

FILED

2014 JUL 25 PM 3:54

SEALED

CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

September 2013 Grand Jury

UNITED STATES OF AMERICA,

Case No. 14CR0658-DMS

Plaintiff,

I N D I C T M E N T
(Superseding)

v.

ISMAEL ZAMBADA-GARCIA (1),
aka "El Mayo,"
aka "Doc,"
ISMAEL ZAMBADA-IMPERIAL (2),
aka "Mayito Gordo,"
aka "Good Guy,"
ISMAEL ZAMBADA-SICAIROS (3),
aka "Mayito Flaco,"
aka "Caballero,"
IVAN ARCHIVALDO GUZMAN-SALAZAR (4),
aka "Luis,"
aka "Chapito,"

Title 21, U.S.C., Sec. 848(a) and (b) - Continuing Criminal Enterprise; Title 21, U.S.C., Secs. 959, 960, and 963 - Conspiracy to Distribute Methamphetamine, Cocaine and Marijuana Intended for Importation; Title 21, U.S.C., Secs. 952, 960, and 963 - Conspiracy to Import Methamphetamine, Cocaine and Marijuana; Title 18, U.S.C., Secs. 1956(h) and 1956(a)(2)(A) - Conspiracy to Launder Money; Title 21, U.S.C., Sec. 853, Title 18, U.S.C., Sec. 982, and Title 28, U.S.C., Sec. 2461(c) - Criminal Forfeiture

Defendants.

The grand jury charges:

Introductory Allegations

1. At all times relevant to this Indictment, there existed a criminal organization known as the "Sinaloa Cartel." The Sinaloa Cartel is a transnational drug trafficking organization based in Sinaloa, Mexico.

2. Under the leadership of defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo," aka "Doc," the Sinaloa Cartel operates as an

1 affiliation of drug traffickers and money launderers located in
2 multiple countries throughout the world who coordinate and pool their
3 collective resources in order to:

4 a. transport drugs from countries of supply in Asia and
5 Central and South America to Mexico;

6 b. transport drugs through Mexico and into the United
7 States;

8 c. distribute drugs to wholesale customers in the United
9 States; and

10 d. collect, launder, and transfer the proceeds of drug
11 trafficking.

12 3. At all times relevant to this Indictment, defendant ISMAEL
13 ZAMBADA-GARCIA, aka "El Mayo," aka "Doc," and members and associates
14 of the Sinaloa Cartel under him coordinated their drug trafficking
15 activities to import large quantities of cocaine from Central and
16 South American countries, including Colombia, Ecuador, Venezuela,
17 Peru, Panama, Costa Rica, Honduras, and Guatemala, to Mexico, as well
18 as import large quantities of methamphetamine precursors from Asia to
19 Mexico. Defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo," aka "Doc,"
20 and members and associates of the Sinaloa Cartel under him coordinated
21 the unloading of large shipments of cocaine in Mexico, and coordinated
22 the transportation and storage of these cocaine shipments within
23 Mexico. Defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo," aka "Doc,"
24 and members and associates of the Sinaloa Cartel under him coordinated
25 their drug trafficking activities to smuggle large quantities of
26 cocaine, generally in shipments of hundreds of kilograms at a time, as
27 well as multi-kilogram quantities of methamphetamine and ton-
28 quantities of marijuana, from Mexico across the United States border,

1 and then into and throughout the United States, including San Diego,
2 California, and elsewhere.

3 Structure and Organization

4 4. At all times relevant to this Indictment, the roles of the
5 various Sinaloa Cartel members were as follows:

6 a. Defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo,"
7 aka "Doc," was one of the primary leaders of the Sinaloa Cartel.
8 Defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo," aka "Doc," negotiated
9 the price for and caused to be obtained large quantities of cocaine
10 from Central and South American countries to Mexico, and caused multi-
11 kilogram quantities of cocaine, methamphetamine and marijuana to be
12 transported from Mexico to the United States border, and then into and
13 throughout the United States. Defendant ISMAEL ZAMBADA-GARCIA,
14 aka "El Mayo," aka "Doc," caused drug proceeds to be laundered and
15 transferred from the United States to Mexico and elsewhere for the
16 benefit of the Sinaloa Cartel's members and associates.

