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4		CLERK, U.S. DISTRICT COURT SOUTHERH DISTRICT OF CALIFORNIA	
5	UNITED STATES	DISTRICT COURT BY:	
6	SOUTHERN DISTRICT OF CALIFORNIA		
7	April 2018 Grand Jury		
8	UNITED STATES OF AMERICA,	Case No. 19 CR 3626 CAB	
9	Plaintiff,		
10		$\frac{I}{N} \xrightarrow{D} \frac{I}{I} \xrightarrow{C} \frac{T}{M} \xrightarrow{E} \frac{N}{I} \xrightarrow{T}$ Title 21, U.S.C., Secs. 841(a)(1)	
11	V.	and 846 - Conspiracy to Distribute Controlled Substances; Title 18,	
12	SAMUEL BECERRA (1), GABRIELLE LOGUE (2),	U.S.C., Secs. 1956(a)(2)(A), 1956(a)(2)(B)(i), and 1956(h) -	
13	KELLY DANIELS (3), LARRY MEISNER (4),	Conspiracy to Launder Monetary Instruments; Title 21, U.S.C.,	
14	WALTER KUTTNER (5), KELLY JEAN KELLY (6),	Sec. 853 and Title 18, U.S.C., Sec. 982 - Criminal Forfeiture	
15	KURT ROIZ (7), RODOLFO ANDRADE (8),		
16	ALFREDO GOMEZ (9),		
17	Defendants.		
18	The grand jury charges:		
19	Count 1		
20	Beginning on a date unknown to the grand jury and continuing up to		
21	and including the date of this Indictment, within the Southern District		
22	of California and elsewhere, defendants SAMUEL BECERRA, GABRIELLE LOGUE,		
23	KELLY DANIELS, LARRY MEISNER, WALTER KUTTNER, KELLY JEAN KELLY, KURT		
24	ROIZ, RODOLFO ANDRADE, and ALFREDO GOMEZ, did knowingly and		
25	intentionally conspire together and with each other and with other		
26		persons known and unknown to the grand jury, to distribute 1 kilogram	
27		nd more of a mixture and substance containing a detectable amount of	
28	eroin, a Schedule I Controlled Substance, and 50 grams and more of		
	MJS:nlv:San Diego:9/12/19		

1 methamphetamine (actual), a Schedule II Controlled Substance; all in 2 violation of Title 21, 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, defendant SAMUEL BECERRA, did knowingly and intentionally conspire and agree with other persons, known and unknown to the Grand Jury:

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

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

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

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FORFEITURE ALLEGATION

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The allegations contained in Counts 1 and 2 are realleged and 2 1. by their reference fully incorporated herein for the purpose of alleging 3 forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853, and Title 18, United States 5 Code, Section 982.

7 2. Upon conviction of the felony offense alleged in Count 1 of this Indictment, said violation being punishable by imprisonment for 8 more than one year and pursuant to Title 21, United States Code, 9 Sections 853(a)(1) and 853(a)(2), defendants SAMUEL BECERRA, GABRIELLE 10 LOGUE, KELLY DANIELS, LARRY MEISNER, WALTER KUTTNER, KELLY JEAN KELLY, 11 12 KURT ROIZ, RODOLFO ANDRADE, and ALFREDO GOMEZ, shall forfeit to the United States all their rights, title and interest in any and all 13 14 property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of the offenses, and any 15 and all property used or intended to be used in any manner or part to 16 commit and to facilitate the commission of the violation alleged in 17 Count 1 of this Indictment. 18

Upon conviction of the offense alleged in Count 2 of this 19 3. 20 Indictment, and pursuant Title 18, United to States Code, Section 982(a)(1), defendant SAMUEL BECERRA, shall forfeit to the United 21 States, all property, real and personal, involved in such offense, and 22 all property traceable to such property. 23

If any of the above-described forfeitable property, as a 24 4. result of any act or omission of the defendants: 25

cannot be located upon the exercise of due diligence; 26 a. has been transferred or sold to, or deposited with, a 27 b. 28 third party;

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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	9 All pursuant to Title 21, United States Code, Section 853, and Title 18,	
10	0 United States Code, Section 982.	
11	DATED: September 13, 2019.	
12	A TRUE BILL:	
13	TRACT	
14	Foreperson	
15	ROBERT S. BREWER, JR. United States Attorney	
16	alualia	
17	By: MATTHEW J. SUTTON 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	
18	MARIO J. PEIA Assistant U.S. Attorneys	
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20	ByDeputy	
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