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FILED

JUL 09 2015

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

BY

DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE MANUEL VALDEZ TORRES, a.k.a.,
"RUBEN;"
ROBERTO GOMEZ, JR., a.k.a., "TITO,"
"BETO;"
LEONEL VALDEZ AYON, a.k.a., LEONEL
VALDEZ GONZALEZ, a.k.a., "LEON;"
LEOBARDO MARTINEZ-CARRANZA,
a.k.a., "WACHO", "WACHON";
EDGAR EDUARDO HERRERA;
ENRIQUE ALONSO VALDEZ YANEZ;
JASON DUANE ROGERS, a.k.a.,
"YONK/YONKI/YONKE;"
SHANNON ANTHONY ARMSTRONG,
a.k.a., "VENADO/BENADO;"
BRADLEY GENE WARD, a.k.a., "FLACO;"
DAVID ANDREWS UHRIG, a.k.a., "CASA,"
"CASA DE PIEDRA;"
WILLIAM JAMES WELCH, a.k.a.,
"BURLINGTON;"
MICHAEL WILLIAM MCGIBBON, a.k.a.,
"BANQUITA;" and
JESUS HUNBERTO ZURITA SICAIROS,

Defendants.

CASE NO. 2:15 - CR - 0131 TLN

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy To
Distribute and to Possess with Intent to Distribute
Methamphetamine, Heroin, And Cocaine; 21 U.S.C.
§ 841(a)(1) – Possession with Intent to Distribute
Methamphetamine (7 Counts); 21 U.S. C. § 841
(a)(1) – Possession with Intent to Distribute Heroin (4
Counts); 21 U.S.C. § 841(a)(1) – Possession with
Intent to Distribute Cocaine (1 Count); 21 U.S.C. §
841(a)(1) – Possession with Intent to Distribute
Marijuana (1 Count); 18 U.S.C. § 922(g)(1) – Felon in
Possession of Firearm (2 Counts); 18 U.S.C.
§ 922(g)(9) - Possession of Firearm by Person
Convicted of a Misdemeanor Crime of Domestic
Violence ; 21 U.S.C. § 853(a), 18 U.S.C. § 924(d)(1)
and 28 U.S.C. § 2461(c) – Criminal Forfeiture

INDICTMENT

COUNT ONE: [21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and to Possess with Intent to Distribute Methamphetamine, Heroin, and Cocaine]

The Grand Jury further charges: T H A T

JOSE MANUEL VALDEZ TORRES, a.k.a., "Ruben;"
ROBERTO GOMEZ, JR., a.k.a., "Tito," "Beto;"
LEONEL VALDEZ AYON, A.K.A. Leonel Valdez Gonzalez, a.k.a., "Leon;"
LEOBARDO MARTINEZ-CARRANZA, a.k.a., "Wacho," "Wachon;"
EDGAR EDUARDO HERRERA;
ENRIQUE ALONSO VALDEZ YANEZ;
JASON DUANE ROGERS, a.k.a., "Yonk/Yonki/Yonke;"
SHANNON ANTHONY ARMSTRONG, a.k.a., "Venado/Benado;"
BRADLEY GENE WARD, a.k.a., "Flaco;"
DAVID ANDREWS UHRIG, a.k.a., "Casa," "Casa De Piedra;"
WILLIAM JAMES WELCH, a.k.a., "Burlington;"
MICHAEL WILLIAM MCGIBBON, a.k.a., "Banquita;" and
JESUS HUNBERTO ZURITA SICAIROS.

defendants herein, beginning on or about January of 2014, and continuing through on or about June 25, 2015, in the Counties of Sacramento and Kern, State and Eastern District of California, and elsewhere, did knowingly and intentionally conspire and agree with each other and with persons known and unknown to the Grand Jury to distribute, and to possess with intent to distribute, at least 500 grams of a mixture and substance containing a detectible amount of methamphetamine, a Schedule II Controlled Substance; at least one kilogram of a mixture and substance containing a detectible amount of heroin, a Schedule I Controlled Substance; and at least five kilograms of a mixture and substance containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

The Grand Jury further charges that SHANNON ANTHONY ARMSTRONG, a.k.a., "Venado/Benado;" committed the above offense after he had sustained the following felony drug offense convictions which had become final:

Possession of Controlled Substance for Sale, in violation of California Health & Safety Code Section 11378, on or about August 17, 2004, in Sacramento County, California, and

Possession of Controlled Substance for Sale, in violation of California Health & Safety Code Section 11378, on or about May 22, 2008, in Placer County, California.

