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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTOPHER ROYBAL,
GEORGE ROYBAL,
JONATHAN ULIBARRI,
JEROME ECKSTEIN,
CESAR RAMIREZ,
MANUEL VALENCIA,
ANTHONY PADILLA,
JAIRUS GRANADO,
JOSE LOPEZ,
TROY CRAWFORD,
CHASE CAMERON,
MICHELLE JOHNSON,
KRISTEN LUCERO,
BRANDY LUCERO,
ERICK VIGIL,
ISAAC GONZALES,
RICHARD SANCHEZ,
PAUL ULIBARRI and
TIANA CANDELARIA,

Defendants.

CRIMINAL NO. 12-3182

Counts 1 and 2: 21 U.S.C. § 846:
Conspiracy;

Counts 3 - 5,: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(B): Distribution of 500 Grams and
More of Cocaine;

Count 6: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(C): Distribution of Cocaine;

Counts 7 - 11, 13 - 15: 21 U.S.C. §§
841(a)(1) and (b)(1)(D): Distribution of
Marijuana;

Count 12 : 21 U.S.C. §§ 841(a)(1) and
(b)(1)(D): Possession with Intent to
Distribute Marijuana;

Counts 16 - 36 : 18 U.S.C. §
1956(a)(1)(B)(i): Laundering of Monetary
Instruments and 18 U.S.C. § 2: Aiding and
Abetting;

Counts 37 - 39: 18 U.S.C. § 1956(h):
Conspiracy to Launder Monetary
Instruments;

Count 40: 18 U.S.C. § 1956 (a)(3)(B):
Laundering of Monetary Instruments;

Count 41: 18 U.S.C. § 1957: Engaging in
Monetary Transactions in Property
Derived from Specified Unlawful Activity;

Counts 42- 60: 21 U.S.C. § 843(b): Use of
a Telephone to Facilitate a Drug
Trafficking Offense.

INDICTMENT

The Grand Jury charges:

Count 1

Between on or about August 2011 through December 12, 2012, in Bernalillo County and elsewhere, in the District of New Mexico, the defendants, **CHRISTOPHER ROYBAL, MANUEL VALENCIA, CESAR RAMIREZ, GEORGE ROYBAL, JONATHAN ULIBARRI, ANTHONY PADILLA, ERICK VIGIL, JAIRUS GRANADO, PAUL ULIBARRI, ISAAC GONZALES, and RICHARD SANCHEZ**, unlawfully, knowingly and intentionally combined, conspired, confederated and agreed with each other and with other persons whose names are known and unknown to the grand jury to commit the following offense against the United States, to wit: distribution of five kilograms and more of a mixture and substance containing a detectable amount of cocaine, contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

In violation of 21 U.S.C. § 846.

Count 2

Between on or about October 2011 and December 12, 2012, in the District of New Mexico and elsewhere, the defendants, **CHRISTOPHER ROYBAL, JOSE LOPEZ, JONATHAN ULIBARRI, TROY CRAWFORD, JAIRUS GRANADO, CHASE CAMERON, MICHELLE JOHNSON, KRISTEN LUCERO, BRANDY LUCERO, and TIANA CANDELARIA**, unlawfully, knowingly and intentionally combined, conspired, confederated and agreed with each other and with other persons whose names are known and unknown to the grand jury to commit the following offense against the United States, to wit:

distribution of 50 kilograms and more of a mixture and substance containing a detectable amount of marijuana, contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

In violation of 21 U.S.C. § 846.

Count 3

On or about August 18, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, unlawfully, knowingly and intentionally distributed a controlled substance, 500 grams and more of a mixture and substance containing a detectable amount of cocaine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B).

Count 4

Between on or about September 10, 2011 and September 12, 2011, in Bernalillo County, in the District of New Mexico, the defendants, **CHRISTOPHER ROYBAL and JONATHAN ULIBARRI**, unlawfully, knowingly and intentionally distributed a controlled substance, 500 grams of a mixture and substance containing a detectable amount of cocaine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B) and 18 U.S.C. § 2.

Count 5

Between on or about April 10, 2012 and April 13, 2012, in Bernalillo County, in the District of New Mexico, the defendants, **CHRISTOPHER ROYBAL and GEORGE ROYBAL**, unlawfully, knowingly and intentionally distributed a controlled substance, 500 grams of a mixture and substance containing a detectable amount of cocaine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B) and 18 U.S.C. § 2.

