

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

DEC 16 2025

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

HENDERSON YOFRE MAVO FINOL,

a.k.a. "Yoltran," "El Feo," "El
Viejo,"

ADAN JOSE RAMIREZ SANCHEZ,

a.k.a. "El Ciego," "El Siego,"

YEFESO RAFAEL COLINA QUIROZ,

a.k.a. "El Bebe,"

**ICHIRO EDUARDO YAMAWAKI
BERRIO,**

a.k.a. "Chiro,"

MAIKOL DAVID APONTE RAMOS,

**ANTONI ALFREDO HERRERA-
MONTANEZ,**

HAGY JOSE BARRIOS-ROJANO,

**YORVIS MICHEL CARRASCAL-
CAMPO,**

MILTON JESUS LOPEZ GUEDES,

YHON DEIVIS RON-SAEZ, and

**LEONEL ARQUIMEDES
BUSTAMANTE-SANCHEZ,**

a.k.a. "Leo Albuquerque,"

Defendants.

CRIMINAL NO. 25-5781 KWP

Count 1: 18 U.S.C. § 1962(d):
Racketeering Conspiracy;

Count 2: 18 U.S.C. § 1959(a)(1): Murder
in Aid of Racketeering; 18 U.S.C. § 2:
Aiding and Abetting;

Count 3: 18 U.S.C. § 1959(a)(1):
Kidnapping in Aid of Racketeering; 18
U.S.C. § 2: Aiding and Abetting;

Count 4: 21 U.S.C. § 846: Conspiracy.

INDICTMENT

The Grand Jury charges:

Count 1

(Racketeer Influenced Corrupt Organizations (RICO) Conspiracy)

At all times relevant to this Indictment,

THE TREN DE ARAGUA (“TdA”) ENTERPRISE

1. The defendants, **HENDERSON YOFRE MAVO FINOL, a.k.a. “Yoltran,” “El Feo,” “El Viejo,” ADAN JOSE RAMIREZ SANCHEZ, a.k.a. “El Ciego,” “El Siego,” YEFESO RAFAEL COLINA QUIROZ, a.k.a. “El Bebe,” ICHIRO EDUARDO YAMAWAKI BERRIO, a.k.a. “Chiro,” MAIKOL DAVID APONTE RAMOS, ANTONI ALFREDO HERRERA-MONTANEZ, HAGY JOSE BARRIOS-ROJANO, YORVIS MICHEL CARRASCAL-CAMPO, MILTON JESUS LOPEZ GUEDES, YHON DEIVIS RON-SAEZ, and LEONEL ARQUIMEDES BUSTAMANTE-SANCHEZ, a.k.a. “Leo Albuquerque,”** and other persons known and unknown to the Grand Jury, were members and associates of Tren de Aragua, a criminal organization operating in and around New Mexico and throughout North, South, and Central America and Spain, otherwise known and hereinafter referred to as TdA. TdA’s members and associates have engaged in criminal activities, including but not limited to, murder, drug trafficking, robbery, human smuggling, and sex trafficking. TdA, including its leaders, members, and associates, constituted an “enterprise,” as defined in Title 18, United States Code, Section 1961(4), namely, a group of individuals associated in fact, although not a legal entity, that engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. TdA operated within the District of New Mexico and elsewhere.

3. TdA originated in the state of Aragua, Venezuela, in approximately 2009 and used the Tocoron prison as a center of operations to orchestrate and conduct criminal activities, that primarily impacted Venezuela and other South American countries. TdA was largely composed of persons from South America, mostly from Venezuela. In the following years, gang members and associates left Venezuela and spread throughout North, South, and Central America and Spain, which expanded TdA's presence. TdA members and associates established a strong gang presence in Colombia, Chile, Peru, Mexico, the United States, including the Districts of New Mexico and Colorado, and elsewhere. As a result, TdA operated as a national and international criminal organization with its members and associates regularly conducting gang activities across the Western Hemisphere.

4. TdA in the United States was organized by geographic area of operation into subsets, or cells. Each regional cell typically had one or more leaders who were responsible for, among other things, managing the criminal enterprise's activities in the territory, collecting money from other members and associates to finance gang activities and crimes, directing day-to-day management of the region, and planning and ordering acts of violence against rival gang members, associates, and other victims. The leaders of these subsets or cells reported to, received directives from, and distributed criminally-derived assets and proceeds to TdA leaders throughout the United States, Mexico, Central America, and South America.

5. In the District of New Mexico, the prominent TdA cell was referred to as "Guerilla Pobre" or "GP." The Guerilla Pobre TdA cell used elephant symbols or images to represent the gang. This TdA cell also frequently organized exclusive late-night parties for Venezuelans, called "rumbas." Rumbas were advertised by TdA members and associates using digital flyers that featured prominent images of an elephant and detailed the fee charged for entry at a secret location.

