

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

UNITED STATES OF AMERICA

vs.

CASE NO: 3:16cr42/MCR

SILVANO ZARAGOZA-AMBRIZ
_____ /

FACTUAL BASIS FOR GUILTY PLEA

The parties agree with the truthfulness of the following factual basis for the defendant's guilty plea. The undersigned parties further agree that not all of the facts known from this investigation are contained in this brief summary.

Between on or about June 1, 2013, and on or about April 20, 2016, the defendant knowingly and willfully conspired with Kyle James Corbi and others to distribute and possess with intent to distribute controlled substances including heroin, cocaine and methamphetamine. Zaragoza-Ambriz routinely "fronted" distribution quantities of methamphetamine and cocaine to Kyle James Corbi, who would then, in turn, sell the controlled substances and provide payment for the illegal drugs to the defendant. The amount of

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COURT, NORTHERN DIST. FL.

methamphetamine provided by the defendant to Corbi and distributed in the manner described above during the course of the conspiracy exceeded five hundred grams. The amount of cocaine provided by the defendant to Corbi and distributed in the manner described above during the course of the conspiracy exceeded five hundred grams. During the conspiracy, the defendant “fronted” a kilogram of heroin to Corbi, which was then distributed by Corbi. The defendant and Corbi also conspired to distribute an additional kilogram of heroin prior to their arrest.

During the course of the conspiracy, Corbi, at different times but including between July 26, 2014, and August 19, 2014, traded or provided firearms, including the firearm described in the indictment, to the defendant in exchange for the controlled substances described in the indictment. Between July 26, 2014, and August 19, 2014, the defendant possessed the firearm described in Count Two of the indictment in furtherance of the drug trafficking offense charged in Count One of the indictment.

ELEMENTS OF THE OFFENSES

Count One: Conspiracy to Possess with Intent to Distribute Methamphetamine, Cocaine and Heroin (21 U.S.C. §§ 841 and 846)

Jury Instruction- Pattern No. 100

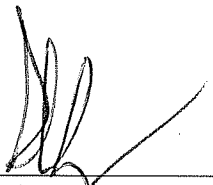
To prove a violation of 21 U.S.C. § 846, the government must prove all of the following elements beyond a reasonable doubt:

- First:*** That two or more people in some way agreed to try to accomplish a shared and unlawful plan to possess a controlled substance;
- Second:*** The defendant knew the unlawful purpose of the plan and willfully joined in it; and
- Third:*** The object of the unlawful plan was to possess with the intent to distribute more than 500 grams of a mixture or substance containing methamphetamine and more than 1 kilogram of a mixture or substance containing heroin and more than 500 grams of a mixture or substance containing cocaine.

ELEMENTS OF THE OFFENSES

Count Two: Possession of a firearm in furtherance of a Drug Trafficking offense (18 U.S.C. § 924(c)) Jury Instruction- Pattern No. 35.2

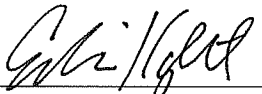
- First:** That the defendant committed the drug trafficking crime as charged in Count One;
- Second:** That during commission of that offense, the defendant knowingly possessed a firearm as charged; and,
- Third:** That the defendant possessed the firearm in furtherance of the drug trafficking crime.



Richard Garcia
Attorney for Defendant
8/17/2016
Date

Silvano Zaragoza-Ambriz
Silvano Zaragoza-Ambriz
Defendant
8/17/2016
Date

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