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United States of America

10  
11 IN THE UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF CALIFORNIA

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14 1: 18 CR - 00207 DAD BAM  
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**FILED**  
SEP 13 2018  
CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY  DEPUTY CLERK

1 UNITED STATES OF AMERICA,  
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3 Plaintiff,

4 v.

- 5 1) DENIS BARRERA-PALMA,  
Aka, "Gunner,"
- 6 2) MARIO ALEXANDER GARCIA,  
Aka, "Ton,"
- 7 3) FRANCISCO LIZANO,  
Aka, "Activo,"
- 8 4) JEFFERSON GUEVARA,  
Aka, "Chino,"
- 9 5) EVER MEMBRENO,  
Aka, "Canecho,"
- 10 6) EDGAR TORRES-AMADOR,
- 11 7) LORENZO AMADOR,  
Aka, "Catracho,"
- 12 8) JOSÉ WILSON NAVARETTE-MENDEZ,  
Aka, "Wilson,"
- 13 9) DENIS RODÓLFO ALFARO-TORRES,  
Aka, "Payin,"
- 14 10) SANTOS HAMILTON BONILLA,  
Aka, "Cuervo,"
- 15 11) HENRY ROGELIO LARA BONILLA,  
Aka, "Repollo,"
- 16 12) CHRISTIAN ELISEO HIDALGO REYES,  
Aka, "Guero,"
- 17 Aka, "Huero,"
- 18 Aka, "Werito,"
- 19 Aka, "White Boy,"
- 20 13) MARVIN VILLEGAS-SEGOVIA,  
Aka, "Chaparro,"
- 21 14) BRENDA YAJAIRA MORALES,  
Aka, "Yari,"
- 22 15) CLAUDIA ELIZABETH LIZAOLA,  
Aka, "Maniaka"
- 23 16) OSCAR ANTONIO REYES,  
Aka, "Tamagas"

24 DEFENDANTS.

CASE NO.

VIOLATIONS: 18 U.S.C. § 1959(a)(3) and 2 –  
Assault with a Dangerous Weapon in Aid of  
Racketeering (Counts 1 and 2);

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to  
Distribute and Possess with Intent to Distribute  
Methamphetamine, Cocaine and Marijuana (Count 3)

18 U.S.C. § 922(g)(5)(A) – Alien in Possession of a  
Firearm (Counts 4 and 5)

25 INDICTMENT

26 The Grand Jury charges:

27 At all times relevant to this Indictment:  
28

I. THE ENTERPRISE

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3 1. *La Mara Salvatrucha*, also known as MS-13 (“MS-13”), is a violent criminal street gang  
4 (hereinafter referred to as “MS-13”), composed primarily of immigrants or descendants of immigrants  
5 from El Salvador, whose members and associates engage in acts of violence, including kidnapping,  
6 murder, and extortion, narcotics sales, illegal possession of firearms, and other crimes, often with the  
7 purpose of intimidating rival gang members, victims of extortion, and members of the community, and  
8 to protect their “turf” and fellow gang members.

9 2. Mara Salvatrucha was formed in Los Angeles, California in the mid-1980s by immigrants  
10 fleeing the civil war in El Salvador. Once in Los Angeles, they organized themselves into a group called  
11 Mara Salvatrucha, which was initially largely composed of Salvadoran immigrants. The name “Mara  
12 Salvatrucha” was a combination of several slang terms: “Mara” is a Central American term for gang or  
13 group; and the phrase “Salvatrucha” was a combination of the words “Salva,” which was an  
14 abbreviation for “Salvadoran,” and “trucha,” which was a slang term for “fear us,” “look out,” or “heads  
15 up.” In the 1990s in Los Angeles, Mara Salvatrucha distinguished itself by committing brutal acts of  
16 violence against rival gang members and non-gang members. In the mid-1990s, Mara Salvatrucha  
17 became associated with the Mexican Mafia, commonly referred to as “la Eme” (which translates in  
18 English to “the M”), and added the number “13” to its name. The number “13” marks the 13th letter of  
19 the alphabet: “M.” While MS-13 originated in Los Angeles, over the years, MS-13 spread as its  
20 members were deported to El Salvador and because its members traveled to other locations in the United  
21 States and abroad. As a result, in addition to operating in Los Angeles, MS-13 operates nationally and  
22 internationally, with more than ten thousand members regularly conducting gang activities in at least 42  
23 states and Washington, D.C., and with thousands more conducting gang activities in Central America  
24 and Mexico.

25 3. MS-13, nationally and internationally, including Los Angeles, is largely comprised of  
26 persons from Central America, including El Salvador, Honduras, and Guatemala. Although each MS-13  
27 locale has a common origin, MS-13 in Los Angeles operates differently than in other locales.  
28 Notwithstanding, clique names in other parts of the United States are often named for existing cliques in

1 Los Angeles. At times, MS-13 members from other geographic locations travel to Los Angeles to  
2 participate in leadership meetings; however, MS-13 in Los Angeles is independent, self-governing, and  
3 makes its own decisions. Conversely, MS-13 members in Los Angeles are sometimes called upon to  
4 provide input in other parts of the country. Also, MS-13 members in Los Angeles distribute drugs from  
5 Los Angeles to other parts of the country.

