

FILED 8 OCT '15 14:47USDC-ORP

**UNDER
SEAL**

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:15-CR-00349-SI

v.

SUPERSEDING INDICTMENT

**RAFAEL AVINA-TORRES,
FREDI GARCIA-MARCIAL,
DANIEL RAMIREZ,
EDUARDO JORGE CARILLO,
HECTOR MORENO PEDRIZCO,
a.k.a. "Chupas,"
FRANCISCO CEJA CASTILLO,
ERIK MARTINEZ,
LORENA MARTINEZ,
DARIO OCHOA SOTO,
a.k.a. "Teddy Bear," a.k.a. "Gordo,"
JORGE IVAN TORRES-AYALA,
JANE DOE
a.k.a. "Alejandra Mandujano-
Molina,"
TESHIA VALERIA HUTCHINSON,
BRIAN LANCE BOUSKA,
a.k.a. "The Russian,"
ANDY JAMES WRIGHT,
JOSHUA TODD SUMMERHAYS,
a.k.a. "Hazy,
DONALD KENT McVEY,
a.k.a. "Donald Duck," a.k.a. "The
Duck,"
WENDI ANN KINGSLAND,**

**21 U.S.C. §§ 841(a)(1),
841(b)(1)(A), 841(b)(1)(B),
841(b)(1)(C), 843(b), 846,
856(a)(1) and 856(b)**

**18 U.S.C. §§ 2, 49(a), 371, 924(c),
1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and
1956(h)**

7 U.S.C. § 2156(a)(1)

Forfeiture Allegations

UNDER SEAL

**MARTHA NAYELI CARRIEDO
CASTANEDA,
a.k.a. "Monica,"
SAMUEL GOMEZ-CHAVEZ,
MATTHEW DANIEL GOOD,
BRADLEY CHARLES YOUNGBLOOD,
OSVALDO PACHECO-AYALA,
ANDREW MICHAEL ROWLAND, and
DEBORAH MILLER,**

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

**(Conspiracy to Manufacture, Distribute and Possess with Intent to
Distribute Methamphetamine; to Use Communication Facilities in Furtherance of the
Conspiracy; and, to Maintain Places to
Manufacture and Distribute Controlled Substances)
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 843(b), 846, 856(a)(1) and 856(b))**

Beginning on or about September 2014, the exact date being unknown to the grand jury, and continuing through October 5, 2015, within the District of Oregon and elsewhere, defendants **DANIEL RAMIREZ, EDUARDO JORGE CARILLO, HECTOR MORENO PEDRIZCO, a.k.a. "Chupas," FRANCISCO CEJA CASTILLO, RAFAEL AVINA-TORRES, ERIK MARTINEZ, LORENA MARTINEZ, DARIO OCHOA SOTO, a.k.a. "Teddy Bear," a.k.a. "Gordo," JORGE IVAN TORRES-AYALA, JANE DOE a.k.a. "Alejandra Mandujano-Molina," TESHIA VALERIA HUTCHINSON, BRIAN LANCE BOUSKA, a.k.a. "The Russian," ANDY JAMES WRIGHT, JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy, DONALD KENT McVEY, a.k.a. "Donald Duck," a.k.a. "The Duck," WENDI ANN KINGSLAND, MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica," SAMUEL GOMEZ-CHAVEZ, MATTHEW DANIEL GOOD, BRADLEY CHARLES YOUNGBLOOD, OSVALDO PACHECO-AYALA, ANDREW MICHAEL ROWLAND**

and **FREDI GARCIA-MARCIAL** did knowingly and willfully combine, conspire, confederate, and agree with each other and with others both known and unknown to the Grand Jury, to carry out the following objects in furtherance of the conspiracy:

Objects of the Conspiracy

1. The conspirators did knowingly and willfully combine, conspire, confederate, and agree to manufacture 500 grams or more of a mixture and substance containing a detectible amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

2. The conspirators did knowingly and willfully combine, conspire, confederate, and agree to distribute 500 grams or more of a mixture and substance containing a detectible amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

3. The conspirators did knowingly and willfully combine, conspire, confederate, and agree to possess with intent to distribute 500 grams or more of a mixture and substance containing a detectible amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

4. The conspirators did knowingly, intentionally and willfully combine, conspire, confederate, and agree to use communication facilities, including cellular telephones, in committing, causing, or facilitating the commission of a felony controlled substance offense under Title 21, United States Code, Section 841(a)(1) and in violation of Title 21, United States Code, Section 843(b).

5. The conspirators did knowingly and willfully combine, conspire, confederate, and agree to open, leave, rent, use and maintain any place, whether permanently or temporarily, for

the purpose of manufacturing, distributing and using any controlled substance, in violation of Title 21, United States Code, Sections 856(a)(1) and 856(b).

Ways and Means of the Conspiracy

It was part of this conspiracy that:

Sources of Supply and Wholesale Distributors

1. Defendants **DANIEL RAMIREZ, EDUARDO JORGE CARILLO, HECTOR MORENO PEDRIZCO, a.k.a. "Chupas," FRANCISCO CEJA CASTILLO, and RAFAEL AVINA-TORRES**, utilizing their associations with criminal organizations and gangs based in Mexico, Texas and California, including individuals associated with a drug cartel in the Mexican state of Michoacán, obtained methamphetamine for purposes of further distribution within the United States, including within the District of Oregon.

2. Defendants **DANIEL RAMIREZ, EDUARDO JORGE CARILLO, HECTOR MORENO PEDRIZCO, a.k.a. "Chupas," FRANCISCO CEJA CASTILLO, and RAFAEL AVINA-TORRES**, coordinated the distribution of methamphetamine from Mexico, California and Texas into the District of Oregon for purposes of further distribution to local dealers.

3. Defendant **LORENA MARTINEZ**, operated, within the District of Oregon, as a source of supply of methamphetamine for defendant **DANIEL RAMIREZ**.

4. Defendant **ERIK MARTINEZ** operated, within the District of Oregon, as a source of supply of methamphetamine for defendant **DANIEL RAMIREZ**.

Manufacturing

5. Defendant **EDUARDO JORGE CARILLO** prepared, processed, packaged and repackaged methamphetamine for purposes of further distribution.

6. Defendant **JORGE IVAN TORRES-AYALA** prepared, processed, packaged and repackaged methamphetamine for purposes of further distribution.

Enforcer

7. Defendant **DARIO OCHOA SOTO, a.k.a. "Teddy Bear," a.k.a. "Gordo,"** operated as an "enforcer" for defendant **DANIEL RAMIEZ**.

Runners and Money Collectors

8. Defendants **JORGE IVAN TORRES-AYALA** and **JANE DOE a.k.a. "Alejandra Mandujano-Molina,"** operated as "runners" for defendant **DANIEL RAMIREZ** picking up methamphetamine in California as well as delivering methamphetamine to various customers within the District of Oregon.

9. Defendants **JORGE IVAN TORRES-AYALA** and **JANE DOE a.k.a. "Alejandra Mandujano-Molina,"** collected money for defendant **DANIEL RAMIREZ** that was derived from the sale of methamphetamine to and by local distributors.

10. Defendant **FRANCISCO CEJA CASTILLO** operated as a "runner" for defendant **EDUARDO JORGE CARILLO** delivering methamphetamine to various customers within the District of Oregon.

