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3		2019 SEP 13 P 4: 47
4		CLERK, U.S. DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA
5	UNITED STATES	DISTRICT COURT BY: ≽ DEPUTY
6		CT OF CELIFORNIA
7		Grand Jury
8		-
9	UNITED STATES OF AMERICA,	Case No. 19 CR 3627 CAB
10	Plaintiff,	<u>I N D I C T M E N T</u>
11	v.	Title 21, U.S.C., Secs. 841(a) 1) and 846 - Conspiracy to Distribute
12	DOUGLAS BOWEN (1), ERICK CIFUENTES (2),	Controlled Substances; Title 18, U.S.C., Secs. 1956(h),
13	JOHN BORDWELL JR. (3),	1956(a)(1)(A)(i) and (a)(1)(B)(i)- Conspiracy to Launder Money;
14	RAYA JAYE KIMBALL (4), STEPHEN ROBERT CHAVEZ (5), ROBERT DAVID HOUSER (6),	Title 18, U.S.C., Sec. 922(g)(1) - Felon in Possession of a Firearm;
15	JUSTIN SCOTT BAKER (7),	Title 21, U.S.C., Secs. 952 and 960 - Importation of a
16	JANETTE LEE TAYLOR (8), EMILIO VANEGAS (9), CURISTORIER NORIS (10)	Controlled Substance; Title 21, U.S.C., Sec. 841(a)(1) -
17	CHRISTOPHER NOBIS (10), MAXIMINO PADILLA (11),	Possession of Methamphetamine with Intent to Distribute; Title 21,
18	ERIKA MARLENE RAMIREZ-RAMIREZ (12), HEAVEN RAPP (13),	U.S.C., Sec. 853, Title 18, U.S.C., Sec. 924(d)(1), Title 28,
19	SHELLY MARIE COBB (14), SARRAH JEAN KENT (15),	U.S.C., Sec. 2461(c) and Title 18, U.S.C., Sec. 982 - Criminal
20	DAVID HOPKINS (16), MATTHEW BOGAN (17),	Forfeiture
21	EMILY USCANGA (18), MICHAEL BOWEN (19),	
22	EDSON GARCIA (20), BRANDON BROOKS (21),	
23	RAHEEM JACKSON (22), HEATHER KIELEY (23),	
24	YVETTE ROMERO (24), BOBBY LEE CRISP (25),	
25	DARIO NAVARRO (26),	
26	Defendants.	
27	The grand jury charges:	a national design of the second se
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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 2 and including the date of this Indictment, within the Southern District 3 of California and elsewhere, defendants DOUGLAS BOWEN, ERICK CIFUENTES, 4 JOHN BORDWELL JR., STEPHEN ROBERT CHAVEZ, ROBERT DAVID HOUSER, JUSTIN 5 SCOTT BAKER, EMILIO VANEGAS, CHRISTOPHER NOBIS, MAXIMINO PADILLA, SARRAH 6 7 JEAN KENT, DAVID HOPKINS, MATTHEW BOGAN, EMILY USCANGA, MICHAEL BOWEN, EDSON GARCIA, BRANDON BROOKS, RAHEEM JACKSON, HEATHER KIELEY, YVETTE 8 9 ROMERO, BOBBY LEE CRISP, and DARIO NAVARRO, did knowingly and intentionally conspire together and with each other and with other 10 persons known and unknown to the grand jury, to distribute 1 kilogram 11 and more of a mixture and substance containing a detectable amount of 12 heroin, a Schedule I Controlled Substance, and 50 grams and more of 13 methamphetamine (actual), a Schedule II Controlled Substance; all in 14 violation of Title 21, United States Code, Sections 841(a)(1) and 846. 15

Count 2

Beginning on a date unknown to the grand jury and continuing to the 17 18 date of this Indictment, within the Southern District of California and elsewhere, defendants DOUGLAS BOWEN, MAXIMINO PADILLA and ERIKA MARLENE 19 20 RAMIREZ-RAMIREZ, did knowingly and intentionally conspire with each 21 other and with other persons known and unknown to the grand jury, to conduct and attempt to conduct financial transactions affecting 22 23 interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, the felonious distribution of 24 25 controlled substances punishable under Title 21, United States Code, Chapter 13, 26

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- 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).