The Grand Jury further charges that BRADLEY GENE WARD, a.k.a., "Flaco" committed the

1 above offense after he had sustained the following felony drug offense conviction which had become
2 final :

3 Possession of Controlled Substance in violation of California Health &
4 Safety Code Section 11377(a), on or about April 19, 2001, in Placer
County, California.

5 The Grand Jury further charges that DAVID ANDREWS UHRIG, a.k.a., "Casa," "Casa De
6 Piedra" committed the above offense after he had sustained the following felony drug convictions which
7 had become final:

8 Possession of Controlled Substance for Sale, in violation of California
9 Health & Safety Code Section 11378, on or about May 6, 1997, in
Sacramento County, California,

10 Transportation/Sale of a Controlled Substance, in violation of California
11 Health & Safety Code Section 11379(a), on or about June 5, 2003, in
Placer County, California,

12 Possession of Controlled Substance, in violation of California Health &
13 Safety Code Section 11377(a), on or about March 12, 2003, in Sacramento
County, California,

14 Possession of a Controlled Substance, in violation of California Health &
15 Safety Code Section 11377(a), on or about April 3, 2007, in Solano
County, California.

16 The Grand Jury further charges that MICHAEL WILLIAM MCGIBBON, a.k.a.,
17 "Banquita" committed the above offense after he had sustained the following felony drug offense
18 conviction which had become final:

19 Transportation/Sale of a Controlled Substance, in violation of California
20 Health & Safety Code Section 11379(a), on or about June 4, 1997, in
Sacramento County, California.

21
22 COUNT TWO: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]

23 The Grand Jury further charges: T H A T

24 JOSE MANUEL VALDEZ TORRES, a.k.a., "Ruben" and
EDGAR EDUARDO HERRERA,

25 defendants herein, on or about March 27, 2015, in the County of Kern, State and Eastern District of
26 California, did knowingly and intentionally possess with intent to distribute a mixture and substance
27 containing at least 500 grams of methamphetamine, a Schedule II Controlled Substance, in violation of
28 Title 21, United States Code, Section 841(a)(1).

1 COUNT THREE: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]

2 The Grand Jury further charges: T H A T

3 ROBERTO GOMEZ, JR., a.k.a., “Tito,” “Beto,”

4 defendant herein, on or about June 25, 2015, in the County of Sacramento, State and Eastern District of
5 California, did knowingly and intentionally possess with intent to distribute a mixture and substance
6 containing at least 500 grams of methamphetamine, a Schedule II Controlled Substance, in violation of
7 Title 21, United States Code, Section 841(a)(1).

8 COUNT FOUR: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

9 The Grand Jury further charges: T H A T

10 ROBERTO GOMEZ, JR., a.k.a., “Tito,” “Beto;”

11 defendant herein, on or about June 25, 2015, in the County of Sacramento, State and Eastern District of
12 California, having been convicted of a crime punishable by a term of imprisonment exceeding one year,
13 that is:

14 Kidnapping, in violation of Arizona Revised Statutes Section 13-1304, on
15 or about July 2, 2012, in Maricopa County, Arizona,

16 did knowingly possess a firearm, specifically, a Kahr .45 caliber semi-automatic handgun, serial no.
17 SE9864, in an affecting commerce in that said firearm had previously been transported in interstate and
18 foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

19 COUNT FIVE: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]

20 The Grand Jury further charges: T H A T

21 LEONEL VALDEZ AYON, a.k.a., Leonel Valdez Gonzalez, a.k.a. “Leon”

22 defendant herein, on or about June 25, 2015, in the County of Kern, State and Eastern District of
23 California, did knowingly and intentionally possess with intent to distribute a mixture and substance
24 containing methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States
25 Code, Section 841(a)(1).

