

20 00458 BLF SVK

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN JOSE

FILED

FEB 04 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE OFFICE

UNITED STATES OF AMERICA,

v.

DAVID CAMPOY,
JOSE MELCHOR CAMPOY,
DAVID WOLCOTT GREENMAN,
KIMBERLY CARRASCO,
LAMBERTO LNU, a/k/a "El Tomate,"
JUAN CARLOS VELAZQUEZ ORTIZ,
IGNACIO ESPINOZA, a/k/a "Nacho,"
JOSE MANUEL RODRIGUEZ NARANJO,
NICHOLAS ARDANUY,
ET.AL *je*

DEFENDANT(S).

SUPERSEDING INDICTMENT

SEE ATTACHMENT

A true bill.

/s/ Foreperson of the Grand Jury Foreman

Filed in open court this 4th day of

February, 2021

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Clerk
WBC
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no process for in-custody
defendants. Arrest warrants
authorized (attached).

Note:
DPE 3 - Remains Ana Gavira Orozco

Attachment 1 to Indictment -- *United States v. David Campoy et al.*

- COUNT ONE: (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) – Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine, Heroin, Cocaine, and Marijuana)
- COUNT TWO: (21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) – Possession with Intent to Distribute and Distribution of Methamphetamine)
- COUNT THREE: (21 U.S.C. § 841(a)(1) and (b)(1)(B)(i) – Possession with Intent to Distribute Heroin)
- COUNT FOUR: (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B)(i) – Attempt to Possess with Intent to Distribute of Heroin)
- COUNT FIVE: (21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) – Possession with Intent to Distribute and Distribution of Methamphetamine)
- COUNT SIX: (21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) – Possession with Intent to Distribute and Distribution of Methamphetamine)
- COUNT SEVEN: (21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) – Possession with Intent to Distribute and Distribution of Methamphetamine)
- COUNT EIGHT: (21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) – Possession with Intent to Distribute Methamphetamine)
- COUNT NINE: (21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) – Possession with Intent to Distribute and Distribution of Methamphetamine)
- COUNT TEN: (21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) and (A)(i) – Possession with Intent to Distribute Methamphetamine and Heroin)
- COUNT ELEVEN: (21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the Commission of a Felony under the Controlled Substances Act)
- COUNT TWELVE: (21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the Commission of a Felony under the Controlled Substances Act)

- COUNT THIRTEEN: (21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the Commission of a Felony under the Controlled Substances Act)
- COUNT FOURTEEN: (21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the Commission of a Felony under the Controlled Substances Act)
- COUNT FIFTEEN: (21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the Commission of a Felony under the Controlled Substances Act)
- COUNT SIXTEEN: (21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the Commission of a Felony under the Controlled Substances Act)
- COUNT SEVENTEEN: (21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the Commission of a Felony under the Controlled Substances Act)
- COUNT EIGHTEEN: (18 U.S.C. § 922(g) – Felon in Possession of Firearms and Ammunition)
- COUNT NINETEEN: (18 U.S.C. § 924(c) – Possessing a Firearm in furtherance of a Drug Trafficking Crime)
- COUNT TWENTY: (18 U.S.C. § 371 – Conspiracy to Manufacture and Deal in Firearms)
- COUNT TWENTY-ONE: (18 U.S.C. § 371 – Conspiracy to Export Arms and Munitions)
- COUNT TWENTY-TWO: (18 U.S.C. §§ 922(a)(1)(A) and 924(n) – Unlawfully Manufacturing and Dealing in Firearms)
- COUNT TWENTY-THREE: (22 U.S.C. §§ 2778(b)(2) and (c) and 22 C.F.R. §§ 121.1, 123.1, and 127.1 – Arms Export Control Act Export of Arms and Munitions)

FILED

FEB 04 2021

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
SAN JOSE OFFICE

1 DAVID L. ANDERSON (CABN 149604)
2 United States Attorney

SVK

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6 **CR 20 00458 BLF**

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 DAVID CAMPOY,
15 JOSE MELCHIOR CAMPOY,
16 DAVID WOLCOTT GREENMAN,
17 KIMBERLY CARRASCO,
18 LAMBERTO LNU, a/k/a "El Tomate,"
19 JUAN CARLOS VELAZQUEZ ORTIZ,
20 IGACIO ESPINOZA, a/k/a "Nacho,"
21 JOSE MANUEL RODRIGUEZ NARANJO,
22 NICHOLAS ARDAN UY,
23 MICHAEL OZUNA GUIZAR,
24 MIGUEL ANGEL CARRIZAL ZAMORA,
25 ROBERTO CAMPOY ROBLES,
26 LUIS GUILLERMO SERRANO, and
27 IVAN CAMPOY MORALES,

28 Defendants.

) CASE NO. CR 20-00458 BLF

) VIOLATIONS:

-) 21 U.S.C. §§ 846, 841(a)(1), and (b)(1)(A) –
-) Conspiracy to Distribute and Possess with Intent to
-) Distribute Controlled Substances (Methamphetamine,
-) Heroin, Cocaine, and Marijuana);
-) 21 U.S.C. §§ 841(a)(1), (b)(1)(A) and (B), and 846 –
-) Possession with Intent to Distribute and Distribution
-) of Methamphetamine and Heroin; Attempt;
-) 21 U.S.C. § 843(b) – Use of a Communication
-) Facility in Facilitating the Commission of a Felony
-) under the Controlled Substances Act
-) 18 U.S.C. § 922(g) – Felon in Possession of Firearms
-) and Ammunition;
-) 18 U.S.C. § 924(c) – Possession of Firearms in
-) furtherance of a Drug Trafficking Crime;
-) 18 U.S.C. § 371 – Conspiracy;
-) 18 U.S.C. §§ 922(a)(1)(A) and 924(n) – Unlawful
-) Manufacturing and Dealing in Firearms;
-) 22 U.S.C. § 2778(b)(2) and (c) and 22 C.F.R. 121.1,
-) 123.1, and 127.1 – Arms Export Control Act Export
-) of Arms and Munitions;
-) 21 U.S.C. § 853 – Forfeiture Allegation
-) 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) –
-) Forfeiture Allegation
-) 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) –
-) Forfeiture Allegation

1 SUPERSEDING INDICTMENT

2 The Grand Jury charges:

3 Introductory Allegations

4 David CAMPOY conspired to distribute and possess with the intent to distribute controlled
5 substances. David CAMPOY conspired to export and manufacture firearms between the United States
6 of America and the United Mexican States. This Superseding Indictment addresses both conspiracies.

7 At all times relevant to this Superseding Indictment, in the Northern District of California and
8 elsewhere:

9 1. David CAMPOY was a resident of San Jose, California, and the leader of the David CAMPOY
10 Drug Trafficking Organization (the "CAMPOY DTO").

11 2. David CAMPOY illegally conspired to export, manufacture, and deal in firearms, including AR-
12 15 assault rifles with grenade launchers and .50 caliber sniper rifles, in the United States and Mexico.
13 David CAMPOY was the user of cellular telephones ending in the following last four digits: -9648, -
14 8795, and -7722.

15 3. Jose Melchor CAMPOY ("Jose CAMPOY") was a resident of San Jose, California, and the adult
16 son of David CAMPOY. Jose CAMPOY was David CAMPOY's top trusted lieutenant. Jose
17 CAMPOY was the user of a cellular telephone ending in the following last four digits -3188.

