

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Criminal Action No.

UNITED STATES OF AMERICA,

Plaintiff,

v

1. **SALVADOR VERA-FIGUEROA,**  
a/k/a Salvador Figueroa-Mendoza,
2. **EMANUEL PIMINTEL,**
3. **MARTIN PIMINTEL,**
4. **ROSALIE AIDE QUIJADA,**
5. **TIBURCIO DELGADILLO-MARTINEZ,**  
a/k/a "Tibu",
6. **SALVADOR DELGADILLO-ALVAREZ,**
7. **ARACELI TOPETE,**  
a/k/a "Shelly",
8. **LUCIO TOPETE-HERNANDEZ,**
9. **DANIEL VELAZQUEZ-GUERRERO,**
10. **JUSTIN SKIPSKI**
11. **JORGE ROSALES-ACEVEDO**

Defendants,

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**INDICTMENT**  
**21 U.S.C. § 846**  
**21 U.S.C. § § 841(a)(1)**  
**18 U.S.C. § 1956(h)**  
**21 U.S.C. §853**

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THE GRAND JURY CHARGES THAT:

**COUNT ONE**

\_\_\_\_\_ From on or about December 1, 2008, through on or about May 26, 2009, both

dates being approximate and inclusive, within the State and District of Colorado and elsewhere, the defendants,

SALVADOR VERA-FIGUEROA,  
EMANUEL PIMINTEL,  
MARTIN PIMINTEL,  
ROSALIE AIDE QUIJADA,  
TIBURCIO DELGADILLO-MARTINEZ,  
SALVADOR DELGADILLO-ALVAREZ,  
ARACELI TOPETE,  
LUCIO TOPETE-HERNANDEZ,  
DANIEL VELAZQUEZ-GUERRERO,  
JUSTIN SKIPSKI,  
JORGE ROSALES-ACEVEDO,

did knowingly and intentionally conspire with each other, and with others known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same.

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

**COUNT TWO**

On or about February 21, 2009 through on or about February 22, 2009, both dates being approximate and inclusive, within the State and District of Colorado, the defendants, SALVADOR VERA-FIGUEROA, TIBURCIO DELGADILLO-MARTINEZ, ARACELI TOPETE, LUCIO TOPETE-HERNANDEZ, and JUSTIN SKIPSKI, did knowingly and intentionally distribute and possess with intent to distribute 500 grams or more, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and did knowingly and intentionally aid, abet, counsel,

command, induce or procure the same.

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

**COUNT THREE**

On or about March 5, 2009 through on or about March 7, 2009, both dates being approximate and inclusive, in the State and District of Colorado, the defendants SALVADOR VERA-FIGUEROA, ROSALIE AIDE QUIJADA, TIBURCIO DELGADILLO-MARTINEZ, ARACELI TOPETE, LUCIO TOPETE-HERNANDEZ, DANIEL VELAZQUEZ-GUERRERO, and JUSTIN SKIPSKI, did knowingly and intentionally distribute and possess with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same.

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

**COUNT FOUR**

On or about March 15, 2009, through and including March 17, 2009, both dates being approximate and inclusive, in the State and District of Colorado, the defendants, SALVADOR VERA-FIGUEROA, EMANUEL PIMINTEL, ROSALIE AIDE QUIJADA, TIBURCIO DELGADILLO-MARTINEZ, SALVADOR DELGADILLO-ALVAREZ, ARACELI TOPETE, LUCIO TOPETE-HERNANDEZ, DANIEL VELAZQUEZ-GUERRERO, and JUSTIN SKIPSKI, did knowingly and intentionally possess and

possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same.