6 4. In Los Angeles, MS-13 operates under the “Los Angeles Program,” which is distinct  
7 from programs in El Salvador, Honduras, Guatemala, and other parts of the United States, whereby its  
8 leaders and members make all decisions concerning how and when a new person becomes a member of  
9 MS-13, how MS-13 operates, when discipline is meted out, when a clique is responsible for paying its  
10 extortionate rent payments, the geographical boundaries of each clique, and the identity of the shot  
11 callers and leaders. MS-13 operates through subsets, known as “cliques,” which are usually named for a  
12 street within a clique’s territory, or for the neighborhood in which the clique operates. MS-13 has more  
13 than 10 cliques operating in Los Angeles, including, but not limited to, Parkview Locos Salvatrachos  
14 (“PVLS”) and Francis Locos Salvatrachos (“FLS”).

15 5. A clique adds new members through an initiation ritual known as “jumping in,” during  
16 which several existing MS-13 members beat up a prospective MS-13 member for 13 seconds. Once  
17 jumped in, an MS-13 member is expected to participate fully in MS-13’s criminal activities.

18 6. Historically, MS-13 members signified their membership with tattoos reading “Mara  
19 Salvatrucha,” “MS,” “MS-13,” or other variations of the gang’s name; however, the recent trend is for  
20 MS-13 members to avoid such tattoos to help avoid detection by law enforcement. MS-13 members  
21 typically refer to other members by their monikers, or nicknames, and often do not know fellow gang  
22 members’ legal names.

23 7. MS-13 members write or paint graffiti in the areas they control to identify the area as  
24 controlled by MS-13.

25 8. MS-13 has a self-imposed code of conduct, which is imposed and enforced to maintain  
26 compliance among its members. MS-13 enforces its rules and promotes discipline among its members  
27 by imposing monetary fines and threatening and committing acts of violence against members who  
28 break the rules. This is known as attending court, being “courted,” or being “regulated.” MS-13,

1 through its leadership or individual cliques, can vote for MS-13 members to be disciplined for violating  
2 MS-13's rules or code of conduct. Depending on the severity of the violation, MS-13, through its  
3 leadership or individual cliques, will decide whether the violator will receive a beating for 13, 26, or 39  
4 seconds, all multiples of 13, and will select at least three to four MS-13 members to administer the  
5 beatings, with one member counting aloud the seconds. Additionally, for even more serious violations  
6 of MS-13's rules, MS-13, through its leadership or individual cliques, may vote to introduce weapons  
7 into the beatings, to include knives, bats and/or pipes. Once an MS-13 member has been disciplined, the  
8 individual cliques may also vote to eject the disciplined member from their cliques. If a member is  
9 voted out of the clique, he/she must be "jumped out" of the clique, which means that member will  
10 receive another beating.

11 9. MS-13 has zero tolerance for members and associates who cooperate with law  
12 enforcement. Once MS-13 has evidence that someone has cooperated with law enforcement, by  
13 receiving and reviewing law enforcement reports or recordings of interviews, MS-13 issues a "green  
14 light" as to that person, which is an order that if any MS-13 member sees the person who is allegedly or  
15 actually cooperating with law enforcement, that person is to be killed on sight.

16 10. MS-13 members also engage in acts of violence against innocent citizens and rival gang  
17 members in their territory. Participation in violent acts increases the respect accorded to members who  
18 commit violent acts. Additionally, commission of violent acts by MS-13 members enhances the gang's  
19 overall reputation for violence in the community, resulting in the intimidation of citizens in MS-13's  
20 territory.

21 11. MS-13 members sometimes engage in money-making activities for the gang. Individual  
22 MS-13 members who sell narcotics are often required to provide a portion of their narcotics proceeds to  
23 the shot caller of the clique. This money is used by the shot caller for a variety of purposes, including  
24 paying the clique's "rent" or dues to the overall MS-13 leader, paying legal fees for MS-13 members in  
25 need, helping MS-13 members in El Salvador and other points abroad, and purchasing weapons that are  
26 maintained by the clique in its territory for protection. If a clique member earns money for the clique  
27 by selling drugs or other criminal ventures, and contributes a portion to the shot caller, this money is  
28 oftentimes considered their rent contribution to the clique. MS-13 also derives income from the

1 extortion of food vendors who operate in MS-13 controlled territory. On a clique level, the clique shot  
2 caller identifies targets for extortion and coordinates which clique member is authorized to collect  
3 extortion from each vendor. MS-13 extorts both legitimate and illegitimate businesses alike. These  
4 businesses are often owned or run by illegal immigrants, who rarely report this extortion to law  
5 enforcement, despite the threats of violence which accompany the extortion.

6 **II. MS-13 IN MENDOTA, FRESNO COUNTY**

7 12. Two cliques of MS-13, PVLS and VLS, have been operating in Mendota and Los  
8 Angeles since at least July 2015.

9 13. In Mendota, the primary rival to MS-13 is the Bulldogs criminal street gang. The MS-13  
10 cliques in Mendota view the Bulldogs as a threat to the El Salvadoran community and regularly  
11 participate in patrols to attack Bulldog gang members. MS-13 uses this violence to expand its control of  
12 Mendota and to rid the town of rival gangs.