18 4. Lamberto LNU, a/k/a "El Tomate" ("Lamberto") was a resident of Mexico, and the Cártel de
19 Sinaloa ("Sinaloa Cartel") affiliated source of controlled substances for the CAMPOY DTO.
20 LAMBERTO was the user of cellular telephones ending in the following last four digits: -2291, -4061, -
21 3157 and -6470.

22 5. David Wolcott GREENMAN ("GREENMAN") was a resident of San Francisco, California, and
23 distributed methamphetamine, heroin, and cocaine for the CAMPOY DTO.

24 6. Juan Carlos VELAZQUEZ Ortiz ("VELAZQUEZ") was a resident of San Jose, California, and
25 distributed methamphetamine for the CAMPOY DTO.

26 7. Ignacio ESPINOZA, a/k/a "Nacho" ("ESPINOZA") was a resident of San Jose, California, and
27 distributed methamphetamine for the CAMPOY DTO. ESPINOZA was the user of cellular telephone
28 number ending in the last four digits -0330.

1 8. Jose Manuel RODRIGUEZ Naranjo ("RODRIGUEZ") was a resident of San Jose, California,
2 and distributed methamphetamine for the CAMPOY DTO.

3 9. Nicholas ARDANUY ("ARDANUY") was a resident of Santa Cruz, California, and distributed
4 methamphetamine and cocaine for the CAMPOY DTO.

5 10. Michael OZUNA Guizar ("OZUNA") was a resident of Avondale, Arizona. He conspired with
6 David CAMPOY to illegally export, manufacture, and deal in firearms, including AR-15 assault rifles
7 with grenade launchers and .50 caliber sniper rifles, in the United States and Mexico. OZUNA was the
8 user of cellular telephone number ending in the last four digits -7448.

9 11. Kimberly CARRASCO ("CARRASCO") was a resident of San Jose, California, and transported
10 methamphetamine for the CAMPOY DTO.

11 12. Miguel Angel CARRIZAL Zamora ("CARRIZAL") was a resident of San Jose, California, and
12 transported methamphetamine with ROGRIGUEZ.

13 13. Roberto CAMPOY Robles ("Roberto CAMPOY") was a resident of Mexico and conspired with
14 David CAMPOY to illegally export, manufacture, and deal in firearms, including AR-15 assault rifles
15 with grenade launchers and .50 caliber sniper rifles, in the United States and Mexico.

16 14. Luis Guillermo SENDINO ("SENDINO") was a resident of Mexico and Arizona and conspired
17 with David CAMPOY to illegally export, manufacture, and deal in firearms, including AR-15 assault
18 rifles with grenade launchers and .50 caliber sniper rifles, in the United States and Mexico.

19 15. Ivan CAMPOY Morales ("Ivan CAMPOY") was a resident of Mexico and conspired with David
20 CAMPOY to illegally manufacture and deal in firearms, including AR-15 assault rifles with grenade
21 launchers and .50 caliber sniper rifles, in the United States and Mexico.

22 The Objects of the Narcotics Conspiracy

23 16. The objects of the narcotics conspiracy were to illegally import methamphetamine and heroin
24 from Mexico into the United States, and to obtain cocaine and marijuana from sources in the United
25 States, and to possess with the intent to distribute the controlled substances in San Jose, California.
26 From San Jose, California, the CAMPOY DTO distributed the controlled substances throughout the
27 Northern District of California and elsewhere.

1 Manner and Means of the Narcotics Conspiracy

2 17. The CAMPOY DTO distributed hundreds of pounds of controlled substances, including
3 methamphetamine, heroin, cocaine, and marijuana, in the Northern District of California and elsewhere.

4 18. The CAMPOY DTO obtained its methamphetamine and heroin from the Sinaloa Cartel in
5 Mexico, and illegally smuggled the methamphetamine and heroin into the United States through secret
6 and covert means.

7 19. The CAMPOY DTO communicated through wire and electronic communications using cellular
8 telephones, as well as through encrypted communication applications using cellular telephones,
9 including WhatsApp, Signal, and Telegram.

10 20. LAMBERTO, the Sinaloa Cartel-affiliated source of controlled substances for the CAMPOY
11 DTO, communicated with David CAMPOY through encrypted communication applications, including
12 WhatsApp, to receive drug orders and to maintain the CAMPOY DTO drug ledger.

13 21. The CAMPOY DTO relied upon covert means to receive shipments of methamphetamine and
14 heroin, including the use of cars with hidden compartments.

15 22. David CAMPOY and Jose CAMPOY received orders of controlled substances from other
16 members of the CAMPOY DTO and would deliver controlled substances to other members of the
17 CAMPOY DTO. Those members would then further distribute the controlled substances throughout the
18 Northern District of California and elsewhere.

19 The Objects of the Firearm Conspiracy

20 23. The objects of the firearms conspiracy were to unlawfully purchase firearms and components of
21 firearms in the United States through licensed federal firearm dealers, to export firearms and
22 components from the United States to Mexico through deception and false means, to receive said
23 firearms and components in Mexico, to manufacture the components into firearms in Mexico, to
24 combine the firearms with grenade launchers assembled in Mexico, to attempt to source .50 caliber
25 sniper rifles, and to resell the firearms with the grenade launchers and .50 caliber sniper rifles on the
26 black market.

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1 Overt Acts in Furtherance of the Firearm Conspiracy

2 In furtherance of the conspiracy and to effect the objects thereof, in the Northern District of
3 California and elsewhere, David CAMPOY and others committed the following overt acts:

4 24. On or about January 14, 2020, Ivan CAMPOY, a resident of Mexico, sent David CAMPOY an
5 image of AR-15 lower receivers, parts which would be considered firearms in the United States.

6 25. On or about January 19, 2020, David CAMPOY and Roberto CAMPOY purchased 10 pistol
7 upper half assemblies chambered in 5.56 mm and 10 M-4 stocks from Model 1 Sales located in
8 Whitewright, Texas. The U.S. Department of State has certified the export of these parts to be
9 controlled by the Export Control Reform Act, thereby requiring a license to be exported out of the
10 United States. The order was placed under the name "Jose Fernando Rivas," a false alias utilized by
11 Roberto CAMPOY. The order was paid for via 16 money orders totaling \$7,505.

12 26. According to Model 1 Sales, the Model 1 Sales order was shipped on February 6, 2020 and sent
13 to 525 S. 2nd Street, Apartment 1, Avondale, Arizona, which is a residential address associated with
14 OZUNA.

15 27. David CAMPOY paid OZUNA \$1,000 to use the address and receive the shipments.

16 28. On or about March 1, 2020, SENDINO met with David CAMPOY in Tucson, Arizona and
17 picked up the boxes containing the firearm components previously purchased by Roberto CAMPOY and
18 David CAMPOY.

19 29. David CAMPOY also informed Roberto CAMPOY via WhatsApp messages that he (David
20 CAMPOY) also provided SENDINO with approximately \$5,000 for the transportation costs and the
21 purchase of grenade launcher tubes.

22 30. On or about March 3, 2020, Ivan CAMPOY informed David CAMPOY via WhatsApp messages
23 that SENDINO would travel to Avondale, Arizona to pick up the firearm components.

