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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
January 2019 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,
v.

TENNY GUON LIM,
aka "The Goat,"
aka "Max Power,"
aka "Wild,"
aka "Bruce,"
aka "Phil,"
FNU LNU,
aka "Orange Tang,"
DARIO BARUCA,
aka "Ventura,"
aka "Fat Dario,"
TAO BO LIANG,
aka "Phil,"
aka "Boobz,"
NIKOLA GALIC,
aka "Leo,"
ABATE SAMUEL ERASTO,
aka "Robert,"
JUMSHER SINGH SAROYA,
aka "Larry Bird,"
MICHAEL ALAN SHEPHERD,
ERNEST KWEKU TAYLOR,
SAYSANA LUANGKHAMDENG,
aka "Say,"
aka "George,"
aka "Wheels,"
FNU LNU,
aka "LB,"
aka "Deathmetal,"

CR No. 19-19CR00275 AB

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to Distribute, and to Possess with Intent to Distribute, Controlled Substances; 21 U.S.C. § 963: Conspiracy to Import and Export Controlled Substances]

1 TYE MCNABB,
2 DAVID BRUNO JONER,
3 aka "Boss Bob,"
4 AMY KIM HARTLMUELLER-TORRES,
5 aka "Betty,"
6 JEFF ALLYN WALKER,
7 aka "Mark," and
8 DENNY VUONG,
9
10 Defendants.

11 The Grand Jury charges:

12 COUNT ONE

13 [21 U.S.C. § 846]

14 A. OBJECTS OF THE CONSPIRACY

15 Beginning on a date unknown and continuing until on or about May
16 3, 2019, in Los Angeles County, Orange County, and San Bernardino
17 County, each within the Central District of California, in the
18 country of Canada, and elsewhere, defendants TENNY GUON LIM, also
19 known as ("aka") "The Goat," aka "Max Power," aka "Wild," aka
20 "Bruce," aka "Phil" ("LIM"), First Name Unknown Last Name Unknown
21 ("FNU LNU"), aka "Orange Tang" ("ORANGE TANG"), DARIO BARUCA, aka
22 "Ventura," aka "Fat Dario" ("BARUCA"), TAO BO LIANG, aka "Phil," aka
23 "Boobz" ("LIANG"), NIKOLA GALIC, aka "Leo" ("GALIC"), ABATE SAMUEL
24 ERASTO, aka "Robert" ("ERASTO"), JUMSHER SINGH SAROYA, aka "Larry
25 Bird" ("SAROYA"), MICHAEL ALAN SHEPHERD ("SHEPHERD"), ERNEST KWEKU
26 TAYLOR ("TAYLOR"), SAYSANA LUANGKHAMDENG, aka "Say," aka "George,"
27 aka "Wheels" ("LUANGKHAMDENG"), FNU LNU, aka "LB," aka "Deathmetal"
28 ("LB"), TYE MCNABB ("MCNABB"), DAVID BRUNO JONER, aka "Boss Bob"
("JONER"), AMY KIM HARTLMUELLER-TORRES, aka "Betty" ("TORRES"), JEFF
ALLYN WALKER, aka "Mark" ("WALKER"), and DENNY VUONG ("VUONG"), and
others known and unknown to the Grand Jury, conspired and agreed with

1 each other to knowingly and intentionally distribute and to possess
2 with intent to distribute the following controlled substances:

3 1. at least five kilograms of a mixture and substance
4 containing a detectable amount of cocaine, a Schedule II narcotic
5 drug controlled substance, in violation of Title 21, United States
6 Code, Sections 841(a)(1), (b)(1)(A)(ii)(II);

7 2. at least 500 grams of a mixture and substance containing a
8 detectable amount of cocaine, a Schedule II narcotic drug controlled
9 substance, in violation of Title 21, United States Code, Sections
10 841(a)(1), (b)(1)(B)(ii)(II);

11 3. at least 50 grams of methamphetamine, a Schedule II
12 controlled substance, in violation of Title 21, United States Code,
13 Sections 841(a)(1), (b)(1)(A)(viii); and

14 4. 3,4-Methylenedioxyamphetamine ("MDMA" or "ecstasy"), a
15 Schedule I controlled substance, in violation of Title 21, United
16 States Code, Sections 841(a)(1), (b)(1)(C).

