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

BY: *b* DEPUTY
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

April 2018 Grand Jury

19 CR 3628 CAB

UNITED STATES OF AMERICA,

Case No. _____

Plaintiff,

I N D I C T M E N T

v.

RAMON CASTILLO (1),
SAMUEL JONES (2),
JULIO NORIEGA (3),
JOHANNA TRUJILLO (4),

Title 21, U.S.C., Secs. 841(a)(1) and 846 - Conspiracy to Distribute Methamphetamine; Title 18, U.S.C., Secs. 1956(h), 1956(a)(1)(A)(i) and (a)(1)(B)(i) - Conspiracy to Launder Money; Title 21, U.S.C., Sec. 853 and Title 18, U.S.C., Sec. 982 - Criminal Forfeiture

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 RAMON CASTILLO, SAMUEL JONES, JULIO NORIEGA, and JOHANNA TRUJILLO, 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 methamphetamine (actual), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

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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, defendant RAMON CASTILLO, did knowingly and intentionally conspire 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).

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 and 2 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).

1 2. Upon conviction of the felony offense alleged in Count 1 of
2 this Indictment, said violation being punishable by imprisonment for
3 more than one year and pursuant to Title 21, United States Code,
4 Sections 853(a)(1) and 853(a)(2), defendants RAMON CASTILLO, SAMUEL
5 JONES, JULIO NORIEGA, and JOHANNA TRUJILLO, shall, upon conviction,
6 forfeit to the United States all their rights, title and interest in any
7 and all property constituting, or derived from, any proceeds the
8 defendants obtained, directly or indirectly, as the result of the
9 offense, and any and all property used or intended to be used in any
10 manner or part to commit and to facilitate the commission of the
11 violation alleged in Count 1 of this Indictment.

12 3. Upon conviction of the offense alleged in Count 2 of this
13 Indictment, and pursuant to Title 18, United States Code,
14 Section 982(a)(1), defendant RAMON CASTILLO, shall forfeit to the United
15 States, all property, real and personal, involved in such offense, and
16 all property traceable to such property.

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

- 19 a. cannot be located upon the exercise of due diligence;
20 b. has been transferred or sold to, or deposited with, a
21 third party;
22 c. has been placed beyond the jurisdiction of the Court;
23 d. has been substantially diminished in value; or
24 e. has been commingled with other property which cannot be
25 subdivided without difficulty;

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1 it is the intent of the United States, pursuant to Title 21, United
2 States Code, Section 853(p) and Title 18, United States Code,
3 Section 982(b), to seek forfeiture of any other property of the
4 defendants up to the value of the property listed above as being subject
5 to forfeiture.

6 All pursuant to Title 21, United States Code, Section 853, and Title 18,
7 United States Code, Section 982.


8 DATED: September 12, 2019.

9 A TRUE BILL:

10 
11 Foreperson

12 ROBERT S. BREWER, JR.
13 United States Attorney

14 By:


15 MATTHEW J. SUTTON
16 MARIO J. PEIA
17 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

18 By  Deputy
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