24 31. On or about March 7, 2020, U.S. Customs and Border Protection (CBP) records showed a 2013
25 Ram 1500 pickup truck bearing Arizona registration CTJ3481 exit the U.S. through the Nogales,
26 Arizona Port of Entry. According to Arizona Department of Motor Vehicles this vehicle is registered to
27 SENDINO. On or about March 8, 2020, CBP records showed SENDINO re-enter the U.S. through the
28 Nogales, Arizona Port of Entry driving the same Ram 1500 pickup truck.

1 32. On or about April 25, 2020, Ivan CAMPOY sent David CAMPOY via WhatsApp the following
 2 message:

NAME	TIME (Approx.)	MESSAGE	TRANSLATION
Ivan CAMPOY	6:52 p.m.	Buenas tardes primo como an estado	Good evening cousin. How have you been?
Ivan CAMPOY	7:02 p.m.	Mire primo ya se terminaron de fabricar las piezas nada mas falta que lleguen los tubos para terminar de maquinarlos y pintarlos pero todo lo demas ya esta listo y pues falta traer las cosas de alla pero con esto del virus los Uber no quieren, que se calme un poco mas esto y me traeran las cosas, pero no se preocupe primo las cosas estan seguras con Luis y el dinero aqui lo tengo, todo va bien primo lento pero bien [Thumb's up Emoji] saludos a todos espero que esten bien cuidense mucho primo	Look, cousin, they finished making the pieces. They are just waiting on the tubes to arrive in order to finish machining and painting them. But everything else is ready. And, the things from over there still need to be brought. But with this virus matter, the Ubers don't want to (possibly work). They want this to settle down a little bit more and they will bring me the things then. But don't worry, cousin. The things are safe with Luis and I have the money here. Everything's going to be okay, cousin. Slow but good. [Thumb's up emoji] My regards to everyone. I hope all is well. Take care, cousin.

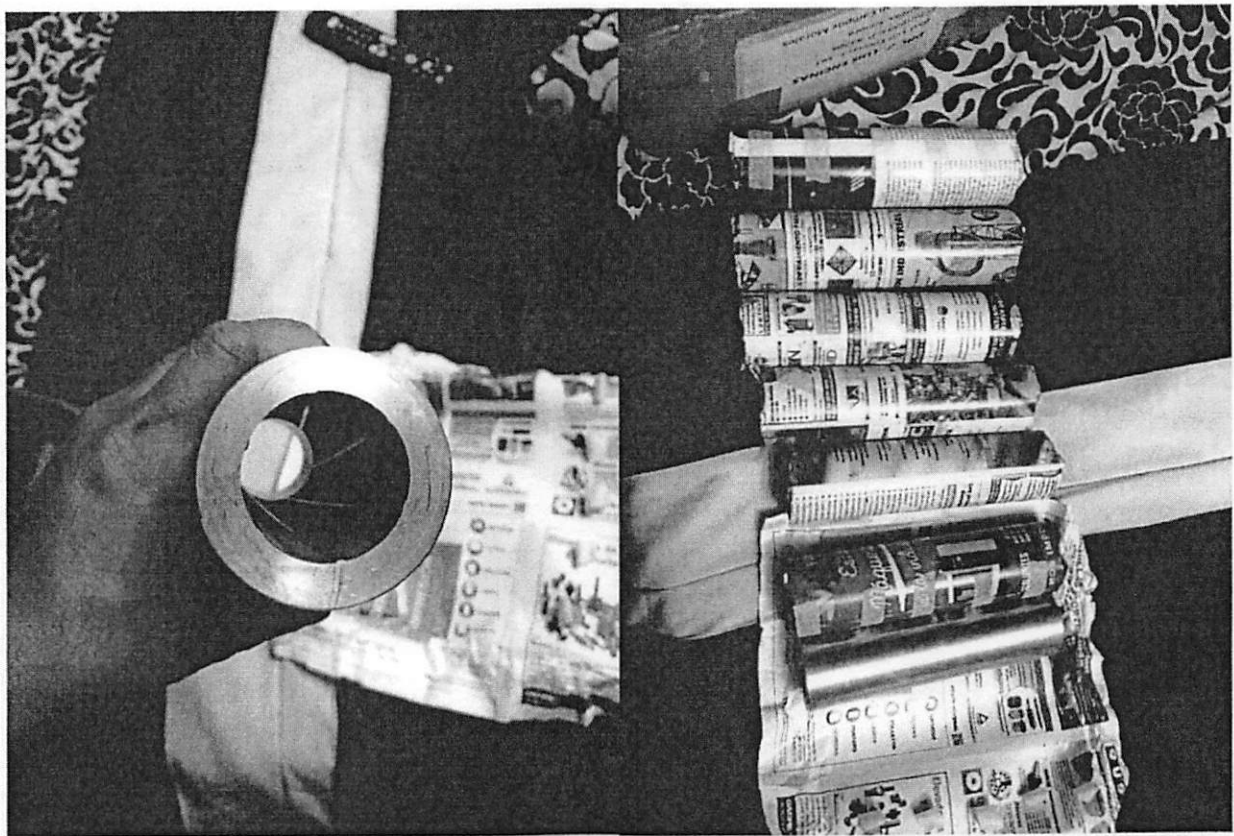
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33. On or about April 26, 2020, Ivan CAMPOY sent David CAMPOY via WhatsApp images of M203 40mm grenade launcher parts, as follows:



1 The words "M203 Cal. 40 MM" are engraved on the side of the black piece. M203 Cal. 40mm is
2 a grenade launcher that is designed to be attached under a rifle.

3 34. On or about June 19, 2020, Ivan CAMPOY sent David CAMPOY via WhatsApp images of
4 seven (7) metal tubes. Ivan CAMPOY informed David CAMPOY that the tubes had arrived and the
5 only remaining task was to machine and paint the parts in order to complete construction of the grenade
6 launchers which would then be fitted to the AR-15 rifles constructed using components purchased and
7 sent by Roberto CAMPOY and David CAMPOY, as follows:



1 35. On or about June 20, 2020, Ivan CAMPOY also asked David CAMPOY via WhatsApp message
2 if he could find .50 caliber Barret sniper rifles.

3 36. On or about January 27, 2021, David CAMPOY possessed in San Jose, California, five AR-15
4 lower receivers with "M16A2" markings that matched the assault rifles distributed by Ivan CAMPOY
5 and other members of the firearm conspiracy. These parts, together with other eleven other firearms,
6 ammunition and approximately 572 pounds of methamphetamine, and several pounds of heroin, are
7 depicted below in a post-seizure photograph. The drugs, weapons and weapons parts were seized by law
8 enforcement agents on January 27, 2021.



1 COUNT ONE: (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) – Conspiracy to Distribute and
2 Possess with Intent to Distribute Methamphetamine, Heroin, Cocaine, and
3 Marijuana)

3 37. The allegations contained in paragraphs 1 through 12 and 16 through 22 above are re-alleged and
4 incorporated as if fully set forth here.

