

**FILED**

NOV 07 2019

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY \_\_\_\_\_  
DEPUTY CLERK

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7 United States of America

8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,  
12 Plaintiff,

13 v.

14 CHRISTOPHER GARRY ROSS,  
15 JUAN CARLOS VASQUEZ,  
RAMIRO BRAVO MORALES, and  
16 JORGE LAMAS,  
17 Defendants.

CASE NO. 2:19 - CR - 192 - MCE

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to  
Manufacture Marijuana; 21 U.S.C. § 841(a)(1) –  
Manufacturing Marijuana; 18 U.S.C. § 924(c) –  
Discharge of a Firearm During and in Relation to a  
Drug Trafficking Offense; 18 U.S.C. § 922(g)(5) –  
Illegal Alien in Possession of Firearm; 21 U.S.C. §  
853(a), 18 U.S.C. § 924(d)(1) and 28 U.S.C. §  
2461(c) – Criminal Forfeiture

18  
19 INDICTMENT

20 COUNT ONE: [21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Manufacture Marijuana]

21 The Grand Jury charges: T H A T

22 CHRISTOPHER GARRY ROSS,  
JUAN CARLOS VASQUEZ,  
23 RAMIRO BRAVO MORALES, and  
24 JORGE LAMAS,

25 defendants herein, between on or about July 1, 2019, and on or about October 25, 2019, in El Dorado  
26 County, State and Eastern District of California, did conspire and agree with each other and with persons  
27 known and unknown to the Grand Jury to knowingly and intentionally manufacture at least 100  
28 marijuana plants, a Schedule I controlled substance, in violation of Title 21, United States Code,

1 Sections 846 and 841(a)(1).

2 COUNT TWO: [21 U.S.C. § 841(a)(1) – Manufacturing Marijuana]

3 The Grand Jury further charges: T H A T

4 CHRISTOPHER GARRY ROSS,  
5 JUAN CARLOS VASQUEZ,  
6 RAMIRO BRAVO MORALES, and  
7 JORGE LAMAS,

8 defendants herein, between on or about July 1, 2019, and on or about October 25, 2019, in El Dorado  
9 County, State and Eastern District of California, did knowingly and intentionally manufacture at least  
10 100 marijuana plants, a Schedule I controlled substance, in violation of Title 21, United States Code,  
11 Section 841(a)(1), and Title 18, United States Code, Section 2.

12 COUNT THREE: [18 U.S.C. § 924(c) – Discharge of a Firearm During and in Relation to a Drug  
13 Trafficking Offense]

14 The Grand Jury further charges: T H A T

15 CHRISTOPHER GARRY ROSS,  
16 JUAN CARLOS VASQUEZ,  
17 RAMIRO BRAVO MORALES, and  
18 JORGE LAMAS,

19 defendants herein, between on or about July 1, 2019, and on or about October 23, 2019, in El Dorado  
20 County, State and Eastern District of California, did knowingly use, carry, brandish, and discharge a  
21 firearm during and in relation to, and did knowingly possess a firearm in furtherance of, a drug  
22 trafficking crime for which the defendants may be prosecuted in a court of the United States,  
23 specifically, Conspiracy to Manufacture Marijuana, as alleged in Count One of this Indictment; the  
24 aforementioned firearm is further described as a 9mm Smith & Wesson Model 59 pistol, bearing serial  
25 number A712797; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

26 ///

27 ///

28 ///

1 **COUNT FOUR: [18 U.S.C. § 922(g)(5) – Illegal Alien in Possession of a Firearm]**

2 The Grand Jury further charges: T H A T

3 JUAN CARLOS VASQUEZ, and  
4 RAMIRO BRAVO MORALES,

5 defendants herein, between on or about July 1, 2019, and on or about October 23, 2019, in El Dorado  
6 County, State and Eastern District of California, knowing that they were aliens illegally and unlawfully  
7 in the United States, did knowingly possess a 9mm Smith & Wesson Model 59 pistol, bearing serial  
8 number A712797, in and affecting commerce, in that said firearm had previously been transported in  
9 interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(5).

10 **FORFEITURE ALLEGATION: [21 U.S.C. § 853(a), 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) –**  
11 **Criminal Forfeiture]**

12 1. Upon conviction of one or more of the offenses alleged in Counts One and Two of this  
13 Indictment, defendants CHRISTOPHER GARRY ROSS, JUAN CARLOS VASQUEZ, RAMIRO  
14 BRAVO MORALES, and JORGE LAMAS shall forfeit to the United States pursuant to Title 21, United  
15 States Code, Section 853(a), the following property:

16 a. All right, title, and interest in any and all property involved in violations of Title  
17 21, United States Code, Section 841(a)(1), or conspiracy to commit such offenses, for which defendants  
18 are convicted, and all property traceable to such property, including the following: all real or personal  
19 property, which constitutes or is derived from proceeds obtained, directly or indirectly, as a result of  
20 such offenses; and all property used, or intended to be used, in any manner or part to commit or to  
21 facilitate the commission of the offenses.