11. Defendant **FRANCISCO CEJA CASTILLO** collected money for defendant **EDUARDO JORGE CARILLO** that was derived from the sale of methamphetamine to and by local distributors.

12. Defendant **SAMUEL GOMEZ-CHAVEZ** removed approximately 17 pounds of methamphetamine and a firearm from a residence associated with **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** in an effort to prevent its discovery by law enforcement.

13. **FREDI GARCIA-MARCIAL** acted as a runner for **RAFAEL AVINA-TORRES**.

Stash Houses

14. Defendants **DANIEL RAMIREZ, EDUARDO JORGE CARILLO** and **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** maintained residences and premises for the purpose of manufacturing, processing and distributing methamphetamine.

Local Distributors

15. Defendants **FRANCISCO CEJA CASTILLO, LORENA MARTINEZ, TESHIA VALERAI HUTCHINSON, BRIAN LANCE BOUSKA, a.k.a. "The Russian," DARIO OCHOA SOTO, a.k.a. "Teddy Bear," a.k.a. "Gordo," ANDY JAMES WRIGHT, JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy," DONALD KENT McVEY, a.k.a. "Donald Duck," a.k.a. "The Duck," WENDI ANN KINGSLAND, MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica," MATTHEW DANIEL GOOD, ANDREW MICHAEL ROWLAND, OSVALDO PACHECO-AYALA** and **BRADLEY CHARLES YOUNGBLOOD** obtained methamphetamine from their sources of supply, including co-defendants **DANIEL RAMIREZ, EDUARDO JORGE CARILLO** and **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** for purposes of distribution within the District of Oregon.

Money Laundering

16. Defendants **DANIEL RAMIREZ, HECTOR MORENO PEDRIZCO, a.k.a. "Chupas," RAFAEL AVINA-TORRES, DARIO OCHOA SOTO, a.k.a. "Teddy Bear," a.k.a. "Gordo,"** and **WENDI ANN KINGSLAND** wire transferred money, obtained or derived from the sale of methamphetamine, in an effort to pay for and to launder the proceeds obtained from the sale of methamphetamine.

Switching Cellular Telephones

17. Defendants **DANIEL RAMIREZ, HECTOR MORENO PEDRIZCO, a.k.a. “Chupas,” RAFAEL AVINA-TORRES, LORENA MARTINEZ, DARIO OCHOA SOTO, a.k.a. “Teddy Bear,” a.k.a. “Gordo,” JORGE IVAN TORRES-AYALA, TESHIA VALERIA HUTCHINSON, ANDY JAMES WRIGHT and WENDI ANN KINGSLAND** periodically switched (“dropped”) cellular telephones in an effort to thwart the investigative efforts of law enforcement.

General Acts by Conspirators

18. Defendants used cellular telephones to facilitate their distribution of methamphetamine in Oregon and elsewhere.

19. Defendants maintained, controlled, and used residences and other premises for receiving, possessing, concealing, packaging, and distributing methamphetamine (“stash houses”) in the District of Oregon.

20. Defendants and other co-conspirators purchased, controlled, maintained, and/or insured vehicles to transport and conceal methamphetamine and the proceeds of drug sales in Oregon.

21. Defendants and other co-conspirators used bank accounts to deposit, transfer, and receive money from the unlawful distribution of methamphetamine with the intent to promote the distribution of methamphetamine and to conceal and disguise the source of the money.

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Overt Acts of the Conspiracy

In furtherance of this conspiracy, and in pursuit of the objects thereof, at least one of the conspirators committed or caused to be committed one or more of the following overt acts, among others, within the District of Oregon and elsewhere:

1. On or about May 18, 2015, **DANIEL RAMIREZ** calls **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** to obtain methamphetamine for a customer to try, which he agrees to provide.
2. On or about May 18, 2015, **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** possessed approximately 18 pounds of methamphetamine for purposes of further distribution.
3. On or about May 18, 2015, **DANIEL RAMIREZ** calls **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** to order approximately four pounds of methamphetamine, for purposes of further distribution, which he agrees to provide.
4. On or about May 18, 2015, **DANIEL RAMIREZ** directs **JANE DOE a.k.a. "Alejandra Mandujano-Molina,"** to deliver methamphetamine to various customers within the greater Portland, Oregon and Washington County, Oregon area and to collect money from them, which she agrees to do.
5. On or about May 18, 2015, **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** contacts **DANIEL RAMIREZ** to obtain one-half of a kilogram of methamphetamine for purposes of further distribution, which **DANIEL RAMIREZ** agrees to provide.
6. On or about May 18, 2015, **BRIAN LANCE BOUSKA, a.k.a. "The Russian,"** orders a pound of methamphetamine, for purposes of further distribution, from **DANIEL RAMIREZ,** which he agrees to provide.

7. On or about May 18, 2015, **DANIEL RAMIREZ** delivers methamphetamine to **BRIAN LANCE BOUSKA, a.k.a. "The Russian."**

8. On or about May 18, 2015, **FRANCISCO CEJA CASTILLO** and **DANIEL RAMIREZ** discuss and attempt to reconcile **DANIEL RAMIREZ'** payment of an outstanding drug debt.

9. On or about May 19, 2015, **RAFAEL AVINA-TORRES** calls **DANIEL RAMIREZ** to check on the quality of methamphetamine he had provided and gives him a bank account number so **DANIEL RAMIREZ** can send him a payment for the methamphetamine that he purchased.

10. On or about May 19, 2015, **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** contacts **DANIEL RAMIREZ** to obtain one-half of a kilogram of methamphetamine for purposes of further distribution, which **DANIEL RAMIREZ** agrees to provide.

11. On or about May 19, 2015, **ANDY JAMES WRIGHT** contacts **DANIEL RAMIREZ** looking for iodine crystals, an ingredient used to manufacture ("cook") methamphetamine.

12. On or about May 19, 2015, **DANIEL RAMIREZ** calls and asks **ANDY JAMES WRIGHT** if he needs more methamphetamine and **ANDY JAMES WRIGHT** tells him he will come by in a couple of days to purchase more.

13. On or about May 19, 2015, **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** calls **DANIEL RAMIREZ** and asks him if he needs more methamphetamine and **DANIEL RAMIREZ** asks **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** to set aside some methamphetamine for him, which he agrees to do.

14. On or about May 19, 2015, **TESHIA VALERIA HUTCHINSON** contacts **DANIEL RAMIREZ** in an effort to obtain methamphetamine for purposes of further distribution.

15. On or about May 20, 2015, **DANIEL RAMIREZ** orders methamphetamine from **LORENA MARTINEZ** for purposes of further distribution.

16. On or about May 20, 2015, **LORENA MARTINEZ** provides **DANIEL RAMIREZ** with a quantity of methamphetamine for purposes of further distribution.

17. On or about May 21, 2015, **RAFAEL AVINA-TORRES** and **DANIEL RAMIREZ** discuss the price of methamphetamine that a source is selling it for and **RAFAEL AVINA-TORRES** agrees to call the source and see if there is any methamphetamine available for them to purchase for purposes of further distribution.

18. On or about May 21, 2015, **RAFAEL AVINA-TORRES** and **DANIEL RAMIREZ** discuss how **DANIEL RAMIREZ** can structure his bank deposits in order to pay **RAFAEL AVINA-TORRES**.

19. On or about May 21, 2015, **DANIEL RAMIREZ** contacts **BRIAN LANCE BOUSKA, a.k.a. "The Russian,"** and asks if he wants to purchase methamphetamine.