5 38. Beginning on or about a date unknown but no later than July 2019, and continuing to on or about
6 January 27, 2021, in the Northern District of California and elsewhere, the defendants,

7 DAVID CAMPOY,
8 JOSE MELCHOR CAMPOY,
9 DAVID WOLCOTT GREENMAN,
10 KIMBERLY CARRASCO,
11 LAMBERTO LNU, a/k/a "El Tomato"
12 JUAN CARLOS VELAZQUEZ ORTIZ,
13 IGNACIO ESPINOZA, a/k/a "Nacho,"
14 JOSE MANUEL RODRIGUEZ NARANJO, and
15 NICHOLAS ARDANUY,

16 and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to distribute
17 and possess with intent to distribute more than 500 grams of a mixture and substance containing a
18 detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II
19 controlled substance; 1,000 grams and more of a mixture and substance containing a detectable amount
20 of heroin, a Schedule I controlled substance; five kilograms and more of a mixture and substance
21 containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a
22 Schedule I controlled substance; and 1,000 kilograms and more of a mixture or substance containing a
23 detectable amount of marijuana, and 1,000 and more marijuana plants.

24 All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and (b)(1)(A)(i), (A)(ii),
25 (A)(viii), and (A)(vii).

26 COUNT TWO: (21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) – Possession with Intent to Distribute
27 and Distribution of Methamphetamine)

28 39. On or about June 17, 2020, in the Northern District of California, the defendants,

DAVID CAMPOY,
JOSE MELCHOR CAMPOY, and
KIMBERLY CARRASCO,

did knowingly and intentionally possess with intent to distribute 500 grams and more of a mixture and
substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its

1 isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section
2 841(a)(1) and (b)(1)(A)(viii).

3 COUNT THREE: (21 U.S.C. § 841(a)(1) and (b)(1)(B)(i) – Possession with Intent to Distribute
4 Heroin)

5 40. Between on or about September 1 and 2, 2020, in the Northern District of California, the
6 defendants,

7 DAVID CAMPOY and
8 JOSE MELCHOR CAMPOY,

9 did knowingly and intentionally possess with intent to distribute 100 grams and more of a mixture and
10 substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of
11 Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(i).

12 COUNT FOUR: (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B)(i) – Attempt to Possess with Intent to
13 Distribute of Heroin)

14 41. Between on or about September 1 and 2, 2020, in the Northern District of California, the
15 defendant,

16 DAVID WOLCOTT GREENMAN,

17 did knowingly and intentionally attempt to possess with intent to distribute 100 grams and more of a
18 mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in
19 violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(i), and 846.

20 COUNT FIVE: (21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) – Possession with Intent to Distribute
21 and Distribution of Methamphetamine)

22 42. On or about November 10, 2020, in the Northern District of California, the defendants,

23 DAVID CAMPOY and
24 DAVID WOLCOTT GREENMAN,

25 did knowingly and intentionally distribute and possess with intent to distribute 500 grams and more of a
26 mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts
27 of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
28 841(a)(1) and (b)(1)(A)(viii).

1 COUNT SIX: (21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) – Possession with Intent to
2 Distribute and Distribution of Methamphetamine)

3 43. On or about July 24, 2019, in the Northern District of California, the defendants,

4 JOSE MANUEL RODRIGUEZ NARANJO and
5 MIGUEL ANGEL CARRIZAL ZAMORA,

6 did knowingly and intentionally distribute and possess with intent to distribute 500 grams and more of a
7 mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts
8 of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
9 841(a)(1) and (b)(1)(A)(viii).

10 COUNT SEVEN: (21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) – Possession with Intent to
11 Distribute and Distribution of Methamphetamine)

12 44. On or about August 14, 2019, in the Northern District of California, the defendant,

13 JOSE MANUEL RODRIGUEZ NARANJO,

14 did knowingly and intentionally distribute and possess with intent to distribute 500 grams and more of a
15 mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts
16 of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
17 841(a)(1) and (b)(1)(A)(viii).

18 COUNT EIGHT: (21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) – Possession with Intent to
19 Distribute Methamphetamine)

20 45. On or about August 28, 2020, in the Northern District of California, the defendants,

21 DAVID CAMPOY and
22 JOSE MELCHOR CAMPOY,

23 did knowingly and intentionally possess with intent to distribute 500 grams and more of a mixture and
24 substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its
25 isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
26 841(a)(1) and (b)(1)(A)(viii).

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1 COUNT NINE:

(21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) – Possession with Intent to Distribute and Distribution of Methamphetamine)

2
3 46. On or about December 18, 2020, in the Northern District of California, the defendants,

4 DAVID CAMPOY and
5 NICHOLAS ARDANUY,

6 did knowingly and intentionally distribute and possess with intent to distribute 500 grams and more of a
7 mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts
8 of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
9 841(a)(1) and (b)(1)(A)(viii).

10 COUNT TEN:

(21 U.S.C. § 841(a)(1) and (b)(1)(A)(viii) and (A)(i) – Possession with Intent to Distribute Methamphetamine and Heroin)

11
12 47. On or about January 27, 2021, in the Northern District of California, the defendant,

13 DAVID CAMPOY,

14 did knowingly and intentionally possess with intent to distribute 500 grams and more of a mixture and
15 substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its
16 isomers, a Schedule II controlled substance, and 1,000 grams and more of a mixture and substance
17 containing a detectable amount of heroin, a Schedule I controlled substances, each in violation of Title
18 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii) and (A)(i).

19 COUNT ELEVEN:

(21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the Commission of a Felony under the Controlled Substances Act)

20
21 48. On or about February 27, 2020, in the Northern District of California and elsewhere, the
22 defendants,

23 DAVID CAMPOY and
24 IGNACIO ESPINOZA, a/k/a “Nacho,”

25 did knowingly and intentionally use any communication facility, in particular, the phone associated with
26 the number ending in the last four digits -9648 (David CAMPOY) and the phone associated with
27 number ending in the last four digits -0330 (ESPINOZA), in facilitating the commission of any act or
28 acts constituting a felony under Title 21, United States Code, Sections 841 and 846, that is, Count One

1 of this Superseding Indictment incorporated by reference herein, to wit, a telephone call in which these
 2 defendants had the following conversation concerning defendants efforts to dominate the market for
 3 methamphetamine in San Jose and Northern California, as follows:

NAME	TRANSLATION
	[NON-PERTINENT PORTIONS OMITTED]
	[Telephone rings]
David CAMPOY	Um-hum. Did you hear about what happened?
ESPINOZA	What?
David CAMPOY	That ice is expensive now.
ESPINOZA	Shut up!
David CAMPOY	Yup.
ESPINOZA	What you mean?
David CAMPOY	Yup. It's twenty eight (28) right now in LA, and they're saying they're selling it for three thousand (3,000) in San Jose. But they want it to go up more.
ESPINOZA	Well, that's how much they were going for pretty much, no? 'Cause I was... <i>if I... if I go to sell them... I, I charge twenty eight (28) or twenty eight and a half (28.5).</i>
David CAMPOY	No, but... Yeah, well now I'm gonna start selling it for more. Because I was selling it for twenty eight (28). [Chuckles]
ESPINOZA	You about to start charging [PH] thirty five (35).
David CAMPOY	No, yea, for sure because in LA they want it to go up to four (4).
ESPINOZA	Oh, shit.
David CAMPOY	Yea. so I was talking to [Unidentified Person] right now, and [Unidentified Person] was telling me that... he goes, "Yeah, <i>we can raise it here to forty five (45) to five (5) probably</i> ".
ESPINOZA	<i>Hey David... if you already are the, the, the, the ambassador here and if the price goes up... fuck! You are going to be the super president.</i>
David CAMPOY	You don't, you don't even know, bro. You do not even know, dude. We're gonna be the super dupers.
ESPINOZA	The super dupers of San Jose...