Rumbas were used to finance other criminal activity through cover fees charged for entry, sale of alcohol, and the sale of controlled substances. TdA members and associates frequently possessed and displayed firearms during the rumba parties. TdA members and associates regularly checked other entrants for weapons prior to admittance to the rumba, which allowed TdA members and associates to maintain control over their drug trafficking activity and facilitate a culture of fear and intimidation.

Purposes of the Enterprise

6. The purposes of the TdA enterprise included, but were not limited to, the following:
 - a. Preserving, promoting, and protecting the power, territory, and profits of the enterprise through the use of intimidation and violence, including, but not limited to, acts involving murder, assault, kidnapping, robbery, other acts of violence, and threats of violence;
 - b. Enriching members and associates of the enterprise through criminal activities, including, but not limited to, robbery, kidnapping, sex trafficking, harboring and transporting aliens, fraud and related activities in connection with identification documents, and manufacturing, possession, and distribution of controlled substances, including marijuana, cocaine, and “tusi”—a narcotic drug popular in Venezuela which typically contains a mixture of ketamine with a variety of other controlled substances, including methamphetamine, MDMA (3,4-Methylenedioxymethamphetamine), cocaine, and fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide, and is typically manufactured to be pink in color.
 - c. Increasing TdA’s control and authority over its territory and profits through threats, intimidation, and acts of violence against members and associates of rival gangs and sex trafficking victims;

- d. Promoting and enhancing the enterprise and its members' and associates' activities;
- e. Keeping victims and potential victims in fear of the enterprise and in fear of its members and associates, through violence and threats of violence;
- f. Providing financial support and information to the leaders, members and associates of the enterprise, both throughout the United States and Central and South America; and
- g. Providing assistance to members and associates of the TdA enterprise who committed crimes for and on behalf of TdA, in order to hinder, obstruct, and prevent law enforcement officers from identifying the offenders of those crimes, apprehending the offenders, and successfully prosecuting and punishing the offenders.

Manner and Means of the Enterprise

7. Among the manner and means by which members and associates of the TdA enterprise, including **HENDERSON YOFRE MAVO FINOL, ADAN JOSE RAMIREZ SANCHEZ, YEFESO RAFAEL COLINA QUIROZ, ICHIRO EDUARDO YAMAWAKI BERRIO, MAIKOL DAVID APONTE RAMOS, ANTONI ALFREDO HERRERA-MONTANEZ, HAGY JOSE BARRIOS-ROJANO, YORVIS MICHEL CARRASCAL-CAMPO, MILTON JESUS LOPEZ GUEDES, YHON DEIVIS RON-SAEZ, and LEONEL ARQUIMEDES BUSTAMANTE-SANCHEZ**, conducted and participated in the conduct of the affairs of the TdA enterprise were the following:

- a. To protect and expand the enterprise's power and territory, members and associates of the enterprise conspired to commit, attempted to commit, and committed acts of violence, including acts involving murder, assault, robbery, kidnapping, and directed attacks

against rival gang members and associates, and members and associates of the enterprise who violated the enterprise's rules, or civilians not involved in gang activities;

b. In the course of carrying out the criminal activities of the enterprise, members and associates of the enterprise carried and used dangerous weapons, including firearms;

c. To generate income for the enterprise, TdA members and associates participated in drug manufacturing and distribution, robbery, sex trafficking, human smuggling, retail theft, fraudulent activities involving identification devices and documents, and organized exclusive parties called rumbas to further their unlawful activity;

d. Members and associates of the enterprise used the enterprise's reputation for violence to further the members' and associates' criminal activities, to include drug trafficking and sex trafficking.

THE RACKETEERING CONSPIRACY

8. Beginning on or about a date unknown, but starting no later than 2022, and continuing until at least on or about the date of this Indictment, in the District of New Mexico and elsewhere, **HENDERSON YOFRE MAVO FINOL, ADAN JOSE RAMIREZ SANCHEZ, YEFESO RAFAEL COLINA QUIROZ, ICHIRO EDUARDO YAMAWAKI BERRIO, MAIKOL DAVID APONTE RAMOS, ANTONI ALFREDO HERRERA-MONTANEZ, HAGY JOSE BARRIOS-ROJANO, YORVIS MICHEL CARRASCAL-CAMPO, MILTON JESUS LOPEZ GUEDES, YHON DEIVIS RON-SAEZ, and LEONEL ARQUIMEDES BUSTAMANTE-SANCHEZ**, and others known and unknown to the Grand Jury, each being a person employed by and associated with TdA, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly, willfully, and unlawfully combined, conspired, confederated, and agreed with one another, and with others unknown to the Grand Jury,

to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate directly and indirectly in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961 and 1961(5), which pattern of racketeering consisted of:

- a. Multiple acts involving:
 1. Murder, chargeable under New Mexico Statutes Annotated, Sections 30-2-1 (murder), 30-1-13 (accessory/aiding and abetting), 30-28-1 (attempt), and 30-28-2 (conspiracy);
 2. Kidnapping, chargeable under New Mexico Statutes Annotated Sections 30-4-1 (kidnapping), 30-1-13 (accessory/aiding and abetting), 30-28-1 (attempt), and 30-28-2 (conspiracy);
 3. Robbery, chargeable under New Mexico Statutes Annotated Sections 30-16-2 (robbery), 30-1-13 (accessory/aiding and abetting), 30-28-1 (attempt), and 30-28-2 (conspiracy); and
- b. Multiple acts indictable under Title 8, United States Code, Section 1324 (relating to bringing in and harboring certain aliens);
- c. Multiple acts indictable under Title 18, United States Code, Section 1591 (relating to sex trafficking) and Title 18, United States Code, Section 2 (aiding and abetting);
- d. Multiple acts indictable under Title 18, United States Code, Section 1028 (relating to fraud and related activity in connection with identification documents) and Title 18, United States Code, Section 2 (aiding and abetting);

- e. Multiple acts indictable under Title 18, United States Code, Section 1426 (relating to the reproduction of naturalization or citizenship papers) and Title 18, United States Code, Section 2 (aiding and abetting); and
- f. Multiple offenses involving dealing in controlled substances in violation of Title 21, United States Code, Sections 841 (manufacture, possession with the intent to distribute, and distribution of controlled substances) and 846 (conspiracy).

9. It was part of the conspiracy that **HENDERSON YOFRE MAVO FINOL, ADAN JOSE RAMIREZ SANCHEZ, YEFESO RAFAEL COLINA QUIROZ, ICHIRO EDUARDO YAMAWAKI BERRIO, MAIKOL DAVID APONTE RAMOS, ANTONI ALFREDO HERRERA-MONTANEZ, HAGY JOSE BARRIOS-ROJANO, YORVIS MICHEL CARRASCAL-CAMPO, MILTON JESUS LOPEZ GUEDES, YHON DEIVIS RON-SAEZ,** and **LEONEL ARQUIMEDES BUSTAMANTE-SANCHEZ**, each agreed that a co-conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

Overt Acts

10. In furtherance of the conspiracy, and to accomplish the object thereof, the defendants and others committed and caused the commission of various overt acts in the District of New Mexico, and elsewhere, including but not limited to the following:

(1) Beginning on or about a date unknown but no later than April 10, 2022, and continuing through on or about the date of this Indictment, **HENDERSON YOFRE MAVO FINOL, ADAN JOSE RAMIREZ SANCHEZ, YEFESO RAFAEL COLINA QUIROZ, ICHIRO EDUARDO YAMAWAKI BERRIO, MAIKOL DAVID APONTE RAMOS,**

ANTONI ALFREDO HERRERA-MONTANEZ, HAGY JOSE BARRIOS-ROJANO, YORVIS MICHEL CARRASCAL-CAMPO, MILTON JESUS LOPEZ GUEDES, YHON DEIVIS RON-SAEZ, and LEONEL ARQUIMEDES BUSTAMANTE-SANCHEZ, and others known and unknown to the Grand Jury, who were citizens of either Venezuela or Colombia, illegally and unlawfully entered and remained in the United States to further the goals of the TdA enterprise.

(2) Beginning on or about a date unknown but no later than May of 2024, and continuing through on or about the date of this Indictment, **HENDERSON YOFRE MAVO FINOL, ADAN JOSE RAMIREZ SANCHEZ, YEFESO RAFAEL COLINA QUIROZ, ICHIRO EDUARDO YAMAWAKI BERRIO, MAIKOL DAVID APONTE RAMOS, ANTONI ALFREDO HERRERA-MONTANEZ, HAGY JOSE BARRIOS-ROJANO, YORVIS MICHEL CARRASCAL-CAMPO, MILTON JESUS LOPEZ GUEDES, YHON DEIVIS RON-SAEZ, and LEONEL ARQUIMEDES BUSTAMANTE-SANCHEZ,** and other TdA members and associates, did manufacture, possess with intent to distribute, and distribute, controlled substances, including marijuana, cocaine, ketamine, methamphetamine, MDMA (3,4-Methylenedioxymethamphetamine), and fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide). Defendants divided the profits of their drug trafficking and paid their sources of supply, which often included TdA members and associates from other states and countries.