Count 6

On or about December 14, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, unlawfully, knowingly and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of cocaine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

Count 7

On or about October 18, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, unlawfully, knowingly and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).

Count 8

On or about November 1, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, unlawfully, knowingly and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).

Count 9

On or about November 7, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, unlawfully, knowingly and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).

Count 10

On or about November 29, 2011, in Bernalillo County, in the District of New Mexico, the defendants, **CHRISTOPHER ROYBAL** and **JONATHAN ULIBARRI**, unlawfully, knowingly and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D) and 18 U.S.C. § 2.

Count 11

On or about December 7, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, unlawfully, knowingly and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).

Count 12

On or about December 14, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).

Count 13

On or about December 20, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, unlawfully, knowingly and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).

Count 14

On or about February 17, 2012, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, unlawfully, knowingly and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).

Count 15

Between or about April 4, 2012 and April 13, 2012, in Bernalillo County, in the District of New Mexico, the defendants, **CHRISTOPHER ROYBAL and GEORGE ROYBAL**, unlawfully, knowingly and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).

Count 16

Between on or about January 15, 2010 through January 20, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a January 15, 2010 cash deposit in the amount of \$1,050 into Wells Fargo Bank account # 6145735020; a January 20, 2010 payment in the amount of \$868.37 to Saxon Mortgage Services; and a January 20, 2010 payment in the amount of \$131.73 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while

conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 17

Between on or about February 16, 2010 through February 18, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a February 16, 2010 cash deposit in the amount of \$1,050 into Wells Fargo Bank account # 6145735020; a February 18, 2010 payment in the amount of \$911.59 to Saxon Mortgage Services; and a February 18, 2010 payment in the amount of \$131.73 to Advanced Loan Servicing , which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 18

Between on or about March 22, 2010 through March 24, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a March 22, 2010 cash deposit in the amount of \$1,100 into Wells Fargo Bank account # 6145735020; a March 24, 2010 payment in the amount of \$911.59 to Saxon Mortgage Services;

and a March 24, 2010 payment in the amount of \$128.93 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 19

On or about April 15, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, an April 15, 2010 cash deposit in the amount of \$800 into Wells Fargo Bank account # 6145735020; an April 15, 2010 payment in the amount of \$911.59 to Saxon Mortgage Services; and an April 15, 2010 payment in the amount of \$131.73 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 20

Between on or about May 18, 2010 through May 21, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a May 18, 2010 cash deposit in the amount of \$1,100 into Wells Fargo Bank account # 6145735020; a May 21, 2010 payment in the amount of \$911.59 to Saxon Mortgage Services; and a May 21, 2010 payment in the amount of \$127.48 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 21

Between on or about June 8, 2010 through June 16, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a June 8, 2010 cash deposit in the amount of \$1,050 into Wells Fargo Bank account # 6145735020; a June 16, 2010 payment in the amount of \$911.59 to Saxon Mortgage Services; and a June 16, 2010 payment in the amount of \$131.73 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source,

ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 22

Between on or about July 14, 2010 through July 16, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a July 14, 2010 cash deposit in the amount of \$1,100 into Wells Fargo Bank account # 6145735020; a July 16, 2010 payment in the amount of \$911.59 to Saxon Mortgage Services; and a July 16, 2010 payment in the amount of \$127.48 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 23

Between on or about August 13, 2010 through August 18, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, an August 13, 2010 cash deposit in the amount of \$1,100 into Wells Fargo Bank account #

6145735020; an August 18, 2010 payment in the amount of \$909.09 to Saxon Mortgage Services; and an August 18, 2010 payment in the amount of \$131.73 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 24

Between on or about September 14, 2010 through September 17, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a September 14, 2010 cash deposit in the amount of \$1,100 into Wells Fargo Bank account # 6145735020; a September 17, 2010 payment in the amount of \$911.59 to Saxon Mortgage Services; and a September 17, 2010 payment in the amount of \$131.73 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 25

Between on or about October 14, 2010 through October 18, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, an October 14, 2010 cash deposit in the amount of \$1,100 into Wells Fargo Bank account # 6145735020; an October 18, 2010 payment in the amount of \$911.59 to Saxon Mortgage Services; and an October 18, 2010 payment in the amount of \$127.48 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 26

