

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION

DEPUTY CLERK

**5-18CR0050-C**

No. \_\_\_\_\_

UNITED STATES OF AMERICA

v.

JOSE GARCIA-LIZANAGA (1)  
a/k/a "Chepe"  
JORGE LUIS LIZARRAGA-TIRADO (2)  
a/k/a "Luis" or "Barba"  
ANTONIO ALVAREZ, JR. (3)  
a/k/a "Tony"  
EDUARDO AGUSTIN CRUZ (4)  
a/k/a "Lalo"  
ROBERT LEE MELENDEZ (5)  
a/k/a "Roberto"  
JESUS MARCUS FRANCO (6)  
a/k/a "Jesse"  
JUANA SANCHEZ (7)  
a/k/a "Juana Salazar" or "Jaime"  
RICHARD DAVID HUPPER (8)  
a/k/a "Piraton"  
ANDREW DOYAL PUGH (9)  
GREGORY HOLLEMAN (10)  
a/k/a "G"  
SAUL CHAVIRA-MOLINA (11)  
JERMAINE EDGAR GARMON (12)  
SHAD EVERETT EVANS (13)  
ARTURO SANCHEZ (14)  
EDWARD TORREZ (15)  
PETRA MARIA SAUCEDA-PEREZ (16)  
a/k/a "Aunt" or "Tia"  
KIM HERRERA (17)  
JESSICA ANGEL DELEON (18)  
BRODERICK BRADLEY (19)  
AMBROSIO GARCIA, JR. (20)  
a/k/a "Bocho"  
AMBROSIO  
GARCIA-RODRIGUEZ, SR. (21)

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances  
(Violation of 21 U.S.C. § 846)

From on or about a date unknown to the grand jury and continuing through on or about the date of this indictment, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Luis Lizarraga-Tirado**, also known as “Luis” or “Barba”, **Antonio Alvarez, Jr.**, also known as “Tony”, **Eduardo Agustin Cruz**, also known as “Lalo”, **Robert Lee Melendez**, also known as “Roberto”, **Jesus Marcus Franco**, also known as “Jesse”, **Juana Sanchez**, also known as “Juana Salazar” or “Jaime”, **Richard David Hupper**, also known as “Piraton”, **Andrew Doyal Pugh**, **Gregory Holleman**, also known as “G”, **Saul Chavira-Molina**, **Jermaine Edgar Garmon**, **Shad Everett Evans**, **Arturo Sanchez**, **Edward Torrez**, **Petra Maria Saucedo-Perez**, also known as “Aunt” or “Tia”, **Kim Herrera**, **Jessica Angel Deleon**, **Broderick Bradley**, **Ambrosio Garcia, Jr.**, also known as “Bocho”, and **Ambrosio Garcia-Rodriguez, Sr.**, defendants, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with persons known and unknown to the grand jury to commit an offense against the United States, that is, to knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine and methamphetamine, both Schedule II controlled substances, and marihuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Controlled Substance Involved in the Conspiracy

Cocaine

With respect to defendants **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Luis Lizarraga-Tirado**, also known as “Luis” or “Barba”, **Antonio Alvarez, Jr.**, also known as “Tony”, **Robert Lee Melendez**, also known as “Roberto”, and **Jesus Marcus Franco**, also known as “Jesse”, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is five kilograms and more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(ii).

With respect to defendants **Eduardo Agustin Cruz**, also known as “Lalo”, **Petra Maria Saucedo-Perez**, also known as “Aunt” or “Tia”, **Kim Herrera**, **Jessica Angel Deleon**, **Ambrosio Garcia, Jr.** also known as “Bocho”, and **Ambrosio Garcia-Rodriguez, Sr.**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 500 grams and more, but less than five kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(ii).

With respect to defendants **Juana Sanchez**, also known as “Juana Salazar” or “Jaime”, **Gregory Holleman**, also known as “G”, **Saul Chavira-Molina**, **Jermaine Edgar Garmon**, **Shad Everett Evans**, **Arturo Sanchez**, **Edward Torrez**, and **Broderick Bradley**, the amount involved in the conspiracy attributable to them as a

result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(b)(1)(C).

Methamphetamine

With respect to defendants **Jose Garcia-Lizanaga**, also known as “Chepe”, **Richard David Hupper**, also known as “Piraton”, and **Andrew Doyal Pugh**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, and 50 grams and more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(viii).

Marihuana

With respect to defendants **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Luis Lizarraga-Tirado**, also known as “Luis” or “Barba”, **Jesus Marcus Franco**, also known as “Jesse”, **Ambrosio Garcia, Jr.**, also known as “Bocho”, and **Ambrosio Garcia-Rodriguez, Sr.**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a mixture and substance containing a detectable amount of marihuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(D).

