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2019 SEP 13 P 4: 46

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

UNITED STATES DISTRICT COURT:
SOUTHERN DISTRICT OF CALIFORNIA

DEPUTY

April 2018 Grand Jury

19 CR 3625 CAB

UNITED STATES OF AMERICA,

Case No.

Plaintiff,

I N D I C T M E N T

v.

Title 21, U.S.C., Secs. 841(a)(1) and 846 - Conspiracy to Distribute Methamphetamine; Title 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. 841(a)(1) - Possession of Methamphetamine with Intent to Distribute; Title 18, U.S.C., Sec. 2 - Aiding and Abetting; Title 21, U.S.C., Sec. 853 and Title 18, U.S.C., Sec. 982 - Criminal Forfeiture

ALFONSO ARROYO (1),
JAMES ANTHONY TATE (2),
ALICE CHAIREZ (3),
ZENA MARIE GONZALES (4),
STEVEN GEISS (5),
TOMMY DIEGO DUENAS (6),
JOSEPHINA HERNANDEZ (7),
KAJLID JAFAR WILKS (8),

Defendants.

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 ALFONSO ARROYO, JAMES ANTHONY TATE, ZENA MARIE GONZALES, STEVEN GEISS, TOMMY DIEGO DUENAS, JOSEPHINA HERNANDEZ, and KAJLID JAFAR WILKS, did knowingly and intentionally conspire together and with each other and with other persons known and unknown to the grand jury, to distribute 50 grams and more of

1 methamphetamine (actual), a Schedule II Controlled Substance; in
2 violation of Title 21, United States Code, Sections 841(a)(1) and 846.

3 Count 2

4 Beginning on a date unknown to the grand jury and continuing to the
5 date of this Indictment, within the Southern District of California and
6 elsewhere, defendants ALFONSO ARROYO and JOSEPHINA HERNANDEZ, did
7 knowingly and intentionally conspire and agree with each other and with
8 other persons, known and unknown to the Grand Jury:

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

16 b. 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, knowing that the monetary instrument and funds
19 involved in the transportation, transmission and transfer represented
20 the proceeds of some form of unlawful activity and knowing that such
21 transportation, transmission and transfer was designed in whole and in
22 part to conceal and disguise the nature, the location, the source, the
23 ownership, and the control of the proceeds of specified unlawful
24 activity, that is, the felonious importation and distribution of
25 controlled substances punishable under Title 21, United States Code,
26 Chapter 13, in violation of Title 18, United States Code,
27 Section 1956(a)(2)(B)(i);

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

Count 3

On or about March 17, 2019, within the Southern District of California, defendants ALFONSO ARROYO, JAMES ANTHONY TATE, and ALICE CHAIREZ, did knowingly and intentionally possess with intent to distribute, approximately 109.91 grams of methamphetamine (actual), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 through 3 are realleged and by their reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a)(1).

2. Upon conviction of the felony offense alleged in Counts 1 and 3 of this Indictment, said violations being punishable by imprisonment for more than one year and pursuant to Title 21, United States Code, Sections 853(a)(1) and 853(a)(2), defendants ALFONSO ARROYO, JAMES ANTHONY TATE, ALICE CHAIREZ, ZENA MARIE GONZALES, STEVEN GEISS, TOMMY DIEGO DUENAS, JOSEPHINA HERNANDEZ, and KAJLID JAFAR WILKS,, shall, upon conviction, forfeit to the United States all their rights, title and interest in any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of the offense, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count 1 of this Indictment.

3. Upon conviction of the offense alleged in Count 2 of this Indictment, and pursuant to Title 18, United States Code, Section 982(a)(1), defendants ALFONSO ARROYO and JOSEPHINA HERNANDEZ,

1 shall forfeit to the United States, all property, real and personal,
2 involved in such offense, and all property traceable to such property.

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

5 a. cannot be located upon the exercise of due diligence;

6 b. has been transferred or sold to, or deposited with, a
7 third party;

8 c. has been placed beyond the jurisdiction of the Court;

9 d. has been substantially diminished in value; or

10 e. has been commingled with other property which cannot be
11 subdivided without difficulty; it is the intent of the United States,
12 pursuant to Title 21, United States Code, Section 853(p) and Title 18,
13 United States Code, Section 982(b), to seek forfeiture of any other
14 property of the defendants up to the value of the property listed above
15 as being subject to forfeiture.


16 All pursuant to Title 21, United States Code, Section 853, and Title 18,
17 United States Code, Section 982.

18 DATED: September 13, 2019.

19 A TRUE BILL:

20 
21 Foreperson

22 ROBERT S. BREWER, JR.
23 United States Attorney

24 By: 
25 MATTHEW J. SUTTON
26 MARIO J. PEIA
27 Assistant U.S. Attorneys

9/16/19
I hereby attest and certify on
That the foregoing document is a full, true and correct
copy of the original on file in my office and in my legal
custody.

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

By  Deputy