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David CAMPOY	[Laughs]
ESPINOZA	The mother fucking Bay.
	[NON-PERTINENT PORTIONS OMITTED]
David CAMPOY	No, I gotta go to Phoenix. I leave in the morning. [Clears throat]. And I already have my ticket for Miami.
ESPINOZA	You fuckin bastard.
David CAMPOY	Everything's closed. Everything's closed. <i>I do not have any more right now... I'm not, I'm not, I'm not... I don't have... there's, there's no more. No "crystally cut cuts". I don't have anymore. "La Casita" called me earlier and I was like, "Dude, I don't have any."</i>
ESPINOZA	You sold everything?
David CAMPOY	Yeah.
ESPINOZA	<i>Damn... that is tough... no, but that's fine, dude. That's fine... [U/I] that's what's up. So then you're going for that then?</i>
David CAMPOY	Yeah, I'm going to... yeah.
ESPINOZA	<i>No, but if...</i>
	[Voices overlap]
David CAMPOY	I'm doing something with my cousin in Phoenix, so I'm gonna jam over there and do that. And then... uh... I'm going to see what I can do, but I called Mexico, and they were telling me the same shit.
	[NON-PERTINENT PORTIONS OMITTED]
ESPINOZA	<i>Oh, but you're leaving early tomorrow morning, right?</i>
David CAMPOY	<i>Uh... yeah, but I'm going to, going to wait just for that, and then I'm gonna... I'm gonna... I don't leave early. I usually leave... I don't even know. Yeah I should leave early. Fuck, it is ten hours. I'll figure it out.</i>
ESPINOZA	You gotta squeeze your ass out, then, tonight.
David CAMPOY	Huh?
ESPINOZA	You gotta squeeze your ass out tonight.
David CAMPOY	No, I can't. No, hell no. I'll... no. I will not... I won't leave, dude. No, no, no.
ESPINOZA	[Laughs]

1	David CAMPOY	No, it's very important that I go.
2	ESPINOZA	<i>No, well, yeah.</i>
3	David CAMPOY	It's seventy five (75). It's... umm... it's seventy five (75) racks, half and half, so I'm gonna fucking go, dude.
4	ESPINOZA	Oh. For sure! [Laughs] Fuck yeah! [Laughs]
5	David CAMPOY	[Laughs]
6	ESPINOZA	I'll be on my... I'll... I'll be on my way right now!
7	David CAMPOY	He all... he told me, <i>"they're going to give you this and that, and then you grab from there."</i> He said, <i>"Put the rest there, and you grab seventy five (75). Then send me half, and you grab the other half for yourself"</i> . And I was like, "Fuck yeah! I'll be there". [Chuckles]
8	ESPINOZA	Fuck! <i>Real quick.</i> Fucking...
9	David CAMPOY	[Laughs] Yeah.
10	ESPINOZA	<i>Well, that's cool. I'm glad to hear that.</i> [Sniffles] Yeah.
11	David CAMPOY	<i>Alright then. Take care, dude. Take it easy.</i>
12	ESPINOZA	Alright.
13	David CAMPOY	Okay, then. Bye.
14	ESPINOZA	Alright, bye.
15		[End of call]

21 COUNT TWELVE: (21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the
 22 Commission of a Felony under the Controlled Substances Act)

23 49. On or about March 1, 2020, in the Northern District of California and elsewhere, the defendants,
 24 JOSE MELCHOR CAMPOY and
 25 IGNACIO ESPINOZA, a/k/a "Nacho,"
 26 did knowingly and intentionally use any communication facility, in particular, the phone associated with
 27 number ending in the last four digits -3188 (Jose CAMPOY) and the phone associated with number
 28 ending in the last four digits -0330 (ESPINOZA), in facilitating the commission of any act or acts

1 constituting a felony under Title 21, United States Code, Sections 841 and 846, that is, Count One of this
 2 Superseding Indictment incorporated by reference herein, to wit a telephone call in which these
 3 defendants had the following conversation concerning ESPINOZA's efforts to obtain controlled
 4 substances, as follows:

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NAME	TRANSLATION
	[Telephone rings]
	[Beginning of call]
ESPINOZA	Hey? [Background: Noises]
Jose CAMPOY	Yeah?
ESPINOZA	I wanted to... Hey, when, when's your dad getting back?
Jose CAMPOY	I have no clue. It should be...
	[Voices overlap]
ESPINOZA	Fuck!
Jose CAMPOY	...today though, but I don't know what time today.
	[Voices overlap]
ESPINOZA	Fuck, dude! Cuz fuck, I [Stutters] um, by any chance, I think, uh I think last time I talked to your pops was before he left, fucking, he said that, you guys, he was out, out like he was out, like out [Stutters] of, out of the market. Like he was dry.
Jose CAMPOY	Um-hum.
ESPINOZA	Is it dry? Cuz I actually need two (2) right now and I can't get a hold of it anywhere else.
Jose CAMPOY	Yeah, I know. We're out right now, too.
ESPINOZA	Yeah.
Jose CAMPOY	Yeah. Everywhere, everyone, everyone's uh, running out right now.
ESPINOZA	I know. [Chuckles] I've started to look and shit cuz fucking, the prices have gone up. And I need more money.
Jose CAMPOY	Yeah. Yeah.
	[Voices overlap]
ESPINOZA	Yeah.

1	Jose CAMPOY	He said the prices, the price should go up cuz everyone's running out.
2		[NON-PERTINENT PORTIONS OMITTED]
3	ESPINOZA	Yeah, I got, I got to [U/I] this dude right now. He's fucking bugging me. He wants two (2). I'm not going to make much you know, but I could probably make like six (6), seven-hundred (700) bucks, yo.
4		
5	Jose CAMPOY	Yeah, well raise it up on him. Be like, "Dude, look, there's no more." You know.
6		
7	ESPINOZA	Nah, yeah [Chuckles]. That's what I'm about to say. I'm about to fucking, [U/I]...
8	Jose CAMPOY	Yeah, talk to him. Be like, "You know what, there's no more. I'm uh have to sell it to you for a little bit more."
9		
10		[Voices overlap]
11	ESPINOZA	<i>Yeah, but the problem</i> , the problem is that he's in Ceres. He's not from here, you know. But, he's from like an hour and a half (1 ½) away and he's out here visiting to pick up two (2).
12		(Voices overlap)
13		
14	Jose CAMPOY	Yeah.
15		[NON-PERTINENT PORTIONS OMITTED]

16 All in violation of Title 21, United States Code, Section 843(b).

17 COUNT THIRTEEN: (21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the
18 Commission of a Felony under the Controlled Substances Act)

19 50. On or about March 3, 2020, in the Northern District of California and elsewhere, the defendants,