20. On or about May 21, 2015, **DANIEL RAMIREZ** calls **JANE DOE a.k.a. "Alejandra Mandujano-Molina,"** and asks her to weigh out a quantity of methamphetamine for purposes of further distribution, which she agrees to do, and he tells her that he will stop by and pick it up.

21. On or about May 21, 2015, **DANIEL RAMIREZ** instructs **JANE DOE a.k.a. "Alejandra Mandujano-Molina,"** to get him a new phone, which she agreed to do.

22. On or about May 21, 2015, **DANIEL RAMIREZ** calls **JANE DOE a.k.a. "Alejandra Mandujano-Molina,"** and instructs her to deliver a quantity of a controlled substance to a customer.

23. On or about May 22, 2015, **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** contacts **DANIEL RAMIREZ** in an effort to pay him for the methamphetamine he had purchased and to obtain some additional methamphetamine for purposes of further distribution, which **DANIEL RAMIREZ** agrees to provide.

24. On or about May 22, 2015, **DANIEL RAMIREZ** instructs **JORGE IVAN TORRES-AYALA** to provide **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** with methamphetamine.

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25. On or about May 23, 2015, **WENDI ANN KINGSLAND** contacts **DANIEL RAMIREZ** to purchase approximately four ounces of methamphetamine for purposes of further distribution, which he agrees to provide.

26. On or about May 23, 2015, **DANIEL RAMIREZ** instructs **JANE DOE a.k.a. "Alejandra Mandujano-Molina,"** that **BRIAN LANCE BOUSKA, a.k.a. "The Russian,"** needs two pounds of methamphetamine and that **WENDI ANN KINGSLAND** needs four ounces of methamphetamine, which she agrees to deliver.

27. On or about May 23, 2015, **JORGE IVAN TORRES-AYALA** delivered methamphetamine to **BRIAN LANCE BOUSKA, a.k.a. "The Russian."**

28. On or about May 23, 2015, **DANIEL RAMIREZ** instructs **JORGE IVAN TORRES-AYALA** to deliver methamphetamine to **WENDI ANN KINGSLAND,** which he agrees to do.

29. On or about May 24, 2015, **DANIEL RAMIREZ** contacts **LORENA MARTINEZ** seeking a quantity of a controlled substance for purposes of further distribution.

30. On or about May 24, 2015, **LORENA MARTINEZ** attempts to obtain methamphetamine for **DANIEL RAMIREZ** for purposes of further distribution.

31. On or about May 24, 2015, **ANDY JAMES WRIGHT** contacts **DANIEL RAMIREZ** to order approximately a pound of methamphetamine for purposes of further distribution, which he agrees to provide.

32. On or about May 25, 2015, **LORENA MARTINEZ** attempts to collect money from the sale of a controlled substance to **DANIEL RAMIREZ**.

33. On or about May 25, 2015, **DANIEL RAMIREZ** calls **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** to order approximately four pounds of methamphetamine for purposes of further distribution.

34. On or about May 25, 2015, **DANIEL RAMIREZ** calls **TESHIA VALERIA HUTCHINSON** and asks if her friend still wanted to obtain a quantity of methamphetamine and **TESHIA VALERIA HUTCHINSON** tells him she will check, which she does.

35. On or about May 26, 2015, **RAFAEL AVINA-TORRES** sends bank account information to **DANIEL RAMIREZ** so he can make a payment for methamphetamine that had been purchased.

36. On or about May 26, 2015, **RAFAEL AVINA-TORRES** tells **DANIEL RAMIREZ** to deposit money into a bank account for the payment of an outstanding drug debt.

37. On or about May 26, 2015, **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** calls **DANIEL RAMIREZ** and asks him to send money to a third party, which he agrees to do.

38. On or about May 26, 2015, **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** texts **DANIEL RAMIREZ** an account number into which he is supposed to deposit money.

39. On or about May 26, 2015, **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** agrees to make some calls for **DANIEL RAMIREZ** to work out a dispute that had arisen with a dealer after **DANIEL RAMIREZ** sent a Caucasian male ("white mule") to the deal.

40. On or about May 27, 2015, **DANIEL RAMIREZ** makes arrangements to give **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** money ("papers") to pay for the methamphetamine he had previously purchased.

41. On or about May 28, 2015, **LORENA MARTINEZ** contacts **DANIEL RAMIREZ** in an effort to collect an outstanding drug debt, which **DANIEL RAMIREZ** agrees to take care of.

42. On or about May 28, 2015, **DANIEL RAMIREZ** contacts **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** in an effort to collect money for an outstanding drug debt, which he agrees to pay.

43. On or about May 28, 2015, **TESHIA VALERIA HUTCHINSON** calls **DANIEL RAMIREZ** to order a quantity of methamphetamine for purposes of further distribution.

44. On or about May 29, 2015, **WENDI ANN KINGSLAND** contacts **DANIEL RAMIREZ** to purchase approximately four ounces of methamphetamine for purposes of further distribution, which he agrees to provide.

45. On or about May 29, 2015, **WENDI ANN KINGSLAND** contacts **DANIEL RAMIREZ** to purchase approximately eight ounces of methamphetamine for purposes of further distribution, which he agrees to provide.

46. On or about May 29, 2015, during a phone call, **DANIEL RAMIREZ** and **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** make arrangements for **DANIEL RAMIREZ** to pay (give the "tickets") for the methamphetamine he had previously purchased.

47. On or about May 29, 2015, **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** texts bank account information to **DANIEL RAMIREZ** so he can deposit money to pay for the methamphetamine he previously purchased.

48. On or about May 30, 2015, **DANIEL RAMIREZ** asks **EDUARDO JORGE CARILLO** for one pound of methamphetamine to complete a drug transaction, which **EDUARDO JORGE CARILLO** agrees to provide.

49. On or about May 30, 2015, **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** contacts **DANIEL RAMIREZ** in order to obtain methamphetamine for purposes of further distribution, which **DANIEL RAMIREZ** agrees to provide.

50. On or about May 30, 2015, **DANIEL RAMIREZ** agrees to pay **LORENA MARTINEZ** for his outstanding drug debt.

51. On or about May 30, 2015, **BRIAN LANCE BOUSKA, a.k.a. "The Russian,"** contacts **DANIEL RAMIREZ** and orders a quantity of methamphetamine for purposes of further distribution, which **DANIEL RAMIREZ** agrees to provide.

52. On or about May 31, 2015, **WENDI ANN KINGSLAND** contacts **DANIEL RAMIREZ** to let him know that she will be stopping by to pay him for the methamphetamine she previously purchased.

53. On or about May 31, 2015, **JORGE IVAN TORRES-AYALA** delivers controlled substances for **DANIEL RAMIREZ**.

54. On or about May 31, 2015, **DANIEL RAMIREZ** called **RAFAEL AVINA-TORRES** and told him he had been told that law enforcement (the “federals”) had been conducting surveillance on them and he was looking for a telescope so he could conduct counter-surveillance and look for law enforcement.

55. On or about June 1, 2015, **HECTOR MORENO PEDRIZCO, a.k.a. “Chupas,”** texts bank account information to **DANIEL RAMIREZ** so he can deposit money to pay for the methamphetamine he previously purchased.

