION</u>
42	COLMENARES	January 20, 2011	\$254,955 Wire Transfer from Bank of America, San Diego, California to Bank of America, Miami, Florida

All in violation of Title 18, United States Code, Sections 1957 and 2.

Count 43

**TRANSPORTATION OF MONETARY INSTRUMENTS  
FROM THE UNITED STATES TO COLOMBIA**

1. The introductory allegations and the manner and means set forth above are incorporated as if set forth in full herein.

2. On or about December 3, 2010, within the Southern District of California and elsewhere, defendants VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez", aka "El Senor", aka "063" and RODRIGO COLMENARES Y SANCHEZ-SOTO did transport and transfer and attempt to transport and transfer monetary instruments, that is, \$846,600 in United States Currency, from a place in the United States, that is, San Diego, California, to and through a place outside the United States, that is, Bogota, Colombia: (a) with the intent to promote the carrying on of specified unlawful activity, that is, narcotics distribution; and (b) knowing that the monetary instruments involved in the transportation and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation and transfer was designed in whole and in part to conceal and disguise the nature, location, the source, ownership, and control of the proceeds of the specified unlawful activity, that is, narcotics distribution; all in violation of Title 18, United States Code, Sections 1956(a)(2)(A), (a)(2)(B)(i), and 2.

Count 44

**TRANSPORTATION OF MONETARY INSTRUMENTS  
FROM THE UNITED STATES TO ECUADOR**

1. The introductory allegations and the manner and means set forth above are incorporated as if set forth in full herein.

2. On or about March 1, 2011, within the Southern District of California and elsewhere, defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez", aka "El Senor", aka "063", did transport and transfer and attempt to transport and transfer monetary instruments, that is, \$10,000 in United States Currency, from a place in the United States, that is, San Diego, California, to and through a place outside the United States, that is, Ecuador: (a) with the intent to promote the carrying on of specified unlawful activity, that is, narcotics distribution; and (b) knowing that the monetary instruments involved in the transportation and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation and transfer was designed in whole and in part to conceal and disguise the nature, location, the source, ownership, and control of the proceeds of the specified unlawful activity, that is, narcotics distribution; all in violation of Title 18, United States Code, Sections 1956(a)(2)(A), (a)(2)(B)(i), and 2.

Count 45

**CONSPIRACY TO DISTRIBUTE COCAINE OUTSIDE THE UNITED STATES**

1. The introductory allegations and the manner and means set forth above are incorporated as if set forth in full herein.

2. Beginning on a date unknown to the grand jury and continuing up to and including on or March 18, 2011, within the Southern District of California and elsewhere, defendants VICTOR MANUEL FELIX-FELIX,



1 aka "Raul Castro Rodriguez", aka "El Senor", aka "063", LUIS ROBERTO  
 2 GARCIA-FIERRO, aka "Arquitecto", JORGE GUILLERMO GONZALEZ-CARDENAS,  
 3 aka "Ingeniero", RODRIGO COLMENARES Y SANCHEZ-SOTO, GABRIELA VAZQUEZ-  
 4 VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", JESUS RODOLFO  
 5 GUAJARDO-FARIAS, aka "Doctor", OSCAR DOMINGUEZ VILLA-DIAZ, JOSE  
 6 BENJAMIN VALDEZ-BERNAL, RIGOBERTO DIAS-PANIAGUA, EFRAIN DIAS-PANIAGUA,  
 7 and LUIS HORACIO RAMIREZ DE ARELLANO-MORALES did knowingly and  
 8 intentionally conspire together and with each other, and with other  
 9 persons known and unknown to the grand jury, to distribute 5 kilograms  
 10 and more, to wit: approximately 4,123 kilograms (approximately 9,070  
 11 pounds) of cocaine, a Schedule II Controlled Substance, intending and  
 12 knowing that such cocaine would be unlawfully imported into the United  
 13 States; all in violation of Title 21, United States Code, Sections 959  
 14 and 960.

#### 15 OVERT ACTS

16 The overt acts set forth in Count Two above are incorporated as  
 17 if set forth in full herein.

18 All in violation of Title 21, United States Code, Section 963.

#### 19 Count 46

#### 20 DISTRIBUTION OF COCAINE OUTSIDE THE UNITED STATES

21 1. The introductory allegations and the manner and means set  
 22 forth above are incorporated as if set forth in full herein.