20 DAVID CAMPOY and
21 IGNACIO ESPINOZA, a/k/a "Nacho,"

22 did knowingly and intentionally use any communication facility, in particular, the phone associated with
23 the number ending in the last four digits -9648 (David CAMPOY) and the phone associated with
24 number ending in the last four digits -0330 (ESPINOZA), in facilitating the commission of any act or
25 acts constituting a felony under Title 21, United States Code, Sections 841 and 846, that is, Count One
26 of this Superseding Indictment incorporated by reference herein, to wit, a telephone call in which these
27 defendants had the following conversation concerning defendant ESPINOZA's efforts to obtain
28 controlled substances, as follows:

1	NAME	TRANSLATION
2		[Telephone rings] [Background: Noises]
3		[Beginning of call]
4	David CAMPOY	Yeah.
5	ESPINOZA	What up?
6	David CAMPOY	Yeah, what are you doing?
7	ESPINOZA	<i>What?</i>
8	David CAMPOY	<i>What's up?</i>
9	ESPINOZA	<i>So what's up? Does your buddy have any there?</i>
10	David CAMPOY	Hmm, not sure. Why?
11	ESPINOZA	Cause I might need one (1) like by like, maybe tomorrow or Thursday.
12	David CAMPOY	When? Tomorrow? I'm leaving tomorrow.
13	ESPINOZA	You're leaving tomorrow?
14	David CAMPOY	<i>Yes.</i>
15	ESPINOZA	<i>You're going to Miami?</i>
16	David CAMPOY	<i>Yes.</i>
17	ESPINOZA	Uh-huh. Well, tell your buddy if it's cool if I call him.
18	David CAMPOY	Yeah, I, I'll tell him <i>that you will call him.</i>
19	ESPINOZA	<i>Tell him... Hey, what's up with yours? Is it good?</i>
20	David CAMPOY	Nope.
21	ESPINOZA	I need like two (2) tomorrow, too.
22	David CAMPOY	<i>There is none.</i>
23	ESPINOZA	Swear to God?
24	David CAMPOY	Look at my Snap right now.
25	ESPINOZA	Why?
26	David CAMPOY	Look at my... because... You want me to tell you why?
27	ESPINOZA	What'd you put?
28	David CAMPOY	You want me to tell you why, or no?
	ESPINOZA	Yes.
	David CAMPOY	[Inhales] Everything to make it, they bring it from China.

1	ESPINOZA	Uh-huh.
2	David CAMPOY	Because of the, because of the Coronavirus, no ships could come to Mexico for the next three (3) months. No more ice.
3	ESPINOZA	[Chuckles] You're lying.
4	David CAMPOY	Believe it.
5	ESPINOZA	Hey, David, you're not going to believe me, but I have someone that has them for two thousand (2,000) right here.
6		
7	David CAMPOY	<i>That's fine, sell them all.</i>
8	ESPINOZA	<i>Well, I'm just saying.</i>
9	David CAMPOY	Do it.
10	ESPINOZA	[U/I] I told them, I told them, "I can't, I can't believe it. I can't, I can't believe it until I see it," is what I told them. Supposedly tomorrow [U/I]...
11		[Voices overlap]
12	David CAMPOY	Exactly. <i>They...</i> Listen to me, dude. Listen to me; <i>They called me from Sinaloa</i> to tell me. You can believe whatever you want.
13		
14	ESPINOZA	...And, and supposedly, and supposedly, he is giving some to Lupita right now. I don't know if that's true.
15	David CAMPOY	<i>Who?</i>
16	ESPINOZA	<i>Those guys.</i>
17	David CAMPOY	Then it's a lie because <i>I am the one who supplies [PH] Lupita.</i>
18	ESPINOZA	<i>Well, I don't know.</i>
19		[Voices overlap]
20	David CAMPOY	[U/I] could check.
21	ESPINOZA	<i>Well, that's why I just listened to them. And I didn't, didn't, didn't tell them anything about me knowing someone who supplies it.</i>
22		[Voices overlap]
23	David CAMPOY	[Laughs] Okay. Listen to me and think about it. It's, it's, it's... Trust me dude, it's done. <i>There is no more, dude.</i>
24		
25	ESPINOZA	Fuck.
26	David CAMPOY	I don't know how, how expensive it's gonna get, but every week it's gonna go up.
27	ESPINOZA	Fuck it!
28	David CAMPOY	<i>It was about time, dude.</i>

1	ESPINOZA	That's fine. That's fine. It was about time!
2	David CAMPOY	Yep, yep, yep. But it's because of the, it's because of the Coronavirus. [Aside: That's fine]
3	ESPINOZA	Because a lot of dumbass people fucked up the market, you know?
4	David CAMPOY	<i>Well, yeah.</i>
5	ESPINOZA	Yeah.
6	David CAMPOY	But it's because of that. It's, it's, it's because of the Coronavirus.
7	ESPINOZA	Yeah.
8	David CAMPOY	Um-hum.
9	[NON-PERTINENT PORTIONS OMITTED]	

10 All in violation of Title 21, United States Code, Section 843(b).

11 **COUNT FOURTEEN:** (21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the
12 Commission of a Felony under the Controlled Substances Act)

13 51. On or about May 1, 2020, in the Northern District of California and elsewhere, the defendants,

14 **DAVID CAMPOY and**
15 **LAMBERTO LNU,**

16 did knowingly and intentionally use any communication facility, in particular, the phone associated with
17 the number ending in the last four digits -8795 (David CAMPOY) and the phone associated with the
18 number ending in the last four digits -6470 (LAMBERTO), in facilitating the commission of any act or
19 acts constituting a felony under Title 21, United States Code, Sections 841 and 846, that is, Count One
20 of this Superseding Indictment incorporated by reference herein, to wit the exchange of the following
21 WhatsApp electronic messages between the defendants as part of the process of settling accounts in the
22 ongoing drug conspiracy and ensuring that both defendants had the same understanding of the amounts
23 paid and owed in the course of the ongoing drug distribution conspiracy, as follows:

1	NAME	TRANSLATION
2		[Beginning of call]
3	CAMPOY	Good evening, how are you doing? I am going to call you later from the other one. I was thinking if instead of one hundred (100) you could do the two hundred (200) because. I think those one hundred (100) are going to go fast.
4	LAMBERTO	Okay.
5	CAMPOY	How are you?
6	CAMPOY	I am home.
7	CAMPOY	I didn't turn on the work one yesterday, because I got there and was really busy. But you did hear the messages, right?
8	CAMPOY	☐☐ ♂ ☐☐ ♂
9	CAMPOY	☹
10	LAMBERTO	Yes, I heard it, all good. Thank God. Don't worry, but honestly I am really worried because we haven't got in. But as soon as we get in, whatever I put away is for you to keep. I wish I had fifty (50) or one hundred (100), anything! But don't worry whatever I get it, will be for you.
11		
12	CAMPOY	Okay.
13	CAMPOY	Thank you.
14	CAMPOY	Hey, just a favor. If you could just send me the updated account with the last payment from now, the one I gave you. Thank you. You can send it to the other number if you want, the one from work.
15		
16	LAMBERTO	676,000
17		300,000
18		-----
19		376,000
20		220,000
21		-----
22		156,000
23	LAMBERTO	That's the bill.
24	LAMBERTO	Are we on the same page or was it seven hundred and seventy-six (776)? To be honest, I can't remember if it was six hundred and seventy-six (676) or seven hundred and seventy-six (776).
25	CAMPOY	Okay.
26	CAMPOY	Thank you.
27	CAMPOY	Let me check mine.
28	CAMPOY	I remember, before seeing you again that the bill was seven hundred and fifty-nine (759). And from then on, including this payment, it has been four (4). So I gave you a payment of one hundred and fifty eight (158) one day... but I have everything written down and I have the messages. So don't worry it's something around that. I will confirm with you later.