17 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
18 ACCOMPLISHED

19 The objects of the conspiracy were to be accomplished, in
20 substance, as follows:

21 1. Defendants LIM, ORANGE TANG, and LB and others known and
22 unknown would arrange to purchase bulk quantities of cocaine and
23 methamphetamine from the United States for importation to Canada and
24 other locations for re-sale, in exchange for bulk quantities of MDMA
25 or for currency.

26 2. Defendant LIM and others known and unknown would arrange
27 for the transportation of MDMA from Canada into the United States for
28 re-sale.

1 3. Defendants LIM, ORANGE TANG, BARUCA, GALIC, ERASTO, SAROYA,
2 SHEPHERD, LB, MCNABB, JONER, and TORRES, and others known and unknown
3 would arrange for the transportation of cocaine and methamphetamine
4 from the United States to Canada and other locations for re-sale.

5 4. Defendant LIM and others known and unknown would provide
6 code names, telephone numbers, and serial numbers of dollar bills to
7 co-conspirators to use as a "token" for identification purposes
8 during the exchange of cocaine and MDMA in the United States.

9 5. Defendant VUONG would provide encrypted Blackberry devices
10 to other co-conspirators to use to communicate with each other
11 regarding drug trafficking business, including the transportation of
12 cocaine, MDMA, and methamphetamine between the United States and
13 Canada.

14 6. Defendant SAROYA, acting at the direction of defendant LIM,
15 would meet with co-conspirators in the United States to establish new
16 sources of supply for cocaine and new routes for transportation of
17 cocaine from the United States to Canada.

18 7. Defendant LUANCHKHAMDENG would deliver MDMA from Canada to
19 co-conspirators in the United States for re-sale.

20 8. Defendants LIANG, LUANGKHAMDENG, and WALKER would pick up
21 cocaine from co-conspirators in the United States for eventual
22 transportation to Canada for re-sale.

23 9. Defendant TAYLOR would travel to the United States to pass
24 messages from Canadian co-conspirators to co-conspirators in the
25 United States to facilitate the transportation of cocaine, MDMA, and
26 methamphetamine between Canada and the United States.

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1 C. OVERT ACTS

2 In furtherance of the conspiracy and to accomplish its objects,
3 on or about the following dates, defendants LIM, ORANGE TANG, BARUCA,
4 LIANG, GALIC, ERASTO, SAROYA, SHEPHERD, TAYLOR, LUANGKHAMDENG, LB,
5 MCNABB, JONER, TORRES, WALKER, and VUONG, and others known and
6 unknown to the Grand Jury, committed various overt acts in Los
7 Angeles County, Orange County, and San Bernardino County, each within
8 the Central District of California, in the country of Canada, and
9 elsewhere, including, but not limited to, the following:

10 1. On or about April 20, 2017, using coded language in a
11 series of text messages, defendant LIM informed a co-conspirator, who
12 later agreed to cooperate with law enforcement ("CHS1"), that
13 defendant LIM could send MDMA once a week from Canada to CHS1 in the
14 Los Angeles, California area, and that on the following day defendant
15 LIM would give CHS1 the schedule for upcoming deliveries of MDMA.

16 2. On or about April 21, 2017, using coded language in a text
17 message, defendant LIM told CHS1 that defendant LIM had 24 kilograms
18 of MDMA ready to send to CHS1.

19 3. On or about April 21, 2017, using coded language in a text
20 message, defendant LIM told CHS1 that defendant LIM missed this
21 week's shipment of MDMA and would have to wait for next week to send
22 MDMA to CHS1.

23 4. On or about April 24, 2017, using coded language in a text
24 message, defendant LIM told CHS1 that defendant LIM had 24 kilograms
25 of MDMA ready to send to CHS1.