Between on or about November 10, 2010 through November 17, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a November 10, 2010 cash deposit in the amount of \$1,200 into Wells Fargo Bank account # 6145735020; a November 17, 2010 payment in the amount of \$911.59 to Saxon Mortgage Services; and a November 17, 2010 payment in the amount of \$131.73 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to

conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 27

Between on or about December 15, 2010 through December 20, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a December 15, 2010 cash deposit in the amount of \$1,050 into Wells Fargo Bank account # 6145735020; a December 20, 2010 payment in the amount of \$911.59 to Saxon Mortgage Services; and a December 17, 2010 payment in the amount of \$127.48 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 28

Between on or about January 12, 2011 through January 20, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a January 12, 2011 cash deposit in the amount of \$1,000 into Wells Fargo Bank account #

6145735020; a January 20, 2011 payment in the amount of \$911.59 to Saxon Mortgage Services; and a January 20, 2011 payment in the amount of \$131.73 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 29

Between on or about February 10, 2011 through February 17, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a February 10, 2011 cash deposit in the amount of \$1,050 into Wells Fargo Bank account # 6145735020; a February 17, 2011 payment in the amount of \$882.65 to Saxon Mortgage Services; and a February 17, 2011 payment in the amount of \$131.73 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 30

Between on or about March 15, 2011 through March 17, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a March 15, 2011 cash deposit in the amount of \$550 into Wells Fargo Bank account # 6145735020; a second March 15, 2011 cash deposit in the amount of \$550 into Wells Fargo Bank account # 6145735020; a March 17, 2011 payment in the amount of \$882.65 to Saxon Mortgage Services; and a March 17, 2011 payment in the amount of \$118.98 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 31

On or about April 18, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, an April 18, 2011 cash deposit in the amount of \$1,050 into Wells Fargo Bank account # 6145735020; an April 18, 2011 payment in the amount of \$882.65 to Saxon Mortgage Services; and an April 18, 2011 payment in the amount of \$131.73 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the

transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 32

Between on or about June 14, 2011 through June 17, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a June 14, 2011 cash deposit in the amount of \$1,050 into Wells Fargo Bank account # 6145735020; a June 17, 2011 payment in the amount of \$882.65 to Saxon Mortgage Services; and a June 17, 2011 payment in the amount of \$131.73 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 33

Between on or about July 12, 2011 through July 15, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a

July 12, 2011 cash deposit in the amount of \$950 into Wells Fargo Bank account # 6145735020; a July 15, 2011 payment in the amount of \$882.65 to Saxon Mortgage Services; and a July 15, 2011 payment in the amount of \$127.48 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 34

Between on or about September 7, 2011 through September 19, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a September 7, 2011 cash deposit in the amount of \$3,000 into Wells Fargo Bank account # 6145735020; a September 19, 2011 payment in the amount of \$890.15 to Saxon Mortgage Services; and a September 19, 2011 payment in the amount of \$131.73 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 35

Between on or about October 17, 2011 through October 20, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, an October 17, 2011 cash deposit in the amount of \$1,100 into Wells Fargo Bank account # 6145735020; an October 19, 2011 cash deposit in the amount of \$500 into Wells Fargo Bank account # 6145735020; an October 19, 2011 payment in the amount of \$890.15 to Saxon Mortgage Services; and an October 20, 2011 payment in the amount of \$127.48 to Advanced Loan Servicing, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 36

Between on or about November 16, 2011 through November 18, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **CHRISTOPHER ROYBAL**, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, a November 16, 2011 cash deposit in the amount of \$1,050 into Wells Fargo Bank account # 6145735020; and a November 18, 2011 payment in the amount of \$900.15 to Saxon Mortgage Services, which involved the proceeds of a specified unlawful activity, that is distribution of controlled substances, knowing that the transaction was designed in whole and in

part to conceal the source, ownership and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2.

Count 37

From on or about October 2011 through December 12, 2012, in the District of New Mexico and elsewhere, the defendants, **CHRISTOPHER ROYBAL, GEORGE ROYBAL, JOSE LOPEZ, CHASE CAMERON and TROY CRAWFORD**, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the grand jury to commit offenses against the United States in violation of 18 U.S.C. § 1956, to wit: to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is distribution of marijuana and conspiracy to do the same, with the intent to promote the carrying on of specified unlawful activity, that is distribution of marijuana and conspiracy to do the same, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, contrary to 18 U.S.C. 1956(a)(1)(A)(i).

Manner and Means of the Conspiracy

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

(1) On April 11, 2012, Chase Cameron transported \$31,500 in United States Currency on Southwest Airlines Flight number 3046 from Albuquerque, New Mexico to San Diego, California and then gave the money to Jose Lopez.