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All in violation of Title 21, United States Code, Section 843(b).

COUNT FIFTEEN: (21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the Commission of a Felony under the Controlled Substances Act)

52. On or about September 21, 2019, in the Northern District of California and elsewhere, the defendants,

DAVID CAMPOY and
LAMBERTO LNU,

did knowingly and intentionally use any communication facility, in particular, the phone associated with the number ending in the last four digits -8795 (David CAMPOY) and the phone associated with the number ending in the last four digits -2291 (LAMBERTO), in facilitating the commission of any act or acts constituting a felony under Title 21, United States Code, Sections 841 and 846, that is, Count One of this Superseding Indictment incorporated by reference herein, to wit defendant LAMBERTO's transmission of the following image of a ledger to defendant David CAMPOY as part of the process of settling accounts in the ongoing drug conspiracy and ensuring that both defendants had the same understanding of the amounts paid and owed in the course of the ongoing drug distribution conspiracy, as follows:

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All in violation of Title 21, United States Code, Section 843(b).

COUNT SIXTEEN: (21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the Commission of a Felony under the Controlled Substances Act)

53. On or about March 24, 2020, in the Northern District of California and elsewhere, the defendants,

DAVID CAMPOY and
LAMBERTO LNU.

did knowingly and intentionally use any communication facility, in particular, the phone associated with the number ending in the last four digits -8795 (David CAMPOY) and the phone associated with the number ending in the last four digits -4061 (LAMBERTO), in facilitating the commission of any act or acts constituting a felony under Title 21, United States Code, Sections 841 and 846, that is, Count One of this Superseding Indictment incorporated by reference herein, to wit defendant LAMBERTO's transmission of the following image of a ledger to defendant David CAMPOY as part of the process of settling accounts in the ongoing drug conspiracy and ensuring that both defendants had the same understanding of the amounts paid and owed in the course of the ongoing drug distribution conspiracy, as follows:

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		579,350
		45,000
3 SNICKERS		<u>624,350</u>
		75,000
04-5 SNICKERS		<u>699,350</u>
		300,000
		<u>399,350</u>
		165,350
		<u>231,000</u>
200 X 2150		130,000
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		<u>75,000</u>
		759,000

1 All in violation of Title 21, United States Code, Section 843(b).

2 COUNT SEVENTEEN: (21 U.S.C. § 843(b) - Use of a Communication Facility in Facilitating the
3 Commission of a Felony under the Controlled Substances Act)

4 54. On or about August 23, 2020, in the Northern District of California and elsewhere, the
5 defendants,

6 DAVID CAMPOY and
7 MICHAEL OZUNA GUIZAR,

8 did knowingly and intentionally use any communication facility, in particular, the phone associated with
9 the number ending in the last four digits -7722 (David CAMPOY) and the phone associated with the
10 number ending in the last four digits -7448 (OZUNA), in facilitating the commission of any act or acts
11 constituting a felony under Title 21, United States Code, Sections 841 and 846, that is, Count One of this
12 Superseding Indictment incorporated by reference herein, to wit a telephone call in which these
13 defendants had the following conversation concerning David CAMPOY's efforts to secure a supplies of
14 controlled substances, as follows:

15	NAME	TRANSLATION
16		[Beginning of call]
17	CAMPOY	[Aside: Go in there and listen for my name.]
18		[Telephone rings]
19	OZUNA	What up?
20	CAMPOY	What up? Is it my friend?
21	OZUNA	What have you been up to, dude?
22		[Voices overlap]
23	CAMPOY	Hey, dude! You are not going to believe what I did, dude!
24	OZUNA	What happened?
25	CAMPOY	I got hooked up with a Chinese guy, dude.
26	OZUNA	Uh-huh.
27	CAMPOY	But, but, one of the good ones, dude. This fucker, dude, has it, dude. And, homes 28 bought out right, not, not, not... He's doesn't rent them. They are his, he's the owner.

1	OZUNA	Yeah.
2		[Voices overlap]
3	CAMPOY	He has... I went in halves with him, dude. I gave him sixty thousand (60,000), and I went in halves with him on a house, dude.
4		
5	OZUNA	Yeah?
6		[Voices overlap]
7	CAMPOY	Straight up Blue Cookies, dude. Dude!
8		[Voices overlap]
9	OZUNA	Nice!
10	CAMPOY	Dude! He's, dude! He's my land lord, dude! And he told me, "Hey! I want to talk to you about something". As if he noticed, you know?
11	OZUNA	Yeah.
12		[Voice overlap]
13	CAMPOY	But, I, I met him through one of my friends who is a thug. So, I figured he probably thought. like, "this guy too", you know?
14		
15	OZUNA	Yeah, for sure.
16		[Voices overlap]
17	CAMPOY	He was...he was, like, "you want to go in?" He's all, "if you want I will give you like a quarter of it for forty (40)." And, I said, "how much for half, dude?" And, he told me, "well, no, sixty (60)". I said, "alright, then". [Chuckles]
18		
19		[Voices overlap]
20	OZUNA	Damn! Sick!
21		[Voices overlap]
22	CAMPOY	So, so I'm in on it, so, there's going to be good stuff. And, he always has some, so, then, he will give me... Like, his numbers are realistic numbers. You know what I mean? Like, they're at twenty five (25), and such, you know? But he gives me a good number.
23		
24		[Voices overlap]
25		
26	OZUNA	Yeah.
27	CAMPOY	Like, here, you know? He threw me like sixteen (16), seventeen (17), indoor, dude!
28		[Voices overlap]

1	OZUNA	Yeah!
2	CAMPOY	And, this guy, he's got it down, dude.
3	OZUNA	That's tight, bro, indo... You know it! It's as long as it's good, dude.
4	CAMPOY	Yeah.
5		[Voices overlap]
6	OZUNA	There's no problem.
7	CAMPOY	Yeah, but I wanted to talk to you about something else.
8		[Voices overlap]
9	OZUNA	The season is coming, then, the season is coming too.
10	CAMPOY	Who? [Pause] Yeah!
11		[Voices overlap]
12	OZUNA	The season is coming too, for the outdoor one, dude.
13	CAMPOY	Yeah, I know. I have a shit ton of that, of that, dude. I have a shit ton of that. I got a bunch of people coming out, soon. The ones from Santa Rosa.
14	OZUNA	That's right! For sure!
15		[Voices overlap]
16	CAMPOY	But, what I wanted to ask you was, can you find me some soda there?
17	OZUNA	I did, know. Like, couple, like, maybe like a month ago. I did the favor for my buddy, but they only gave him nine (9).
18	CAMPOY	Yeah? Okay, when it comes up, you let me know, dude. And, I'll jam over there.
19		[Voices overlap]
20	OZUNA	Yeah.
21	CAMPOY	[Burps] And, we'll do a round trip.
22		[Voices overlap]
23	OZUNA	It's expensive right now, dude.
24	CAMPOY	I know it is. I know it is. What number can you get me?
25	OZUNA	Fuck! I don't know exactly right now, but, like, like, I'm telling you, like, like a month ago, this guy, they only gave him nine (9). And, this guy came all the way to San Jose, and I tried to find... I know a couple of fools out here, and I hit him up, and they only had nine (9).
26		[Voices overlap]
27		[Voices overlap]
28		[Voices overlap]