13 14. MS-13 members in Mendota have a hierarchy within each clique. The lowest of the  
14 members are referred to as "Parros." Parros take orders from higher ranking gang members and are  
15 responsible for doing errands and committing crimes on behalf of the gang. The next level, above  
16 Parros, are "Chequeos." Chequeos also take orders from higher ranking gang members and are  
17 responsible for fighting with rival gang members and expanding the gang's territory. Parros and  
18 Chequeos take orders from "Homeboys." Homeboys are the leaders, or shot callers, of the gang and  
19 direct the gang's activity. Before an MS-13 member can become a Homeboy, he must commit three  
20 confirmed murders that benefit the gang.

21 15. As a whole, MS-13 is united and members are not confined to committing crimes in their  
22 specific cliques or territories. This phenomenon has been clearly evidenced with MS-13 members in  
23 Mendota. While PVLS and VLS are the two primary cliques, MS-13 members in Mendota have  
24 demonstrated on more than one occasion that they work collectively and commit crimes together with  
25 other MS-13 members from other cliques such as the Fulton Locos Salvatruchos ("Fulton"), Francis  
26 Locos Salvatruchos ("Francis"), and Dalmacias Locos Salvatruchos ("DCLS") cliques.

27 16. The collaborative criminal efforts of the individual cliques gives each individual clique  
28 the force multiplier of the collective resources and manpower.

1 17. MS-13 gang members in Mendota often receive instructions from higher ranking  
2 members in Los Angeles, Santa Maria, and Oakland. Many times, these instructions involve traveling to  
3 Los Angeles or Oakland to support MS-13 criminal activities, including conducting assaults, helping  
4 wanted subjects travel to escape law enforcement, and transporting drugs and firearms for MS-13  
5 members.

6 18. Denis BARRERA-PALMA, aka "Gunner"; Claudia LIZAOLA, aka "Maniaka";  
7 Jefferson GUEVARA, aka "Chino"; Denis Rodolfo ALFARO-TORRES, aka "Payin;" Jose Wilson  
8 NAVARETTE-MENDEZ, aka "Wilson"; Ever MEMBRENO, aka "Canecho"; Christian Eliseo  
9 HIDALGO REYES, aka "Guero," "Huero," "Werito," "White Boy;" Santos Hamilton BONILLA, aka  
10 "Cuervo;" Henry Rogelio Lara BONILLA, aka "Repollo," "Repollin;" Francisco LIZANO, aka "Javi,"  
11 "Activo;" Mario Alexander GARCIA, aka "Ton;" Marvin VILLEGAS-SEGOVIA, aka "Chaparro;"  
12 Brenda Yajaira MORALES, aka "Yari;" EDGAR TORRES-AMADOR; LORENZO AMADOR, aka  
13 "Catracho;" OSCAR ANTONIO REYES, aka, "Tamagas," the defendants, and others known and  
14 unknown to the Grand Jury, are members and associates of MS-13.

15 **III. PURPOSES OF THE ENTERPRISE**

16 19. The purposes of the MS-13 Enterprise included:

- 17 a. Preserving and protecting the power, territory, reputation, and profits  
18 of the enterprise through the use of intimidation, threats of violence, and violence, including  
19 assaults and murder;
- 20 b. Promoting and enhancing the enterprise and its leaders', members', and associates'  
21 activities, including, but not limited to, murder, extortion, drug trafficking, robbery, and other  
22 criminal activities;
- 23 c. Keeping victims, potential victims, and community members in fear of the enterprise  
24 through violence and threats of violence;
- 25 d. Providing financial support and information to gang leaders, members, and  
26 associates, including individuals incarcerated in the United States and in El Salvador;
- 27 e. Providing assistance to gang leaders, members, and associates who committed  
28 crimes on behalf of the enterprise; and

1 f. Hindering, obstructing, and preventing law enforcement officers from: identifying  
2 participants in the enterprise's criminal activities; apprehending the perpetrators of those crimes;  
3 and successfully prosecuting and punishing the offenders.

4 **IV. MEANS AND METHODS OF THE ENTERPRISE**

5 20. Among the means and methods by which the members and associates of MS-13 conduct  
6 and participate in the conduct of the affairs of the enterprise were the following:

7 a. The members and associates of MS-13 used intimidation, threats of violence, and  
8 violence, including assaults and murder, to preserve, expand, and protect MS-13's territory and  
9 activities; to promote and enhance its prestige, reputation, and position in the community; and to  
10 discipline gang members who had been disloyal or had violated gang rules;

11 b. The members and associates of MS-13 attended regular gang meetings and  
12 communicated with other MS-13 members to discuss, among other things: the structure and  
13 organization of the gang; past criminal acts committed against rival gang members and others;  
14 MS-13 leaders, members, and associates who had been arrested or incarcerated; disciplining MS-  
15 13 leaders, members, and associates who had violated gang rules; police interactions with MS-13  
16 leaders, members, and associates; the identities of individuals suspected of cooperating with law  
17 enforcement, and proposed actions to be taken against them; and plans and agreements regarding  
18 the commission of future crimes, as well as ways to conceal these crimes;