All in violation of Title 21, United States Code, Section 846.

Count Two

Distribution and Possession with Intent to Distribute  
500 Grams or More of Cocaine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(ii))

On or about June 10, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Ambrosio Garcia, Jr.**, also known as “Bocho”, and **Ambrosio Garcia-Rodriguez, Sr.**, defendants, did intentionally and knowingly distribute and possess with intent to distribute 500 grams and more, but less than five kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Three

Distribution and Possession with Intent to Distribute  
500 Grams or More of Methamphetamine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii))

On or about June 6, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Richard David Hupper**, also known as “Piraton”, and **Andrew Doyal Pugh**, defendants, did intentionally and knowingly distribute and possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Four

Distribution and Possession with Intent to Distribute Marihuana  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(D))

On or about May 4, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Robert Lee Melendez**, also known as “Roberto”, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of marihuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

Count Five  
Unlawful Use of a Communications Facility  
(Violation of 21 U.S.C. § 843(b))

On or about April 30, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Luis Lizarraga-Tirado**, also known as “Luis” or “Barba”, and **Robert Lee Melendez**, also known as “Roberto”, defendants, did intentionally and knowingly use a communications facility, to wit: cellular telephones, in facilitating the commission of Distribution and Possession with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 843(b).



Count Six  
Unlawful Use of a Communications Facility  
(Violation of 21 U.S.C. § 843(b))

On or about April 21, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, and **Juana Sanchez**, also known as “Juana Salazar” or “Jaime”, defendants, did intentionally and knowingly use a communications facility, to wit: cellular telephones, in facilitating the commission of Distribution and Possession with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 843(b).

Count Seven

Distribution and Possession with Intent to Distribute  
500 Grams or More of Cocaine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(ii))

On or about April 16, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Luis Lizarraga-Tirado**, also known as “Luis” or “Barba”, **Antonio Alvarez, Jr.**, also known as “Tony”, and **Jessica Angel Deleon**, defendants, did intentionally and knowingly distribute and possess with intent to distribute 500 grams and more, but less than five kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Eight  
Unlawful Use of a Communications Facility  
(Violation of 21 U.S.C. § 843(b))

On or about April 15, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Luis Lizarraga-Tirado**, also known as “Luis” or “Barba”, and **Jesus Marcus Franco**, also known as “Jesse”, defendants, did intentionally and knowingly use a communications facility, to wit: cellular telephones, in facilitating the commission of Distribution and Possession with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 843(b).

Count Nine

Distribution and Possession with Intent to Distribute Cocaine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about April 10, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, and **Jorge Luis Lizarraga-Tirado**, also known as “Luis” or “Barba”, defendants, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Ten  
Bulk Cash Smuggling  
(Violation of 31 U.S.C. § 5332(a))

On or about April 7, 2018, in the Lubbock Division of the Northern District of Texas, the Western District of Texas, and elsewhere, **Petra Maria Saucedo-Perez**, also known as “Aunt” or “Tia”, defendant, did, with the intent to evade a currency reporting requirement under Title 31, United States Code, Section 5316, knowingly conceal more than \$10,000 in currency and other monetary instruments, on the defendant’s person and in a conveyance, article of luggage, merchandise, and other container, and transported and transferred, and attempted to transport and transfer, such currency and monetary instruments from a place within the United States to a place outside of the United States.

In violation of Title 31, United States Code, Section 5332(a), and Title 18, United States Code, Section 2.

Count Eleven  
Unlawful Use of a Communications Facility  
(Violation of 21 U.S.C. § 843(b))

On or about April 6, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Luis Lizarraga-Tirado**, also known as “Luis” or “Barba”, **Eduardo Agustin Cruz**, also known as “Lalo”, and **Jesus Marcus Franco**, also known as “Jesse”, defendants, did intentionally and knowingly use a communications facility, to wit: cellular telephones, in facilitating the commission of Distribution and Possession with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 843(b).

Count Twelve

Possession with Intent to Distribute Cocaine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 21, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Saul Chavira-Molina**, defendant, did intentionally and knowingly possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count Thirteen

Possession with Intent to Distribute Cocaine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 19, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Arturo Sanchez**, defendant, did intentionally and knowingly possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).



Count Fourteen

Possession with Intent to Distribute Cocaine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 16, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Gregory Holleman**, also known as “G”, and **Jermaine Edgar Garmon**, defendants, did intentionally and knowingly possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Fifteen

Possession with Intent to Distribute Cocaine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 16, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Shad Everett Evans**, defendant, did intentionally and knowingly possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count Sixteen

Distribution and Possession with Intent to Distribute  
28 Grams or More of Cocaine Base  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(iii))

On or about February 9, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Broderick Bradley**, defendant, did intentionally and knowingly distribute and possess with intent to distribute 28 grams and more, but less than 280 grams, of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii).