56. On or about June 1, 2015, **DONALD KENT McVEY, a.k.a. “Donald Duck,” a.k.a. “The Duck,”** contacts **DANIEL RAMIREZ** in order to obtain between three and four ounces of methamphetamine for purposes of further distribution, which **DANIEL RAMIREZ** agrees to provide.

57. On or about June 1, 2015, **DONALD KENT McVEY, a.k.a. “Donald Duck,” a.k.a. “The Duck,”** contacts **DANIEL RAMIREZ** to tell him that the methamphetamine he provided was less than the amount ordered.

58. On or about June 1, 2015, **DANIEL RAMIREZ** contacts **JANE DOE a.k.a. “Alejandra Mandujano-Molina,”** to inquire whether her customers had paid her the money they owed because he needed the money to pay his source of supply.

59. On or about June 2, 2015, **HECTOR MORENO PEDRIZCO, a.k.a. “Chupas,”** texts bank account information to **DANIEL RAMIREZ** so he can deposit money to pay for the methamphetamine he previously purchased.

60. On or about June 3, 2015, **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** contacts **DANIEL RAMIREZ** in order to obtain methamphetamine for purposes of further distribution, which **DANIEL RAMIREZ** agrees to provide.

61. On or about June 3, 2015, **DANIEL RAMIREZ** and **LORENA MARTINEZ** coordinate his purchase of methamphetamine from a third-party for purposes of further distribution.

62. On or about June 4, 2015, **DANIEL RAMIREZ** tells **DONALD KENT McVEY, a.k.a. "Donald Duck," a.k.a. "The Duck,"** that he has run out of methamphetamine and if he can find some he will let him know.

63. On or about June 4, 2015, **ANDY JAMES WRIGHT** contacts **DANIEL RAMIREZ** in an attempt to order a quantity of methamphetamine and **DANIEL RAMIREZ** tells him that he is currently out of product.

64. On or about June 4, 2015, **DANIEL RAMIREZ** orders methamphetamine from **ERIK MARTINEZ** for purposes of further distribution.

65. On or about June 4, 2015, **ERIK MARTINEZ** agrees to supply **DANIEL RAMIREZ** with methamphetamine for purposes of further distribution.

66. On or about June 4, 2015, **ERIK MARTINEZ** agrees to source **DANIEL RAMIREZ** with methamphetamine, for purposes of further distribution, any time he is running low and his alternative source of supply is unavailable.

67. On or about June 4, 2015, **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** contacts **DANIEL RAMIREZ** in order to obtain methamphetamine for purposes of further distribution, which **DANIEL RAMIREZ** agrees to provide.

68. On or about June 4, 2015, **DANIEL RAMIREZ** and **LORENA MARTINEZ** work together to coordinate the purchase of methamphetamine from a third-party for purposes of further distribution.

69. On or about June 4, 2015, **DANIEL RAMIREZ** calls **DARIO OCHOA SOTO**, a.k.a. “**Teddy Bear**,” a.k.a. “**Gordo**,” in an effort to collect money derived from the sale of methamphetamine to a customer, and **DARIO OCHOA SOTO**, a.k.a. “**Teddy Bear**,” a.k.a. “**Gordo**,” makes arrangements to get the money to **DANIEL RAMIREZ**.

70. On or about June 5, 2015, **WENDI ANN KINGSLAND** contacts **DANIEL RAMIREZ** to purchase approximately two to three ounces of methamphetamine for purposes of further distribution, which he agrees to provide.

71. On or about June 5, 2015, **WENDI ANN KINGSLAND** contacts **DANIEL RAMIREZ** to purchase approximately 12 ounces of methamphetamine for purposes of further distribution, which he agrees to provide.

72. On or about June 5, 2015, **DANIEL RAMIREZ** contacts **LORENA MARTINEZ** to let her know he has money for her as payment for an outstanding drug debt and she agrees to pick up the money.

73. On or about June 5, 2015, **LORENA MARTINEZ** contacts **DANIEL RAMIREZ** asking if she can “borrow” a quantity of a controlled substance for purposes of further distribution.

74. On or about June 5, 2015, **LORENA MARTINEZ** contacts **DANIEL RAMIREZ** in an effort to obtain a quantity of a controlled substance and he tells her he will attempt to provide it.

75. On or about June 5, 2015, **DANIEL RAMIREZ** calls **DONALD KENT McVEY, a.k.a. "Donald Duck," a.k.a. "The Duck,"** and tells him that he has methamphetamine available for sale, which **DONALD KENT McVEY, a.k.a. "Donald Duck," a.k.a. "The Duck,"** agrees to purchase for purposes of further distribution.

76. On or about June 5, 2015, **DANIEL RAMIREZ** calls **DONALD KENT McVEY, a.k.a. "Donald Duck," a.k.a. "The Duck,"** to let him know that he is still awaiting the delivery of methamphetamine and he will let him know when it arrives.

77. On or about June 5, 2015, **DANIEL RAMIREZ** contacts **DONALD KENT McVEY, a.k.a. "Donald Duck," a.k.a. "The Duck,"** and tells him to come and pick up the methamphetamine he ordered.

78. On or about June 6, 2015, **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** contacts **DANIEL RAMIREZ** and lets him know the methamphetamine he delivered to him was less than what he ordered.

79. On or about June 6, 2015, **DANIEL RAMIREZ** tells **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** that he "owes" him some additional methamphetamine, which he agrees to provide.

80. On or about June 6, 2015, **WENDI ANN KINGSLAND** contacts **DANIEL RAMIREZ** to purchase approximately two ounces of methamphetamine for purposes of further distribution, which he agrees to provide.

81. On or about June 6, 2015, **WENDI ANN KINGSLAND** contacts **DANIEL RAMIREZ** to let him know that she has money to pay him for her previous methamphetamine purchase and arranges a time and place to get it to him.

82. On or about June 7, 2015, **DANIEL RAMIREZ** agrees to supply a customer with methamphetamine after he pays a portion of his outstanding drug debt.

83. On or about June 9, 2015, **ERIK MARTINEZ** calls **DANIEL RAMIREZ** to obtain a quantity of methamphetamine for purposes of further distribution.

84. On or about June 9, 2015, **DANIEL RAMIREZ** agrees to provide **ERIK MARTINEZ** with methamphetamine for purposes of further distribution.

85. On or about June 11, 2015, **BRIAN LANCE BOUSKA, a.k.a. "The Russian,"** contacts **DANIEL RAMIREZ** to inquire about the status of his order and to order an additional quantity of methamphetamine for purposes of further distribution.

86. On or about June 11, 2015, **DANIEL RAMIREZ** confirms he has **BRIAN LANCE BOUSKA, a.k.a. "The Russian's"** order.

87. On or about June 11, 2015, **DANIEL RAMIREZ** contacts **LORENA MARTINEZ** to let her know he has money to give to her to pay for an outstanding drug debt, which she agrees to pick up the following day.

88. On or about June 12, 2015, **DONALD KENT McVEY, a.k.a. "Donald Duck," a.k.a. "The Duck,"** contacts **DANIEL RAMIREZ** and complains about the quality of the methamphetamine he had purchased, for purposes of further distribution, and to verify whether it was the same stuff he had previously purchased.

89. On or about June 14, 2015, **DANIEL RAMIREZ** agrees to supply a customer with methamphetamine, for purposes of further distribution.

90. On or about June 15, 2015, **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** negotiates with a third party in an effort to obtain a cheaper price for a quantity of methamphetamine that he wants to buy for purposes of further distribution.