19 c. The members and associates of MS-13 also communicated with other MS-13  
20 members in Texas and elsewhere, and represented their gang allegiance, through social media  
21 such as Facebook, including by posting photographs of themselves with other gang members,  
22 throwing gang hand signs, wearing colors or clothing associated with MS-13, and posing with  
23 weapons or gang-related graffiti, and by sending and/or posting messages referencing their  
24 affiliation with MS-13;

25 d. The members and associates of MS-13 financed the enterprise through a variety of  
26 activities, including the extortion of money—sometimes referred to as “paying rent”—from gang  
27 members and from legitimate and illegitimate businesses operating in the gang's territory, as  
28 well as through the commission of robberies;



1 e. The members and associates of MS-13 distributed and agreed to distribute  
2 controlled substances on behalf of the gang;

3 f. The funds raised by the gang were used for gang purposes, including obtaining  
4 weapons and providing support for MS-13 gang members, including those imprisoned in the  
5 United States and in El Salvador;

6 g. The members and associates of MS-13 hindered and obstructed the efforts of law  
7 enforcement to identify, apprehend, and successfully prosecute and punish gang members;

8 h. The members and associates of MS-13 investigated rival gang members or other  
9 persons targeted for violence; obtained information about such targets, including locations  
10 frequented by them; and used such information in their plans to attack such targets; and

11 i. The members and associates of MS-13 would and did agree that acts of murder,  
12 including conspiracy and attempts to commit murder, and other acts of violence, would be  
13 committed by members and associates of MS-13 against rival gang members and persons  
14 deemed as threats to MS-13 and for the purpose of imposing discipline within the gang, and on  
15 other occasions as deemed necessary.

16 COUNT ONE: [18 U.S.C. §§ 1959(a)(3) and 2 – Assault with a Dangerous Weapon in Aid of  
17 Racketeering]

18 The Grand Jury further charges: T H A T

19 DENIS BARRERA-PALMA, aka “Gunner,” and  
20 EDGAR TORRES-AMADOR,

21 Defendants herein, as follows:

22 21. Paragraphs 1 through 20 of this Indictment are incorporated herein.

23 22. On or about May 14, 2018, in the county of Fresno, State and Eastern District of  
24 California, together with others known and unknown to the Grand Jury, for the purpose of gaining  
25 entrance to and maintaining and increasing position in MS-13, an enterprise engaged in racketeering  
26 activity, while aiding and abetting one another, did assault Victim-1 with a dangerous weapon, that is, a  
27 pipe, in violation of California Penal Code § 245(a)(1).

28 All in violation of 18 U.S.C. §§ 1959(a)(3) and 2.

1 COUNT TWO: [18 U.S.C. §§ 1959(a)(3) and 2 – Assault with a Dangerous Weapon in Aid of  
2 Racketeering]

3 The Grand Jury further charges: T H A T

4 LORENZO AMADOR,  
5 AKA, “CATRACHO,”

6 defendant herein, as follows:

7 23. Paragraphs 1 through 20 of this Indictment are incorporated herein.

8 24. Defendant herein, on or about August 12, 2018, in the County of Fresno, State and  
9 Eastern District of California, together with others known and unknown to the Grand Jury, for the  
10 purpose of gaining entrance to and maintaining and increasing position in MS-13, an enterprise engaged  
11 in racketeering activity, while aiding and abetting one another, did assault Victim-2 with a dangerous  
12 weapon, that is, a knife, in violation of California Penal Code § 245(a)(1).

13 All in violation of 18 U.S.C. §§ 1959(a)(3) and 2.  
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1 COUNT THREE: [21 U.S.C. §§ 846 and 841(a)(1) – Conspiracy to Distribute and Possess with  
2 Intent to Distribute Methamphetamine, Cocaine and Marijuana]

3 The Grand Jury further charges: T H A T

4 DENIS BARRERA-PALMA,  
5 Aka, "Gunner,"  
6 MARIO ALEXANDER GARCIA,  
7 Aka, "Ton,"  
8 FRANCISCO LIZANO,  
9 Aka, "Activo,"  
10 Aka, "Javi,"  
11 JEFFERSON GUEVARA,  
12 Aka, "Chino,"  
13 EVER MEMBRENO,  
14 Aka, "Canecho,"  
15 LORENZO AMADOR,  
16 Aka, "Catracho,"  
17 JOSE WILSON NAVARETTE-MENDEZ,  
18 Aka, "Wilson,"  
19 DENIS rodolfo ALFARO-TORRES,  
20 Aka, "Payin,"  
21 SANTOS HAMILTON BONILLA,  
22 Aka, "Cuervo,"  
23 HENRY ROGELIO LARA BONILLA,  
24 Aka, "Repollo,"  
25 Aka, "Repollin,"  
26 CHRISTIAN ELISEO HIDALGO REYES,  
27 Aka, "Guero,"  
28 Aka, "Huero,"  
Aka, "Werito,"  
Aka, "White Boy,"  
MARVIN VILLEGAS-SEGOVIA,  
Aka, "Chaparro,"  
BRENDA YAJAIRA MORALES,  
Aka, "Yari,"  
CLAUDIA ELIZABETH LIZAOLA,  
Aka, "Maniaka"  
OSCAR ANTONIO REYES,  
Aka, "Tamagas"

defendants herein, as follows:

25. Paragraphs 1 through 20 of this Indictment are incorporated herein.

26. Defendants herein, beginning at a date unknown, but no later than on about May 2017  
and continuing until August 30, 2018, in the County of Fresno, State and Eastern District of California  
and elsewhere, did knowingly and intentionally conspire and agree with each other, and with other  
persons known and unknown to the grand jury, to distribute and possess with intent to distribute a

1 mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled  
2 substance, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled  
3 substance, and marijuana, a Schedule I controlled substance.