17 b. Defendant ISMAEL ZAMBADA-IMPERIAL, aka "Mayito Gordo,"
18 "Good Guy," the son of defendant ISMAEL ZAMBADA-GARCIA, caused multi-
19 kilogram quantities of cocaine and ton quantities of marijuana to be
20 transported from Mexico to the United States border, and then into and
21 throughout the United States for distribution. Defendant ISMAEL
22 ZAMBADA-IMPERIAL further caused drug proceeds to be collected from
23 customers in the United States and laundered and transferred from the
24 United States to Mexico and elsewhere for the benefit of the Sinaloa
25 Cartel's members and associates.

26 c. Defendant ISMAEL ZAMBADA-SICAIROS, aka "Mayito Flaco,"
27 "Caballero," the son of defendant ISMAEL ZAMBADA-GARCIA, caused multi-
28 kilogram quantities of methamphetamine to be transported from Asia to

1 Mexico. Once the methamphetamine arrived in Mexico, defendant ISMAEL
2 ZAMBADA-SICAIROS caused it to be transported from Mexico to the United
3 States border, and then into and throughout the United States for
4 distribution. Defendant ISMAEL ZAMBADA-SICAIROS further caused drug
5 proceeds to be collected from customers in the United States and
6 laundered and transferred from the United States to Mexico and
7 elsewhere for the benefit of the Sinaloa Cartel's members and
8 associates.

9 d. Defendant IVAN ARCHIVALDO GUZMAN-SALAZAR, aka "Luis,"
10 aka "Chapito," caused multi-kilogram quantities of cocaine and ton
11 quantities of marijuana to be transported from Mexico to the United
12 States border, and then into and throughout the United States for
13 distribution. Defendant IVAN ARCHIVALDO GUZMAN-SALAZAR further caused
14 drug proceeds to be collected from customers in the United States and
15 laundered and transferred from the United States to Mexico and
16 elsewhere for the benefit of the Sinaloa Cartel's members and
17 associates.

18 Purpose and Methodology

19 5. At all times relevant to this Indictment, defendants ISMAEL
20 ZAMBADA-GARCIA, aka "El Mayo," aka "Doc," ISMAEL ZAMBADA-IMPERIAL,
21 aka "Mayito Gordo," "Good Guy," ISMAEL ZAMBADA-SICAIROS, aka "Mayito
22 Flaco," "Caballero," IVAN ARCHIVALDO GUZMAN-SALAZAR, aka "Luis,"
23 aka "Chapito," and members and associates of the Sinaloa Cartel under
24 them pooled their collective resources and used shared networks of
25 couriers affiliated with the Sinaloa Cartel, to coordinate their
26 activities to:

27 a. Cause large quantities of cocaine, methamphetamine and
28 other drugs and drug precursor chemicals to be imported from Asia and

1 Central and South American countries, including Colombia, Ecuador,
2 Venezuela, Peru, Panama, Costa Rica, Honduras, and Guatemala, to
3 Mexico, using various means, including cargo aircraft, private
4 aircraft, submarines and other submersible and semi-submersible
5 vessels, container ships, supply vessels, go-fast boats, fishing
6 vessels, buses, rail cars, tractor trailers, trucks, automobiles, and
7 private and commercial interstate and foreign carriers. After the
8 drugs and drug precursor chemicals arrived in Mexico, the conspirators
9 used shared resources to unload and store the drugs in Mexico.

10 b. Cause large quantities of cocaine, methamphetamine and
11 marijuana, at times in shipments of hundreds of kilograms at a time,
12 to be transported from various locations in Mexico to the United
13 States border where the drugs were then stored in multiple warehouses,
14 stash houses, and safe houses located in the areas of Tijuana,
15 Mexicali, and elsewhere.

16 c. Cause drugs to be smuggled across the United States-
17 Mexico border through the Southern District of California and
18 elsewhere using multiple means, including automobiles, tractor
19 trailers, trucks, fishing vessels and tunnels.

20 d. Cause drugs to be unloaded by stash house operators
21 affiliated with the Sinaloa Cartel, and stored at multiple stash
22 houses, safe houses, and warehouse locations in the Southern District
23 of California and elsewhere.

24 e. Cause cocaine, methamphetamine and marijuana to be
25 transported throughout the United States, using various means,
26 including automobiles, tractor trailers, trucks, and private and
27 commercial interstate carriers.