23 2. On or about November 6, 2010, in Guayaquil, Ecuador,  
 24 defendants VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez",  
 25 aka "El Senor", aka "063", JORGE GUILLERMO GONZALEZ-CARDENAS,  
 26 aka "Ingeniero", LUIS ROBERTO GARCIA-FIERRO, aka "Arquitecto", RODRIGO  
 27 COLMENARES Y SANCHEZ-SOTO, OSCAR DOMINGUEZ VILLA-DIAZ, RIGOBERTO DIAS-  
 28 PANIAGUA, EFRAIN DIAS-PANIAGUA did knowingly and intentionally

1 distribute 5 kilograms and more, to wit, approximately 2,513 kilograms  
2 (approximately 5,528 pounds) of cocaine, a Schedule II Controlled  
3 Substance, intending and knowing that the cocaine would be unlawfully  
4 imported into the United States; in violation of Title 21, United  
5 States Code, Sections 959, 960, and 963, and Title 18, United States  
6 Code, Section 2.

7 Count 47

8 **DISTRIBUTION OF COCAINE OUTSIDE THE UNITED STATES**

9 1. The introductory allegations and the manner and means set  
10 forth above are incorporated as if set forth in full herein.

11 2. On or about January 20, 2011, in Guayaquil, Ecuador,  
12 defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez",  
13 aka "El Senor", aka "063", did knowingly and intentionally distribute  
14 5 kilograms and more, to wit, approximately 500 kilograms  
15 (approximately 1,100 pounds) of cocaine, a Schedule II Controlled  
16 Substance, intending and knowing that the cocaine would be unlawfully  
17 imported into the United States; in violation of Title 21 United  
18 States Code, Sections 959, 960, and 963, and Title 18, United States  
19 Code, Section 2.

20 Count 48

21 **DISTRIBUTION OF COCAINE OUTSIDE THE UNITED STATES**

22 1. The introductory allegations and the manner and means set  
23 forth above are incorporated as if set forth in full herein.

24 2. On or about January 21, 2011, in Guayaquil, Ecuador,  
25 defendant VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez",  
26 aka "El Senor", aka "063", did knowingly and intentionally distribute  
27 5 kilograms and more, to wit, approximately 340 kilograms  
28 (approximately 748 pounds) of cocaine, a Schedule II Controlled

1 Substance, intending and knowing that the cocaine would be unlawfully  
2 imported into the United States; in violation of Title 21 United  
3 States Code, Sections 959, 960, and 963, and Title 18, United States  
4 Code, Section 2.

5 Count 49

6 **DISTRIBUTION OF COCAINE OUTSIDE THE UNITED STATES**

7 1. The introductory allegations and the manner and means set  
8 forth above are incorporated as if set forth in full herein.

9 2. On or about March 13, 2011, in Guayaquil, Ecuador,  
10 defendants VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez",  
11 aka "El Senor", aka "063", and LUIS ROBERTO GARCIA-FIERRO,  
12 aka "Arquitecto", did knowingly and intentionally distribute  
13 5 kilograms and more, to wit, approximately 340 kilograms  
14 (approximately 748 pounds) of cocaine, a Schedule II Controlled  
15 Substance, intending and knowing that the cocaine would be unlawfully  
16 imported into the United States; in violation of Title 21 United  
17 States Code, Sections 959, 960, and 963, and Title 18, United States  
18 Code, Section 2.

19 Count 50

20 **DISTRIBUTION OF COCAINE OUTSIDE THE UNITED STATES**

21 1. The introductory allegations and the manner and means set  
22 forth above are incorporated as if set forth in full herein.

23 2. On or about March 17, 2011, in Guayaquil, Ecuador,  
24 defendants VICTOR MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez",  
25 aka "El Senor", aka "063", and JORGE GUILLERMO GONZALEZ-CARDENAS,  
26 aka "Ingeniero", did knowingly and intentionally distribute  
27 5 kilograms and more, to wit, approximately 430 kilograms  
28 (approximately 946 pounds) of cocaine, a Schedule II Controlled

1 Substance, intending and knowing that the cocaine would be unlawfully  
2 imported into the United States; in violation of Title 21, United  
3 States Code, Sections 959, 960, and 963, and Title 18, United States  
4 Code, Section 2.

5 Count 51

6 **CONSPIRACY TO IMPORT COCAINE INTO THE UNITED STATES**

7 1. The introductory allegations and the manner and means set  
8 forth above are incorporated as if set forth in full herein.