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

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**COUNT FIVE**

On or about March 25, 2009, through on or about April 6, 2009, both dates being approximate and inclusive, in the State and District of Colorado, the defendants, SALVADOR VERA-FIGUEROA, EMANUEL PIMINTEL, MARTIN PIMINTEL, ROSALIE AIDE QUIJADA, TIBURCIO DELGADILLO-MARTINEZ, SALVADOR DELGADILLO-ALVAREZ, ARACELI TOPETE, LUCIO TOPETE-HERNANDEZ, DANIEL VELAZQUEZ-GUERRERO, and JUSTIN SKIPSKI, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and did knowingly aid, abet, counsel, command, induce or procure the same

\_\_\_\_\_All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

**COUNT SIX**

On or about May 3, 2009, through on or about May 9, 2009, both dates being approximate and inclusive, in the State And District of Colorado, the defendants, SALVADOR VERA-FIGUEROA, EMANUEL PIMINTEL, MARTIN PIMINTEL, ROSALIE AIDE QUIJADA, TIBURCIO DELGADILLO-MARTINEZ, SALVADOR DELGADILLO-ALVAREZ, ARACELI-TOPETE, LUCIO TOPETE-HERNANDEZ, DANIEL

VELAZQUEZ-GUERRERO, JUSTIN SKIPSKI and JORGE ROSALES-ACEVEDO, did knowingly and intentionally distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and did knowingly aid, abet, counsel, command, induce or procure the same.

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

### **COUNT SEVEN**

On or about December 1, 2008 and continuing through and including May 26, 2009, both dates being approximate and inclusive, in the State and District of Colorado, and elsewhere, the defendants SALVADOR VERA-FIGUEROA, EMANUEL PIMINTEL, MARTIN PIMINTEL, ROSALIE AIDE QUIJADA, TIBURCIO DELGADILLO-MARTINEZ, SALVADOR DELGADILLO-ALVAREZ, ARACELI TOPETE, LUCIANO TOPETE-HERNANDEZ, DANIEL VELAZQUEZ-GUERRERO, JUSTIN SKIPSKI, conspired between themselves and other persons unknown to the grand jury, to commit the offense of engaging in a monetary transaction in property derived from specified unlawful activities in violation of Title 18, United States Code, Section 1956(a)(1), namely United States currency being derived from the unlawful distribution of controlled substances in violation of Title 21, United States Code, Section 841(a)(1), on and between December 1, 2008, through and including May 26, 2009.

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

**COUNT EIGHT**

\_\_\_\_\_The allegations contained in Counts One through Seven of this Indictment are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provisions of 21 U.S.C. 853.

Upon conviction of the violations alleged in Counts One through Seven of this Indictment involving violations of 21 U.S.C. § § 846 and 841, the defendants

SALVADOR VERA-FIGUEROA,  
EMANUEL PIMINTEL,  
MARTIN PIMINTEL,  
ROSALIE AIDE QUIJADA,  
TIBURCIO DELGADILLO-MARTINEZ,  
SALVADOR DELGADILLO-ALVAREZ,  
ARACELI TOPETE,  
LUCIO TOPETE-HERNANDEZ,  
DANIEL VELAZQUEZ-GUERRERO,  
JUSTIN SKIPSKI, and  
JORGE ROSALES-ACEVEDO,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all of the defendant's right, title and interest in all property constituting and derived from any proceeds obtained directly and indirectly as a result of such offenses, and in all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses, including, but not limited to:

- a. \$174, 415.00 in United States currency seized on March 25, 2009;
- b. \$96, 030.00 in United States currency seized on May 26, 2009 from the residence at 319 Buckthorn Road, New Castle, Colorado;
- c. \$31,000.00 in United States currency seized on May 26, 2009 from the residence at 6968 U.S. Hiway 82, #16, Glenwood Springs, Colorado.

If any of the property described above, 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to see forfeiture of any other property of said defendants up to the value of the forfeitable property. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Ink signature on file in the Clerk's Office  
FOREPERSON

DAVID M. GAQUETTE  
Acting United States Attorney

s/ Wyatt B. Angelo  
WYATT B. ANGELO  
Assistant United States Attorney  
400 Rood Avenue, Suite 220  
Grand Junction, CO 81501  
Telephone: (970)-241-3843  
FAX: (970)-248-3630  
E-mail: [wyatt.angelo@usdoj.gov](mailto:wyatt.angelo@usdoj.gov)  
Attorney for Plaintiff United States

(Rev. 05/05)

DATE: July 22, 2009

DEFENDANT: Salvador Vera-Figueroa a/k/a Salvador Figueroa-Mendoza

YOB: 1972

STATE: Mexico

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:**

Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii)(II)  
Conspiracy to possess with intent to distribute 5 kilograms of cocaine.