91. On or about June 16, 2015, **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** agrees to supply a customer with approximately one pound of methamphetamine, for purposes of further distribution.

92. On or about June 16, 2015, **OSVALDO PACHECO-AYALA** calls **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** to order approximately one pound of methamphetamine for purposes of further distribution, which **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** agrees to provide.

93. On or about June 19, 2015, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica,"** exchanges a series of text messages with a potential customer telling him that she can supply him with methamphetamine and that she has the "good stuff."

94. On or about June 19, 2015, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica,"** exchanges a series of text messages with a potential customer setting up a drug deal for the next morning.

95. On or about June 19, 2015, **RAFAEL AVINA-TORRES** calls **FRANCISCO CEJA CASTILLO** to warn him about law enforcement surveillance.

96. On or about June 20, 2015, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica,"** coordinates a drug deal with a customer who is buying methamphetamine for purposes of further distribution.

97. On or about June 20, 2015, **DANIEL RAMIREZ** calls **FRANCISCO CEJA CASTILLO** to order a quantity of methamphetamine for purposes of further distribution, which **FRANCISCO CEJA CASTILLO** agrees to provide.

98. On or about June 21, 2015, **FRANCISCO CEJA CASTILLO** exchanges a series of text messages with a customer trying to collect on an outstanding drug debt.

99. On or about June 21, 2015, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica,"** exchanges a series of text messages with a customer and sets up a deal for the sale of methamphetamine, for purposes of further distribution.

100. On or about June 24, 2015, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica,"** exchanges a series of text messages with a customer and agrees to provide the customer with a "sample" of methamphetamine so he can evaluate her product and decide whether to purchase more.

101. On or about June 30, 2015, **DANIEL RAMIREZ** calls **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** to order approximately five pounds of methamphetamine for purposes of further distribution, which he agrees to provide.

102. On or about June 30, 2015, **ERIK MARTINEZ** collects money to pay back **DANIEL RAMIREZ** for the methamphetamine he has previously purchased.

103. On or about June 30, 2015, **ERIK MARTINEZ** and **DANIEL RAMIREZ** discuss and make arrangements for **ERIK MARTINEZ** to pay **DANIEL RAMIREZ** back for the methamphetamine he previously ordered.

104. On or about June 30, 2015, **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** contacts **DANIEL RAMIREZ** in order to obtain methamphetamine for purposes of further distribution, which **DANIEL RAMIREZ** agrees to provide.

105. On or about June 30, 2015, **WENDI ANN KINGSLAND** contacts **DANIEL RAMIREZ** about getting a quantity of methamphetamine for purposes of further distribution, which he agrees to provide as soon as it is ready.

106. On or about June 30, 2015, **DANIEL RAMIREZ** talks to **JORGE IVAN TORRES-AYALA** to get an update about how much methamphetamine is available to sell,

which he provides, and then instructs **JORGE IVAN TORRES-AYALA** to see if he can use it to complete an order for a customer.

107. On or about June 30, 2015, **DANIEL RAMIREZ** instructs **JANE DOE a.k.a. "Alejandra Mandujano-Molina,"** to complete an order for methamphetamine and to deliver it to either **WENDI ANN KINGSLAND** or **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** depending on who has money available.

108. On or about June 30, 2015, **DANIEL RAMIREZ** instructs **JORGE IVAN TORRES-AYALA** to provide **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** with a quantity of methamphetamine, which he agrees to do.

109. On or about June 30, 2015, **DANIEL RAMIREZ** calls **JORGE IVAN TORRES-AYALA** and they discuss how much money a customer owes and how much of a controlled substance was available for further distribution.

110. On or about June 30, 2015, **JORGE IVAN TORRES-AYALA** delivers a quantity of methamphetamine to **JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy,"** for purposes of further distribution.

111. On or about June 30, 2015, **TESHIA VALERIA HUTCHINSON** calls **DANIEL RAMIREZ** to obtain a quantity of methamphetamine for purposes of further distribution, which he agrees to provide.

112. On or about July 1, 2015, **WENDI ANN KINGSLAND** contacts **DANIEL RAMIREZ** to let him know that the police came looking for her and that she needs to have someone go back to her hotel room and retrieve her stuff and methamphetamine, which **DANIEL RAMIREZ** agrees to take care of.

113. On or about July 1, 2015, **MATTHEW DANIEL GOOD** contacts **DANIEL RAMIREZ** to order a quantity of methamphetamine for purposes of further distribution, which he agrees to provide.

114. On or about July 2, 2015, **EDUARDO JORGE CARILLO** asks **FRANCISCO CEJA CASTILLO** to bring him a quantity of methamphetamine, which **FRANCISCO CEJA CASTILLO** agrees to do.

115. On or about July 2, 2015, **DANIEL RAMIREZ** calls **FRANCISCO CEJA CASTILLO** to obtain a quantity of methamphetamine, which **FRANCISCO CEJA CASTILLO** agrees to try and facilitate.

116. On or about July 2, 2015, **ERIK MARTINEZ** and **DANIEL RAMIREZ** discuss and make arrangements for **ERIK MARTINEZ** to pay **DANIEL RAMIREZ** back for the methamphetamine he previously ordered.

117. On or about July 2, 2015, **DANIEL RAMIREZ** calls **JORGE IVAN TORRES-AYALA** and they discuss how much money one customer provided and how much money another customer was going to deliver.

118. On or about July 2, 2015, **DANIEL RAMIREZ** asks an individual to reach out to an alternative source of supply for methamphetamine located in Apatzingan, in the Mexican state of Michoacán, and find out how much money the individual wants up front and when he can send a courier to pick up the product, which the person agrees to do.

119. On or about July 3, 2015, **LORENA MARTINEZ** contacts **DANIEL RAMIREZ** to obtain a controlled substance, for purposes of further distribution, which he agrees to provide.

120. On or about July 3, 2015, **WENDI ANN KINGSLAND** contacts **DANIEL RAMIREZ** to purchase approximately eight ounces of methamphetamine for purposes of further distribution, which he agrees to provide.

121. On or about July 3, 2015, **DANIEL RAMIREZ** provides **WENDI ANN KINGSLAND** with approximately eight ounces of methamphetamine, for purposes of further distribution.

122. On or about July 3, 2015, **WENDI ANN KINGSLAND** possessed approximately eight ounces of methamphetamine for purposes of further distribution.

123. On or about July 3, 2015, **DARIO OCHOA SOTO, a.k.a. "Teddy Bear," a.k.a. "Gordo,"** calls **DANIEL RAMIREZ** and asks him to come over, in reply **DANIEL RAMIREZ** asks **DARIO OCHOA SOTO, a.k.a. "Teddy Bear," a.k.a. "Gordo,"** if he has sold all of the controlled substances, to which **DARIO OCHOA SOTO, a.k.a. "Teddy Bear," a.k.a. "Gordo,"** tells him he has not, but that he does have all of **DANIEL RAMIREZ'** money.

124. On or about July 4, 2015, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica,"** talks with a customer and agrees to supply him with methamphetamine, for purposes of further distribution.

125. On or about July 5, 2015, **FRANCISCO CEJA CASTILLO** agrees to supply a customer with a quantity of methamphetamine for purposes of further distribution.

126. On or about July 6, 2015, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica,"** talks with a customer and agrees to supply him with methamphetamine for purposes of further distribution.