12 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 14 California, defendant JOHN BORDWELL JR., knowing his status 15 as a convicted felon, that is, a person who had previously been convicted in 16 17 a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm that traveled in and affected 18 interstate commerce, to wit: one .25 caliber RG arms pistol; in violation 19 of Title 18, United States Code, Section 922(g)(1). 20

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)-4piperidinyl] propanamide), a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21,

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

Count 5

On or about March 10, 2019, within the Southern District 4 of 5 California, defendants DOUGLAS BOWEN, JUSTIN SCOTT BAKER, JANETTE LEE 6 TAYLOR, and MAXIMINO PADILLA, did knowingly and intentionally possess with intent to distribute, a mixture or substance containing a detectable 7 amount of methamphetamine, a Schedule II Controlled Substance; 8 in violation of Title 21, United States Code, Section 841(a)(1), and 9 Title 18, United States Code, Section 2. 10

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.

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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

1 provisions of Title 21, United States Code, Section 853, Title 18, United 2 States Code, Section 924(d)(1), Title 28, United States Code, 3 Section 2461(c), and Title 18, United States Code, Section 982(a)(1).

2. Upon conviction of the felony offenses alleged in Counts 1 and 4 5 4 through 7 of this Indictment, said violations being punishable by 6 imprisonment for more than one year and pursuant to Title 21, United 7 States Code, Sections 853(a)(1) and 853(a)(2), defendants DOUGLAS BOWEN, ERICK CIFUENTES, JOHN BORDWELL JR., RAYA JAYE KIMBALL, STEPHEN ROBERT 8 9 CHAVEZ, ROBERT DAVID HOUSER, JUSTIN SCOTT BAKER, JANETTE LEE TAYLOR. EMILIO VANEGAS, CHRISTOPHER NOBIS, MAXIMINO PADILLA, HEAVEN RAPP, SHELLY 10 MARIE COBB, SARRAH JEAN KENT, DAVID HOPKINS, MATTHEW BOGAN, EMILY 11 USCANGA, MICHAEL BOWEN, EDSON GARCIA, BRANDON BROOKS, RAHEEM JACKSON, 12 HEATHER KIELEY, YVETTE ROMERO, BOBBY LEE CRISP, and DARIO NAVARRO, shall, 13 upon conviction, forfeit to the United States all their rights, title 14 and interest in any and all property constituting, or derived from, any 15 proceeds the defendants obtained, directly or indirectly, as the result 16 of the offenses, and any and all property used or intended to be used 17 in any manner or part to commit and to facilitate the commission of the 18 violations alleged in Counts 1 and 4 through 7 of this Indictment. 19

20 3. Upon conviction of the offense alleged in Count 2 of this Indictment, and 21 pursuant to Title 18, United States Code, 22 Section 982(a)(1), defendants DOUGLAS BOWEN, MAXIMINO PADILLA, and ERIKA MARLENE RAMIREZ-RAMIREZ, shall forfeit to the United States, all 23 property, real and personal, involved in such offense, and all property 24 25 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

1 Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense, including but not 2 limited to, one .25 caliber RG arms pistol. 3

If any of the above-described forfeitable property, as a 5. 4 5 result of any act or omission of the defendants:

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cannot be located upon the exercise of due diligence; a.

7 b. has been transferred or sold to, or deposited with, a third party; 8

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с. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

11 has been commingled with other property which cannot be е. subdivided without difficulty; it is the intent of the United States, 12 pursuant to Title 21, United States Code, Section 853(p) and Title 18, 13 United States Code, Section 982(b), to seek forfeiture of any other 14 property of the defendants up to the value of the property listed above 15 16 as being subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853, Title 18, 17 United States Code, Section 924(d)(1), Title 28, United States Code, 18 Section 2461(c), and Title 18, United States Code, Section 982(a)(1). 19

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A TRUE BILL:

Foreperson

24 ROBERT S. BREWER, JR. United States Attorney

By:

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

DATED: September 13, 2019.

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 custody. CLERK, U.S. DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA By Deputy 6