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2019 SEP 13 P 4: 47

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

CEPUTY

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

April 2018 Grand Jury

UNITED STATES OF AMERICA.

Plaintiff,

V.

DAVID HOPKINS (16),

MATTHEW BOGAN (17), EMILY USCANGA (18), MICHAEL BOWEN (19), EDSON GARCIA (20), BRANDON BROOKS (21), RAHEEM JACKSON (22),

HEATHER KIELEY (23), YVETTE ROMERO (24),

BOBBY LEE CRISP (25),

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DOUGLAS BOWEN (1), ERICK CIFUENTES (2), JOHN BORDWELL JR. (3), RAYA JAYE KIMBALL (4), STEPHEN ROBERT CHAVEZ (5), ROBERT DAVID HOUSER (6), JUSTIN SCOTT BAKER (7), JANETTE LEE TAYLOR (8), EMILIO VANEGAS (9), CHRISTOPHER NOBIS (10), MAXIMINO PADILLA (11), ERIKA MARLENE RAMIREZ-RAMIREZ (12), HEAVEN RAPP (13), SHELLY MARIE COBB (14), SARRAH JEAN KENT (15),

DARIO NAVARRO (26),

The grand jury charges:

Defendants.

Case No. 19 CR 3627 CAB

INDICTMENT

Title 21, U.S.C., Secs. 841(a) 1) and 846 - Conspiracy to Distribute Controlled Substances; Title 18, U.S.C., Secs. 1956(h), 1956(a)(1)(A)(i) and (a)(1)(B)(i)-Conspiracy to Launder Money; Title 18, U.S.C., Sec. 922(q)(1) -Felon in Possession of a Firearm; Title 21, U.S.C., Secs. 952 and 960 - Importation of a Controlled Substance; Title 21, U.S.C., Sec. 841(a)(1) -Possession of Methamphetamine with Intent to Distribute; Title 21, U.S.C., Sec. 853, Title 18, U.S.C., Sec. 924(d)(1), Title 28, U.S.C., Sec. 2461(c) and Title 18, U.S.C., Sec. 982 - Criminal Forfeiture

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MJS:nlv:San Diego:9/12/19

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 DOUGLAS BOWEN, ERICK CIFUENTES, JOHN BORDWELL JR., STEPHEN ROBERT CHAVEZ, ROBERT DAVID HOUSER, JUSTIN SCOTT BAKER, EMILIO VANEGAS, CHRISTOPHER NOBIS, MAXIMINO PADILLA, SARRAH JEAN KENT, DAVID HOPKINS, MATTHEW BOGAN, EMILY USCANGA, MICHAEL BOWEN, EDSON GARCIA, BRANDON BROOKS, RAHEEM JACKSON, HEATHER KIELEY, YVETTE ROMERO, BOBBY LEE CRISP, and DARIO NAVARRO, 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 methamphetamine (actual), a Schedule II Controlled Substance; all in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Count 2

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, defendants DOUGLAS BOWEN, MAXIMINO PADILLA and ERIKA MARLENE RAMIREZ-RAMIREZ, did knowingly and intentionally conspire with each other and with other persons known and unknown to the grand jury, to conduct and attempt to conduct financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, the felonious distribution of controlled substances punishable under Title 21, United States Code, Chapter 13,

- a. with the intent to promote the carrying on of such specified unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and
- b. knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and while conducting and attempting to conduct such financial transactions knew the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

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

Count 3

On or about January 23, 2019, within the Southern District of California, defendant JOHN BORDWELL JR., knowing his status as a convicted felon, that is, a person who had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm that traveled in and affected interstate commerce, to wit: one .25 caliber RG arms pistol; in violation of Title 18, United States Code, Section 922(g)(1).

Count 4

On or about February 5, 2019, within the Southern District of California, defendants RAYA JAYE KIMBALL and STEPHEN ROBERT CHAVEZ, did knowingly and intentionally import a mixture or substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21,

United States Code, Sections 952 and 960, and Title 18, United States Code, Section 2.

Count 5

On or about March 10, 2019, within the Southern District of California, defendants DOUGLAS BOWEN, JUSTIN SCOTT BAKER, JANETTE LEE TAYLOR, and MAXIMINO PADILLA, did knowingly and intentionally possess with intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, 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.

Count 6

On or about August 3, 2019, within the Southern District of California, defendant HEAVEN RAPP, did knowingly and intentionally import a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

Count 7

On or about August 3, 2019, within the Southern District of California, defendant SHELLY MARIE COBB, did knowingly and intentionally import a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 through 7 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, Title 18, United States Code, Section 924(d)(1), Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 982(a)(1).

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- 2. Upon conviction of the felony offenses alleged in Counts 1 and 4 through 7 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 DOUGLAS BOWEN, ERICK CIFUENTES, JOHN BORDWELL JR., RAYA JAYE KIMBALL, STEPHEN ROBERT CHAVEZ, ROBERT DAVID HOUSER, JUSTIN SCOTT BAKER, JANETTE LEE TAYLOR. EMILIO VANEGAS, CHRISTOPHER NOBIS, MAXIMINO PADILLA, HEAVEN RAPP, SHELLY MARIE COBB, SARRAH JEAN KENT, DAVID HOPKINS, MATTHEW BOGAN, EMILY USCANGA, MICHAEL BOWEN, EDSON GARCIA, BRANDON BROOKS, RAHEEM JACKSON, HEATHER KIELEY, YVETTE ROMERO, BOBBY LEE CRISP, and DARIO NAVARRO, 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 offenses, 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 violations alleged in Counts 1 and 4 through 7 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 DOUGLAS BOWEN, MAXIMINO PADILLA, and ERIKA MARLENE RAMIREZ-RAMIREZ, shall forfeit to the United States, all property, real and personal, involved in such offense, and all property traceable to such property.
- 4. Upon conviction of the offense alleged in Count 3 of this Indictment, defendant JOHN BORDWELL JR., shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and

Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense, including but not limited to, one .25 caliber RG arms pistol.

- 5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:
 - a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendants up to the value of the property listed above as being subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d)(1), Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 982(a)(1).

DATED: September 13, 2019.

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ROBERT S. BREWER, JR. United States Attorney

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MATTHEW J. SUTTON
MARIO J. PEIA
Assistant U.S. Attorneys

A TRUE BILL:

Foreperson

I hereby attest and certify on 911616

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

Ву_____

Deputy