26 COUNT SIX: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Heroin]

27 The Grand Jury further charges: T H A T

1 LEONEL VALDEZ AYON, a.k.a., Leonel Valdez Gonzalez, a.k.a., "Leon"
2 defendant herein, on or about June 25, 2015, in the County of Kern, State and Eastern District of
3 California, did knowingly and intentionally possess with intent to distribute a mixture and substance
4 containing heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code,
5 Section 841(a)(1).

6 COUNT SEVEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]

7
8 The Grand Jury further charges: T H A T

9 JASON DUANE ROGERS, a.k.a., "Yonk/Yonki/Yonke"
10 defendant herein, on or about June 25, 2015, in the County of Sacramento, State and Eastern District of
11 California, did knowingly and intentionally possess with intent to distribute a mixture and substance
12 containing methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States
13 Code, Section 841(a)(1).

14 COUNT EIGHT: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Heroin]

15 The Grand Jury further charges: T H A T

16 BRADLEY GENE WARD, a.k.a., "Flaco"
17 defendant herein, on or about June 25, 2015, in the County of Sacramento, State and Eastern District of
18 California, did knowingly and intentionally possess with intent to distribute a mixture and substance
19 containing heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code,
20 Section 841(a)(1).

21
22 The Grand Jury further charges that BRADLEY GENE WARD, a.k.a., "Flaco" committed the
23 above offense after he had sustained the following felony drug offense conviction which had become
24 final :

25 Possession of Controlled Substance in violation of California Health &
26 Safety Code Section 11377(a), on or about April 19, 2001, in Placer
County, California.

27 //

28 //

COUNT NINE: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

The Grand Jury further charges: T H A T

BRADLEY GENE WARD, a.k.a., “Flaco”

defendant herein, on or about June 25, 2015, in the County of Sacramento, State and Eastern District of California, having been convicted of a crime punishable by a term of imprisonment exceeding one year, that is:

1. Take vehicle without owner’s consent, in violation of California Vehicle Code Section 10851, on or about October 2, 2000, in Sacramento County, California,
2. Possession of Controlled Substance, in violation of California Health & Safety Code Section 11377(a), on or about April 19, 2001, in Placer County, California,
3. Take vehicle without owner’s consent, in violation of California Vehicle Code Section 10851(a), on or about May 7, 2001, in Sacramento County, California,
4. Possession of forged check in violation of California Penal Code Section 475(c), on or about May 28, 2004, in Sacramento County, California,
5. Auto theft with prior in violation of California Penal Code Section 666.5, on or about January 9, 2006, in Placer County, California
6. Take vehicle without owner’s consent, in violation of California Vehicle Code Section 10851, on or about May 11, 2009, in Sacramento County, California,
7. Evading a peace officer/disregard safety, in violation of California Vehicle Code Section 2800.2(a), on or about May 11, 2009, in Sacramento County, California,
8. Take vehicle without owner’s consent, in violation of California Vehicle Code Section 10851(a), on or about March 1, 2010, Placer County, California.

did knowingly possess a firearm, specifically, a loaded Ruger 9 mm semi-automatic pistol, serial no. 301-68014, in and affecting commerce in that said firearm had previously been transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TEN: [18 U.S.C. § 922(g)(9) – Possession of Firearm by Person Convicted of a Misdemeanor Crime of Domestic Violence.]

The Grand Jury further charges: T H A T

1 WILLIAM JAMES WELCH, a.k.a., "Burlington,"
2 defendant herein, on or about June 25, 2015, in the County of Sacramento, State and Eastern District of
3 California, having been convicted of a misdemeanor crime of domestic violence, that is:

4 Infliction of corporal injury on spouse/cohabitant, in violation of
5 California Penal Code Section 273.5(a), on or about April 30, 1998, in
6 Sacramento County, California,

7 did knowingly possess a firearm, specifically:

8 A Glenfield .22 caliber rifle Serial No. 19284145, loaded with 8
9 rounds of ammunition.

10 In and affecting commerce in that said firearm had previously been transported in interstate and foreign
11 commerce, in violation of Title 18, United States Code, Section 922(g)(9).