4 All in violation of Title 21, United States Code, §§ 846, and 841(a)(1).  
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1 COUNT FOUR: [18 U.S.C. § 922(g)(5)(A) – Alien in Possession of a Firearm]

2 The Grand Jury further charges: T H A T

3 FRANCISCO LIZANO,  
4 AKA, "JAVI," "ACTIVO,"

5 defendant herein, on or about August 30, 2018, in the County of Fresno, State and Eastern District of  
6 California, then being an alien illegally and unlawfully in the United States, did knowingly possess a  
7 firearm, specifically a Glock Model 17 semiautomatic pistol, in and affecting commerce, in that said  
8 firearm had previously been transported in interstate and foreign commerce, in violation of Title 18,  
9 United States Code, § 922(g)(5)(A).

10 COUNT FIVE: [18 U.S.C. § 922(g)(5)(A) – Alien in Possession of a Firearm]

11 The Grand Jury further charges: T H A T

12 BRENDA YAJAIRA MORALES,

13 defendant herein, on or about August 30, 2018, in the County of Fresno, State and Eastern District of  
14 California, then being an alien illegally and unlawfully in the United States, did knowingly possess a  
15 firearm, specifically a Jimenez Arms Inc. 9 mm pistol, in and affecting commerce, in that said firearm  
16 had previously been transported in interstate and foreign commerce, in violation of Title 18, United  
17 States Code, § 922(g)(5)(A).

1 FORFEITURE ALLEGATION: [18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) – Criminal Forfeiture]

2 1. Upon conviction of the offense alleged in Count Three of this Indictment, defendants  
3 DENIS BARRERA-PALMA, MARIO ALEXANDER GARCIA, FRANCISCO LIZANO,  
4 JEFFERSON GUEVARA, EVER MEMBRENO, LORENZO AMADOR, JOSE WILSON  
5 NAVARETTE-MENDEZ, DENIS RODOLFO ALFARO-TORRES, SANTOS HAMILTON  
6 BONILLA, HENRY ROGELIO LARA BONILLA, CHRISTIAN ELISEO HIDALGO REYES,  
7 MARVIN VILLEGAS-SEGOVIA, BRENDA YAJAIRA MORALES, CLAUDIA ELIZABETH  
8 LIZAOLA, and OSCAR ANTONIO REYES, shall forfeit to the United States pursuant to Title 21,  
9 United States Code, Section 853(a), the following property:

10 a. All right, title, and interest in any and all property involved in violation of Title  
11 21, United States Code, Section 841(a)(1), or conspiracy to commit such offense, for which defendants  
12 are convicted, and all property traceable to such property, including the following: all real or personal  
13 property, which constitutes or is derived from proceeds obtained, directly or indirectly, as a result of  
14 such offense; and all property used, or intended to be used, in any manner or part to commit or to  
15 facilitate the commission of the offense.

16 b. A sum of money equal to the total amount of proceeds obtained as a result of the offense,  
17 or conspiracy to commit such offense, for which defendants are convicted.

18 2. Upon conviction of the offenses alleged in Counts Four and Five of this Indictment,  
19 defendants FRANCISCO LIZANO AND BRENDA YAJAIRA MORALES shall forfeit to the United  
20 States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code,  
21 Section 2461(c), any firearms and ammunition involved in or used in the knowing commission of the  
22 offenses.

23 2. If any property subject to forfeiture, as a result of the offenses alleged in Counts Four and  
24 Five of this Indictment, for which defendants are convicted:

- 25 a. cannot be located upon the exercise of due diligence;
- 26 b. has been transferred or sold to, or deposited with, a third party;
- 27 c. has been placed beyond the jurisdiction of the Court;
- 28 d. has been substantially diminished in value; or

1 c. has been commingled with other property which cannot be divided without  
2 difficulty;

3 it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as  
4 incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of  
5 defendants, up to the value of the property subject to forfeiture.  
6  
7

8 A TRUE BILL.

9 **/s/ Signature on file w/AUSA**

10 \_\_\_\_\_  
11 FOREPERSON

11 MCGREGOR W. SCOTT  
12 United States Attorney

12 **KIRK E. SHERRIFF**

13 By  
14 KIRK E. SHERRIFF  
15 Assistant U.S. Attorney  
16 Chief, Fresno Office  
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**FILED**

SEP 13 2018

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY   
DEPUTY CLERK

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

*Eastern District of California*

*Criminal Division*

1:18 CR - 00207 DAD BAM

THE UNITED STATES OF AMERICA

vs.