(3) Beginning on a date unknown but not later than on or about March 17, 2024, and continuing through on or about February 25, 2025, **HENDERSON YOFRE MAVO FINOL, ADAN JOSE RAMIREZ SANCHEZ, YEFESO RAFAEL COLINA QUIROZ, ICHIRO EDUARDO YAMAWAKI BERRIO, MAIKOL DAVID APONTE RAMOS, ANTONI**

ALFREDO HERRERA-MONTANEZ, HAGY JOSE BARRIOS-ROJANO, YORVIS MICHEL CARRASCAL-CAMPO, MILTON JESUS LOPEZ GUEDES, YHON DEIVIS RON-SAEZ, and LEONEL ARQUIMEDES BUSTAMANTE-SANCHEZ, and others known and unknown to the Grand Jury, unlawfully possessed and used firearms as aliens illegally and unlawfully in the United States, in furtherance of their drug trafficking activity, and to instill fear and threaten violence in support of TdA's other unlawful activities.

(4) Beginning on a date unknown but not later than on or about May 17, 2024, and continuing through on or about June 29, 2024, **HENDERSON YOFRE MAVO FINOL, ICHIRO EDUARDO YAMAWAKI BERRIO, ANTONI ALFREDO HERRERA-MONTANEZ, HAGY JOSE BARRIOS-ROJANO, MILTON JESUS LOPEZ GUEDES,** and others known and unknown to the Grand Jury, unlawfully transported and harbored illegal aliens that had been smuggled into the United States, and transferred the proceeds earned from transporting and harboring illegal aliens to other TdA members and associates in the District of New Mexico and elsewhere.

(5) From on or about May 16, 2024, through on or about July 14, 2024, **YEFESO RAFAEL COLINA QUIROZ, ICHIRO EDUARDO YAMAWAKI BERRIO MAIKOL DAVID APONTE RAMOS, ANTONI ALFREDO HERRERA-MONTANEZ, HAGY JOSE BARRIOS-ROJANO, YORVIS MICHEL CARRASCAL-CAMPO, YHON DEIVIS RON-SAEZ, and LEONEL ARQUIMEDES BUSTAMANTE-SANCHEZ,** and others known and unknown to the Grand Jury, planned and attended rumbas for the purpose of generating money for the enterprise, to include creating rumba flyers, obtaining DJs and photos for the rumba flyers, sharing the rumba flyers, charging a cover to enter the rumbas, pooling resources to fund the rumbas, obtaining tusi ingredients, and manufacturing and distributing tusi at the rumbas.

(6) On or about May 17, 2024, and on or about May 24, 2024, **YORVIS MICHEL CARRASCAL CAMPO** and another TdA member and associate exchanged audio messages regarding a drug debt owed to **YORVIS MICHEL CARRASCAL CAMPO** by **HENDERSON YOFRE MAVO FINOL**.

(7) On or about May 17, 2024, **YORVIS MICHEL CARRASCAL CAMPO** sent an audio message to another TdA member and associate where he stated he expected shipments of controlled substances in approximately 14 days and was willing to distribute controlled substances to TdA members and associates if **HENDERSON YOFRE MAVO FINOL**'s debt was paid.

(8) On or about May 18, 2024, **MAIKOL DAVID APONTE RAMOS** and **ANTONI ALFREDO HERRERA-MONTANEZ** sent audio messages to another TdA member and associate detailing that they were manufacturing and preparing tusi for distribution at the rumba on the same date.

(9) On or about May 19, 2024, **HAGY JOSE BARRIOS-ROJANO** and another TdA member and associate exchanged a photograph showing multiple TdA members and associates, including **YEFESO RAFAEL COLINA QUIROZ**, **MAIKOL DAVID APONTE RAMOS**, **ANTONI ALFREDO HERRERA-MONTANEZ**, and **HAGY JOSE BARRIOS-ROJANO** at a rumba.

(10) On or about May 21, 2024, a TdA member and associate exchanged audio messages with **YEFESO RAFAEL COLINA QUIROZ** and another TdA member and associate confirming that the TdA member and associate picked up between 20 and 40 grams of a controlled substance intended for later packaging.

(11) From on or about May 23, 2024, through on or about July 8, 2024, **HENDERSON YOFRE MAVO FINOL** repeatedly distributed tusi to TdA members and associates in Colorado and New Mexico for further distribution. Once the tusi was sold, TdA members and associates in New Mexico sent the drug proceeds to **HENDERSON YOFRE MAVO FINOL**, who re-distributed those proceeds to TdA leaders in the United States and in Central and South America.