28 //

1 f. Cause cocaine, methamphetamine and marijuana to be sold
2 and distributed to wholesale customers in the greater Los Angeles,
3 California area; the greater Chicago, Illinois area, and elsewhere.

4 g. Cause drugs proceeds to be collected from customers,
5 counted, packaged, and transferred and laundered from the United
6 States through the Southern District of California, and elsewhere, to
7 Mexico, and elsewhere, using multiple means, including bulk cash
8 smuggling, structured bank deposits, wire transfers, currency exchange
9 transfers, alternative credit-based systems used to transfer money
10 without the use of wires or other traditional means, goods-based
11 systems in which items, including high-end luxury vehicles and
12 airplanes, were purchased in one location and transferred to another
13 location, and other methods by shared networks of money couriers and
14 money launderers associated with the Sinaloa Cartel.

15 h. Use various means to communicate with each other in
16 order to coordinate their drug trafficking activities, including
17 cellular telephones, satellite telephones, computers, instant
18 messaging applications on smart phones, and email accounts.

19 i. Use coded language and other means to misrepresent,
20 conceal and hide, and to cause to be misrepresented, concealed and
21 hidden, the drug trafficking activities of the Sinaloa Cartel, and to
22 avoid detection and apprehension by law enforcement authorities.

23 j. Use various means to evade law enforcement and protect
24 their drug distribution activities, including: obtaining guns and
25 other weapons; bribing corrupt public officials; engaging in violence
26 and threats of violence; and intimidating with threats of violence
27 members of law enforcement, rival drug traffickers, and members of
28 their own drug trafficking organization.

Count 1

1
2 1. Paragraphs one through five of the Introductory Allegations
3 of this Indictment are realleged and incorporated by reference as
4 though fully set forth herein.

5 2. Beginning no later than in or about May 2005 and continuing
6 up to and including July 25, 2014, within the Southern District of
7 California, and elsewhere, defendant ISMAEL ZAMBADA-GARCIA, aka "El
8 Mayo," aka "Doc," did knowingly and intentionally engage in a
9 continuing criminal enterprise by violating various felony provisions
10 of the Controlled Substances Act (Title 21, United States Code,
11 Sections 801, et seq.), including but not limited to Title 21, United
12 States Code, Sections 959, 960 and 963, as alleged in Count 2, and
13 Sections 952, 960 and 963, as alleged in Count 3, which violations
14 were part of a continuing series of violations of said Act and were
15 undertaken by defendant in concert with five or more other person with
16 respect to whom defendant occupied a position of organizer, supervisor
17 and other position of management, and from which such continuing
18 series of violations defendant obtained substantial income and
19 resources.

20 3. Furthermore, defendant ISMAEL ZAMBADA-GARCIA, aka "El Mayo,"
21 aka "Doc," was a principal administrator, organizer, supervisor and
22 leader of the criminal enterprise, which involved a conspiracy to
23 distribute 150 kilograms and more of cocaine, a Schedule II Controlled
24 Substance, for the purpose of unlawful importation into the United
25 States, and a conspiracy to import 150 kilograms and more of cocaine,
26 a Schedule II Controlled Substance, into the United States from a
27 place outside thereof.

28 All in violation of Title 21, U.S.C., Section 848(a) and (b).

1 United States from a place outside thereof; all in violation of Title
2 21, United States Code, Sections 952, 960, and 963.

3 Count 4

4 Beginning no later than in or about May 2005 and continuing up to
5 and including July 25, 2014, within the Southern District of
6 California and elsewhere, defendants ISMAEL ZAMBADA-GARCIA, aka "El
7 Mayo," aka "Doc," and IVAN ARCHIVALDO GUZMAN-SALAZAR, aka "Luis,"
8 aka "Chapito," did knowingly and intentionally conspire with each
9 other, and with other persons known and unknown to the grand jury, to
10 commit offenses against the United States under Title 18, United
11 States Code, Section 1956, namely: transport, transmit and transfer
12 monetary instruments and funds, that is United States currency, from a
13 place in the United States to and through a place outside the United
14 States, with the intent to promote the carrying on of specified
15 unlawful activity, that is the distribution of controlled substances,
16 in violation of Title 18, United States Code, Section 1956(a)(2)(A);
17 all in violation of Title 18, United States Code, Section 1956(h).

