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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

SEALED

United States of America,

Plaintiff,

vs.

SUPERSEDING
INDICTMENT

CR 18-1840-TUC-RCC (JR)

Violations:

1. Aureliano Guzmán-Loera, aka Mario
Aureliano Guzman-Loera, aka Guano, aka
KI, aka Chente, aka Mr. W, aka Wuano,
aka *kitttttttGGgGG
(Counts 1-4)
3. FNU LNU, aka Adrian, aka Cachorro,
(Count 2)
4. FNU LNU, aka Compa,
(Count 2)
5. FNU LNU, aka Guera, aka Lucky Charms,
aka Osa,
(Count 3)
6. Ruperto Salgueiro-Nevarez,
aka El 37, aka Batman,
(Count 3)
7. FNU LNU, aka Ochoa, aka Davidson,
(Count 3)

8. 

Defendants.

21 U.S.C. §§ 959(a) and (d), 960(a)(3),
(b)(1)(A), (b)(1)(B)(ii), (b)(1)(F),
and 963
(International Conspiracy to
Distribute Heroin, Cocaine and
Fentanyl)
Count 1

21 U.S.C. §§ 846, 841(a)(1) and
(b)(1)(A)(vi)
(Conspiracy to Possess with Intent to
Distribute Fentanyl)
Count 2

21 U.S.C. §§ 959, 960(a)(3) and
(b)(1)(A); 18 U.S.C. § 2
(International Distribution of
Heroin)
Count 3

21 U.S.C. §§ 959, 960(a)(3) and
(b)(1)(B)(ii); 18 U.S.C. § 2
(International Distribution of
Cocaine)
Count 4

21 U.S.C. §853
(Forfeiture)

THE GRAND JURY CHARGES:

COUNT 1

Beginning at a time unknown and continuing up to and including [REDACTED] in the country of Mexico and elsewhere, defendant **AURELIANO GUZMÁN-LOERA**, aka Mario Aureliano Guzman-Loera, aka Guano, aka KI, aka Chente, aka Mr. W, aka Wuano, aka *kitttttttGGgGG, who will first enter the United States in the District of Arizona, did knowingly and intentionally combine, conspire, confederate and agree with persons known and unknown to the grand jury to distribute and cause the distribution of a controlled substance, to wit: 1 kilogram or more of heroin, a Schedule I controlled substance, intending, knowing, and having reasonable cause to believe that such heroin would be unlawfully imported into the United States; 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II Controlled Substance, intending, knowing, and having reasonable cause to believe that such fentanyl would be unlawfully imported into the United States; and 5 kilograms and more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending, knowing, or having reasonable cause to believe that such cocaine would be unlawfully imported into the United States; in violation of Title 21, United States Code, Sections 959(a) & (d), 960(a)(3), (b)(1)(A), (b)(1)(B)(ii), & (b)(1)(F).

All in violation of Title 21, United States Code, Section 963.

COUNT 2

Beginning at a time unknown, to on or about [REDACTED] at or near [REDACTED] in the [REDACTED] and elsewhere, **AURELIANO GUZMÁN-LOERA**, aka Mario Aureliano Guzman-Loera, aka Guano, aka KI, aka Chente, aka Mr. W, aka Wuano, aka *kitttttttGGgGG, FNU LNU, aka ADRIAN, aka Cachorro, and FNU LNU, aka

1 COMPA, did knowingly and intentionally combine, conspire, confederate and agree with
2 persons known and unknown to the grand jury, to possess with intent to distribute 400
3 grams or more of a mixture or substance containing a detectable amount of fentanyl, that
4 is, approximately [REDACTED], a Schedule II controlled substance, in violation of Title
5 21, United States Code, Sections 841(a)(1) & (b)(1)(A)(vi).

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

7 **COUNT 3**

8 Beginning on or about [REDACTED] and continuing up to and including on
9 about [REDACTED] in the country of Mexico and elsewhere, defendants
10 **AURELIANO GUZMÁN-LOERA**, aka Mario Aureliano Guzman-Loera, aka Guano,
11 aka KI, aka Chente, aka Mr. W, aka Wuano, aka *kitttttttGGgGG, **FNU LNU**, aka
12 **GUERA**, aka Lucky Charms, aka Osa, **RUPERTO SALGUEIRO-NEVAREZ**, aka El
13 37, aka Batman, **FNU LNU**, aka **OCHOA**, aka Davidson, and [REDACTED]
14 [REDACTED] who will first enter the United
15 States in the District of Arizona, did knowingly and intentionally distribute and cause the
16 distribution of 1 kilogram or more of heroin, a Schedule I controlled substance, intending,
17 knowing, and having reasonable cause to believe that such heroin would be unlawfully
18 imported into the United States, and did aid, abet, counsel, command, induce, procure, or
19 cause the same, in violation of Title 21, United States Code, Sections 959(a) & (d),
20 960(a)(3) & (b)(1)(A), and Title 18, United States Code, Section 2.

21 **COUNT 4**

22 On or about [REDACTED] in the country of Mexico, defendant **AURELIANO**
23 **GUZMÁN-LOERA**, aka Mario Aureliano Guzman-Loera, aka Guano, aka KI, aka
24 Chente, aka Mr. W, aka Wuano, aka *kitttttttGGgGG,, who will first enter the United
25 States in the District of Arizona, did knowingly and intentionally distribute and cause the
26 distribution of 5 kilograms and more of a mixture or substance containing a detectable
27 amount of cocaine, a Schedule II controlled substance, that is, approximately [REDACTED]
28 [REDACTED] of cocaine; intending, knowing, or having reasonable cause to believe that such

cocaine would be unlawfully imported into the United States; in violation of Title 21, United States Code, Sections 959(a) & (d), 960(a)(3) & (b)(1)(B)(ii) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

Upon conviction of the offenses in Counts One, Two, and Three of this Indictment, defendants, **AURELIANO GUZMÁN-LOERA**, aka Mario Aureliano Guzman-Loera, aka Guano, aka KI, aka Chente, aka Mr. W, aka Wuano, aka *kitttttttGGgGG, FNU LNU, aka ADRIAN, aka Cachorro, FNU LNU, aka COMPA, FNU LNU, aka GUERA, aka Lucky Charms, aka Osa, **RUPERTO SALGUEIRO-NEVAREZ**, aka El 37, aka Batman, FNU LNU, aka OCHOA, aka Davidson, and [REDACTED]

[REDACTED], shall forfeit to the United States pursuant to Title 21, United States Code, Section 853:

(a) All right, title, and interest in (1) any property, real or personal, constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of the said violation, and (2) any property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate, the commission of the said violation;

If any of the forfeitable property, as a result of any act or omission of the defendants: (1) cannot be located upon the exercise of due diligence; (2) has been transferred or sold to, or deposited with, a third party; (3) has been placed beyond the jurisdiction of the court; (4) has been substantially diminished in value; or (5) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property, including but not limited to all property, both real and personal, owned by the defendants.

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1 All pursuant to Title 21, United States Code, Section 853 and Rule 32.2(a), Federal
2 Rules of Criminal Procedure.

3
4 A TRUE BILL

5
6 /s/
FOREPERSON OF THE GRAND JURY
7 Dated: November 13, 2019

8 MICHAEL BAILEY
9 United States Attorney
District of Arizona

10 /s/

11
12 RYAN P. DEJOE
Assistant U.S. Attorney

13 REDACTED FOR
14 PUBLIC DISCLOSURE
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