12 COUNT ELEVEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]

13 The Grand Jury further charges: T H A T

14 MICHAEL WILLIAM MCGIBBON, a.k.a., "Banquita,"

15 defendant herein, on or about June 25, 2015, in the County of Sacramento, State and Eastern District of
16 California, did knowingly and intentionally possess with intent to distribute a mixture and substance
17 containing methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States
18 Code, Section 841(a)(1).

19 The Grand Jury further charges that MICHAEL WILLIAM MCGIBBON, a.k.a., "Banquita;"
20 committed the above offense after having been convicted of the following felony drug offense which
21 had become final:

22 Transportation/Sale of a Controlled Substance, in violation of California
23 Health & Safety Code Section 11379(a), on or about June 4, 1997, in
24 Sacramento County, California.

25 COUNT TWELVE: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Marijuana]

26 The Grand Jury further charges: T H A T

27 MICHAEL WILLIAM MCGIBBON, a.k.a., "Banquita,"

28 defendant herein, on or about June 25, 2015, in the County of Sacramento, State and Eastern District of
California, did knowingly and intentionally possess with intent to distribute marijuana, a Schedule I

1 Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

2 The Grand Jury further charges that MICHAEL WILLIAM MCGIBBON, a.k.a., "Banquita"
3 committed the above offense after having been convicted of the following felony drug offense which
4 had become final:

5 Transportation/Sale of a Controlled Substance, in violation of California
6 Health & Safety Code Section 11379(a), on or about June 4, 1997, in
7 Sacramento County, California.

8 COUNT THIRTEEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]

9
10 The Grand Jury further charges: T H A T

11 Jose Manuel VALDEZ TORRES, a.k.a. "RUBEN,"

12 defendant herein, on or about June 25, 2015, at 2335 Venice Drive, in the City of Delano, County of
13 Kern, State and Eastern District of California, did knowingly and intentionally possess with intent to
14 distribute at least 500 grams of a mixture and substance containing methamphetamine, a Schedule II
15 Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

16 COUNT FOURTEEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Heroin]

17
18 The Grand Jury further charges: T H A T

19 Jose Manuel VALDEZ TORRES, a.k.a., "RUBEN,"

20 defendant herein, on or about June 25, 2015, at 2335 Venice Drive, in the City of Delano, County of
21 Kern, State and Eastern District of California, did knowingly and intentionally possess with intent to
22 distribute a mixture and substance containing at least 100 grams of heroin, a Schedule I Controlled
23 Substance, in violation of Title 21, United States Code, Section 841(a)(1).

24 COUNT FIFTEEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]

25
26 The Grand Jury further charges: T H A T

27 Jose Manuel VALDEZ TORRES, a.k.a., "RUBEN;"

28 defendant herein, on or about June 25, 2015, at 9190 Tuolumne Drive # 29, in the City and County of

1 Sacramento, State and Eastern District of California, did knowingly and intentionally possess with intent
2 to distribute at least 50 grams of a mixture and substance containing methamphetamine, a Schedule II
3 Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

4 COUNT SIXTEEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Heroin]

5
6 The Grand Jury further charges: T H A T

7 Jose Manuel VALDEZ TORRES, a.k.a., “RUBEN”

8 defendant herein, on or about June 25, 2015, at 9190 Tuolumne Drive # 29, in the City and County of
9 Sacramento, State and Eastern District of California, did knowingly and intentionally possess with intent
10 to distribute at least 100 grams of a mixture and substance containing heroin, a Schedule I Controlled
11 Substance, in violation of Title 21, United States Code, Section 841(a)(1).

12 COUNT SEVENTEEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Cocaine]

13
14 The Grand Jury further charges: T H A T

15 Jose Manuel VALDEZ TORRES, a.k.a., “RUBEN”

16 defendant herein, on or about June 25, 2015, at 9190 Tuolumne Drive # 29, in the City and County of
17 Sacramento, State and Eastern District of California, did knowingly and intentionally possess with intent
18 to distribute a mixture and substance containing cocaine, a Schedule II Controlled Substance, in
19 violation of Title 21, United States Code, Section 841(a)(1).