**COUNT TWO:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT THREE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(ii)(II)  
Possession with intent to distribute more than 5 kilograms of cocaine.

**COUNT FOUR:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT FIVE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C)  
Possession with intent to distribute a mixture or substance containing a detectable amount of cocaine.

**COUNT SIX:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute 500 grams of cocaine.



**COUNT SEVEN:**

Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 1956(h)  
Money laundering conspiracy

**COUNT EIGHT:**

Title 21, United States Code, Section 853(p), Forfeiture

**LOCATION OF OFFENSE:** Garfield County, Colorado

**PENALTY:** **COUNT ONE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT TWO:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT THREE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FOUR:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FIVE:** NMT 20 years; NMT \$1,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SIX:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SEVEN:** NMT 20 years, NMT \$500,000.00 fine or an amount equal to twice the value of the property involved, which ever is greater.

**COUNT EIGHT:** Forfeiture

**AGENTS:** Marshall Dixon, TFO

**AUTHORIZED BY:** Wyatt B. Angelo  
Assistant U.S. Attorney

**ESTIMATED TIME OF TRIAL:**

five days or less     over five days     other

THE GOVERNMENT

  X   will seek pretrial detention in this case \_\_\_\_\_ will **not** seek pretrial detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDETF CASE: No \_\_\_\_\_ Yes   X

(Rev. 05/05)

DATE: July 22, 2009

DEFENDANT: Emanuel Pimintel

YOB: 1990

STATE: Garfield County

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:**

Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii)(II)  
Conspiracy to possess with intent to distribute 5 kilograms of cocaine.

**COUNT FOUR:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT FIVE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C)  
Possession with intent to distribute a mixture or substance containing a detectable amount of cocaine.

**COUNT SIX:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute 500 grams of cocaine.

**COUNT SEVEN:**

Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 1956(h)  
Money laundering conspiracy

**COUNT EIGHT:**

Title 21, United States Code, Section 853(p), Forfeiture

LOCATION OF OFFENSE: Garfield County, Colorado

PENALTY: **COUNT ONE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FOUR:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FIVE:** NMT 20 years; NMT \$1,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SIX:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SEVEN:** NMT 20 years, NMT \$500,000.00 fine or an amount equal to twice the value of the property involved, which ever is greater.

                     **COUNT EIGHT:** Forfeiture

AGENTS: Marshall Dixon, TFO

AUTHORIZED BY: Wyatt B. Angelo  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

       five days or less      X   over five days           other

THE GOVERNMENT

  X   will seek pretrial detention in this case           will **not** seek pretrial detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDETF CASE: No        Yes   X

(Rev. 05/05)

DATE: July 22, 2009

DEFENDANT: Martin Pimintel

YOB: 1964

STATE: Garfield County

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:**

Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii)(II)  
Conspiracy to possess with intent to distribute 5 kilograms of cocaine.

**COUNT FIVE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C)  
Possession with intent to distribute a mixture or substance containing a detectable amount of cocaine.

**COUNT SIX:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute 500 grams of cocaine.

**COUNT SEVEN:**

Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 1956(h)  
Money laundering conspiracy

**COUNT EIGHT:**

Title 21, United States Code, Section 853(p), Forfeiture

LOCATION OF OFFENSE: Garfield County, Colorado

PENALTY: **COUNT ONE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FIVE:** NMT 20 years; NMT \$1,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SIX:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SEVEN:** NMT 20 years, NMT \$500,000.00 fine or an amount equal to twice the value of the property involved, which ever is greater.

                     **COUNT EIGHT:** Forfeiture

AGENTS: Marshall Dixon, TFO

AUTHORIZED BY: Wyatt B. Angelo  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

       five days or less      X   over five days           other

THE GOVERNMENT

  X   will seek pretrial detention in this case           will **not** seek pretrial detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDEF CASE: No        Yes   X

(Rev. 05/05)

DATE: July 22, 2009

DEFENDANT: Rosalie Aide Quijada

YOB: 1972

STATE: Garfield County

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:**

Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii)(II)  
Conspiracy to possess with intent to distribute 5 kilograms of cocaine.