(2) On April 15, 2012, Troy Crawford transported \$12,500 in United States Currency on Southwest Airlines Flight number 2025 from Albuquerque, New Mexico to Los Angeles, California and then gave the money to Jose Lopez the following day.

In violation of 18 U.S.C. § Section 1956(h).

Count 38

From on or about May 24, 2011 through June 3, 2011, in the District of New Mexico and elsewhere, the defendants, **CHRISTOPHER ROYBAL and JEROME ECKSTEIN**, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the grand jury to commit offenses against the United States in violation 18 U.S.C. § 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, distribution of controlled substances, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property

involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to 18 U.S.C. § 1956(a)(1)(B)(i).

Manner and Means of the Conspiracy

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

(1) On May 24, 2011, \$10,000 United States currency was deposited into Bank of the West Account # 024-633941.

(2) On May 27, 2011, \$6,000 United States currency was deposited into Bank of the West Account # 024-633941.

(3) On May 27, 2011, \$4,000 United States currency was deposited into Bank of the West Account # 024-633941.

(4) On May 31, 2011, \$20,000 was transferred from Bank of the West Account # 024-633941 to Bank of the West Account # 024-630798.

(5) On June 3, 2011, a \$7,500 check payable to "Kristen Velasquez" drawn on Bank of the West Account # 024-630798 was cashed.

(6) On June 3, 2011, a \$7,500 check payable to "Britney Gutierrez" drawn on Bank of the West Account # 024-630798 was cashed.

In violation of 18 U.S.C. § Section 1956(h).

Count 39

From on or about December 12, 2011 through January 26, 2012, in the District of New Mexico and elsewhere, the defendants, **CHRISTOPHER ROYBAL and JEROME ECKSTEIN**, did knowingly combine, conspire, and agree with each other and with other

persons known and unknown to the grand jury to commit offenses against the United States in violation 18 U.S.C. § 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, distribution of controlled substances, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to 18 U.S.C. § 1956(a)(1)(B)(i).

Manner and Means of the Conspiracy

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

(1) On December 12, 2011, Christopher Roybal deposited \$4,400 United States currency into Kirtland Federal Credit Union Account # 214845-8.

(2) On December 13, 2011, Jerome Eckstein deposited \$5,000 United States currency into Kirtland Federal Credit Union Account # 214845-8.

(3) On December 13, 2011, \$10,000 was transferred from Kirtland Federal Credit Union Account # 214845-8 to Kirtland Federal Credit Union Account # 214845-9.

(4) On December 14, 2011, check #249 drawn on Kirtland Federal Credit Union Account # 214845-9 in the amount of \$5,000 was deposited into Main Bank Account # 10104550 in the name of 6000 Gibson, LLC.

(5) On December 20, 2011, Jerome Eckstein deposited \$3,000 United States currency into Kirtland Federal Credit Union Account # 214845-9.

(6) On December 20, 2011, Jerome Eckstein deposited \$2,500 United States currency into Kirtland Federal Credit Union Account # 214845-9.

(7) On December 21, 2011, check #210 drawn on Kirtland Federal Credit Union Account # 214845-9 in the amount of \$5,000 was deposited into Main Bank Account # 10104550 in the name of 6000 Gibson, LLC.

(8) On December 27, 2011, Jerome Eckstein deposited \$5,000 United States currency into Kirtland Federal Credit Union Account # 214845-9.

(9) On December 28, 2011, Christopher Roybal and Jerome Eckstein deposited \$2,000 United States currency into Kirtland Federal Credit Union Account # 214845-9.

(10) On December 28, 2011, Christopher Roybal and Jerome Eckstein deposited \$3,000 United States currency into Kirtland Federal Credit Union Account # 214845-9.

(11) On December 28, 2011, check #214 drawn on Kirtland Federal Credit Union Account # 214845-9 in the amount of \$5,000 was deposited into Main Bank Account # 10104550 in the name of 6000 Gibson, LLC.

(12) On January 3, 2012, check #212 drawn on Kirtland Federal Credit Union Account # 214845-9 in the amount of \$18,000 was deposited into Main Bank Account # 10104550 in the name of 6000 Gibson, LLC.

(13) On January 12, 2012, check #215 drawn on Kirtland Federal Credit Union Account # 214845-9 in the amount of \$5,000 was deposited into Main Bank Account # 10104550 in the name of 6000 Gibson, LLC.

(14) On January 17, 2012, check #404 drawn on Kirtland Federal Credit Union Account # 214845-9 in the amount of \$2,000 was deposited into Main Bank Account # 10104550 in the name of 6000 Gibson, LLC.