DENIS BARRERA-PALMA, aka, "Gunner,"

MARIO ALEXANDER GARCIA,

aka, "Ton,"

FRANCISCO LIZANO,

aka, "Activio,"

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aka, "Huro" aka, "Werito," aka, "White Boy,"

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CLAUDIA ELIZABETH LIZAOLA, aka, "Maniaka"

OSCAR ANTONIO REYES, aka, "Tamagas"

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INDICTMENT

**VIOLATION(S):** 18 U.S.C. § 1959(a)(3) and 2 – Assault with a Dangerous Weapon in Aid of Racketeering (Count 1);  
18 U.S.C. § 1959(a)(6) – Conspiracy to Commit Assault With A Dangerous Weapon in Aid of Racketeering (Count 2)  
21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and Possess with Intent to  
Distribute Methamphetamine, Cocaine and Marijuana (Count 3);  
18 U.S.C. § 922(g)(5)(A) – Alien in Possession of a Firearm (Counts 4 and 5)

A true bill,

15/

Foreman.

Filed in open court this \_\_\_\_\_ day

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

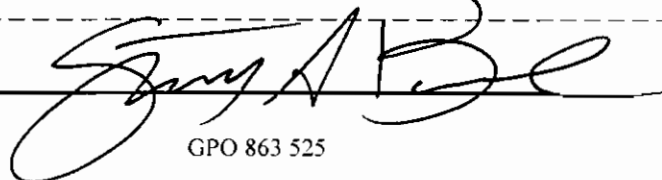
Clerk.

Bail, \$

NO BAIL WARRANT

AS PREVIOUSLY SET

As to A's Lorenzo Amador & Jefferson Guevara  
As to All others



GPO 863 525

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
Fresno County

U.S.C. Citation  
Please see Indictment

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**DEFENDANT** -- U.S. vs.  
Denis Barrera-Palma aka "Gunner"

Address

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-HSI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y  Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW  
DOCKET NO.

MAGISTRATE  
JUDGE CASE NO.  
1:18-mj-150 SKO

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
If not detained, give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No  
If "Yes," give date filed  
Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

DATE TRANSFERRED TO U.S. CUSTODY

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

KAS<sub>2</sub>  
AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Denis Barrera-Palma

**COUNT ONE:** Assault with a Dangerous Weapon in Aid of Racketeering.

**VIOLATION:** 18 U.S.C. § 1959(a)(3)

**PENALTY:** 20 years imprisonment  
\$250,000 fine  
3 years of supervised release  
\$100 special assessment

**COUNT THREE:** Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances.

**VIOLATION:** 21 U.S.C. §§ 846, 841(a)(1)

**PENALTY:** 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
Fresno County

U.S.C. Citation  
Please see Indictment

**DEFENDANT -- U.S. vs.**  
Mario Alexander Garcia aka "Ton"

Address {

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-HSI; Yetter-FBI-IFO

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y  Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.  
1:18-mj-150 SKO

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
If not detained, give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?

- Yes
- No

If "Yes," give date filed

Mo. Day Year

**DATE OF ARREST**

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

**DATE TRANSFERRED TO U.S. CUSTODY**

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

DEFENDANT DETAINED; NEXT COURT DATE SEPTEMBER 13, 2018

KAS<sub>2</sub>  
AUSA INITIALS

PENALTY SLIP

DEFENDANT: Mario Garcia-Villanueva

COUNT THREE: Conspiracy to Distribute and Possess with  
Intent to Distribute Controlled  
Substances.

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1)

PENALTY: 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life  
maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
Fresno County

U.S.C. Citation  
Please see Indictment

**DEFENDANT -- U.S. vs.**

Francisco Lizano aka "Active" aka "Javi"

Address

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-HSI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

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U.S. Att'y  Defense

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SHOW DOCKET NO.

MAGISTRATE JUDGE CASE NO.  
1:18-mj-150 SKO

**DEFENDANT**

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- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No  
If "Yes," give date filed  
Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

DEFENDANT DETAINED; NEXT COURT DATE SEPTEMBER 13, 2018

KASc  
AUSA INITIALS

PENALTY SLIP

DEFENDANT: Francisco Lizano

COUNT THREE: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances.

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1)

PENALTY: 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life maximum  
\$100 special assessment

COUNT FOUR: Alien in possession of a firearm.

VIOLATION: 18 U.S.C. § 922(g)(5)(A)

PENALTY: 10 years imprisonment  
\$250,000 fine  
3 year minimum supervised release, life maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
Fresno County

U.S.C. Citation  
Please see Indictment

**DEFENDANT -- U.S. vs.**

Jefferson Guevara aka "Chino"

Address

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-HSI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court, give name of court

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SHOW DOCKET NO.