(12) On or about May 24, 2024, the day before a scheduled rumba, a TdA member and associate exchanged messages with **MAIKOL DAVID APONTE RAMOS**, including audio messages coordinating the pickup of “things” from **MAIKOL DAVID APONTE RAMOS**’s drug source of supply in Colorado, a screenshot of a \$50 payment from **MAIKOL DAVID APONTE RAMOS** to the other TdA member and associate, and a photograph of a package containing tusi ingredients sent from the other TdA member and associate to **MAIKOL DAVID APONTE RAMOS**.

(13) On or about May 24, 2024, a TdA member and associate transferred money to **YORVIS MICHEL CARRASCAL CAMPO** as payment for a drug debt owed by **HENDERSON YOFRE MAVO FINOL**.

(14) Between on or about May 24, 2024, and on or about June 16, 2024, **YORVIS MICHEL CARRASCAL CAMPO**, supplied ketamine to TdA members and associates in the District of New Mexico, which was then used to manufacture and distribute tusi.

(15) From on or about May 25, 2024, to on about June 29, 2024, **YEFESO RAFAEL COLINA QUIROZ**, **MAIKOL DAVID APONTE RAMOS**, **ANTONI ALFREDO HERRERA-MONTANEZ**, **HAGY JOSE BARRIOS-ROJANO**, and **YORVIS MICHEL CARRASCAL-CAMPO**, and others known and unknown to the Grand Jury, held Jane Doe 1

against her will and, by physically assaulting Jane Does 1 and 2, using threats of violence against Jane Does 1 and 2, creating a coercive environment with consistent possession and display of firearms, and pointing firearms at Jane Does 1 and 2, caused Jane Doe 1 to engage in commercial sex acts.

(16) From on or about May 25, 2024, to on about June 29, 2024, **YEFESO RAFAEL COLINA QUIROZ, HAGY JOSE BARRIOS-ROJANO, and ANTONI ALFREDO HERRERA-MONTANEZ**, and others known and unknown to the Grand Jury, knowingly drove Jane Doe 1 and others to “appointments” or “dates” at hotels or apartments. There, Jane Doe 1 and others would meet customers to perform sexual acts in exchange for money. These events occurred on almost a daily basis and, often, multiple times per day. Following the “date” or “appointment,” Jane Doe 1 and others gave **YEFESO RAFAEL COLINA QUIROZ, HAGY JOSE BARRIOS-ROJANO, ANTONI ALFREDO HERRERA-MONTANEZ**, and other TdA members and associates money received in exchange for performing the sex acts.

(17) When **YEFESO RAFAEL COLINA QUIROZ, HAGY JOSE BARRIOS-ROJANO, and ANTONI ALFREDO HERRERA-MONTANEZ**, and others known and unknown to the Grand Jury, drove Jane Doe 1 and others to the “appointments” or “dates,” they unlawfully possessed firearms.

(18) When Jane Doe 1 and others did not “work” or expressed that they did not want to “work,” **YEFESO RAFAEL COLINA QUIROZ, MAIKOL DAVID APONTE RAMOS, ANTONI ALFREDO HERRERA-MONTANEZ, and HAGY JOSE BARRIOS-ROJANO**, and others known and unknown to the Grand Jury, assaulted Jane Doe 1 and others and verbally threatened to assault them.

(19) On or about June 12, 2024, **ADAN JOSE RAMIREZ SANCHEZ**, traveled to Albuquerque with other TdA members and associates to find John Doe 1 and question him about his loyalty to the TdA enterprise and connections to rival gangs.

(20) On or about June 13, 2024, two days before a scheduled rumba, **HENDERSON YOFRE MAVO FINOL** sent a TdA member and associate audio messages detailing \$500 owed by the TdA member and associate and, once he was paid, that **HENDERSON YOFRE MAVO FINOL** would send 40 grams of a controlled substance to the TdA member and associate and **HENDERSON YOFRE MAVO FINOL** would be able to pay others he owed.

(21) On or about June 14, 2024, a TdA member and associate paid **HENDERSON YOFRE MAVO FINOL** \$500 to satisfy his drug debt.

(22) On or about June 14, 2024, multiple audio messages were sent between TdA members and associates detailing the acquisition of pounds of marijuana from **ADAN JOSE RAMIREZ SANCHEZ** and **HENDERSON YOFRE MAVO FINOL**, to later be packaged and distributed by **YEFESO RAFAEL COLINA QUIROZ** and other TdA members and associates.

(23) On or between June 12, 2024, and June 15, 2024, **ADAN JOSE RAMIREZ SANCHEZ** and **HENDERSON YOFRE MAVO FINOL** directed another TdA member and associate to commence the kidnapping of John Doe 1.

(24) On or about June 15, 2024, **ADAN JOSE RAMIREZ SANCHEZ** sent an audio message to another TdA member and associate, inquiring about the location of John Doe 1. The other TdA member and associate responded that he was already at the house.