127. On or about July 6, 2015, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica,"** exchanges a series of text messages with a customer discussing the price and quality of the methamphetamine she has available for sale in an effort to keep his business.

128. On or about July 7, 2015, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica,"** exchanges a series of text messages with a customer and agrees to sell him a quantity of methamphetamine for purposes of further distribution.

129. On or about July 7, 2015, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica,"** exchanges a series of text messages with a customer and agrees to sell the customer a quantity of methamphetamine for purposes of further distribution.

130. On or about July 7, 2015, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica,"** sends a text message to a customer to let them know they were short in their payment to her for the methamphetamine they purchased.

131. On or about July 8, 2015, **FRANCISCO CEJA CASTILLO** sends a series of text message to a customer trying to collect an outstanding drug debt and tells the customer that he won't get any more methamphetamine until he pays his debt.

132. On or about July 8, 2015, **ERIK MARTINEZ** possessed approximately two (2) pounds of methamphetamine for purposes of further distribution.

133. On or about July 8, 2015, **FRANCISCO CEJA CASTILLO** agrees to supply a customer with a quantity of methamphetamine.

134. On or about July 9, 2015, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica,"** exchanges a series of text messages with a customer and agrees to sell them a quantity of methamphetamine for purposes of further distribution.

135. On or about July 10, 2015, **HECTOR MORENO PEDRIZCO, a.k.a. “Chupas,”** possessed approximately 22 pounds of methamphetamine for purposes of further distribution.

136. On or about July 10, 2015, following the arrest of **HECTOR MORENO PEDRIZCO, a.k.a. “Chupas,”** by law enforcement agents, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. “Monica,”** attempts to arrange a place to hide approximately 17 pounds of methamphetamine that is intended for further distribution.

137. On or about July 10, 2015, following the arrest of **HECTOR MORENO PEDRIZCO, a.k.a. “Chupas,”** by law enforcement agents, **SAMUEL GOMEZ-CHAVEZ** took possession of approximately 17 pounds of methamphetamine that was intended for further distribution, and a firearm in an attempt to move it into a safe storage location so that it would not be found by law enforcement.

138. On or about July 10, 2015, **MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. “Monica,”** calls one of **HECTOR MORENO PEDRIZCO, a.k.a. “Chupas’,”** sources of supply to warn him and let him know that **HECTOR MORENO PEDRIZCO, a.k.a. “Chupas,”** had been arrested and not to try and call him anymore and that she was taking care of his “stuff” (the methamphetamine).

139. On or about July 13, 2015, **HECTOR MORENO PEDRIZCO, a.k.a. “Chupas,”** following his arrest by law enforcement agents, calls his source of supply to warn him about a potential government informant and “to keep an eye out.”

140. On or about August 13, 2015, **DANIEL RAMIREZ** calls **MATTHEW DANIEL GOOD** and **MATTHEW DANIEL GOOD** tells **DANIEL RAMIREZ** that he has

things (money) available for him and that he wants to meet with **DANIEL RAMIREZ** later to purchase an additional quantity of methamphetamine for purposes of further distribution.

141. On or about August 6, 2015, **DANIEL RAMIREZ** makes arrangements for another vehicle to conduct counter-surveillance for **DANIEL RAMIREZ** in an effort to help him detect law enforcement officers.

142. On or about August 10, 2015, **DANIEL RAMIREZ** tells **LORENA MARTINEZ** to contact **DARIO OCHOA SOTO** to obtain approximately two pounds of methamphetamine for purposes of further distribution.

143. On or about August 11, 2015, **DANIEL RAMIREZ** contacts **LORENA MARTINEZ** in an effort to acquire a pound of methamphetamine for purposes of further distribution.

144. On or about August 11, 2015, **TESHIA VALERIA HUTCHINSON** calls **DANIEL RAMIREZ** to obtain a pound of methamphetamine, for purposes of further distribution, which he agrees to provide.

145. On or about August 14, 2015, **TESHIA VALERIA HUTCHINSON** calls **DANIEL RAMIREZ** to obtain a quantity of methamphetamine for purposes of further distribution.

146. On or about August 16, 2015, **EDUARDO JORGE CARILLO** sends a text message to a customer telling them that he wants to avoid problems but that they owe him a lot of money from their purchase of methamphetamine and he wants to know how the customer will cover the debt.

147. On or about August 19, 2015, **EDUARDO JORGE CARILLO** sends a text message to a customer who owes him money telling him that if he wants to keep being supplied

with methamphetamine he needs to introduce him to one of his clients who will purchase methamphetamine from **EDUARDO JORGE CARILLO**.

148. On or about August 20, 2015, **FRANCISCO CEJA CASTILLO** sends a text message to **EDUARDO JORGE CARILLO** telling him that there are some customers who want a sample of methamphetamine, which **EDUARDO JORGE CARILLO** tells him to provide and he agrees to do so.

149. On or about August 20, 2015, **FRANCISCO CEJA CASTILLO** sends a text message to **EDUARDO JORGE CARILLO** regarding a client who wants to purchase a quantity of methamphetamine, to which **EDUARDO JORGE CARILLO** texts back the price to sell the methamphetamine.

150. On or about August 20, 2015, **BRADLEY CHARLES YOUNGBLOOD** calls **FRANCISCO CEJA CASTILLO** to order a quantity of methamphetamine, for purposes of further distribution, which he agrees to provide.

151. On or about August 22, 2015, **BRADLEY CHARLES YOUNGBLOOD** calls **FRANCISCO CEJA CASTILLO** to order a quantity of methamphetamine, for purposes of further distribution, which he agrees to provide.

152. On or about September 8, 2015, **BRADLEY CHARLES YOUNGBLOOD** calls **FRANCISCO CEJA CASTILLO** to order a quantity of methamphetamine, for purposes of further distribution, which he agrees to provide.

153. On or about September 8, 2015, **BRADLEY CHARLES YOUNGBLOOD** texts **FRANCISCO CEJA CASTILLO** letting him know that he has money for him to pay for the methamphetamine he ordered.

154. On or about September 10, 2015, **MATTHEW DANIEL GOOD** possessed a quantity of methamphetamine for purposes of further distribution.

155. On or about September 18, 2015, **RAFAEL AVINA-TORRES** and **FREDI GARCIA-MARCIAL** possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine.

156. On or about September 24, 2015, **ANDREW MICHAEL ROWLAND** calls **DANIEL RAMIREZ** in an effort to obtain a quantity of methamphetamine for purposes of further distribution, which **DANIEL RAMIREZ** agrees to provide.

157. On or about September 25, 2015, **ANDREW MICHAEL ROWLAND** calls **DANIEL RAMIREZ** in an effort to obtain a quantity of methamphetamine for purposes of further distribution.

158. On or about September 26, 2015, **DANIEL RAMIREZ** calls **ANDREW MICHAEL ROWLAND** to see if he knows any potential customers in Madras, Oregon who he could sell methamphetamine to and **ANDREW MICHAEL ROWLAND** agrees to make a call on his behalf.

159. On or about September 26, 2015, **ANDREW MICHAEL ROWLAND** calls **DANIEL RAMIREZ** and tells him that he can introduce him to some potential customers.

160. On or about September 26, 2015, **ANDREW MICHAEL ROWLAND** talks with **DANIEL RAMIREZ** and orders a quantity of methamphetamine for purposes of further distribution, which **DANIEL RAMIREZ** agrees to provide.