18 FORFEITURE ALLEGATIONS

19 1. The allegations contained in Counts 1 through 4 of this
20 Indictment are realleged and by reference fully incorporated herein
21 for the purpose of alleging forfeiture to the United States of America
22 pursuant to the provisions of Title 21, United States Code,
23 Section 853, and Title 18, United States Code, Section 982.

24 2. As a result of the commission of the felony offenses alleged
25 in Counts 1 through 3 of this Indictment, said violations being
26 punishable by imprisonment for more than one year and pursuant to
27 Title 21, United States Code, Sections 853(a)(1) and 853(a)(2),
28 defendants ISMAEL ZAMBADA-GARCIA, aka "El Mayo," aka "Doc," ISMAEL

1 ZAMBADA-IMPERIAL, aka "Mayito Gordo," aka "Good Guy," ISMAEL ZAMBADA-
2 SICAIROS, aka "Mayito Flaco," aka "Caballero," and IVAN ARCHIVALDO
3 GUZMAN-SALAZAR, aka "Luis," aka "Chapito," shall, upon conviction,
4 forfeit to the United States all their rights, title and interest in
5 any and all property constituting, or derived from, any proceeds any
6 defendant obtained, directly or indirectly, as the result of the
7 felony offense alleged in this Indictment, and any and all property
8 used or intended to be used in any manner or part to commit and to
9 facilitate the commission of the violation alleged in this indictment.
10 The property to be forfeited includes, but is not limited to, the
11 following: 1982 Cessna Turbo 210 bearing Serial #21064675, United
12 States tail number N1218U and Mexican tail number XB-NKY; 2006
13 Mercedes SLR McLaren bearing VIN #WDDAJ76F66M000890; 2014 Nissan
14 GTR bearing VIN #JN1AR5EF4EM270727; 2010 Lamborghini Murcielago
15 bearing VIN #ZHWBU8AHXALA03904 and 2008 Lamborghini bearing
16 VIN #ZHWBU37S58LA02742.

17 3. As a result of the commission of the felony offense alleged
18 in Count 4 of this Indictment, said violation being punishable by
19 imprisonment for more than one year, and pursuant to Title 18, United
20 States Code, Section 982(a)(1), defendants ISMAEL ZAMBADA-GARCIA,
21 aka "El Mayo," aka "Doc," and IVAN ARCHIVALDO GUZMAN-SALAZAR,
22 aka "Luis," aka "Chapito," shall, upon conviction, forfeit to the
23 United States all rights, title and interest in any and all property
24 involved in such offense, and any property traceable to such property.

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

27 //

28 //

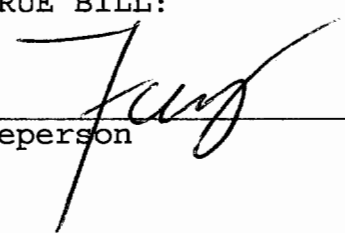
- 1 a. cannot be located upon the exercise of due diligence;
2 b. has been transferred or sold to, or deposited with, a
3 third party;
4 c. has been placed beyond the jurisdiction of the Court;
5 d. has been substantially diminished in value; or
6 e. has been commingled with other property which cannot be
7 subdivided without difficulty;

8 it is the intent of the United States, pursuant to Title 21,
9 United States Code, Section 853(p), as to Counts 1 through 3, and
10 Title 21, United States Code, Section 853(p), as incorporated by
11 Title 18, United States Code, Section 982(b)(1) as to Count 4, to seek
12 forfeiture of any other property of the defendant up to the value of
13 the said property listed above as being subject to forfeiture.

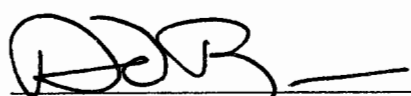
14 All in violation of Title 21, United States Code, Section 853,
15 Title 18, United States Code, Section 982, and Title 28, United States
16 Code, Section 2461(c).

17 DATED: July 25, 2014.

18 A TRUE BILL:

19
20 
Foreperson

21 LAURA E. DUFFY
22 United States Attorney

23 By: 
24 ADAM L. BRAVERMAN
Assistant U.S. Attorney
25
26
27
28