(25) On or about June 16, 2024, **HAGY JOSE BARRIOS-ROJANO** and another TdA member and associate shared an Apple Maps pin location reflecting the Peaks at

Sandia View Apartment complex, located at 1501 Indian School Rd. NE, Albuquerque, New Mexico 87102.

(26) On or about June 16, 2024, at the direction of **HENDERSON YOFRE MAVO FINOL** and another TdA member and associate, **HAGY JOSE BARRIOS-ROJANO**, kidnapped John Doe 1 by luring him to an apartment located within the Peaks at Sandia View Apartment complex, located at 1501 Indian School Rd. NE, Albuquerque, New Mexico 87102.

(27) On or about June 16, 2024, **LEONEL ARQUIMEDES BUSTAMANTE-SANCHEZ**, and other TdA members and associates assaulted and restrained John Doe 1, took his firearm, and struck John Doe 1 in the head and face with a firearm, which resulted in John Doe 1's incapacitation and ultimately the execution of the kidnapping plan.

(28) On or about June 16, 2024, after TdA members and associates kidnapped and restrained John Doe 1, one of the TdA members and associates present at the apartment placed a phone call to **HENDERSON YOFRE MAVO FINOL**, who conferenced with other TdA members, associates, and leaders, located inside the United States and abroad, including **ADAN JOSE RAMIREZ SANCHEZ**, to enable **HENDERSON YOFRE MAVO FINOL**, **ADAN JOSE RAMIREZ SANCHEZ**, and other TdA members, associates, and leaders to interrogate John Doe 1 about his loyalty to TdA and his connections to rival gangs.

(29) On or about June 16, 2024, a TdA leader participating in the phone call gave the order to kill John Doe 1 at an apartment located within the Peaks at Sandia View Apartment complex located at 1501 Indian School Rd. NE, Albuquerque, New Mexico 87102.

(30) On or about June 16, 2024, defendants **YEFESO RAFAEL COLINA QUIROZ**, **ICHIRO EDUARDO YAMAWAKI BERRIO**, **MAIKOL DAVID APONTE RAMOS**, **YORVIS MICHEL CARRASCAL-CAMPO**, and **MILTON JESUS LOPEZ**

GUEDES and other TdA members and associates, carried out the TdA leader's order to kill John Doe 1 by restraining and strangling John Doe 1 until John Doe 1 died.

(31) On or about June 16, 2024, using a cell phone, a TdA member and associate sent photos of John Doe 1's deceased body to **ADAN JOSE RAMIREZ SANCHEZ** and other TdA leaders to demonstrate that TdA members and associates carried out the murder as directed by the TdA leaders.

(32) On or about June 16, 2024, following the murder of John Doe 1, **ANTONI ALFREDO HERRERA-MONTANEZ** obtained luggage into which to put John Doe 1's body so that TdA members and associates could transport John Doe 1's body from the scene of the murder.

(33) On or about June 16, 2024, following the murder of John Doe 1, **ANTONI ALFREDO HERRERA-MONTANEZ** obtained cleaning supplies to aid TdA members and associates in concealing the murder from law enforcement.

(34) On or about June 16, 2024, **YEFESO RAFAEL COLINA QUIROZ**, **MAIKOL DAVID APONTE RAMOS**, and **YORVIS MICHEL CARRASCAL-CAMPO** cleaned up the scene of the murder to conceal the murder from law enforcement.

(35) Between on or about June 16, 2024, and on or about June 17, 2024, **YEFESO RAFAEL COLINA QUIROZ** and **YHON DEIVIS RON-SAEZ** drove to find a burial spot for John Doe 1's body, obtained shovels to bury John Doe 1, and sent an Apple Maps pin identifying the proposed burial site to another TdA member and associate to facilitate the burial of John Doe 1.

(36) Between on or about June 16, 2024, and on or about June 17, 2024, **YHON DEIVIS RON-SAEZ** drove a red Chevrolet Sonic, belonging to **ANTONI HERRERA**

MONTANEZ, to transport the suitcase containing John Doe 1's body to a remote location within the District of New Mexico.

(37) Between on or about June 16, 2024, and on or about June 17, 2024, **YEFESO RAFAEL COLINA QUIROZ, MAIKOL DAVID APONTE RAMOS, HAGY JOSE BARRIOS-ROJANO, YORVIS MICHEL CARRASCAL-CAMPO, MILTON JESUS LOPEZ GUEDES**, and **YHON DEIVIS RON-SAEZ**, and other TdA members and associates, buried John Doe 1's body in a remote location within the District of New Mexico.

(38) On or about June 20, 2024, a TdA member and associate sent an audio message to **HENDERSON YOFRE MAVO FINOL** requesting that he address rising concerns from other TdA members and associates concerning a possible law enforcement investigation.