9 2. Beginning on a date unknown to the grand jury and continuing  
10 up to and including March 18, 2011, within the Southern District of  
11 California, and elsewhere, defendants VICTOR MANUEL FELIX-FELIX,  
12 aka "Raul Castro Rodriguez", aka "El Senor", aka "063", LUIS ROBERTO  
13 GARCIA-FIERRO, aka "Arquitecto", JORGE GUILLERMO GONZALEZ-CARDENAS,  
14 aka "Ingeniero", RODRIGO COLMENARES Y SANCHEZ-SOTO, GABRIELA VAZQUEZ-  
15 VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", JESUS RODOLFO  
16 GUAJARDO-FARIAS, aka "Doctor", OSCAR DOMINGUEZ VILLA-DIAZ, JOSE  
17 BENJAMIN VALDEZ-BERNAL, RIGOBERTO DIAS-PANIAGUA, EFRAIN DIAS-PANIAGUA,  
18 and LUIS HORACIO RAMIREZ DE ARELLANO-MORALES did knowingly and  
19 intentionally conspire together and with each other, and with other  
20 persons known and unknown to the grand jury, to import 5 kilograms and  
21 more, to wit: approximately 4,123 kilograms (approximately  
22 9,070 pounds) of cocaine, a Schedule II Controlled Substance, into the  
23 United States from a place outside thereof; in violation of Title 21,  
24 United States Code, Sections 952 and 960.

25 **OVERT ACTS**

26 The overt acts set forth in Count 2 above are incorporated as if  
27 set forth in full herein. All in violation of Title 21, United States  
28 Code Section 963.

FORFEITURE ALLEGATIONS

1  
2 1. The introductory allegations and the manner and means set  
3 forth above are incorporated as if set forth in full herein.

4 2. The allegations contained in the above Counts are re-alleged  
5 and by their reference fully incorporated herein for the purpose of  
6 alleging forfeiture to the United States of America pursuant to the  
7 provisions of Title 21, United States Code, Section 853, and Title 18,  
8 United States Code, Section 982(a)(1).

9 3. As a result of the commission of the felony offenses alleged  
10 in Counts 1 and 45 through 51 of this Indictment under Title 21,  
11 United States Code, said violations being punishable by imprisonment  
12 for more than one year, and pursuant to Title 21, United States Code,  
13 Section 853(a)(1), defendants VICTOR MANUEL FELIX-FELIX, aka "Raul  
14 Castro Rodriguez", aka "El Senor", aka "063", LUIS ROBERTO GARCIA-  
15 FIERRO, aka "Arquitecto", JORGE GUILLERMO GONZALEZ-CARDENAS, aka  
16 "Ingeniero", RODRIGO COLMENARES Y SANCHEZ-SOTO, GABRIELA VAZQUEZ-  
17 VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", JESUS RODOLFO  
18 GUAJARDO-FARIAS, aka "Doctor", OSCAR DOMINGUEZ VILLA-DIAZ, JOSE  
19 BENJAMIN VALDEZ-BERNAL, RIGOBERTO DIAS-PANIAGUA, EFRAIN DIAS-PANIAGUA,  
20 and LUIS HORACIO RAMIREZ DE ARELLANO-MORALES, shall, upon conviction,  
21 forfeit to the United States all their rights, title and interest in  
22 any and all property constituting, or derived from, any proceeds the  
23 defendants obtained directly or indirectly as a result of the  
24 offenses.

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1           4. As a result of the commission of the felony offenses alleged  
 2 in Counts 1 and 45 through 51 of this Indictment said violations being  
 3 punishable by imprisonment for more than one year and pursuant to  
 4 Title 21, United States Code Section 853(a)(2), defendants VICTOR  
 5 MANUEL FELIX-FELIX, aka "Raul Castro Rodriguez", aka "El Senor",  
 6 aka "063", LUIS ROBERTO GARCIA-FIERRO, aka "Arquitecto", JORGE  
 7 GUILLERMO GONZALEZ-CARDENAS, aka "Ingeniero", RODRIGO COLMENARES Y  
 8 SANCHEZ-SOTO, GABRIELA VAZQUEZ-VILLAVICENCIO, aka "Karla", aka "Gaby",  
 9 aka "Monina", JESUS RODOLFO GUAJARDO-FARIAS, aka "Doctor", OSCAR  
 10 DOMINGUEZ VILLA-DIAZ, JOSE BENJAMIN VALDEZ-BERNAL, RIGOBERTO DIAS-  
 11 PANIAGUA, EFRAIN DIAS-PANIAGUA, and LUIS HORACIO RAMIREZ DE ARELLANO-  
 12 MORALES shall, upon conviction, forfeit to the United States all their  
 13 rights, title and interest in any and all property used or intended to  
 14 be used in any manner or part to commit and to facilitate the  
 15 commission of the Title 21 violations alleged in this Indictment.