**COUNT THREE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(ii)(II)  
Possession with intent to distribute more than 5 kilograms of cocaine.

**COUNT FOUR:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT FIVE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C)  
Possession with intent to distribute a mixture or substance containing a detectable amount of cocaine.

**COUNT SIX:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute 500 grams of cocaine.

**COUNT SEVEN:**

Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 1956(h)  
Money laundering conspiracy

**COUNT EIGHT:**

Title 21, United States Code, Section 853(p), Forfeiture

**LOCATION OF OFFENSE:** Garfield County, Colorado

**PENALTY:** **COUNT ONE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT THREE:**NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FOUR:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FIVE:** NMT 20 years; NMT \$1,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SIX:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SEVEN:**NMT 20 years, NMT \$500,000.00 fine or an amount equal to twice the value of the property involved, which ever is greater.

**COUNT EIGHT:** Forfeiture

**AGENTS:** Marshall Dixon, TFO

**AUTHORIZED BY:** Wyatt B. Angelo  
Assistant U.S. Attorney

**ESTIMATED TIME OF TRIAL:**

       five days or less      X   over five days           other

**THE GOVERNMENT**

  X   will seek pretrial detention in this case           will **not** seek pretrial detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle**



**one)**

OCDETF CASE: No \_\_\_\_\_ Yes  X

(Rev. 05/05)

DATE: July 22, 2009

DEFENDANT: Tiburcio Delgadillo-Martinez a/k/a "Tibu"

YOB: 1976

STATE: Garfield County

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:**

Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii)(II)  
Conspiracy to possess with intent to distribute 5 kilograms of cocaine.

**COUNT TWO:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT THREE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(ii)(II)  
Possession with intent to distribute more than 5 kilograms of cocaine.

**COUNT FOUR:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT FIVE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C)  
Possession with intent to distribute a mixture or substance containing a detectable amount of cocaine.

**COUNT SIX:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute 500 grams of cocaine.

**COUNT SEVEN:**

Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 1956(h)  
Money laundering conspiracy

**COUNT EIGHT:**

Title 21, United States Code, Section 853(p), Forfeiture

**LOCATION OF OFFENSE:** Garfield County, Colorado

**PENALTY:** **COUNT ONE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT TWO:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT THREE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FOUR:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FIVE:** NMT 20 years; NMT \$1,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SIX:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SEVEN:** NMT 20 years, NMT \$500,000.00 fine or an amount equal to twice the value of the property involved, which ever is greater.

**COUNT EIGHT:** Forfeiture

**AGENTS:** Marshall Dixon, TFO

**AUTHORIZED BY:** Wyatt B. Angelo  
Assistant U.S. Attorney

**ESTIMATED TIME OF TRIAL:**

\_\_\_\_\_ five days or less     over five days    \_\_\_\_\_ other

THE GOVERNMENT

X  will seek pretrial detention in this case \_\_\_\_\_ will **not** seek pretrial detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDETF CASE: No \_\_\_\_\_ Yes  X

(Rev. 05/05)

DATE: July 22, 2009

DEFENDANT: Salvador Delgadillo-Alvarez

YOB: 1980

STATE: Garfield County

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:**

Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii)(II)  
Conspiracy to possess with intent to distribute 5 kilograms of cocaine.

**COUNT FOUR:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT FIVE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C)  
Possession with intent to distribute a mixture or substance containing a detectable amount of cocaine.

**COUNT SIX:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute 500 grams of cocaine.

**COUNT SEVEN:**

Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 1956(h)  
Money laundering conspiracy

**COUNT EIGHT:**

Title 21, United States Code, Section 853(p), Forfeiture

LOCATION OF OFFENSE: Garfield County, Colorado

PENALTY: **COUNT ONE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FOUR:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

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**COUNT SEVEN:** NMT 20 years, NMT \$500,000.00 fine or an amount equal to twice the value of the property involved, which ever is greater.