Count Seventeen

Distribution and Possession with Intent to Distribute Cocaine  
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about January 29, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Broderick Bradley**, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Forfeiture Notice  
(21 U.S.C. § 853(a) and 21 U.S.C. § 853(p))

Upon conviction of any offense charging a violation of United States Code, Title 21, and pursuant to 21 U.S.C. § 853(a), defendants, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Luis Lizarraga-Tirado**, also known as “Luis” or “Barba”, **Antonio Alvarez, Jr.**, also known as “Tony”, **Eduardo Agustin Cruz**, also known as “Lalo”, **Robert Lee Melendez**, also known as “Roberto”, **Jesus Marcus Franco**, also known as “Jesse”, **Juana Sanchez**, also known as “Juana Salazar” or “Jaime”, **Richard David Hupper**, also known as “Piraton”, **Andrew Doyal Pugh**, **Gregory Holleman**, also known as “G”, **Saul Chavira-Molina**, **Jermaine Edgar Garmon**, **Shad Everett Evans**, **Arturo Sanchez**, **Edward Torrez**, **Petra Maria Saucedo-Perez**, also known as “Aunt” or “Tia”, **Kim Herrera**, **Jessica Angel Deleon**, **Broderick Bradley**, **Ambrosio Garcia, Jr.**, also known as “Bocho”, and/or **Ambrosio Garcia-Rodriguez, Sr.**, defendants, shall forfeit to the United States of America any property constituting, or derived from, any proceeds the defendant(s) obtained, directly or indirectly, as a result of the offense(s), and any of the property used, or intended to be used, in any manner or part, by the defendant(s) to commit, or to facilitate the commission of the offense(s).

Pursuant to 21 U.S.C. § 853(p), if any of the property described above, as a result of any act or omission of the defendant(s):

- 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 divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the forfeitable property described above.

A TRUE BILL:



FOREPERSON

ERIN NEALY COX  
UNITED STATES ATTORNEY



SEAN M. LONG

Assistant United States Attorney  
Texas State Bar No. 24056734  
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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

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LUBBOCK DIVISION

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UNITED STATES OF AMERICA

v.

JOSE GARCIA-LIZANAGA (1)

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BRODERICK BRADLEY (19)

AMBROSIO GARCIA, JR. (20)

a/k/a "Bocho"

AMBROSIO GARCIA-RODRIGUEZ, SR. (21)

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INDICTMENT

- COUNT 1: CONSPIRACY TO DISTRIBUTE AND POSSESS  
WITH INTENT TO DISTRIBUTE CONTROLLED  
SUBSTANCES  
Title 21, United States Code, Section 846.
- COUNTS 2 and 7: DISTRIBUTION AND POSSESSION WITH INTENT TO  
DISTRIBUTE 500 GRAMS OR MORE OF COCAINE  
Title 21, United States Code, Sections 841(a)(1),  
841(b)(1)(B)(ii).
- COUNT 3: DISTRIBUTION AND POSSESSION WITH INTENT TO  
DISTRIBUTE 500 GRAMS OR MORE OF  
METHAMPHETAMINE  
Title 21, United States Code, Sections 841(a)(1),  
841(b)(1)(A)(viii).
- COUNT 4: DISTRIBUTION AND POSSESSION WITH INTENT TO  
DISTRIBUTE MARIHUANA  
Title 21, United States Code, Sections 841(a)(1),  
841(b)(1)(D).
- COUNTS 5, 6, 8, and 11: UNLAWFUL USE OF A COMMUNICATIONS FACILITY  
Title 21, United States Code, Section 843(b).
- COUNTS 9 and 17: DISTRIBUTION AND POSSESSION WITH INTENT TO  
DISTRIBUTE COCAINE  
Title 21, United States Code, Sections 841(a)(1),  
841(b)(1)(C).
- COUNT 10: BULK CASH SMUGGLING  
Title 31, United States Code, Section 5332(a).
- COUNTS 12-15: POSSESSION WITH INTENT TO DISTRIBUTE  
COCAINE  
Title 21, United States Code, Sections 841(a)(1),  
841(b)(1)(C).
- COUNT 16: DISTRIBUTION AND POSSESSION WITH INTENT TO  
DISTRIBUTE 28 GRAMS OR MORE OF COCAINE BASE  
Title 21, United States Code, Sections 841(a)(1),  
841(b)(1)(B)(iii).

FORFEITURE NOTICE

(17 COUNTS + FORFEITURE NOTICE)



A true bill rendered:

Lubbock

Foreperson

Filed in open court this

13th

day of

June

A.D. 2018.

SEALED ARREST WARRANT TO ISSUE AS TO EACH DEFENDANT

  
UNITED STATES MAGISTRATE JUDGE