161. On or about September 26, 2015, **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** calls **DANIEL RAMIREZ** and offers to supply him with a quantity of methamphetamine, which **DANIEL RAMIREZ** agrees to buy.

Count 2
(Conspiracy to Commit Money Laundering)
(18 U.S.C. §§ 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h))

Beginning in approximately September 2014, the exact date being unknown to the grand jury, and continuing through October 5, 2015, within the District of Oregon and elsewhere, defendants **DANIEL RAMIREZ, HECTOR MORENO PEDRIZCO, a.k.a. “Chupas,”** **RAFAEL AVINA-TORRES, DARIO OCHOA SOTO, a.k.a. “Teddy Bear,” a.k.a. “Gordo,”** and **WENDI ANN KINGSLAND** and other persons whose identities are known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate, and agree to: (a) knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce and involving the proceeds of the unlawful distribution of a controlled substance, a specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of a specified unlawful activity; and (b) knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce and involving the proceeds of the unlawful distribution of a controlled substance, a specified unlawful activity, with the intent to promote the carrying on of specified unlawful activity, and knowing that the property involved in the transactions represented the proceeds of some form of unlawful activity

In violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h).

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Superseding Indictment

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Count 3
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about January 15, 2015, within the District of Oregon, defendant **DANIEL RAMIREZ** did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count 4
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about January 26, 2015, within the District of Oregon, defendant **DANIEL RAMIREZ** did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count 5
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 12, 2015, within the District of Oregon, defendants **JORGE IVAN TORRES-AYALA** and **JANE DOE a.k.a. "Alejandra Mandujano-Molina,"** did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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Count 6
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 19, 2015, within the District of Oregon, defendants **JORGE IVAN TORRES-AYALA** and **JANE DOE a.k.a. "Alejandra Mandujano-Molina,"** did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count 7
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about March 13, 2015, within the District of Oregon, defendants **JORGE IVAN TORRES-AYALA** and **JANE DOE a.k.a. "Alejandra Mandujano-Molina,"** did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count 8
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about April 21, 2015, within the District of Oregon, defendant **DANIEL RAMIREZ** did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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Count 9
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about April 29, 2015, within the District of Oregon, defendants **JORGE IVAN TORRES-AYALA** and **JANE DOE a.k.a. "Alejandra Mandujano-Molina,"** did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count 10
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about May 11, 2015, within the District of Oregon, defendant **DANIEL RAMIREZ** did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count 11
(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about May 30, 2015, within the District of Oregon, defendant **DEBORAH MILLER** did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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Count 12
(Use of Communication Facility to Facilitate a Drug Offense)
(21 U.S.C. § 843(b))

On or about May 30, 2015, within the District of Oregon, defendant **DEBORAH MILLER** knowing and intentionally used a communication facility, to-wit: a cellular telephone, in committing, causing, and facilitating the commission of the felony crime of possession with the intent to distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code Section 841(a)(1);

In violation of Title 21, United States Code, Section 843(b).

Count 13
(Possession with Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about June 10, 2015, within the District of Oregon, defendant **ANDY JAMES WRIGHT** did knowingly and intentionally possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count 14
(Possession with the Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about June 16, 2015, within the District of Oregon, defendant **OSVALDO PACHECO-AYALA** did knowingly and intentionally possess with the intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

Count 15
(Possession with Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B))

On or about July 3, 2015, within the District of Oregon, defendant **WENDI ANN KINGSLAND** did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

Count 16
(Possession with Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about July 8, 2015, within the District of Oregon, defendant **ERIK MARTINEZ** did knowingly and intentionally possess with intent to distribute 500 grams or more a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

Count 17
(Possession with Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about July 10, 2015, within the District of Oregon, defendants **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas," MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica" and SAMUEL GOMEZ-CHAVEZ** did knowingly and intentionally possess with intent to distribute 500 grams or more a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

Count 18
(Distribution of Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about July 10, 2015, within the District of Oregon, defendant **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** did knowingly and intentionally distribute 500 grams or more a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

Count 19
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)
(18 U.S.C. § 924(c))

On or about July 10, 2015, within the District of Oregon, defendant **HECTOR MORENO PEDRIZCO, a.k.a. "Chupas,"** in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute and possess with intent to distribute methamphetamine and possession with the intent to distribute methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), as set forth in Counts 1 and 17, did knowingly possess a firearm;

**UNDER
SEAL**

In violation of Title 18, United States Code, Section 924(c).

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Count 20
(Possession with Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about September 10, 2015, in the District of Oregon, defendant **MATTHEW DANIEL GOOD**, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count 21
(Possession with Intent to Distribute Methamphetamine)
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A))

On or about September 18, 2015, in the District of Oregon, defendants **RAFAEL AVINA-TORRES** and **FREDI GARCIA-MARCIAL**, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

Count 22
(Conspiracy to Violate the Animal Welfare Act)
(18 U.S.C. § 371)

Introduction

At all times relevant to this Indictment:

A. Cockfighting is a game or contest of chance in which a knife, a gaff or other sharp instrument is attached to the legs of gamecocks or roosters for the purpose of fighting each other. The fight occurs in a pit or ring surrounded by spectators. The fights between the roosters are supervised by a referee. The fight is ended when one rooster is dead or refuses to continue to

fight. If not killed during the fight, the losing rooster is almost always killed after the fight. A series of cockfights conducted in a day is referred to as a derby. A derby usually consists of dozens of individual cockfights lasting for several hours depending on the number of entries.

B. Participants in cockfighting include: (1) a promoter, who generally makes arrangements and oversees activities at the derby;(2) handlers or pitters, who prepare and handle birds during a fight and may be the actual owner of the bird or someone paid to do the job; (3) referees, who officiate in the pit during the cockfight; (4) spectators, who attend and watch the cockfights; and (5) concession workers, who sell food and drink.

C. In a derby a number of entrants or cockfighters pay a predetermined entry fee to enter a pre-set number of roosters. The roosters are usually matched within a few ounces of each other for individual fights. The cockfighter whose roosters win the most fights in a derby wins the purse, which consists of all the entry fees of the derby participants. Side bets also may occur between and among the cockfighters that do not involve the overall purse.

D. For the purposes of this Indictment, the term "rooster" is synonymous with the terms "gamecock," "cock," "bird," and "chicken." A mature gamecock resembles an ordinary rooster, except it has been surgically altered, trained and conditioned for fighting. Gamecocks also generally receive vitamins, drugs and other supplements to boost their strength and endurance.

E. Participants in the cockfighting described in this Indictment would bring roosters to a derby's designated location in Oregon, and other persons would come to the derby as spectators or workers. One or more of the participants and their roosters would have traveled in interstate commerce. Various persons would perform roles at the derby as described above.

Objects of the Conspiracy

Beginning on or about May 21, 2015, and continuing through about August 11, 2015, in the District of Oregon, defendants **DANIEL RAMIREZ** and **EDUARDO JORGE CARILLO**, and others willfully and knowingly combined, conspired, confederated and agreed to commit the following offense against the United States: to knowingly sponsor and exhibit an animal in an animal fighting venture in or affecting interstate or foreign commerce, in violation of Title 7, United States Code, Section 2156(a)(1).

