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2019 SEP 13 P 4:46

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

UNITED STATES DISTRICT COURT BY: *f*
SOUTHERN DISTRICT OF CALIFORNIA

DEPUTY

April 2018 Grand Jury

19 CR 3626 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 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

SAMUEL BECERRA (1),
GABRIELLE LOGUE (2),
KELLY DANIELS (3),
LARRY MEISNER (4),
WALTER KUTTNER (5),
KELLY JEAN KELLY (6),
KURT ROIZ (7),
RODOLFO ANDRADE (8),
ALFREDO GOMEZ (9),

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 SAMUEL BECERRA, GABRIELLE LOGUE, KELLY DANIELS, LARRY MEISNER, WALTER KUTTNER, KELLY JEAN KELLY, KURT ROIZ, RODOLFO ANDRADE, and ALFREDO GOMEZ, did knowingly and intentionally conspire together and with each other and with other persons known and unknown to the grand jury, to distribute 1 kilogram and more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and 50 grams and more of

1 methamphetamine (actual), a Schedule II Controlled Substance; all 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, defendant SAMUEL BECERRA, did knowingly and intentionally
7 conspire and agree with other persons, known and unknown to the Grand
8 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).

- 1 c. has been placed beyond the jurisdiction of the Court;
2 d. has been substantially diminished in value; or
3 e. has been commingled with other property which cannot be
4 subdivided without difficulty; it is the intent of the United States,
5 pursuant to Title 21, United States Code, Section 853(p) and Title 18,
6 United States Code, Section 982(b), to seek forfeiture of any other
7 property of the defendants up to the value of the property listed above
8 as being subject to forfeiture.


9 All pursuant to Title 21, United States Code, Section 853, and Title 18,
10 United States Code, Section 982.

11 DATED: September 13, 2019.

12 A TRUE BILL:

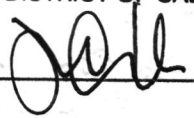
13 
14 Foreperson

15 ROBERT S. BREWER, JR.
16 United States Attorney

17 By: 
18 MATTHEW J. SUTTON
19 MARIO J. PEIA
Assistant U.S. Attorneys

I hereby attest and certify on 9/16/19
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

20 By  Deputy
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