

SEALED

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

April 2018 Grand Jury

19 CR 3624 CAB

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN CARLOS OCHOA (1),
BELINDA MARIA MENKE (2),
OSCAR CLEMENTE-PEREZ (3),
ANTON DOCKERY (4),
AMIRA NOVELO-TORRES (5),
GUILLERMO CASTELLANO (6),
MONICA ALCANTAR (7),
ALBERTO FRAYRE (8),
IVAN RODRIGUEZ (9),
BRIAN PERIN (10),
EDWARD DIBARTOLA (11),
JUANITA ORTIZ (12),
LORENA TORRES (13),
MARCUS DEWAYNE CALDWELL (14),
CANDACE MARIE SPEARS (15),
EDUARDO LERMA (16),
GENE FITZGERALD (17),
MELISSA YOUNG (18),
JESSIE AVINA (19),

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 Controlled Substances; Title 18, U.S.C., Secs. 1956(a)(2)(A), 1956(a)(2)(B)(i), and 1956(h) - Conspiracy to Launder Monetary Instruments; Title 21, U.S.C., Sec. 853 and Title 18, U.S.C., Sec. 982 - Criminal Forfeiture

The grand jury charges:

Count 1

Beginning on a date unknown to the grand jury and continuing up to and including the date of this Indictment, within the Southern District of California and elsewhere, defendants JUAN CARLOS OCHOA, BELINDA MARIA MENKE, OSCAR CLEMENTE-PEREZ, ANTON DOCKERY, AMIRA NOVELO-TORRES, GUILLERMO CASTELLANO, MONICA ALCANTAR, ALBERTO FRAYRE, IVAN RODRIGUEZ,

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

10 Count 2

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

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

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

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

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

8 FORFEITURE ALLEGATION

9 1. The allegations contained in Counts 1 and 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.

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

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