26 Importation of Approximately 25 Kilograms of Suspected MDMA

27 5. On or about May 7, 2017, using coded language in a series
28 of text messages, defendant LIM told CHS1 that defendant LIM had

1 three drug couriers, including defendant LUANGKHAMDENG, waiting in
2 Long Beach, California to pick up cocaine from CHS1, and defendant
3 LIM asked CHS1 to arrange to deliver the cocaine to defendant LIM's
4 drug couriers the following day.

5 6. On or about May 9, 2017, using coded language in a series
6 of text messages, defendant LIM instructed CHS1 to tell defendant
7 LUANGKHAMDENG to return to Canada from the United States because the
8 cocaine that defendant LIM was supposed to receive was not yet ready
9 for pick up.

10 7. On or about May 14, 2017, using coded language in a series
11 of text messages, defendant LIM told CHS1 that defendant LIM believed
12 the encrypted cellular devices the conspirators had been using to
13 communicate with each other had been "compromised" by the National
14 Security Agency; that defendant LIM was going to start using
15 different encrypted cellular devices that were "resistant from law
16 enforcement"; and that defendant LIM would send new encrypted devices
17 to CHS1 to use in future communications in furtherance of the
18 conspiracy.

19 8. On or about May 14, 2017, using coded language in a text
20 message, defendant LIM asked CHS1 whether CHS1 had cocaine to send to
21 defendant LIM in Canada, and whether defendant LIM should send MDMA
22 to CHS1 in Long Beach as compensation for such cocaine.

23 9. On or about May 15, 2017, using coded language in a text
24 message, defendant LIM told CHS1 that defendant's LIM's "partners"
25 wanted to send more MDMA to CHS1 in Long Beach, but that the partners
26 wanted to know whether CHS1 had cocaine ready to send to Canada.

27 10. On or about May 23, 2017, using coded language in a series
28 of text messages, defendant LIM asked CHS1 whether CHS1 would have

1 the cocaine ready to send to Canada that week, and whether defendant
2 LIM should send more MDMA from Canada to CHS1 in Long Beach.

3 11. On or about May 26, 2017, using coded language in a text
4 message, defendant LIM told CHS1 that defendant LUANGKHAMDENG would
5 deliver MDMA to CHS1 that Sunday or sometime after, and defendant LIM
6 asked CHS1 whether CHS1 had cocaine ready to give to defendant
7 LUANGKHAMDENG in exchange for the MDMA.

8 12. On or about May 29, 2017, using coded language in a series
9 of text messages, defendant LIM told CHS1 that defendant
10 LUANGKHAMDENG may not be able to travel from Canada to Long Beach to
11 deliver MDMA to and pick up cocaine from CHS1, but that defendant LIM
12 would attempt to arrange defendant LUANGKHAMDENG's travel to Long
13 Beach to do so.

14 13. On or about June 2, 2017, using coded language in a series
15 of text messages, defendant LIM told CHS1 that defendant
16 LUANGKHAMDENG would leave Vancouver, British Columbia, Canada, on
17 Monday to deliver MDMA to and pick up cocaine from CHS1 in Long
18 Beach.

19 14. On or about June 5, 2017, using coded language in a series
20 of text messages, defendant LIM told CHS1 that defendant
21 LUANGKHAMDENG had to delay his trip to Long Beach to deliver MDMA and
22 pick up cocaine until the following day.

23 15. On or about June 10, 2017, defendant LUANGKHAMDENG
24 attempted to cross the United States-Canada border in Blaine,
25 Washington while in possession of approximately 24.2 kilograms of
26 suspected MDMA in his vehicle, which he intended to distribute.

27

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1 Discussion of Transportation of Cocaine from California to Canada

2 16. On or about September 6, 2017, using coded language in a
3 series of text messages, defendant WALKER asked defendant MCNABB
4 whether defendant MCNABB had any good news about the transportation
5 of cocaine from California to Canada that week; to which defendant
6 MCNABB responded that defendant WALKER would receive payment on
7 September 12, 2017 for a prior load of cocaine he had transported.

8 17. On or about November 27, 2017, using coded language in a
9 series of text messages, defendant WALKER asked defendant MCNABB for
10 the location in California at which defendant WALKER would pick up
11 cocaine; to which defendant MCNABB replied that a third party would
12 call defendant WALKER on his cellular phone that evening with the
13 location.