16           5. Pursuant to Title 18, United States Code, Section 982(a)(1),  
 17 as a result of the commission of the felony offenses alleged in  
 18 Counts 2 thru 44 of this Indictment (Section 1956 and 1957 counts),  
 19 said violations being punishable by imprisonment for more than one  
 20 year upon conviction, defendants VICTOR MANUEL FELIX-FELIX, aka "Raul  
 21 Castro Rodriguez", aka "El Senor", aka "063", LUIS ROBERTO GARCIA-  
 22 FIERRO, aka "Arquitecto", JORGE GUILLERMO GONZALEZ-CARDENAS,  
 23 aka "Ingeniero", RODRIGO COLMENARES Y SANCHEZ-SOTO, GABRIELA VAZQUEZ-  
 24 VILLAVICENCIO, aka "Karla", aka "Gaby", aka "Monina", JESUS RODOLFO  
 25 GUAJARDO-FARIAS, aka "Doctor", OSCAR DOMINGUEZ VILLA-DIAZ, JOSE  
 26 BENJAMIN VALDEZ-BERNAL, RIGOBERTO DIAS-PANIAGUA, EFRAIN DIAS-PANIAGUA,  
 27 LUIS HORACIO RAMIREZ DE ARELLANO-MORALES, MARIA RAQUEL BENITEZ,  
 28 ADALBERTO URBINA-GOMEZ, CARLOS CAMET-RIVADENEYRA, aka "Guero", ARIEL



1 JULIAN SAVEIN, JOSE NIEVES MONTENEGRO-FELIX, aka "Charlie", ALEXIS  
2 FERNANDO VELAZCO-HERRERA, aka "Fercho", JUAN J. PIMENTEL, MARTIN  
3 MORALES-SOTO, JUAN CARLOS ALZATE, aka "Guero", JEFFREY JAMES BROWN,  
4 LINDA BROWN, aka "Sarah", NORMAN GILDARDO CUENCA-HURTADO, DARREN P.  
5 COMANS, aka "Darren Commons", PATRICIA LOPEZ, aka "Susana", JOSE  
6 NICEFORO GONZALEZ-RIVERA, aka "Raul", JOSE AUGUSTO GONZALEZ-ROMAN,  
7 RONALD BLOCH, and OSCAR LNU shall, upon conviction, forfeit to the  
8 United States of America any property, real or personal, involved in  
9 such offense, and any property traceable to such property. The  
10 property to be forfeited includes, but is not limited to, the  
11 following:

12 a. \$13,770,858.00 in United States currency, representing  
13 the value, in United States currency, of the money laundered as a  
14 result of the money laundering counts alleged in Counts 2 thru 44.

15 b. \$76,275,500.00 in United States Currency, representing  
16 the amount of proceeds obtained as a result of the drug trafficking  
17 offenses alleged in Counts 1 and 45 through 51.

18 6. If any of the above-described forfeitable property, as a  
19 result of any act or omission of the defendants

- 20 a. cannot be located upon the exercise of due diligence;  
21 b. has been transferred or sold to, or deposited with,  
22 a third party;  
23 c. has been placed beyond the jurisdiction of the court;  
24 d. has been substantially diminished in value; or  
25 e. has been commingled with other property which cannot  
26 be divided without difficulty,

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1 it is the intent of the United States of America, pursuant to  
2 Title 21, United States Code, Section 853(p), as incorporated by  
3 Title 18, United States Code, Section 982(b)(1) and Title 28, United  
4 States Code, Section 2461(c) to seek forfeiture of any other property  
5 of the defendants up to the value of the said property listed above as  
6 being subject to forfeiture.

7 All in violation of Title 21, United States Code, Section 853, and  
8 Title 18, United States Code, Section 982.

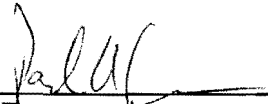
9 DATED: May 13, 2011.

10

A TRUE BILL:

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Foreperson

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LAURA E. DUFFY  
United States Attorney

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By:   
JOHN R. KRAEMER  
Assistant U.S. Attorney

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