

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence
of the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington
July 24, 2020

WILLIAM M. McCOOL, Clerk

By  Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO. CR20-092 JCC

INDICTMENT

- (1) ALAN GOMEZ-MARENTES (aka
GUAJAS),
- (2) JUAN ANTONIO GONZALEZ-
CARRILLO (aka TOTO),
- (3) LUIS ARTURO MAGANA-
RAMIREZ (aka GUERO),
- (4) JOSE ELIAS BARBOSA (aka PRIMO,
aka PRIETO),
- (5) JOSE DANIEL ESPINOZA (aka
APACHE),
- (6) ESTEFHANY COREA-MENDOZA
(aka SICARIA),
- (7) ADRIAN IZAZAGA-MARTINEZ,
- (8) JORGE MONDRAGON,
- (9) BENJAMIN FUENTES (aka
CHANCHAS),
- (10) LUIS ZAVALZA-SANCHEZ (aka
FLAKO),
- (11) ALYSHA JONES (aka MANDY),
- (12) ARMANDO FIERRO-PONCE,
- (13) AMANDA MEYER,
- (14) MICHAEL ANDREW WOOD,
- (15) LUIS CASTILLO-BARRAGAN,
- (16) EFRAIN LUNA-RODRIGUEZ,

INDICTMENT

United States v. Alan GOMEZ-MARENTES, et al. - 1

UNITED STATES ATTORNEY
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(17) JULIAN PINEDA CASILLAS,
(18) BLANCA MEDINA, and
(19) RUTH MELISA GOMEZ-
MARENTES,

Defendants.

The Grand Jury charges that:

COUNT 1
(Conspiracy to Distribute Controlled Substances)

Beginning at a time unknown and continuing until on or about July 23, 2020, at King, Pierce, and Kitsap Counties, within the Western District of Washington, and elsewhere, ALAN GOMEZ-MARENTES, JUÁN ANTONIO GONZALEZ-CARRILLO, LUIS ARTURO MAGANA-RAMIREZ, JOSE ELIAS BARBOSA, JOSE DANIEL ESPINOZA, ESTEFHANY COREA-MENDOZA, ADRIAN IZAZAGA-MARTINEZ, JORGE MONDRAGON, BENJAMIN FUENTES, LUIS ZAVALZA-SANCHEZ, ALYSHA JONES, ARMANDO FIERRO-PONCE, AMANDA MEYER, MICHAEL ANDREW WOOD, LUIS CASTILLO-BARRAGAN, EFRAIN LUNA-RODRIGUEZ, JULIAN PINEDA CASILLAS, BLANCA MEDINA, RUTH MELISA GOMEZ-MARENTES, and others known and unknown, did knowingly and intentionally conspire to distribute substances controlled under Title 21, United States Code, Section 812, Schedules I and II, to wit: heroin and methamphetamine, contrary to the provisions of Title 21, United States Code.

Specific Quantity Allegations as to Methamphetamine

The Grand Jury further alleges that with respect to ALAN GOMEZ-MARENTES, JUAN ANTONIO GONZALEZ-CARRILLO, LUIS ARTURO MAGANA-RAMIREZ, JOSE ELIAS BARBOSA, JOSE DANIEL ESPINOZA, ESTEFHANY COREA-MENDOZA, ADRIAN IZAZAGA-MARTINEZ, JORGE MONDRAGON, BENJAMIN FUENTES, LUIS ZAVALZA-SANCHEZ, ALYSHA JONES, ARMANDO FIERRO-PONCE, AMANDA MEYER, MICHAEL ANDREW WOOD, LUIS CASTILLO-

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1 BARRAGAN, EFRAIN LUNA-RODRIGUEZ, JULIAN PINEDA CASILLAS,
2 BLANCA MEDINA, RUTH MELISA GOMEZ-MARENTES, their conduct as
3 members of the conspiracy charged in Count 1, which includes the reasonably
4 foreseeable conduct of the other members of the conspiracy charged in Count 1, involved
5 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, and
6 500 grams or more of a mixture or substance containing a detectable amount of
7 methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21,
8 United States Code, Section 841(b)(1)(A).

