

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

: SEALED  
: SUPERSEDING  
: INDICTMENT

- v. -

ABRAHAM INZUNZA INZUNZA,  
a/k/a "Peke,"  
a/k/a "Peque,"

: S6 12 Cr. 218 (ALC)

:

Defendant.

:

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COUNT ONE

The Grand Jury charges:

1. From at least in or about 2008, up to and including on or about March 6, 2014, ABRAHAM INZUNZA INZUNZA, a/k/a "Peke," a/k/a "Peque," the defendant, who will first enter the United States in the Southern District of New York, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that ABRAHAM INZUNZA INZUNZA, a/k/a "Peke," a/k/a "Peque," the defendant, and others known and unknown, would and did distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States or into waters within a distance of 12 miles of the coast

of the United States, in violation of Sections 812, 959(a) & (c), and 960(a)(3) of Title 21, United States Code.

3. The controlled substances involved in the offense were: (i) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Section 960(b)(1)(B) of Title 21, United States Code; (ii) 1,000 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Section 960(b)(1)(G) of Title 21, United States Code; and (iii) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, in violation of Section 960(b)(1)(H) of Title 21, United States Code.

#### Overt Acts

4. In furtherance of said conspiracy and to effect the illegal object thereof, ABRAHAM INZUNZA INZUNZA, a/k/a "Peke," a/k/a "Peque," the defendant, and others known and unknown, committed the following overt acts:

a. On or about March 13, 2012, in Santo Domingo, Dominican Republic, pursuant to the orders of ABRAHAM INZUNZA INZUNZA, a/k/a "Peke," a/k/a "Peque," the defendant, and a co-conspirator not named as a defendant herein ("CC-1"), another co-conspirator ("CC-2") met with three confidential sources working for the Drug Enforcement Administration and

discussed, among other things, the importation of over one hundred kilograms of cocaine into the United States.

b. On or about August 21, 2013, ABRAHAM INZUNZA INZUNZA communicated with a co-conspirator not named as a defendant herein ("CC-3") and instructed CC-3 to ensure that a sample of methamphetamine was shown to a customer in Los Angeles, California.

c. On or about August 23, 2013, ABRAHAM INZUNZA INZUNZA communicated with a co-conspirator not named as a defendant herein ("CC-4") and gave CC-4 permission to cross a quantity of narcotics into the United States from Mexico.

d. On or about August 24, 2013, ABRAHAM INZUNZA INZUNZA communicated with CC-3 and instructed CC-3 regarding the delivery of approximately eight pounds of methamphetamine in Los Angeles, California.

e. On or about August 26, 2013, ABRAHAM INZUNZA INZUNZA communicated with CC-1 regarding the delivery of approximately \$10,000 in the United States.

f. On or about August 31, 2013, ABRAHAM INZUNZA INZUNZA communicated with a co-conspirator not named as a defendant herein ("CC-5") and instructed CC-5 to deliver approximately five pounds of methamphetamine to a customer in New Mexico and approximately five pounds of methamphetamine to a customer in Phoenix, Arizona.

g. On or about September 3, 2013, ABRAHAM INZUNZA INZUNZA instructed CC-3 regarding the delivery of approximately eight pounds of methamphetamine to a customer in Los Angeles, California.

h. On or about September 15, 2013, ABRAHAM INZUNZA INZUNZA communicated with a co-conspirator not named as a defendant herein ("CC-6"), and CC-6 requested permission to cross approximately 400 kilograms of marijuana across the border from Mexico into the United States.

(Title 21, United States Code, Section 963.)

**COUNT TWO**

The Grand Jury further charges:

5. From at least in or about 2008, up to and including on or about March 6, 2014, ABRAHAM INZUNZA INZUNZA, a/k/a "Peke," a/k/a "Peque," the defendant, who will first enter the United States in the Southern District of New York, unlawfully, intentionally, and knowingly did engage in a continuing criminal enterprise, in that he committed violations of Title 21, United States Code, Sections 812, 841, 846, 952, 959, and 963, including violations one through four set forth below, which violations were part of a continuing series of violations undertaken by ABRAHAM INZUNZA INZUNZA, in concert with five or more other persons, with respect to whom ABRAHAM INZUNZA INZUNZA was an organizer, supervisor and manager, and

from which continuing series of violations ABRAHAM INZUNZA INZUNZA obtained substantial income and resources. The continuing series of violations, as defined by Title 21, United States Code, Section 848(c), includes the following:

Violation One

6. From at least in or about 2008, up to and including on or about March 6, 2014, in the District of New Mexico, the District of Arizona, the Central District of California, and elsewhere, ABRAHAM INZUNZA INZUNZA, a/k/a "Peke," a/k/a "Peque," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States. It was a part and an object of the conspiracy that ABRAHAM INZUNZA INZUNZA, and others known and unknown, would and did distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States or into waters within a distance of 12 miles of the coast of the United States, in violation of Sections 812, 959(a) & (c), and 960(a)(3) of Title 21, United States Code. The controlled substances involved in the offense were: (i) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Section 960(b)(1)(B) of Title 21, United States Code; (ii) 1,000 kilograms and more of mixtures and substances

containing a detectable amount of marijuana, in violation of Section 960(b)(1)(G) of Title 21, United States Code; and (iii) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, in violation of Section 960(b)(1)(H) of Title 21, United States Code.

#### Violation Two

7. On or about August 21, 2013, in the Central District of California, ABRAHAM INZUNZA INZUNZA, a/k/a "Peke," a/k/a "Peque," the defendant, intentionally and knowingly did distribute and possess with intent to distribute a controlled substance, to wit, 50 grams and more of mixtures and substances containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(B), and Title 18, United States Code, Section 2.

#### Violation Three

8. On or about August 24, 2013, in the Central District of California, ABRAHAM INZUNZA INZUNZA, a/k/a "Peke," a/k/a "Peque," the defendant, intentionally and knowingly did distribute and possess with intent to distribute a controlled substance, to wit, 50 grams and more of mixtures and substances containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(B), and Title 18, United States Code, Section 2.

#### Violation Four

9. On or about August 31, 2013, in the District of New Mexico and the District of Arizona, ABRAHAM INZUNZA INZUNZA, a/k/a "Peke," a/k/a "Peque," the defendant, intentionally and knowingly did import into the United States from any place outside thereof a controlled substance, to wit, 500 grams of mixtures and substances containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 952(a) and 960(b)(1)(H), and Title 18, United States Code, Section 2.

(Title 21, United States Code, Sections 848(a), 848(c) and 959(c), and Title 18, United States Code, Section 3238.)

#### COUNT THREE

The Grand Jury further charges:

10. From at least in or about 2008, up to and including on or about March 6, 2014, ABRAHAM INZUNZA INZUNZA, a/k/a "Peke," a/k/a "Peque," the defendant, who will first enter the United States in the Southern District of New York, unlawfully, intentionally, and knowingly did engage in a continuing criminal enterprise, in that he committed violations of Title 21, United States Code, Sections 812, 841, 846, 952, 959, and 963, including violations one through four set forth in Count Two above, which violations were part of a continuing series of violations undertaken by ABRAHAM INZUNZA INZUNZA in

concert with five or more other persons, and with respect to which continuing criminal enterprise ABRAHAM INZUNZA INZUNZA was the principal administrator, organizer, and leader, and one of several such principal administrators, organizers and leaders, from which continuing series of violations ABRAHAM INZUNZA INZUNZA obtained substantial income and resources, and the violations of Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1), 846, 952, 959, and 963, involved at least 150 kilograms of mixtures and substances containing a detectable amount of cocaine and at least 10,000 grams of mixtures and substances containing a detectable amount of methamphetamine.

(Title 21, United States Code, Sections 848(a), 848(b), 848(c), 848(s), and 959(c), and Title 18, United States Code, Section 3238.)



### FORFEITURE ALLEGATION

11. As a result of committing the controlled substance offense alleged in Counts One, Two, and Three of this Indictment, ABRAHAM INZUNZA INZUNZA, a/k/a "Peke," a/k/a "Peque," the defendant, shall forfeit to the United States pursuant to 21 U.S.C. §§ 853 and 970, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the said violations, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One, Two, and Three of this Indictment.

### Substitute Assets Provision

6. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty; it is the intention of the United States, pursuant to Title 21, United States Code, Sections 853(p) and 970, to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 21, United States Code, Sections 853 and 970.)

[REDACTED]  
FOREPERSON [REDACTED]

Preet Bharara  
PREET BHARARA  
United States Attorney

CERTIFIED AS A TRUE COPY ON

THIS DATE 4/11/14

BY Mary Salcedo

( ) Clerk  
(X) Deputy

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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ABRAHAM INZUNZA INZUNZA,  
a/k/a "Peke,"  
a/k/a "Peque,"

Defendant.

SEALED SUPERSEDING INDICTMENT

S6 12 Cr. 218 (ALC)

(Title 21, United States Code, Sections 963, 848(a), and 848(b).)

PREET BHARARA  
United States Attorney.

TRUE BILL

Foreperson

3/17/14 Filed Sealed Superseding Indictment  
oc A/w issued.  
Judy Weiss  
USMA