14 18. On or about November 28, 2017, in a text message, defendant
15 WALKER sent defendant MCNABB a photograph of the serial number of a
16 dollar bill, which defendant WALKER would use as a "token" for
17 identification purposes when picking up cocaine in California.

18 19. On or about November 30, 2017, using coded language in a
19 text message, defendant WALKER told defendant MCNABB that he would
20 return from California that evening with cocaine defendant WALKER
21 received that day.

22 20. On or about November 30, 2017, using coded language in a
23 series of text messages, defendant WALKER asked defendant MCNABB
24 whether defendant WALKER would be paid in Canadian or Mexican
25 currency for transporting cocaine; to which defendant MCNABB replied
26 that they would talk in person about it the following day.

27 21. On or about December 1, 2017, using coded language in a
28 series of text messages, defendant WALKER asked defendant MCNABB when

1 they should meet up that day so that defendant WALKER could pick up
2 \$10,000 as payment for transporting cocaine.

3 Sale of Encrypted Devices to Discuss Drug Trafficking

4 22. On or about February 3, 2018, using coded language in a
5 recorded telephone call, defendant LIM told an individual whom he
6 believed to be a drug supplier, but who was, in fact, cooperating
7 with law-enforcement ("CHS2"), that defendant LIM had a drug courier
8 who could pick up cocaine in the Los Angeles area for transportation
9 to Canada.

10 23. On or about February 3, 2018, using coded language in a
11 recorded telephone call, defendant LIM told CHS2 that defendant LIM
12 would send CHS2 the phone number of a co-conspirator who would sell
13 encrypted cellular devices to CHS2 for use in securely communicating
14 with defendant LIM about drug trafficking.

15 24. On or about February 6, 2018, using coded language in a
16 text message, defendant LIM asked CHS2 whether CHS2 would have
17 cocaine ready this week for delivery to defendant LIM.

18 25. On or about February 6, 2018, using coded language in a
19 text message, defendant LIM sent CHS2 a code name and phone number
20 for defendant VUONG who would sell CHS2 encrypted cellular devices.

21 26. On or about February 9, 2018, in Alhambra, California,
22 defendant VUONG, acting at the direction of defendant LIM, sold two
23 encrypted cellular devices to an undercover agent posing as an
24 associate of CHS2 in exchange for \$2,500.

25 27. On or about February 14, 2018, using coded language in a
26 series of text messages, defendant LIM ordered 25 kilograms of
27 cocaine from CHS2 and gave CHS2 a code name and phone number for the
28 individual who would pick up the cocaine from CHS2; defendant LIM

1 also sent a serial number of a dollar bill, which the individual
2 would use to identify himself.

3 Discussion of Transportation of Cocaine from California to Canada

4 28. On or about March 2, 2018, using coded language in a text
5 message, defendant MCNABB told defendant WALKER that there would be
6 no transportation of cocaine the following day.

7 29. On or about March 2, 2018, using coded language in a text
8 message, defendant WALKER told defendant MCNABB that defendant WALKER
9 was waiting to cross the border from Canada back to the United
10 States.

11 Possession with Intent to Distribute Approximately 47 Kilograms of
12 Methamphetamine and 5 Kilograms of Cocaine

13 30. On or about March 7, 2018, in Redlands, California,
14 defendants ERASTO and GALIC rented a storage locker at Extra Space
15 Storage (the "Extra Space Storage locker") for the purpose of storing
16 controlled substances.

17 31. On or about March 11, 2018, using coded language in a
18 recorded telephone call, defendant LIM told CHS2 that defendant LIM
19 would give CHS2 the phone number for defendant LIM's associate for
20 CHS2 to use in setting up a meeting in the Los Angeles area to
21 discuss the transportation of cocaine from California to Canada.

22 32. On or about March 15, 2018, in Redlands, California,
23 defendant SHEPHERD rented a storage locker at Public Storage (the
24 "Public Storage locker") for the purpose of storing controlled
25 substances.