(15) On January 20, 2012, there was a deposit of \$5,500 United States currency into Kirtland Federal Credit Union Account # 214845-9.

(16) On January 21, 2012, there was deposit of \$8,000 United States currency into Kirtland Federal Credit Union Account # 214845-9.

(17) On January 23, 2012, check #405 drawn on Kirtland Federal Credit Union Account # 214845-9 in the amount of \$4,500 was deposited into Main Bank Account # 10104550 in the name of 6000 Gibson, LLC.

(18) On January 26, 2012, check #406 drawn on Kirtland Federal Credit Union Account # 214845-9 in the amount of \$5,000 was deposited into Main Bank Account # 10104550 in the name of 6000 Gibson, LLC.

In violation of 18 U.S.C. § Section 1956(h).

Count 40

Between on or about November 3, 2011 through December 12, 2012, in the District of New Mexico, the defendants, **CHRISTOPHER ROYBAL and JEROME ECKSTEIN**, with the intent to conceal and disguise the nature, location, source, ownership and control of property, did knowingly conduct and attempt to conduct a financial transaction affecting interstate or foreign commerce involving property represented by a law enforcement officer, to be proceeds of specified unlawful activity, to wit: distribution of controlled substances.

In violation of 18 U.S.C. §§1956(a)(3)(B) and 2.

Count 41

On or about July 26, 2011, in the District of Nevada and elsewhere, the defendant, **CHRISTOPHER ROYBAL**, did knowingly engage and attempt to engage in a monetary transaction by through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is a \$10,100 United States currency cash buy-in at Paris Las Vegas Casino, such property having been derived from a specified unlawful activity, namely, distribution of controlled substances.

In violation of 18 U.S.C. § 1957.

Counts 42 - 60

For each of Counts 42 through 60, on or about the date specified for each Count, in the District of New Mexico, the defendants named in each Count did unlawfully, knowingly, and intentionally use a communication facility, that is a telephone, in facilitating the commission of any act or acts constituting a felony under 21 U.S.C. § 841(a)(1), that is, distribution of a controlled substance:

Count	Date	Defendants	Call #s	Telephone
42	4/11/12	GEORGE ROYBAL and CHRISTOPHER ROYBAL	224	(505) 239-3039 and (505) 205-7387
43	4/11/12	GEORGE ROYBAL and CHRISTOPHER ROYBAL	268	(505) 239-3039 and (505) 205-7387

Count	Date	Defendants	Call #s	Telephone
44	2/28/12 - 2/29/12	JOSE LOPEZ and CHRISTOPHER ROYBAL	5, 11 and 75	(858) 837-2030 and (505) 563-0640
45	5/5/12	CESAR RAMIREZ and CHRISTOPHER ROYBAL	60, 66 and 68	(505) 353-6072 and (505) 225-0342
46	4/10/12	TROY CRAWFORD and CHRISTOPHER ROYBAL	188, 191 and 199	(562) 310-5118 and (505) 205-7387
47	4/10/12	BRANDY LUCERO and CHRISTOPHER ROYBAL	189	(505) 718-0057 and (505) 205-7387
48	4/10/12	KRISTEN LUCERO and CHRISTOPHER ROYBAL	127	(505) 718-0562 and (505) 205-7387
49	3/3/12	JAIRUS GRANADO and CHRISTOPHER ROYBAL	281 and 292	(505) 814-3663 and (505) 563-0640
50	4/11/12	CHASE CAMERON and CHRISTOPHER ROYBAL	315 and 324	(323) 533-6976 and (505) 205-7387

Count	Date	Defendants	Call #s	Telephone
51	3/3/12	TIANA CANDELARIA and CHRISTOPHER ROYBAL	314 and 333	(505) 506-3883 and (505) 563-0640
52	4/9/12 - 4/10/12	ANTHONY PADILLA and CHRISTOPHER ROYBAL	87, 95 and 129	(505) 426-5109 and (505) 205-7387
53	3/3/12	ERICK VIGIL and CHRISTOPHER ROYBAL	279 and 329	(505) 340-4984 and (505) 563-0640
54	4/21/12	MANUEL VALENCIA and CHRISTOPHER ROYBAL	1083	(575) 707-2870 and (505) 205-7387
55	5/23/2012	PAUL ULIBARRI and CHRISTOPHER ROYBAL	193 and 212	(505) 269-5463 and (505) 225-0342
56	4/13/2012	MICHELLE JOHNSON and CHRISTOPHER ROYBAL	375, 377 and 384	(954) 279-9326 and (505) 205-7387
57	7/26/12	ISAAC GONZALES and CESAR RAMIREZ	39	(702) 237-3776 and (505) 710-7390