(39) On or about August 18, 2024, in the District of Colorado, **ADAN JOSE RAMIREZ SANCHEZ**, and other TdA members and associates, armed with firearms and other weapons, forced their way into apartments located at 1268 N. Dallas St., Aurora, Colorado, to locate rivals and individuals they believed owed money to the TdA enterprise. Shortly afterwards, a shootout ensued at the apartment complex located at 1268 N. Dallas St., Aurora, Colorado between the opposing groups resulting in the death of John Doe 2. **ADAN JOSE RAMIREZ SANCHEZ** was directly involved in the shootout.

(40) On or about September 16, 2024, **YEFESO RAFAEL COLINA QUIROZ, ICHIRO EDUARDO YAMAWAKI BERRIO**, and another TdA member and associate travelled in a vehicle together in Colorado, while unlawfully possessing a firearm.

(41) On or about November 20, 2024, **ADAN JOSE RAMIREZ SANCHEZ** participated in a recorded video call with another TdA member and associate, during which he confirmed his role in directing the kidnapping of John Doe 1, to force John Doe 1 to answer for

his role in a murder of a TdA member and associate in Colombia and described the murder of John Doe 1 as a directive from other TdA leaders.

(42) On or about February 25, 2025, **YEFESO RAFAEL COLINA QUIROZ** possessed ammunition inside of his bedroom in apartment 5 of the Sierra Meadows apartment complex, located at 4224-4246 Eubank Blvd. NE, Albuquerque, New Mexico 87111.

(43) On or about February 25, 2025, **MAIKOL DAVID APONTE RAMOS, ANTONI ALFREDO HERRERA-MONTANEZ**, and other TdA members and associates possessed two firearms, extended firearm magazines, ammunition, pink-colored tusi packaged for distribution, a digital scale, a blender with residue from a pink-colored substance, and various ingredients used to manufacture tusi inside of apartment 6 of the Sierra Meadows apartment complex, located at 4224-4246 Eubank Blvd. NE, Albuquerque, New Mexico 87111.

(44) On or about February 25, 2025, **MAIKOL DAVID APONTE RAMOS** and **ANTONI ALFREDO HERRERA-MONTANEZ** possessed fake United States lawful permanent resident cards and social security cards inside of apartment 6 of the Sierra Meadows apartment complex, located at 4224-4246 Eubank Blvd. NE, Albuquerque, New Mexico 87111.

SPECIAL SENTENCING FACTORS

Murder of John Doe 1

11. As part of their agreement to conduct and participate in the conduct of the affairs of the TdA enterprise through a pattern of racketeering activity, the defendants **HENDERSON YOFRE MAVO FINOL, ADAN JOSE RAMIREZ SANCHEZ, YEFESO RAFAEL COLINA QUIROZ, ICHIRO EDUARDO YAMAWAKI BERRIO, MAIKOL DAVID APONTE RAMOS, ANTONI ALFREDO HERRERA-MONTANEZ, HAGY JOSE BARRIOS-ROJANO, YORVIS MICHEL CARRASCAL-CAMPO, MILTON JESUS**

LOPEZ GUEDES, YHON DEIVIS RON-SAEZ, and LEONEL ARQUIMEDES

BUSTAMANTE-SANCHEZ committed the following act:

12. On or about June 16, 2024, in the District of New Mexico, **HENDERSON YOFRE MAVO FINOL, ADAN JOSE RAMIREZ SANCHEZ, YEFESO RAFAEL COLINA QUIROZ, ICHIRO EDUARDO YAMAWAKI BERRIO, MAIKOL DAVID APONTE RAMOS, ANTONI ALFREDO HERRERA-MONTANEZ, HAGY JOSE BARRIOS-ROJANO, YORVIS MICHEL CARRASCAL-CAMPO, MILTON JESUS LOPEZ GUEDES, YHON DEIVIS RON-SAEZ, and LEONEL ARQUIMEDES BUSTAMANTE-SANCHEZ**, and others known and unknown to the Grand Jury, did unlawfully, willfully, deliberately, and with premeditation, kill John Doe 1 and did aid and abet the same, in violation of New Mexico Statutes Annotated, Sections 30-2-1 (murder) and 30-1-13 (accessory/aiding and abetting).

In violation of 18 U.S.C. § 1962(d).

Count 2
(Murder in Aid of Racketeering)

13. At all times relevant to this Indictment, as more fully described in Paragraphs 1 through 7 of Count 1 of this Indictment, which are re-alleged and incorporated by reference as though set forth fully herein, TdA, including its leaders, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), namely, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

14. At all times relevant to this Indictment, the TdA enterprise, through its leaders, members, and associates, engaged in racketeering activity as defined in Title 18, United States Code, Section 1959(b)(1) and 1961(1), namely offenses involving dealing in controlled substances in violation of Title 21, United States Code, Sections 841 and 846, and acts indictable under Title 8, United States Code, Section 1324 (relating to bringing in and harboring certain aliens), and Title 18, United States Code, Section 1591 (relating to sex trafficking).