26 33. On or about March 17, 2018, using coded language in a text
27 message, defendant LIM sent CHS2 a code name, phone number, and
28 dollar bill serial number for defendant SAROYA, who would meet with

1 CHS2's associate in the Los Angeles area in order to discuss the
2 transportation of cocaine from California to Canada.

3 34. On or about March 28, 2018, in Los Angeles, defendant
4 SAROYA, acting at the direction of defendant LIM, met with an
5 undercover agent ("UC1") posing as an associate of CHS2 in order to
6 discuss the transportation of cocaine from California to Canada.

7 35. On or about March 28, 2018, in Los Angeles, defendant
8 SHEPHERD waited in a vehicle outside the location where defendant
9 SAROYA met with UC1 posing as an associate of CHS2.

10 36. On or about April 4, 2018, using coded language in a text
11 message, defendant SAROYA informed defendant ERASTO that he would
12 remove controlled substances from the Extra Space Storage locker,
13 which defendants ERASTO and GALIC had rented the previous month, that
14 evening.

15 37. On or about April 4, 2018, in Redlands, California,
16 defendants SAROYA and SHEPHERD removed controlled substances from the
17 Extra Space Storage locker.

18 38. On or about April 4, 2018, in Redlands, California,
19 defendants SAROYA and SHEPHERD put the controlled substances they had
20 removed from the Extra Space Storage locker into the Public Storage
21 locker.

22 39. On or about April 5, 2018, in Redlands, California,
23 defendant SAROYA and SHEPHERD transferred controlled substances from
24 the Public Storage locker into a vehicle driven by defendant SAROYA.

25 40. On or about April 5, 2018, in Kern County, California,
26 defendant SAROYA knowingly and intentionally possessed approximately
27 46.6 kilograms of methamphetamine in his vehicle.

28

1 41. On or about April 5, 2018, in Redlands, California,
2 defendant SHEPHERD knowingly and intentionally possessed
3 approximately 4.984 kilograms of a mixture and substance containing a
4 detectable amount of cocaine in the Public Storage locker.

5 42. On or about May 3, 2018, using coded language in a recorded
6 prison visit video, defendant TAYLOR asked defendant SHEPHERD whether
7 there were any controlled substances left in the Public Storage
8 locker or the Extra Space Storage locker, to which defendant SHEPHERD
9 replied that all of the controlled substances had been seized by law
10 enforcement.

11 43. On or about May 3, 2018, using coded language in a recorded
12 prison visit video, defendant SHEPHERD assured defendant TAYLOR that
13 defendant SHEPHERD would not cooperate with law enforcement.

14 44. On or about May 3, 2018, using coded language in a recorded
15 prison visit video, defendant TAYLOR told defendant SHEPHERD that the
16 organization would help defendant SHEPHERD with his legal case after
17 his arrest.

18 45. On or about May 3, 2018, using coded language in a recorded
19 prison visit video, defendant SHEPHERD told defendant TAYLOR that
20 other conspirators may be cooperating with law enforcement.

21 Pick Up of Approximately 30 Kilograms of Sham Cocaine

22 46. On or about May 4, 2018, using coded language in a series
23 of text messages, defendant LIM sent CHS2 a code name, phone number,
24 and dollar bill serial number for defendant WALKER so that CHS2 could
25 arrange for defendant WALKER to pick up 36 kilograms of cocaine from
26 CHS2 on behalf of defendant LIM.

27 47. On or about May 9, 2018, using coded language in a series
28 of text messages, defendant LIM sent CHS2 a code name, phone number,

1 and dollar bill serial number for defendant LIANG so that CHS2 could
2 arrange for defendant LIANG to pick up 36 kilograms of cocaine from
3 CHS2 on behalf of defendant LIM.

4 48. On or about May 9, 2018, using coded language in a recorded
5 telephone call, defendant LIM, pretending to be defendant LIANG,
6 attempted to arrange a meeting with an undercover agent posing as an
7 associate of CHS2 ("UC2") to pick up cocaine.

8 49. On or about May 15, 2018, using coded language in a
9 recorded telephone call, defendant LIANG arranged to meet UC2 the
10 following morning to pick up cocaine on behalf of defendant LIM.