20 FORFEITURE ALLEGATION: [21 U.S.C. § 853(a), 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) –
21 Criminal Forfeiture]

22 1. Upon conviction of one or more of the offenses alleged in Counts One through Three,
23 Five through Eight, and Eleven through Seventeen of this Indictment, defendant shall forfeit to the
24 United States pursuant to Title 21, United States Code, Section 853(a), the following property:

25 a. All right, title, and interest in any and all property involved in violations of Title
26 21, United States Code, Section 841(a)(1), or conspiracy to commit such offenses, for which the
27 defendant is convicted, and all property traceable to such property, including the following: all real or
28 personal property, which constitutes or is derived from proceeds obtained, directly or indirectly, as a

1 result of such offenses; and all property used, or intended to be used, in any manner or part to commit or
2 to facilitate the commission of the offenses.

3 b. A sum of money equal to the total amount of proceeds obtained as a result of the
4 offenses, or conspiracy to commit such offenses, for which a defendant is convicted.

5 2. Upon conviction of the offenses alleged in Four, Nine, and Ten of this Indictment, the
6 convicted defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section
7 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in
8 or used in the knowing commission of the offenses.

9 3. If any property subject to forfeiture, as a result of the offenses alleged in Counts One
10 through ~~Twenty Three~~ ^{seventeen} of this Indictment, for which a defendant is convicted:

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

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

13 c. has been placed beyond the jurisdiction of the Court;

14 d. has been substantially diminished in value; or

15 e. has been commingled with other property which cannot be divided without
16 difficulty;

17 it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28,
18 United States Code, Section 2461(c), to seek forfeiture of any other property of defendants, up to the
19 value of the property subject to forfeiture.
20

21 A TRUE BILL.

22 **/s/ Signature on file w/AUSA**

23 FOREPERSON

24 
25 BENJAMIN B. WAGNER
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JOSE MANUEL VALDEZ TORRES, a.k.a., "Ruben;" -BW+
ROBERTO GOMEZ, JR., a.k.a., "Tito," "Beto;" NPN+
LEONEL VALDEZ AYON, A.K.A. Leonel Valdez Gonzalez, a.k.a. "Leon;" NPN+
LEOBARDO MARTINEZ-CARRANZA, a.k.a., "Wacho," "Wachon;" NPN+
EDGAR EDUARDO HERRERA; -BW+
ENRIQUE ALONSO VALDEZ YANEZ; -BW+
JASON DUANE ROGERS, a.k.a., "Yonk/Yonki/Yonke;" NPN+
SHANNON ANTHONY ARMSTRONG, a.k.a., "Venado/Benado;" NPN+
BRADLEY GENE WARD, a.k.a., "Flaco;"
DAVID ANDREWS UHRIG, a.k.a., "Casa," "Casa De Piedra;"
WILLIAM JAMES WELCH, a.k.a., "Burlington;"
MICHAEL WILLIAM MCGIBBON, a.k.a., "Banquita;" and
JESUS HUNBERTO ZURITA SICAIROS } NPN+

INDICTMENT

VIOLATION(S): 21 U.S.C. §§ 846, 841(A)(1) – Conspiracy To Distribute And To Possess With Intent To Distribute Methamphetamine, Heroin, And Cocaine; 21 U.S.C. § 841(A)(1) – Possession With Intent To Distribute Methamphetamine; 21 U.S.C. § 841(A)(1) – Distribution Of Methamphetamine; 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Heroin; 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Cocaine; 21 U.S.C. § 841(a)(1) – Possession With Intent to Distribute Marijuana; 18 U.S.C. § 922(G)(1) – Felon In Possession Of Firearm; 21 U.S.C. § 853(A), 18 U.S.C. § 924(D)(1) AND 28 U.S.C. § 2461(C) CRIMINAL FORFEITURE

A true bill.

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 9 day

of July, A.D. 20 15

NO BAIL WARRANT PENDING HEARING

NO PROCESS NECESSARY

Bail, \$ _____

2:15 - CR - 0131 TLN

United States v. Jose Manuel Valdez Torres, et al.
Penalties for Indictment

NOTE - The below penalties reflect the charges without the prior drug felony convictions charged since the enhanced penalties do not become effective until an information charging the prior convictions is filed pursuant to 21 U.S.C. § 851(a) and no such information has been filed as yet.