22 b. A sum of money equal to the total amount of proceeds obtained as a result of the  
23 offenses, or conspiracy to commit such offenses, for which defendants are convicted.

24 2. Upon conviction of the offenses alleged in Counts Three and Four of this Indictment,  
25 defendants CHRISTOPHER GARRY ROSS, JUAN CARLOS VASQUEZ, RAMIRO BRAVO  
26 MORALES, and JORGE LAMAS shall forfeit to the United States pursuant to Title 18, United States  
27 Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and  
28 ammunition involved in or used in the knowing commission of the offenses.

1 3. If any property subject to forfeiture, as a result of the offenses alleged in Counts One  
2 through Four of this Indictment, for which defendants are convicted:

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

9 it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28,  
10 United States Code, Section 2461(c), to seek forfeiture of any other property of defendants, up to the  
11 value of the property subject to forfeiture.

12  
13 A TRUE BILL.

14  
15 **/s/ Signature on file w/AUSA**  
16 **FOREPERSON**

17   
18 **McGREGOR W. SCOTT**  
**United States Attorney**

No. \_\_\_\_\_

**2:19 - CR - 192 - MCE**

**UNITED STATES DISTRICT COURT**

*Eastern District of California*

*Criminal Division*

**THE UNITED STATES OF AMERICA**

vs.

**CHRISTOPHER GARRY ROSS  
JUAN CARLOS VASQUEZ  
RAMIRO BRAVO MORALES  
JORGE LAMAS**

**INDICTMENT**

**VIOLATION(S):** 21 U.S.C. § 846, 841(a)(1) – Conspiracy to Manufacture Marijuana; 21 U.S.C. § 841(a)(1) – Manufacturing Marijuana; 18 U.S.C. § 924(c) – Discharge of a Firearm During and in Relation to a Drug Trafficking Offense; 18 U.S.C. § 922(g)(5) – Illegal Alien in Possession of Firearm; 21 U.S.C. § 853(a), 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

*A true bill,*

**/s/ Signature on file w/AUSA**

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*Foreman.*

Filed in open court this 7 day

of Nov, A.D. 20 19

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*[Signature]*  
-----  
*Clerk.*

Bail, \$ \_\_\_\_\_

**NO PROCESS NECESSARY**

**NO BAIL WARRANT PENDING HEARING**

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*[Signature]*  
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*Jorge Lamas  
Christopher Ross  
Juan Vasquez  
Ramiro Morales*

**United States v. Christopher Garry Ross et. al**  
**Penalties for Indictment**

**Defendants**

**Christopher Garry Ross**  
**Juan Carlos Vasquez**  
**Ramiro Bravo Morales**  
**Jorge Lamas**

**COUNT 1:**           **ALL DEFENDANTS**

**VIOLATION:**       21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to Manufacture Marijuana

**PENALTIES:**       Mandatory minimum of 5 years in prison and a maximum of up to 40  
years in prison; or  
Fine of up to \$5,000,000; or both fine and imprisonment  
Supervised release of at least 4 years up to life

**SPECIAL ASSESSMENT:** \$100 (mandatory on each count)

**COUNT 2:**           **ALL DEFENDANTS**

**VIOLATION:**       21 U.S.C. § 841(a)(1) – Manufacture Marijuana

**PENALTIES:**       Mandatory minimum of 5 years in prison and a maximum of up to 40  
years in prison; or  
Fine of up to \$5,000,000; or both fine and imprisonment  
Supervised release of at least 4 years up to life

**SPECIAL ASSESSMENT:** \$100 (mandatory on each count)

**COUNT 3:**           **ALL DEFENDANTS**

**VIOLATION:**       18 U.S.C. § 924(c) – Discharge of a Firearm During and In Relation to a  
Drug Trafficking Offense

**PENALTIES:**       Mandatory minimum of 10 years in prison and a maximum of up to life in  
prison; or  
Fine of up to \$250,000; or both fine and imprisonment  
A five-year term of Supervised Release  
**\*\* Term of imprisonment must run consecutive to any other term of  
imprisonment imposed. \*\***

**SPECIAL ASSESSMENT: \$100 (mandatory on each count)**

**COUNT 4:            **Juan Carlos Vasquez**  
**Ramiro Bravo Morales****

**VIOLATION:            18 U.S.C. § 922(g)(5) - Alien in possession of firearm**

**PENALTIES:            Not more than 120 months,  
Not more than \$250,000 fine or both  
A three-year term of Supervised Release**

**SPECIAL ASSESSMENT: \$100 (mandatory on each count)**

**FORFEITURE ALLEGATION:    **ALL DEFENDANTS****

**VIOLATION:            18 U.S.C. § 924(d)(1) 21 U.S.C. § 853(a) and 28 U.S.C. § 2461(c) -  
Criminal Forfeiture**

**PENALTIES:            As stated in the charging document**