11 50. On or about May 15, 2018, using coded language in a text
12 message, defendant LIM told CHS2 to have UC2 distribute only 30
13 kilograms of cocaine to defendant LIANG, and that another courier
14 would pick up the remainder of the cocaine to be delivered to
15 defendant LIM.

16 51. On or about May 16, 2018, using coded language in a text
17 message, defendant LIANG told UC2 to bring use one luggage bag with
18 wheels to hold all of the cocaine that UC2 would provide to defendant
19 LIANG that day.

20 52. On or about May 16, 2018, in Costa Mesa, California,
21 defendant LIANG picked up from UC2 approximately 30 kilograms of a
22 substance defendant LIANG believed to be cocaine.

23 53. On or about May 16, 2018, using coded language in a series
24 of text messages, defendant LIANG told defendant LIM that he opened
25 one of the packages he received from UC2 and the cocaine appeared to
26 be of poor quality; to which defendant LIM responded that defendant
27 LIANG should return the substance to UC2.

28

1 54. On or about May 16, 2018, using coded language in a series
2 of text messages, defendant LIM told CHS2 that the cocaine defendant
3 LIANG picked up from UC2 was not real cocaine, and that defendant
4 LIANG wanted to return the cocaine.

5 55. On or about May 16, 2018, in Costa Mesa, California,
6 defendant LIANG knowingly and intentionally possessed approximately
7 14.6 grams of cocaine base and drug paraphernalia.

8 Possession with Intent to Distribute Approximately 90 Kilograms of
9 Cocaine

10 56. On or about May 21, 2018, using coded language in a series
11 of text messages, defendant WALKER asked whether defendants JONER and
12 TORRES had confirmed the next delivery of cocaine, to which defendant
13 JONER replied that the delivery was confirmed for Wednesday, but
14 defendant TORRES then clarified that the delivery had not yet been
15 confirmed.

16 57. On or about May 23, 2018, using coded language in a text
17 message, defendant TORRES instructed defendant WALKER to leave the
18 next morning to pick up cocaine in California.

19 58. On or about May 25, 2018, using coded language in a series
20 of text messages, defendant WALKER informed defendants JONER and
21 TORRES that the delivery of cocaine would be delayed by seven hours,
22 and defendant JONER instructed defendant WALKER to offer to pay money
23 to expedite the delivery.

24 59. On or about May 26, 2018, using coded language in a text
25 message, defendant TORRES informed defendant WALKER that the cocaine
26 delivery was scheduled for that morning.

27 60. On or about May 26, 2018, using coded language in a series
28 of text messages, defendant WALKER informed defendants TORRES and

1 JONER that defendant WALKER was scheduled to arrive in Washington
2 State with cocaine the following night.

3 61. On or about May 26, 2018, using coded language in a series
4 of text messages, defendant TORRES informed defendants WALKER and
5 JONER that they would transport the cocaine across the United States-
6 Canada border that Monday.

7 62. On or about May 26, 2018, in Fresno, California, defendant
8 WALKER knowingly and intentionally possessed approximately 90.2
9 kilograms of a mixture and substance containing a detectable amount
10 of cocaine.

11 63. On or about May 27, 2018, using coded language in a text
12 message, defendant WALKER told defendant TORRES that a federal agent
13 was watching defendants TORRES and JONER.

14 64. On or about June 2, 2018, using coded language in a text
15 message, defendant LB told defendant JONER that they should try to
16 cross the United States-Canada border without any drugs to see if
17 they are stopped by law enforcement at the border, to which defendant
18 JONER agreed.

19 65. On or about June 3, 2018, in his residence in Fall City,
20 Washington, defendant JONER knowingly and intentionally possessed
21 approximately 0.713 grams of a mixture and substance containing a
22 detectable amount of cocaine, approximately \$41,526 in U.S. currency,
23 and six firearms.

24 66. On or about June 6, 2018, using coded language in a series
25 of text messages, defendant JONER told defendant LB that a third
26 party could get a report of defendant WALKER's traffic stop, during
27 which law enforcement had seized approximately 90.2 kilograms of
28 cocaine; defendant LB replied that they had to show their Mexican