Count	Date	Defendants	Call #s	Telephone
58	8/4/12	ISAAC GONZALES and CESAR RAMIREZ	447 and 449	(702) 237-3776 and (505) 710-7390
59	8/16/12	RICHARD SANCHEZ and CESAR RAMIREZ	1019 and 1043	(303) 437-8934 and (505) 710-7390
60	8/18/12	RICHARD SANCHEZ and CESAR RAMIREZ	1172 and 1202	(303) 437-8934 and (505) 710-7390

Each in violation of 21 U.S.C. § 843(b).

FORFEITURE ALLEGATIONS

Counts 1 through 15 of this Indictment are incorporated as part of this section of the indictment as if fully re-alleged herein for the purpose of alleging forfeiture to the United States pursuant to 21 U.S.C. § 853.

Upon conviction of any offense in violation of 21 U.S.C. §§ 841 or 846, the defendants, **CHRISTOPHER ROYBAL, MANUEL VALENCIA, CESAR RAMIREZ, GEORGE ROYBAL, JONATHAN ULIBARRI, ANTHONY PADILLA, JAIRUS GRANADO, JOSE LOPEZ, TROY CRAWFORD, ERICK VIGIL, CHASE CAMERON, MICHELLE JOHNSON, KRISTEN LUCERO, BRANDY LUCERO, ISAAC GONZALES, RICHARD SANCHEZ, PAUL ULIBARRI and TIANA CANDELARIA** shall forfeit to the United States pursuant to 21 U.S.C. § 853 any property constituting, or derived from, proceeds obtained,

directly or indirectly, as a result of each offense for which the Defendants are convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offenses.

Counts 16 through 41 of this Indictment are incorporated as part of this section of the indictment as if fully re-alleged herein for the purpose of alleging forfeiture to the United States pursuant to 18 U.S.C. § 982(a)(1).

Upon conviction of any offense in violation of 18 U.S.C. § 1956, the defendants, **CHRISTOPHER ROYBAL, GEORGE ROYBAL, JOSE LOPEZ, TROY CRAWFORD, CHASE CAMERON and JEROME ECKSTEIN** shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(1) all property, real and personal, involved in such offense, or conspiracy to commit such offense, for which the Defendants are convicted, and all property traceable to such property.

The property to be forfeited to the United States includes but is not limited to the following:

1. MONEY JUDGMENT

A sum of money equal to at least \$4,176,000 in United States currency, including any interest accruing to the date of the judgment, representing the amount of money derived from or involved in the offenses, or traceable to property involved in the offenses, for which the Defendants are jointly and severally liable.

2. PERSONAL PROPERTY

- a. Main Bank Account #010104550;
- b. Bank of the West Account #024-633941;

- c. Bank of the West Account #028626655;
- d. Kirtland Federal Credit Union Account #214845-8;
- e. Kirtland Federal Credit Union Account #214845-9;
- f. Bank of America Account #439002715443;
- g. 2006 Mitsubishi Gallant (VIN #4A3AB36F66E009743);
- h. 2006 Nissan Maxima (VIN #1N4BA41E06C815206);
- i. 2001 Chevrolet Tahoe (VIN #1GNEK13T31R119077);
- j. 2000 Chevrolet Monte Carlo SS (VIN #2G1WX12K6Y9212373);
- k. 2006 Dodge Magnum (VIN #2D4FV47T76H148575);
- l. 2000 Chevrolet Monte Carlo SS (VIN #2G1WX12K9Y9267464);
- m. 2006 Ford F-350 (VIN #1FTWW31P66EA15135);
- n. 2002 Ford F-150 (VIN #1FTRW07312KE01439); and
- o. 1967 Chevrolet Camaro (VIN # 124377L161370).

3. REAL PROPERTY

- a. 8004 Saddlebrook, Albuquerque, New Mexico 87120 – Lot 11, P1 Block 12, Vacation and Replat for Parkwest Unit 5, Albuquerque, NM; and
- b. 6000 Gibson, Albuquerque, New Mexico – Tract number G-Two-A-One (G-2-A-1), Siesta Hills Subdivision No. 2, City of Albuquerque, Bernalillo County, New Mexico.

