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CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY WRC DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

September 2016 Grand Jury

18 CR 1127 GPC

UNITED STATES OF AMERICA,
Plaintiff,

v.

JESUS ADOLFO RENE
DUARTE LANGUREN (1),
MANUEL VASQUEZ MEDINA (2),
aka "Manny,"
[REDACTED] (3),
MANUEL DEJESUS ESTRADA (4),
IVAN VERDUGO-SALAZAR (5),
aka "Tavo,"
Defendants.

Case No.

I N D I C T M E N T

Title 21, U.S.C., Secs. 841(a)(1) and 846 - Conspiracy to Distribute Controlled Substances; Title 18, U.S.C., Secs. 1956(a)(2)(A), 1956(a)(2)(B)(i), and 1956(h) - Conspiracy to Launder Monetary Instruments; Title 21, U.S.C., Sec. 853 and Title 18, U.S.C., Sec. 982 - Criminal Forfeiture

The grand jury charges:

Count 1

Beginning on a date unknown to the grand jury and continuing up to and including the date of this Indictment, within the Southern District of California and elsewhere, defendants JESUS ADOLFO RENE DUARTE LANGUREN, MANUEL VASQUEZ MEDINA, aka "Manny," [REDACTED] MANUEL DEJESUS ESTRADA, and IVAN VERDUGO-SALAZAR, aka "Tavo," did knowingly and intentionally conspire together and with each other and with other persons known and unknown to the grand jury to distribute 500 grams and

1 more of a mixture and substance containing a detectable amount of
2 methamphetamine, and 5 kilograms and more of a mixture and substance
3 containing a detectable amount of cocaine, both Schedule II Controlled
4 Substances; and 1 kilogram and more of a mixture and substance containing
5 a detectable amount of heroin, a Schedule I Controlled Substance; all
6 in violation of Title 21, United States Code, Sections 841(a)(1)
7 and 846.

8 Count 2

9 Beginning on a date unknown to the grand jury and continuing to the
10 date of this Indictment, within the Southern District of California and
11 elsewhere, defendant JESUS ADOLFO RENE DUARTE LANGUREN did knowingly and
12 intentionally conspire and agree with other persons, known and unknown
13 to the Grand Jury:

14 a. to transport, transmit, and transfer a monetary instrument and
15 funds from a place in the United States to and through a place outside
16 the United States with the intent to promote the carrying on of specified
17 unlawful activity, that is, the felonious importation and distribution
18 of controlled substances punishable under Title 21, United States Code,
19 Chapter 13, in violation of Title 18, United States Code,
20 Section 1956(a)(2)(A); and

21 b. to transport, transmit, and transfer a monetary instrument and
22 funds from a place in the United States to and through a place outside
23 the United States, knowing that the monetary instrument and funds
24 involved in the transportation, transmission and transfer represented
25 the proceeds of some form of unlawful activity and knowing that such
26 transportation, transmission and transfer was designed in whole and in
27 part to conceal and disguise the nature, the location, the source, the
28 ownership, and the control of the proceeds of specified unlawful

1 activity, that is, the felonious importation and distribution of
2 controlled substances punishable under Title 21, United States Code,
3 Chapter 13, in violation of Title 18, United States Code,
4 Section 1956(a)(2)(B)(i);

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

6 FORFEITURE ALLEGATION

7 1. The allegations contained in Counts 1 and 2 are realleged and
8 by their reference fully incorporated herein for the purpose of alleging
9 forfeiture to the United States of America pursuant to the provisions
10 of Title 21, United States Code, Section 853 and Title 18, United States
11 Code, Section 982(a)(1).

12 2. Upon conviction of the felony offense alleged in Count 1 of
13 this Indictment, said violation being punishable by imprisonment for
14 more than one year and pursuant to Title 21, United States Code,
15 Sections 853(a)(1) and 853(a)(2), defendants JESUS ADOLFO RENE DUARTE
16 LANGUREN, MANUEL VASQUEZ MEDINA, aka "Manny," [REDACTED] MANUEL
17 DEJESUS ESTRADA, and IVAN VERDUGO-SALAZAR, aka "Tavo," shall, upon
18 conviction, forfeit to the United States all their rights, title and
19 interest in any and all property constituting, or derived from, any
20 proceeds the defendants obtained, directly or indirectly, as the result
21 of the offense, and any and all property used or intended to be used in
22 any manner or part to commit and to facilitate the commission of the
23 violation alleged in Count 1 of this Indictment.

24 3. Upon conviction of the offense alleged in Count 2 of this
25 Indictment, and pursuant to Title 18, United States Code,
26 Section 982(a)(1), defendant JESUS ADOLFO RENE DUARTE LANGUREN, shall
27 forfeit to the United States, all property, real and personal, involved
28 in such offense, and all property traceable to such property.

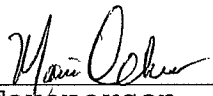
1 4. If any of the above-described forfeitable property, as a
2 result of any act or omission of the defendants:

- 3 a. cannot be located upon the exercise of due diligence;
- 4 b. has been transferred or sold to, or deposited with, a
5 third party;
- 6 c. has been placed beyond the jurisdiction of the Court;
- 7 d. has been substantially diminished in value; or
- 8 e. has been commingled with other property which cannot be
9 subdivided without difficulty; it is the intent of the United States,
10 pursuant to Title 21, United States Code, Section 853(p) and Title 18,
11 United States Code, Section 982(b), to seek forfeiture of any other
12 property of the defendants up to the value of the property listed above
13 as being subject to forfeiture.


14 All pursuant to Title 21, United States Code, Section 853, and Title 18,
15 United States Code, Section 982.


16 DATED: March 2, 2018.

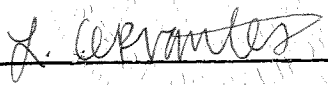
17 A TRUE BILL:

18 
19 Foreperson

20 ADAM L. BRAVERMAN
21 United States Attorney

22 By: 
23 MATTHEW J. SUTTON
24 Assistant U.S. Attorney

25 By: 
26 DAVID J. RAWLS
27 Assistant U.S. Attorney

28 I hereby attest and certify on 3/5/18
That the foregoing document is a full, true and correct
copy of the original on file in my office and in my legal
custody.
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
By  Deputy