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

UNITED STATES DISTRICT COURT BY: *[Signature]*
SOUTHERN DISTRICT OF CALIFORNIA

DEPUTY

April 2018 Grand Jury

19 CR 3630 CAB

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAVIER VERGARA (1),
RAUL ALONSO VARELA-RUIZ (2),
MICHELANGELO BECERRA (3),
CANDICE HARRINGTON (4),
AMANDA BITTICKS (5),
EDUARDO E. PARDO (6),
ROSE VELASQUEZ (7),

Defendants.

Case No. _____

I N D I C T M E N T

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

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 JAVIER VERGARA, RAUL ALONSO VARELA-RUIZ, MICHELANGELO BECERRA, CANDICE HARRINGTON, AMANDA BITTICKS, EDUARDO E. PARDO, and ROSE VELASQUEZ, 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.

1 Count 2

2 Beginning on a date unknown to the grand jury and continuing to the
3 date of this Indictment, within the Southern District of California and
4 elsewhere, defendant JAVIER VERGARA, did knowingly and intentionally
5 conspire and agree with other persons, known and unknown to the Grand
6 Jury:

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

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

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

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1 FORFEITURE ALLEGATION

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

7 2. Upon conviction of the felony offense alleged in Count 1 of
8 this Indictment, said violation being punishable by imprisonment for
9 more than one year and pursuant to Title 21, United States Code,
10 Sections 853(a)(1) and 853(a)(2), defendants JAVIER VERGARA, RAUL ALONSO
11 VARELA-RUIZ, MICHELANGELO BECERRA, CANDICE HARRINGTON, AMANDA BITTICKS,
12 EDUARDO E. PARDO, and ROSE VELASQUEZ, shall forfeit to the United States
13 all their rights, title and interest in any and all property
14 constituting, or derived from, any proceeds the defendants obtained,
15 directly or indirectly, as the result of the offenses, and any and all
16 property used or intended to be used in any manner or part to commit and
17 to facilitate the commission of the violation alleged in Count 1 of this
18 Indictment.

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

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

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

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:

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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

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21 By  Deputy
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