Defendants

JOSE MANUEL VALDEZ TORRES, a.k.a., "Ruben;"
ROBERTO GOMEZ, JR., a.k.a., "Tito," "Beto;"
LEONEL VALDEZ AYON, A.K.A. Leonel Valdez Gonzalez, a.k.a. "Leon;"
LEOBARDO MARTINEZ-CARRANZA, a.k.a., "Wacho," "Wachon;"
EDGAR EDUARDO HERRERA;
ENRIQUE ALONSO VALDEZ YANEZ;
JASON DUANE ROGERS, a.k.a., "Yonk/Yonki/Yonke;"
SHANNON ANTHONY ARMSTRONG, a.k.a., "Venado/Benado;"
BRADLEY GENE WARD, a.k.a., "Flaco;"
DAVID ANDREWS UHRIG, a.k.a., "Casa," "Casa De Piedra;"
WILLIAM JAMES WELCH, a.k.a., "Burlington;"
MICHAEL WILLIAM MCGIBBON, a.k.a., "Banquita;" and
JESUS HUNBERTO ZURITA SICAIROS.

COUNT 1: **ALL DEFENDANTS**

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to Distribute Over 500 Grams of a mixture containing Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison; or fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 2: **Jose Manual Valdez Torres and Edgar Eduardo Herrera**

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with the Intent to Distribute Over 500 Grams of a mixture containing Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison; or fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 3: **Roberto Gomez, Jr.**

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with the Intent to Distribute Over 500 Grams of a mixture containing Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison; or fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 4: **Roberto Gomez, Jr.**

VIOLATION: 18 U.S.C. § 922(g) - Felon in possession of firearm

PENALTIES: Not more than 120 months,
Not more than \$250,000 fine or both
A three-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 5: **Leonel Valdez Ayon**

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute Methamphetamine

PENALTIES: Up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 6: **Leonel Valdez Ayon**

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with the Intent to Distribute Heroin

PENALTIES: Up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment

Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 7: **Jason Duane Rogers**

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute
Methamphetamine

PENALTIES: Up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 8: **Bradley Gene Ward**

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute Heroin

PENALTIES: Up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 9: **Bradley Gene Ward**

VIOLATION: 18 U.S.C. § 922(g) - Felon in possession of firearm

PENALTIES: Not more than 120 months,
Not more than \$250,000 fine or both
A three-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 10: **William James Welch**

VIOLATION: 18 U.S.C. § 922(g) - Felon in possession of firearm

PENALTIES: Not more than 120 months,
Not more than \$250,000 fine or both
A three-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 11: **Michael William McGibbon**

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute Methamphetamine

PENALTIES: Up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 12: **Michael William McGibbon**

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute Marijuana

PENALTIES: Up to 5 years in prison; or
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of at least 2 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 13: **Jose Manuel Valdez Torres**

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) – Possession with the Intent to Distribute Over 500 Grams of a mixture containing Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison; or fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 14: **Jose Manuel Valdez Torres**

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) – Possession with the Intent to Distribute Over 100 Grams of a mixture containing Heroin

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40 years in prison; or fine of up to \$5,000,000; or both fine and imprisonment

Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 15: **Jose Manuel Valdez Torres**

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) – Possession with the Intent to Distribute
Over 50 Grams of a substance containing methamphetamine

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40
years in prison; or fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 16: **Jose Manuel Valdez Torres**

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) – Possession with the Intent to Distribute
Over 100 Grams of a mixture containing Heroin

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40
years in prison; or fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

COUNT 17: **Jose Manuel Valdez Torres**

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute Cocaine

PENALTIES: Up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION: **All Defendants**

VIOLATION: 21 U.S.C. § 853(a) - Criminal Forfeiture (drugs)

18 U.S.C. § 934(d)(1), 28 U.S.C. § 2461(c) - Criminal Forfeiture (non-
drugs)

PENALTIES: As stated in the charging document