MAGISTRATE JUDGE CASE NO.  
1:18-mj-150 SKO

**DEFENDANT**

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- 1)  Has not been arrested, pending outcome of this proceeding  
If not detained, give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No } If "Yes," give date filed  
Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

This report amends AO 257 previously submitted

Please issue no bail warrant



KASz  
AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Jefferson Guevara

**COUNT THREE:** Conspiracy to Distribute and Possess with  
Intent to Distribute Controlled  
Substances.

**VIOLATION:** 21 U.S.C. §§ 846, 841(a)(1)

**PENALTY:** 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life  
maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
Fresno County

U.S.C. Citation  
Please see Indictment

**DEFENDANT** -- U.S. vs.  
Ever Membreno aka "Canebo"

Address {

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-HSI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

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U.S. Att'y  Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE JUDGE CASE NO. 1:18-mj-150 SKO

**DEFENDANT**

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- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

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- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No } If "Yes," give date filed  
Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

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Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

This report amends AO 257 previously submitted

KAS  
AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Ever Membreno

**COUNT THREE:** Conspiracy to Distribute and Possess with  
Intent to Distribute Controlled  
Substances.

**VIOLATION:** 21 U.S.C. §§ 846, 841(a)(1)

**PENALTY:** 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life  
maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
Fresno County

U.S.C. Citation  
Please see Indictment

**DEFENDANT -- U.S. vs.**

Edgar Torres-Amador

Address {

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-IISI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

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U.S. Att'y  Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO. 1:18-mj-150 SKO

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
If not detained, give date any prior summons was served on above charges
- 2)  Is a fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No  
If "Yes," give date filed  
Mo. Day Year

DATE OF ARREST

Or . . . if Arresting Agency & Warrant were not Federal  
Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on

THIS FORM Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

ICAS  
AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Edgar Torres-Amador

**COUNT ONE:** Assault with a Dangerous Weapon in Aid of Racketeering.

**VIOLATION:** 18 U.S.C. § 1959(a)(3)

**PENALTY:** 20 years imprisonment  
\$250,000 fine  
3 years of supervised release  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
Fresno County

U.S.C. Citation  
Please see Indictment

**DEFENDANT -- U.S. vs.**  
Lorenzo Amador aka "Catracho"

Address {

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-HSI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y  Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

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1:18-mj-150 SKO

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
If not detained, give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No  
If "Yes," give date filed  
Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

Please issue no bail warrant

YASL  
AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Lorenzo Amador

**COUNT TWO:** Assault with a Dangerous Weapon in Aid of Racketeering.

**VIOLATION:** 18 U.S.C. § 1959(a)(3)

**PENALTY:** 20 years imprisonment  
\$250,000 fine  
3 years of supervised release  
\$100 special assessment

**COUNT THREE:** Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances.

**VIOLATION:** 21 U.S.C. §§ 846, 841(a)(1)

**PENALTY:** 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
 Fresno County

U.S.C. Citation  
 Please see Indictment

**DEFENDANT -- U.S. vs.**  
 Jose Wilson Navarettc-Mendez aka "Wilson"

Address

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-HSI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court. give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

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U.S. Att'y  Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

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 1:18-mj-150 SKO

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
 If not detained, give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
 If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No } If "Yes," give date filed  
 Mo. Day Year

**DATE OF ARREST**

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

**DATE TRANSFERRED TO U.S. CUSTODY**

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on

THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS



KAS<sub>2</sub>  
AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Jose Wilson Navarette-Mendez

**COUNT THREE:** Conspiracy to Distribute and Possess with  
Intent to Distribute Controlled  
Substances.

**VIOLATION:** 21 U.S.C. §§ 846, 841(a)(1)

**PENALTY:** 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life  
maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
 Fresno County

U.S.C. Citation  
 Please see Indictment

**DEFENDANT -- U.S. vs.**

Denis Rodolfo Alfaro-Torres aka "Payin"

Address {

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-IISI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

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U.S. Att'y  Defense

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- 1)  Has not been arrested, pending outcome of this proceeding  
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- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
 If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No } If "Yes," give date filed  
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Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

KAS<sub>2</sub>  
AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Denis Alfaro-Torres

**COUNT THREE:** Conspiracy to Distribute and Possess with  
Intent to Distribute Controlled  
Substances.

**VIOLATION:** 21 U.S.C. §§ 846, 841(a)(1)

**PENALTY:** 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life  
maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
Fresno County

U.S.C. Citation  
Please see Indictment

**DEFENDANT -- U.S. vs.**  
Santos Hamilton Bonilla aka "Cuervo"

Address {

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-HSI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y  Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.  
1:18-mj-150 SKO

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
If not detained, give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No } If "Yes," give date filed  
Mo. Day Year

**DATE OF ARREST**

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

**DATE TRANSFERRED TO U.S. CUSTODY**

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

DEFENDANT DETAINED; NEXT COURT DATE: SEPTEMBER 13, 2018

KA S  
AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Santos Hamilton Bonilla

**COUNT THREE:** Conspiracy to Distribute and Possess with  
Intent to Distribute Controlled  
Substances.

**VIOLATION:** 21 U.S.C. §§ 846, 841(a)(1)

**PENALTY:** 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life  
maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
Fresno County

U.S.C. Citation  
Please see Indictment

**DEFENDANT -- U.S. vs.**

Henry Rogelio Lara Bonilla aka "Repollo" aka "Repollin"

Address

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-HSI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

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MAGISTRATE JUDGE CASE NO.  
1:18-mj-150 SKO

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
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- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No  
If "Yes," give date filed  
Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal  
Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

DEFENDANT DETAINED; NEXT COURT DATE SEPTEMBER 13, 2018

KAS  
AUSA INITIALS

PENALTY SLIP

DEFENDANT: Henry Rogelio Lara Bonilla

COUNT THREE: Conspiracy to Distribute and Possess with  
Intent to Distribute Controlled  
Substances.

