

SEALED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

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FILED U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS ARMANDO CHAVEZ, (1)
MICHELLE CHAVEZ, (2)

JOSE LUIS BALDERAS, (4)

JAVIER HERNANDEZ, (6)

Defendants.

CRIMINAL DO
SA17 CR 0118 OG
INDICTMENT

[Vio.: 21 U.S.C. § 846:
Conspiracy to Distribute and
Possess With Intent to
Distribute Cocaine;
21 U.S.C. § 841(a)(1) and
841(b)(1)(C): Possession with
Intent to Distribute Cocaine:
18 U.S.C. § 2: Aiding and
Abetting.]

THE GRAND JURY CHARGES:

COUNT ONE
[21 U.S.C. § 846]

That beginning on or about August of 2014, the exact date unknown to the Grand Jury, and continuing until on or about May of 2016, 2015, in the Western District of Texas, Defendants,

JESUS ARMANDO CHAVEZ,
MICHELLE CHAVEZ,

JOSE LUIS BALDERAS,

JAVIER HERNANDEZ,

and others known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally combine, conspire, confederate, and agree together and with one another to distribute and possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled Substance,

contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and in violation of Title 21, United States Code, Section 846.

COUNT TWO
[21 U.S.C. § 841(a)(1), 841(b)(1)(C)]

That on or about December 29, 2014, in the Western District of Texas, Defendant,

did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE
[21 U.S.C. § 841(a)(1), 841(b)(1)(C)]
[18 U.S.C. § 2]

That on or about January 26, 2015, in the Western District of Texas, Defendant,

JOSE LUIS BALDERAS,

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FOUR

[21 U.S.C. § 841(a) (1), 841(b) (1) (C)]

That on or about February 5, 2015, in the Western District of Texas, Defendant,

did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a) (1) and 841(b) (1) (C).

COUNT FIVE

[21 U.S.C. § 841(a) (1), 841(b) (1) (C)]

That on or about February 20, 2015, in the Western District of Texas, Defendant,

did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a) (1) and 841(b) (1) (C).

COUNT SIX

[21 U.S.C. § 841(a) (1), 841(b) (1) (C)]

That on or about March 3, 2015, in the Western District of Texas, Defendant,

did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVEN
[21 U.S.C. § 841(a)(1), 841(b)(1)(C)]

That on or about March 16, 2015, in the Western District of Texas, Defendant,

did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT
[21 U.S.C. § 841(a)(1), 841(b)(1)(C)]
[18 U.S.C. § 2]

That on or about April 6, 2015, in the Western District of Texas, Defendants,

JOSE LUIS BALDERAS,

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections

841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT NINE
[21 U.S.C. § 841(a)(1), 841(b)(1)(C)]
[18 U.S.C. § 2]

That on or about May 8, 2015, in the Western District of Texas, Defendants,

**JESUS ARMANDO CHAVEZ, AND
JAVIER HERNANDEZ,**

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TEN
[21 U.S.C. § 841(a)(1), 841(b)(1)(C)]
[18 U.S.C. § 2]

That on or about May 21, 2015, in the Western District of Texas, Defendants,

**JESUS ARMANDO CHAVEZ, AND
JAVIER HERNANDEZ,**

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code,

Section 2.

COUNT ELEVEN
[21 U.S.C. § 841(a)(1), 841(b)(1)(C)]
[18 U.S.C. § 2]

That on or about June 9, 2015, in the Western District of Texas, Defendants,

**JESUS ARMANDO CHAVEZ, AND
MICHELLE CHAVEZ,**

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWELVE
[21 U.S.C. § 841(a)(1), 841(b)(1)(C)]

That on or about August 7, 2015, in the Western District of Texas, Defendant,

did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTEEN
[21 U.S.C. § 841(a)(1), 841(b)(1)(C)]
[18 U.S.C. § 2]

That on or about January 5, 2016, in the Western District of Texas, Defendants,

JESUS ARMANDO CHAVEZ, AND
MICHELLE CHAVEZ,

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FOURTEEN
[21 U.S.C. § 841(a)(1), 841(b)(1)(C)]
[18 U.S.C. § 2]

That on or about March 4, 2016, in the Western District of Texas, Defendants,

JESUS ARMANDO CHAVEZ, AND
MICHELLE CHAVEZ,

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved a quantity of cocaine, a Schedule II Controlled

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

A TRUE BILL.

FOREPERSON

LESLIE CALDWELL
ASSISTANT ATTORNEY GENERAL
OF THE CRIMINAL DIVISION

By:



Charlie Strauss
Attorney for the United States,
Acting Under the Authority Conferred
By 28 U.S.C. Section 515