9 *Specific Quantity Allegations as to Heroin*

10 The Grand Jury further alleges that with respect to JUAN ANTONIO
11 GONZALEZ-CARRILLO, LUIS ARTURO MAGANA-RAMIREZ, JOSE DANIEL
12 ESPINOZA, and JULIAN PINEDA CASILLAS, their conduct as members of the
13 conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of
14 other members of the conspiracy charged in Count 1, involved 1 kilogram or more of a
15 mixture or substance containing a detectable amount of heroin, in violation of Title 21,
16 United States Code, Section 841(b)(1)(A).

17 The Grand Jury further alleges that with respect to JOSE ELIAS BARBOSA,
18 ESTEFHANY COREA-MENDOZA, ADRIAN IZAZAGA-MARTINEZ, JORGE
19 MONDRAGON, BENJAMIN FUENTES, and AMANDA MEYER, their conduct as
20 members of the conspiracy charged in Count 1, which includes the reasonably
21 foreseeable conduct of other members of the conspiracy charged in Count 1, involved
22 100 grams or more of a mixture or substance containing a detectable amount of heroin, in
23 violation of Title 21, United States Code, Section 841(b)(1)(B).

24 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1), and
25 846.

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COUNT 2**(Possession with Intent to Distribute – Methamphetamine)**

On or about November 9, 2019, at King and Kitsap Counties, within the Western District of Washington and elsewhere, ALAN GOMEZ-MARENTES, JOSE ELIAS BARBOSA, ALYSHA JONES, and RUTH MELISA GOMEZ-MARENTES, did knowingly and intentionally possess with the intent to distribute, and aid and abet the possession of with intent to distribute, methamphetamine, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense involved 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, and 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

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

COUNT 3**(Attempted Possession with Intent to Distribute – Methamphetamine and Heroin)**

On or about June 5, 2020, at Pierce County, within the Western District of Washington and elsewhere, JUAN ANTONIO GONZALEZ-CARRILLO, LUIS ARTURO MAGANA-RAMIREZ, and JULIAN PINEDA CASILLAS did knowingly and intentionally attempt to possess with the intent to distribute, and aid and abet the attempted possession with intent to distribute, methamphetamine and heroin, a substance controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that with respect to LUIS ARTURO MAGANA-RAMIREZ and JULIAN PINEDA CASILLAS, this offense involved 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, and 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts,

1 isomers, and salts of its isomers, in violation of Title 21, United States Code, Section
2 841(b)(1)(A).

3 The Grand Jury further alleges that with respect to JUAN ANTONIO
4 GONZALEZ-CARRILLO, LUIS ARTURO MAGANA-RAMIREZ, and JULIAN
5 PINEDA CASILLAS, this offense involved 1 kilogram or more of a mixture or substance
6 containing a detectable amount of heroin, in violation of Title 21, United States Code,
7 Section 841(b)(1)(A).

8 The Grand Jury further alleges that this offense was committed during and in
9 furtherance of the conspiracy charged in Count 1, above.

10 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),
11 841(b)(1)(C), and 846, and Title 18, United States Code, Section 2.

12 **COUNT 4**
13 **(Conspiracy to Commit Money Laundering)**

14 Beginning at a time unknown, but within the last five years, and continuing
15 through July 23, 2020, in King County, within the Western District of Washington, and
16 elsewhere, ALAN GOMEZ-MARENTES and RUTH GOMEZ-MARENTES, and others
17 known and unknown, unlawfully and knowingly combined, conspired, confederated and
18 agreed together and with each other to commit certain money laundering offenses under
19 Title 18, United States Code, Section 1956, as follows:

20 **1956(a)(1)(B)(i)**

21 Did conduct and attempt to conduct financial transactions, that is: transactions
22 involving the movement of funds by wire and other means affecting interstate and foreign
23 commerce, which in fact involved the proceeds of specified unlawful activity, that is,
24 conspiracy to distribute controlled substances, in violation of Title 21, United States
25 Code, Sections 841(a)(1) and 846, knowing that the transactions are designed in whole or
26 in part to conceal and disguise the nature, the location, the source, the ownership, and the
27 control of the proceeds of the specified unlawful activity, in violation of Title 18, United
28 States Code, Section 1956(a)(1)(B)(i); and

1956(a)(1)(B)(ii)

Did conduct and attempt to conduct financial transactions, that is: transactions involving the movement of funds by wire and other means affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, knowing that the transactions are designed in whole or in part to avoid a transaction reporting requirement under State and Federal Law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

The Grand Jury further alleges this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 18, United States Code, Section 1956(h).