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1)

PENALTY: 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life  
maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
Fresno County

U.S.C. Citation  
Please see Indictment

**DEFENDANT -- U.S. vs.**

Christian Elisco Hidalgo Reyes aka "Guero" aka "Hucro" aka "Wcrito" aka "White Boy"

Address

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotunan-HSI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

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U.S. Att'y  Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.  
1:18-mj-150 SKO

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
If not detained, give date any prior summons was served on above charges
- 2)  Is a fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No } If "Yes," give date filed  
Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS



KAS  
AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Christian Eliseo Hidalgo Reyes

**COUNT THREE:** Conspiracy to Distribute and Possess with  
Intent to Distribute Controlled  
Substances.

**VIOLATION:** 21 U.S.C. §§ 846, 841(a)(1)

**PENALTY:** 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life  
maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
 Fresno County

U.S.C. Citation  
 Please see Indictment

**DEFENDANT -- U.S. vs.**

Marvin Villegas-Segovia aka "Chaparro"

Address {

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-HSI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

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U.S. Att'y  Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.  
 1:18-mj-150 SKO

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
 If not detained, give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
 If answer to (6) is "Yes," show name of institution

Has detainer been filed?

Yes  No } If "Yes," give date filed

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

DEFENDANT DETAINED; NEXT COURT DATE SEPTEMBER 13, 2018

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AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Marvin Villegas-Segovia

**COUNT THREE:** Conspiracy to Distribute and Possess with  
Intent to Distribute Controlled  
Substances.

**VIOLATION:** 21 U.S.C. §§ 846, 841(a)(1)

**PENALTY:** 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life  
maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
Fresno County

U.S.C. Citation  
Please see Indictment

**DEFENDANT -- U.S. vs.**  
Brenda Yajaira Morales aka "Yari"

Address {

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-HSI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court. give name of court

this person/proceeding is transferred from another district per FRCrP  20  21  40. Show District

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U.S. Att'y  Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.  
1:18-mj-150 SKO

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1)  Has not been arrested, pending outcome of this proceeding  
If not detained, give date any prior summons was served on above charges
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?

- Yes
- No

If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

KAS  
AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Brenda Yajaira Morales

**COUNT THREE:** Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances.

**VIOLATION:** 21 U.S.C. §§ 846, 841(a)(1)

**PENALTY:** 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life maximum  
\$100 special assessment

**COUNT FIVE:** Alien in possession of a firearm.

**VIOLATION:** 18 U.S.C. § 922(g)(5)(A)

**PENALTY:** 10 years imprisonment  
\$250,000 fine  
3 year minimum supervised release, life maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
Fresno County

U.S.C. Citation  
Please see Indictment

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**DEFENDANT -- U.S. vs.**  
Claudia Elizabeth Lizaola aka "Maniaka"

Address

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agnts Demmon-FBI; Kotman-HSI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court, give name of court

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MAGISTRATE JUDGE CASE NO.  
1:18-mj-150 SKO

**DEFENDANT**

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- 3)  Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4)  On this charge
- 5)  On another conviction
- 6)  Awaiting trial on other charges }  Fed'l  State  
If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No  
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Mo. Day Year

DATE OF ARREST

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DATE TRANSFERRED TO U.S. CUSTODY

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

DEFENDANT DETAINED; NEXT COURT DATE SEPTEMBER 13, 2018

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AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Claudia Lizaola

**COUNT THREE:** Conspiracy to Distribute and Possess with  
Intent to Distribute Controlled  
Substances.

**VIOLATION:** 21 U.S.C. §§ 846, 841(a)(1)

**PENALTY:** 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life  
maximum  
\$100 special assessment

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT**

BY  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)

**OFFENSE CHARGED**

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense  
 Fresno County

U.S.C. Citation  
 Please see Indictment

**DEFENDANT -- U.S. vs.**  
 Oscar Antonio Reyes aka "Tamagas"

Address {

Birth Date

- Male  Alien
- Female (if applicable)

(Optional unless a juvenile)

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Special Agents Demmon-FBI; Kotman-HSI; Yetter-FBI-TFO

person is awaiting trial in another Federal or State Court, give name of court

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- 4)  On this charge
- 5)  On another conviction
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 If answer to (6) is "Yes," show name of institution

Has detainer been filed?  Yes  No  
 If "Yes," give date filed  
 Mo. Day Year

**DATE OF ARREST**

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

**DATE TRANSFERRED TO U.S. CUSTODY**

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on

THIS FORM

Maria G. Robles

U.S. Att'y  Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS



\_\_\_\_\_  
AUSA INITIALS

**PENALTY SLIP**

**DEFENDANT:** Oscar Antonio Reyes

**COUNT THREE:** Conspiracy to Distribute and Possess with  
Intent to Distribute Controlled  
Substances.

**VIOLATION:** 21 U.S.C. §§ 846, 841(a)(1)

**PENALTY:** 20 years imprisonment  
\$1,000,000 fine  
3 year minimum supervised release, life  
maximum  
\$100 special assessment