15. On or about June 16, 2024, in the District of New Mexico and elsewhere, the defendants **HENDERSON YOFRE MAVO FINOL, ADAN JOSE RAMIREZ SANCHEZ, YEFESO RAFAEL COLINA QUIROZ, ICHIRO EDUARDO YAMAWAKI BERRIO, MAIKOL DAVID APONTE RAMOS, ANTONI ALFREDO HERRERA-MONTANEZ, HAGY JOSE BARRIOS-ROJANO, YORVIS MICHEL CARRASCAL-CAMPO, MILTON JESUS LOPEZ GUEDES, YHON DEIVIS RON-SAEZ, and LEONEL ARQUIMEDES BUSTAMANTE-SANCHEZ**, along with others known and unknown to the Grand Jury, for the purpose of gaining entrance to and maintaining and increasing position in TdA, an enterprise engaged in racketeering activity, while aiding and abetting each other, did knowingly and intentionally murder John Doe 1, in violation of New Mexico Statutes Annotated Sections 30-2-1 (murder) and 30-1-13 (accessory/aiding and abetting).

In violation of 18 U.S.C. §§ 1959(a)(1) and 2.

Count 3
(Kidnapping in Aid of Racketeering)

16. At all times relevant to this Indictment, as more fully described in Paragraphs 1 through 7 of Count 1 of this Indictment, which are re-alleged and incorporated by reference as though set forth fully herein, TdA, including its leaders, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), namely, a group of

individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

17. At all times relevant to this Indictment, the TdA enterprise, through its leaders, members, and associates, engaged in racketeering activity as defined in Title 18, United States Code, Section 1959(b)(1) and 1961(1), namely, offenses involving dealing in controlled substances in violation of Title 21, United States Code, Sections 841 and 846, and acts indictable under Title 8, United States Code, Section 1324 (relating to bringing in and harboring certain aliens), and Title 18 United States Code, Section 1591 (relating to sex trafficking).

18. On or about June 16, 2024, in the District of New Mexico and elsewhere, the defendants, **ADAN JOSE RAMIREZ SANCHEZ, HENDERSON YOFRE MAVO FINOL, HAGY JOSE BARRIOS-ROJANO and LEONEL BUSTAMANTE-SANCHEZ**, along with others known and unknown to the Grand Jury, for the purpose of gaining entrance to and maintaining and increasing position in TdA, an enterprise engaged in racketeering activity, while aiding and abetting each other, did knowingly and intentionally kidnap John Doe 1, in violation of New Mexico Statutes Annotated 30-4-1 (kidnapping) and 30-1-13 (accessory/aiding and abetting).

In violation of 18 U.S.C. §§ 1959(a)(1) and 2.

Count 4
(Drug Conspiracy)

19. Beginning on or about a date unknown, but no later than May of 2024, and continuing through on or about the date of this Indictment, in the District of New Mexico and elsewhere, the defendants, **HENDERSON YOFRE MAVO FINOL, ADAN JOSE RAMIREZ SANCHEZ, YEFESO RAFAEL COLINA QUIROZ, ICHIRO EDUARDO YAMAWAKI**

BERRIO, MAIKOL DAVID APONTE RAMOS, ANTONI ALFREDO HERRERA-MONTANEZ, HAGY JOSE BARRIOS-ROJANO, YORVIS MICHEL CARRASCAL-CAMPO, MILTON JESUS LOPEZ GUEDES, YHON DEIVIS RON-SAEZ, and LEONEL ARQUIMEDES BUSTAMANTE-SANCHEZ, unlawfully, knowingly and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit an offense defined in 21 U.S.C. § 841(a)(1), specifically, manufacture of, distribution of, and possession with intent to manufacture and distribute, a controlled substance.

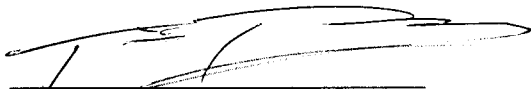
20. The controlled substances involved in the offense were (i) mixtures and substances containing a detectable amount of cocaine, ketamine, methamphetamine, MDMA (3,4-Methylenedioxymethamphetamine), and fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide, in violation of 21 U.S.C. §841(b)(1)(C); and (ii) mixtures and substances containing a detectable amount of marijuana, in violation of 21 U.S.C. § 841(b)(1)(D).

In violation of 21 U.S.C. § 846.

A TRUE BILL:



FOREPERSON OF THE GRAND JURY


Assistant United States Attorney