**COUNT EIGHT:** Forfeiture

AGENTS: Marshall Dixon, TFO

AUTHORIZED BY: Wyatt B. Angelo  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

     five days or less      X   over five days         other

THE GOVERNMENT

  X   will seek pretrial detention in this case         will **not** seek pretrial detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDETF CASE: No      Yes   X

(Rev. 05/05)

DATE: July 22, 2009

DEFENDANT: Araceli Topete a/k/a "Shelly"

YOB: unknown

STATE: Garfield County

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:**

Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii)(II)  
Conspiracy to possess with intent to distribute 5 kilograms of cocaine.

**COUNT TWO:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT THREE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(ii)(II)  
Possession with intent to distribute more than 5 kilograms of cocaine.

**COUNT FOUR:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT FIVE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C)  
Possession with intent to distribute a mixture or substance containing a detectable amount of cocaine.

**COUNT SIX:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute 500 grams of cocaine.

**COUNT SEVEN:**

Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 1956(h)  
Money laundering conspiracy

**COUNT EIGHT:**

Title 21, United States Code, Section 853(p), Forfeiture

**LOCATION OF OFFENSE:** Garfield County, Colorado

**PENALTY:** **COUNT ONE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT TWO:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT THREE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FOUR:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FIVE:** NMT 20 years; NMT \$1,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SIX:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SEVEN:** NMT 20 years, NMT \$500,000.00 fine or an amount equal to twice the value of the property involved, which ever is greater.

**COUNT EIGHT:** Forfeiture

**AGENTS:** Marshall Dixon, TFO

**AUTHORIZED BY:** Wyatt B. Angelo  
Assistant U.S. Attorney

**ESTIMATED TIME OF TRIAL:**

five days or less  over five days  other



THE GOVERNMENT

X  will seek pretrial detention in this case \_\_\_\_\_ will **not** seek pretrial detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. (**Circle one**)

OCDETF CASE: No \_\_\_\_\_ Yes  X

(Rev. 05/05)

DATE: July 22, 2009

DEFENDANT: Lucio Topete-Hernandez

YOB: 1960

STATE: Garfield County

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:**

Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii)(II)  
Conspiracy to possess with intent to distribute 5 kilograms of cocaine.

**COUNT TWO:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT THREE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(ii)(II)  
Possession with intent to distribute more than 5 kilograms of cocaine.

**COUNT FOUR:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT FIVE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C)  
Possession with intent to distribute a mixture or substance containing a detectable amount of cocaine.

**COUNT SIX:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute 500 grams of cocaine.

**COUNT SEVEN:**

Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 1956(h)  
Money laundering conspiracy

**COUNT EIGHT:**

Title 21, United States Code, Section 853(p), Forfeiture

**LOCATION OF OFFENSE:** Garfield County, Colorado

**PENALTY:** **COUNT ONE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT TWO:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT THREE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FOUR:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FIVE:** NMT 20 years; NMT \$1,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SIX:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SEVEN:** NMT 20 years, NMT \$500,000.00 fine or an amount equal to twice the value of the property involved, which ever is greater.

**COUNT EIGHT:** Forfeiture

**AGENTS:** Marshall Dixon, TFO

**AUTHORIZED BY:** Wyatt B. Angelo  
Assistant U.S. Attorney

**ESTIMATED TIME OF TRIAL:**

five days or less  over five days  other

THE GOVERNMENT

  X   will seek pretrial detention in this case \_\_\_\_\_ will **not** seek pretrial detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDETF CASE: No \_\_\_\_\_ Yes   X

(Rev. 05/05)

DATE: July 22, 2009

DEFENDANT: Daniel Velasquez-Guerrero

YOB: 1973

STATE: Garfield County

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:**

Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii)(II)  
Conspiracy to possess with intent to distribute 5 kilograms of cocaine.

**COUNT THREE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(ii)(II)  
Possession with intent to distribute more than 5 kilograms of cocaine.

**COUNT FOUR:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT FIVE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C)  
Possession with intent to distribute a mixture or substance containing a detectable amount of cocaine.