Overt Acts

In order to carry out the objects of the conspiracy, the above defendants and other persons committed various overt acts within the District of Oregon and elsewhere, including but not limited to the following:

1. Defendants **DANIEL RAMIREZ** and **EDUARDO JORGE CARILLO** obtained roosters for purposes of training and entering them into various cockfights.
2. Defendants **DANIEL RAMIREZ** and **EDUARDO JORGE CARILLO** would care for and feed his roosters in an effort to make sure they were able to perform during various cockfights.
3. Defendant **DANIEL RAMIREZ** would feed vitamins to his roosters in an effort to enhance their performance during various cockfights.
4. Defendants **DANIEL RAMIREZ** and **EDUARDO JORGE CARILLO** would order, obtain and then attach knives, gaffs or other sharp instruments to the legs of gamecocks or roosters for the purpose of fighting.
5. Defendants **DANIEL RAMIREZ** and **EDUARDO JORGE CARILLO** would pay an entry fee to enter his roosters in various cockfights.

6. Defendants **DANIEL RAMIREZ** and **EDUARDO JORGE CARILLO** would bet on various roosters at the cockfights.

7. On or about June 13, 2015, in Polk County, in the District of Oregon, defendant **DANIEL RAMIREZ** and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited an animal, namely, a rooster, in an animal fighting venture in or affecting interstate or foreign commerce.

All of the above conduct violated Title 18, United States Code, Section 371.

Count 23
(Unlawful Animal Fighting Venture)
(7 U.S.C. § 2156(a)(1) and 18 U.S.C. §§ 2 and 49(a))

On or about June 13, 2015, in Polk County, in the District of Oregon, defendant **DANIEL RAMIREZ** and others, as principals and/or as aiders and abettors, knowingly sponsored and exhibited an animal, namely, a rooster, in an animal fighting venture in or affecting interstate or foreign commerce;

In violation of Title 7, United States Code, Section 2156(a)(1), Title 18, United States Code, Sections 2 and 49(a).

Criminal Forfeiture Allegation:
(Narcotics Offense)

Upon conviction of a controlled substance offense listed above in Count 1, Counts 3 through 18 and Counts 20 through 21, defendants **DANIEL RAMIREZ, EDUARDO JORGE CARILLO, HECTOR MORENO PEDRIZCO, a.k.a. "Chupas," FRANCISCO CEJA CASTILLO, RAFAEL AVINA-TORRES, ERIK MARTINEZ, LORENA MARTINEZ, DARIO OCHOA SOTO, a.k.a. "Teddy Bear," a.k.a. "Gordo," JORGE IVAN TORRES-AYALA, JANE DOE a.k.a. "Alejandra Mandujano-Molina," TESHIA VALERIA**

HUTCHINSON, BRIAN LANCE BOUSKA, a.k.a. "The Russian," ANDY JAMES WRIGHT, JOSHUA TODD SUMMERHAYS, a.k.a. "Hazy, DONALD KENT McVEY, a.k.a. "Donald Duck," a.k.a. "The Duck," WENDI ANN KINGSLAND, MARTHA NAYELI CARRIEDO CASTANEDA, a.k.a. "Monica," SAMUEL GOMEZ-CHAVEZ, MATTHEW DANIEL GOOD, BRADLEY CHARLES YOUNGBLOOD, OSVALDO PACHECO-AYALA, ANDREW MICHAEL ROWLAND, FREDI GARCIA-MARCIAL and DEBORAH MILLER defendants herein, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, to include, but not limited to:

1. A sum of money representing the amount of proceeds obtained as a result of the offense, in the form of a money judgment.
2. Any specific bank accounts constituting drug proceeds or property facilitating the drug conspiracy or drug offense.
3. Any specific vehicles constituting drug proceeds or facilitating property.
4. All that lot or parcel of land together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 21465 SW Farmington Road, Beaverton, Washington County, Oregon, more particularly described as:

A part of that certain tract of land in Section 23, Township 1 South, Range 2 West of the Willamette Meridian, Washington County, Oregon, described in deed to John Santoro, et ux, and Joe Santoro, et ux, recorded November 3, 1949 in Book 300, Page 433, Washington County, Oregon, Deed Records, described as follows: Beginning at the Southeast corner of that certain tract of land described in deed to Joseph Santoro, et ux, and John Santoro, et ux, recorded in Book 493, Page 344, said Deed Records,

which bears South 338.46 feet and East 1842.32 feet from the quarter corner on the West line of said Section 23, and running thence, following the boundary of the Santoro tract first above mentioned, South 89 degrees 40 minutes East 812.38 feet, North 02 degrees 19 minutes 45 seconds West 161.36 feet, South 52 degrees 06 minutes 45 seconds East 1049.00 feet, and South 13 degrees 49 minutes 45 seconds East 658.56 feet to a point in the center of Farmington Road (State Highway 208); thence, following the centerline thereof, South 43 degrees 36 minutes 02 seconds West 839.27 feet, South 50 degrees 19 minutes West 510.10 feet, and South 34 degrees 59 minutes West 258.35 feet to the Southerly Southeast corner of said Santoro Tract first above mentioned, said corner also being the East Northeast corner of that tract of land described in deed to Loyd Ingram and Lulu May Ingram, husband and wife, recorded February 7, 1908, Book 78, Page 319, Deed Records; thence continuing along the boundary thereof, North 89 degrees 49 minutes west 544.50 feet, North 14 minutes West 192.06 feet, and North 61 degrees 40 minutes West 243.44 feet to a point thereon; thence North 03 degrees 54 minutes 41 seconds East 1975.32 feet to the point of beginning.

Criminal Forfeiture Allegation
(Money Laundering)

Upon conviction of the money laundering offense listed above in Count 2, defendants **DANIEL RAMIREZ, HECTOR MORENO PEDRIZCO, a.k.a. "Chupas," RAFAEL AVINA-TORRES, DARIO OCHOA SOTO, a.k.a. "Teddy Bear," a.k.a. "Gordo,"** and **WENDI ANN KINGSLAND** defendants herein, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(1), all property, real or personal, involved in such offense, all property traceable to such offense, and all property that constitutes or was derived from proceeds of the offense.

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Criminal Forfeiture Allegation
(Animal Welfare Act)

Upon conviction of an Animal Welfare Act violation listed above in Counts 22 and 23 defendants **DANIEL RAMIREZ** and **EDUARDO JORGE CARILLO** shall forfeit to the United States pursuant to Title 7, United States Code, Section 2156(f) and Title 28, United States Code, Section 2461, any and all animals involved in the violation.

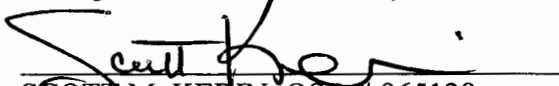
DATED this 8 day of October 2015.

A TRUE BILL. 

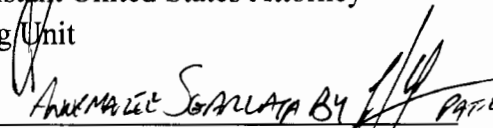
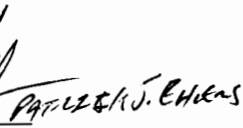
OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
Acting United States Attorney


SCOTT M. KERIN, OSB # 965128
Assistant United States Attorney
Violent Crimes Unit

PATRICK J. EHLERS, OSB # 041186
Assistant United States Attorney
Drug Unit


ANNEMARIE SGARLATA BY 
ANNEMARIE SGARLATA, OSB # 065061
Assistant United States Attorney
Asset Recovery and Money Laundering Division