ASSET FORFEITURE ALLEGATIONS***Drug Offenses***

The allegations in Counts 1 through 3 of this Indictment are hereby realleged and incorporated by reference herein for the purpose of alleging forfeiture to the United States pursuant to Title 21, United States Code, Section 853.

Pursuant to Title 21, United States Code, Section 853, upon conviction of the felony drug offenses charged in Counts 1 through 3 of this Indictment, defendants ALAN GOMEZ-MARENTES, JUAN ANTONIO GONZALEZ-CARRILLO, LUIS ARTURO MAGANA-RAMIREZ, JOSE ELIAS BARBOSA, JOSE DANIEL ESPINOZA, ESTEFHANY COREA-MENDOZA, ADRIAN IZAZAGA-MARTINEZ, JORGE MONDRAGON, BENJAMIN FUENTES, LUIS ZAVALZA-SANCHEZ, ALYSHA JONES, ARMANDO FIERRO-PONCE, AMANDA MEYER, MICHAEL ANDREW WOOD, LUIS CASTILLO-BARRAGAN, EFRAIN LUNA-RODRIGUEZ, JULIAN PINEDA CASILLAS, BLANCA MEDINA, and RUTH MELISA GOMEZ-MARENTES, shall forfeit to the United States of America any and all property, real or personal, constituting or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of such offenses, and shall further forfeit any and all property, real

1 or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate
 2 the commission of, such offenses. The property to be forfeited includes, but is not
 3 limited to, the following:

4 a. Four thousand one hundred U.S. Dollars (\$4,100.00), more or less,
 5 seized from the person of MICHAEL ANDREW WOOD on April 22, 2020; and

6 b. Sums of money representing the proceeds that each defendant
 7 obtained as a result of the Conspiracy to Distribute Controlled Substances, as alleged in
 8 Count 1, above.

9 ***Money Laundering Offenses***

10 The allegations in Count 4 of this Indictment are hereby realleged and
 11 incorporated by reference herein for the purposes of alleging forfeiture to the United
 12 States pursuant to Title 18, United States Code, Section 982(a)(1).

13 Upon conviction of the felony offense in violation of Title 18, United States Code,
 14 Sections 1956, as charged in Count 4 of this Indictment, defendants ALAN GOMEZ-
 15 MARENTES and RUTH GOMEZ-MARENTES, shall forfeit to the United States of
 16 America any property, real or personal, involved in such offense, and any property
 17 traceable to such property, including but not limited to the following,

18 a. A sum of money representing any property, real or personal,
 19 involved in the offense charged in Count 4 of this Indictment, and any property traceable
 20 to such property.

21 ***Substitute Assets***

22 If any of the property described above, as a result of any act or omission of the
 23 defendants:

- 24 a. cannot be located upon the exercise of due diligence;
- 25 b. has been transferred or sold to, or deposited with, a third party;
- 26 c. has been placed beyond the jurisdiction of the Court;
- 27 d. has been diminished in value; or
- 28 e. has been commingled with other property which cannot be divided without
 difficulty,


1 it is the intent of the United States, pursuant to Title 21, United States Code, Section
2 853(p), to seek the forfeiture of any other property of the defendants up to the value of
3 the above-described forfeitable property.

4
5 A TRUE BILL:

6 DATED: 7/23/2020

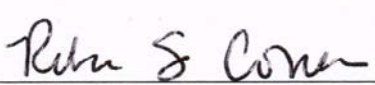
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8 *(Signature of Foreperson redacted*
9 *pursuant to the policy of the Judicial*
10 *Conference of the United States)*

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FOREPERSON


BRIAN T. MORAN
United States Attorney


VINCE LOMBARDI
Assistant United States Attorney


AMY JAQUETTE
Assistant United States Attorney


MARCI L. ELLSWORTH
Assistant United States Attorney

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