**COUNT SIX:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute 500 grams of cocaine.

**COUNT SEVEN:**

Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 1956(h)  
Money laundering conspiracy

**COUNT EIGHT:**

Title 21, United States Code, Section 853(p), Forfeiture

**LOCATION OF OFFENSE:** Garfield County, Colorado

**PENALTY:** **COUNT ONE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT THREE:**NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FOUR:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FIVE:** NMT 20 years; NMT \$1,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SIX:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SEVEN:**NMT 20 years, NMT \$500,000.00 fine or an amount equal to twice the value of the property involved, which ever is greater.

**COUNT EIGHT:** Forfeiture

**AGENTS:** Marshall Dixon, TFO

**AUTHORIZED BY:** Wyatt B. Angelo  
Assistant U.S. Attorney

**ESTIMATED TIME OF TRIAL:**

       five days or less      X   over five days           other

**THE GOVERNMENT**

  X   will seek pretrial detention in this case           will **not** seek pretrial detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle**

**one)**

OCDETF CASE: No \_\_\_\_\_ Yes  X

(Rev. 05/05)

DATE: July 22, 2009

DEFENDANT: Justin Skipski

YOB: 1980

STATE: Garfield County

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:**

Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii)(II)  
Conspiracy to possess with intent to distribute 5 kilograms of cocaine.

**COUNT TWO:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT THREE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(ii)(II)  
Possession with intent to distribute more than 5 kilograms of cocaine.

**COUNT FOUR:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute more than 500 grams of cocaine.

**COUNT FIVE:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C)  
Possession with intent to distribute a mixture or substance containing a detectable amount of cocaine.

**COUNT SIX:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute 500 grams of cocaine.



**COUNT SEVEN:**

Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 1956(h)  
Money laundering conspiracy

**COUNT EIGHT:**

Title 21, United States Code, Section 853(p)

**LOCATION OF OFFENSE:** Garfield County, Colorado

**PENALTY:** **COUNT ONE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT TWO:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT THREE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FOUR:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT FIVE:** NMT 20 years; NMT \$1,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SIX:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SEVEN:** NMT 20 years, NMT \$500,000.00 fine or an amount equal to twice the value of the property involved, which ever is greater.

**COUNT EIGHT:** Forfeiture

**AGENTS:** Marshall Dixon, TFO

**AUTHORIZED BY:** Wyatt B. Angelo  
Assistant U.S. Attorney

**ESTIMATED TIME OF TRIAL:**

       five days or less      X   over five days           other

THE GOVERNMENT

X  will seek pretrial detention in this case \_\_\_\_\_ will **not** seek pretrial detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDETF CASE: No \_\_\_\_\_ Yes  X

(Rev. 05/05)

DATE: July 22, 2009

DEFENDANT: Jorge Rosales-Acevedo

YOB: unknown

STATE: Garfield County

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_  
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES \_\_\_X\_\_\_ NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: **COUNT ONE:**

Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii)(II)  
Conspiracy to possess with intent to distribute 5 kilograms of cocaine.

**COUNT SIX:**

Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii)(II)  
Possession with intent to distribute 500 grams of cocaine.

**COUNT EIGHT:**

Title 21, United States Code, Section 853(p), Forfeiture

LOCATION OF OFFENSE: Garfield County, Colorado

PENALTY: **COUNT ONE:** NLT 10 years, NMT Life Imprisonment; NMT \$4,000,000.00 fine or both; 3 years supervised release; \$100 SMA

**COUNT SIX:** NLT 5 years, NMT 40 years; NMT \$2,000,000.00 fine or both; 3 years supervised release; \$100 SMA

\_\_\_\_\_ **COUNT EIGHT:** Forfeiture

AGENTS: Marshall Dixon, TFO

AUTHORIZED BY: Wyatt B. Angelo  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

\_\_\_\_\_ five days or less      X   over five days    \_\_\_\_\_ other

THE GOVERNMENT

  X   will seek pretrial detention in this case    \_\_\_\_\_ will **not** seek pretrial detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDETF CASE: No \_\_\_\_\_ Yes   X