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3	3	2019 SEP 13 P 4:46
4	UNITED STATES DISTRICT COURT	
5	SOUTHERN DISTRICT	I OF CALIFORNIA
6	April 2018 Grand Jury	
7	UNITED STATES OF AMERICA,	19 CR 3624 CAB Case No.
8	Plaintiff,	I N D I C T M E N T
9	v.	Title 21, U.S.C., Secs. 841(a)(1)
10	JUAN CARLOS OCHOA (1),	and 846 - Conspiracy to Distribute Controlled Substances; Title 18,
11	OSCAR CLEMENTE-PEREZ (3), ANTON DOCKERY (4).	U.S.C., Secs. 1956(a)(2)(A), 1956(a)(2)(B)(i), and 1956(h) -
12	AMIRA NOVELO-TORRES (5), GUILLERMO CASTELLANO (6)	Conspiracy to Launder Monetary Instruments; Title 21, U.S.C.,
13	MONITCA ATCANTAD (7)	Sec. 853 and Title 18, U.S.C., Sec. 982 - Criminal Forfeiture
14	IVAN RODRIGUEZ (9),	
15	BRIAN PERIN (10), EDWARD DIBARTOLA (11),	
16	JUANITA ORTIZ (12), LORENA TORRES (13),	
17	MARCUS DEWAYNE CALDWELL (14), CANDACE MARIE SPEARS (15),	
18	EDUARDO LERMA (16), GENE FITZGERALD (17),	
19	MELISSA YOUNG (18),	
20	JESSIE AVINA (19),	
21	Defendants.	
22	The grand jury charges:	
23	Count 1 Beginning on a data unknown to the	
24	Beginning on a date unknown to the grand jury and continuing up to	
25	and including the date of this Indictment, within the Southern District	
20	of California and elsewhere, defendants JUAN CARLOS OCHOA, BELINDA MARIA	
28	DUCKERI, AMIRA NOVELO-TORRES,	
20	GUILLERMO CASTELLANO, MONICA ALCANTAR, ALBERTO FRAYRE, IVAN RODRIGUEZ,	
	MJS:nlv:San Diego:9/12/19	*

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BRIAN PERIN, EDWARD DIBARTOLA, JUANITA ORTIZ, LORENA TORRES, MARCUS 1 DEWAYNE CALDWELL, CANDACE MARIE SPEARS, EDUARDO LERMA, GENE FITZGERALD, 2 MELISSA YOUNG, and JESSIE AVINA, did knowingly and intentionally 3 conspire together and with each other and with other persons known and Δ unknown to the grand jury, to distribute 1 kilogram and more of a mixture 5 and substance containing a detectable amount of heroin, a Schedule I 6 Controlled Substance, and 50 grams and more of methamphetamine (actual), 7 a Schedule II Controlled Substance; all in violation of Title 21, 8 9 United States Code, Sections 841(a)(1) and 846.

Count 2

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Beginning on a date unknown to the grand jury and continuing to the date of this Indictment, within the Southern District of California and elsewhere, defendants JUAN CARLOS OCHOA and BELINDA MARIA MENKE, did knowingly and intentionally conspire and agree with each other and with other persons, known and unknown to the Grand Jury:

a. to transport, transmit, and transfer a monetary instrument and 16 funds from a place in the United States to and through a place outside 17 the United States with the intent to promote the carrying on of specified 18 unlawful activity, that is, the felonious importation and distribution 19 of controlled substances punishable under Title 21, United States Code, 20 Chapter 13, 21 in violation of 18, United Title States Code, Section 1956(a)(2)(A); and 22

b. to transport, transmit, and transfer a monetary instrument and
funds from a place in the United States to and through a place outside
the United States, knowing that the monetary instrument and funds
involved in the transportation, transmission and transfer represented
the proceeds of some form of unlawful activity and knowing that such
transportation, transmission and transfer was designed in whole and in

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part to conceal and disguise the nature, the location, the source, the 1 ownership, and the control of the proceeds of specified unlawful 2 activity, that is, the felonious importation and distribution of 3 controlled substances punishable under Title 21, United States Code, 4 Chapter 13, 5 in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i); 6

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

FORFEITURE ALLEGATION

9 1. The allegations contained in Counts 1 an 2 are realleged and 10 by their reference fully incorporated herein for the purpose of alleging 11 forfeiture to the United States of America pursuant to the provisions 12 of Title 21, United States Code, Section 853, and Title 18, United States 13 Code, Section 982.

Upon conviction of the felony offense alleged in Count 1 of 14 2. this Indictment, said violation being punishable by imprisonment for 15 more than one year and pursuant to Title 21, United States Code, 16 Sections 853(a)(1) and 853(a)(2), defendants JUAN CARLOS OCHOA, BELINDA 17 MARIA MENKE, OSCAR CLEMENTE-PEREZ, ANTON DOCKERY, AMIRA NOVELO-TORRES, 18 GUILLERMO CASTELLANO, MONICA ALCANTAR, ALBERTO FRAYRE, IVAN RODRIGUEZ, 19 BRIAN PERIN, EDWARD DIBARTOLA, JUANITA ORTIZ, LORENA TORRES, MARCUS 20 DEWAYNE CALDWELL, CANDACE MARIE SPEARS, EDUARDO LERMA, GENE FITZGERALD, 21 MELISSA YOUNG, and JESSIE AVINA, shall forfeit to the United States all 22 their rights, title and interest in any and all property constituting, 23 or derived from, any proceeds the defendants obtained, directly or 24 indirectly, as the result of the offenses, and any and all property used 25 or intended to be used in any manner or part to commit and to facilitate 26 the commission of the violation alleged in Count 1 of this Indictment. 27

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3. Upon conviction of the offense alleged in Count 2 of this 1 2 Indictment, and pursuant to Title 18, United States Code, 3 Section 982(a)(1), defendants JUAN CARLOS OCHOA and BELINDA MARIA MENKE, shall forfeit to the United States, all property, real and personal, 4 involved in such offense, and all property traceable to such property. 5 4. If any of the above-described forfeitable property, 6 as a 7 result of any act or omission of the defendants: 8 cannot be located upon the exercise of due diligence; a. 9 b. has been transferred or sold to, or deposited with, a 10 third party; 11 has been placed beyond the jurisdiction of the Court; с. has been substantially diminished in value; or 12 d. has been commingled with other property which cannot be 13 е. subdivided without difficulty; it is the intent of the United States, 14 pursuant to Title 21, United States Code, Section 853(p) and Title 18, 15 United States Code, Section 982(b), to seek forfeiture of any other 16 property of the defendants up to the value of the property listed above 17 as being subject to forfeiture. 18 All pursuant to Title 21, United States Code, Section 853, and Title 18, 19 United States Code, Section 982. 20 21 DATED: September 13, 2019. 22 A TRUE BILL: 23 Foreperson 24 ROBERT S. BREWER, JR. United States Attorney 25 9110 I hereby attest and certify on That the foregoing document is a full, true and correct 26 Bv: copy of the original on file in my office and in my legal MATTHEW J. SUTTON custody. 27 MARIO J. PEIA CLERK, U.S. DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA Assistant U.S. Attorneys 28 A By Deputy