1	CAMPOY	[Aside: You want another piece? Here, take one from here.]
2	OZUNA	It was just a little quarter.
3	CAMPOY	Uh-huh. Okay, but how much did he give it for?
4		[Voices overlap]
5	OZUNA	What did you want? Did you wanted the whole thing, or what?
6	CAMPOY	Yes, I wanted the whole thing, and few of them, dude. I'll go pick up at least four (4), maybe five (5), depending on the number, you know? Even if just, like, four (4).
7		[Voices overlap]
8	OZUNA	Let me call him, let me call him. If not, call me tomorrow. I'll tell you how much.
9		[Voices overlap]
10	CAMPOY	Okay, this is the number. Yeah! I'll call you tomorrow.
11	OZUNA	Alright.
12		[Voices overlap]
13	CAMPOY	Alright, bye. Alright.
14		[Voices overlap]
15	OZUNA	Alright. Late.
16		[End of call]

17
18 All in violation of Title 21, United States Code, Section 843(b).

19
20 COUNT EIGHTEEN: (18 U.S.C. § 922(g) – Felon in Possession of Firearms and Ammunition)

21 55. On or about January 27, 2021, in the Northern District of California, the defendant,

22 DAVID CAMPOY,

23 knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding
24 one year, knowingly possessed firearms and ammunition, as follows:

- 25 • Remington 12-gauge shotgun, serial number 514153
- 26 • Kimber Pro Carry II, serial number KR261180
- 27 • EAA .357 Revolver, serial number 1067202
- 28 • Silver Taurus PT 92, serial number TKC86906

- 1 • Beretta Nano, serial number: NUO51426
- 2 • Gold Colt 1911, serial number 896313
- 3 • Glock 34 Gen 4, serial number YET956
- 4 • RIA, M1911, serial number RIA1350504
- 5 • HK USP Compact .40, serial number 26-068582
- 6 • FN Five-Seven Handgun, serial number 386317105
- 7 • 5 x AR-15 lower receivers with "M16A2" Markings
- 8 • AR-15, No Serial Numbers
- 9 • ammunition

10 and the above firearms and ammunition were in and affecting interstate and foreign commerce.

11 Each in violation of Title 18, United States Code, Section 922(g)(1).

12 COUNT NINETEEN: (18 U.S.C. § 924(c) – Possessing a Firearm in furtherance of a Drug
13 Trafficking Crime)

14 On or about January 27, 2021, in the Northern District of California, the defendant,

15 DAVID CAMPOY,

16 did knowingly possess firearms in furtherance of the drug trafficking crimes charged in Counts One and
17 Ten of this Superseding Indictment, all in violation of Title 18, United States Code, Section
18 924(c)(1)(A).

19 COUNT TWENTY: (18 U.S.C. § 371 – Conspiracy to Manufacture and Deal in Firearms)

20 56. The allegations in Paragraphs 2, 10, 13–15, and 23–36 are re-alleged and incorporated as if fully
21 set forth here.

22 57. Beginning on or about a date unknown but no later than January 14, 2020, and continuing to on
23 or about January 27, 2021, in the Northern District of California and elsewhere, the defendants,

24 DAVID CAMPOY,
25 MICHAEL OZUNA GUIZAR,
26 ROBERTO CAMPOY ROBLES,
LUIS GUILLERMO SENDINO, and
IVAN CAMPOY MORALES,

27 and others known and unknown to the Grand Jury, did knowingly conspire to commit offenses against
28 the United States, namely engaging in the business of importing, manufacturing, and dealing in firearms,

1 and in the course of such business to ship, transport, and receive any firearm in interstate and foreign
2 commerce, in violation of Title 18, United States Code, Section 922(a)(1)(A).

3 COUNT TWENTY-ONE: (18 U.S.C. § 371 – Conspiracy to Export Arms and Munitions)

4 58. The allegations in Paragraphs 2, 10, 13–15, and 23–36 are re-alleged and incorporated as if fully
5 set forth here.

6 59. Beginning on or about a date unknown but no later than January 14, 2020, and continuing to on
7 or about January 27, 2021, in the Northern District of California and elsewhere, the defendants,

8 DAVID CAMPOY,
9 MICHAEL OZUNA GUIZAR,
10 ROBERTO CAMPOY ROBLES,
11 LUIS GUILLERMO SENDINO, and
12 IVAN CAMPOY MORALES,

11 and others known and unknown to the Grand Jury, did knowingly conspire to commit offenses against
12 the United States, namely exporting and causing to be exported from the United States to Mexico a
13 defense article, that is 10 pistol upper half assemblies chambered in 5.56 mm and 10 M-4 stocks from
14 Model 1 Sales located in Whitewright, Texas, which were designated as a defense article on the United
15 States Munitions List, without having first obtained from the Department of State a license for such
16 export or written authorization for such export, in violation of Title 22, United States Code, Sections
17 2778(b)(2) and 2778(c), and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1.

18 COUNT TWENTY-TWO: (18 U.S.C. §§ 922(a)(1)(A) and 924(n) – Unlawfully Manufacturing and
19 Dealing in Firearms)

20 60. Beginning on or about a date unknown but no later than January 14, 2020, and continuing to on
21 or about January 27, 2021, in the Northern District of California and elsewhere, the defendants,

22 DAVID CAMPOY,
23 MICHAEL OZUNA GUIZAR,
24 ROBERTO CAMPOY ROBLES,
25 LUIS GUILLERMO SENDINO, and
26 IVAN CAMPOY MORALES,

25 and others known and unknown to the Grand Jury, did knowingly engage in the business of importing,
26 manufacturing, and dealing in firearms, and in the course of such business to ship, transport, and receive
27 any firearm in interstate and foreign commerce, and with the intent to engage in conduct that constitutes
28 a violation of section 922(a)(1)(A), traveled from any State and foreign country into any other State and

1 acquired, and attempted to acquire, a firearm in such other State in furtherance of such purpose, in
2 violation of 18 U.S.C. §§ 922(a)(1)(A) and 924(n).

3 COUNT TWENTY-THREE: (22 U.S.C. §§ 2778(b)(2) and (c) and 22 C.F.R. §§ 121.1, 123.1,
4 and 127.1 – Arms Export Control Act Export of Arms and
Munitions)

5 61. Beginning on or about a date unknown but no later than January 14, 2020, and continuing to on
6 or about January 27, 2021, in the Northern District of California and elsewhere, the defendants,

7 DAVID CAMPOY,
8 MICHAEL OZUNA GUIZAR,
9 ROBERTO CAMPOY ROBLES,
LUIS GUILLERMO SENDINO, and
IVAN CAMPOY MORALES,

10 and others known and unknown to the Grand Jury, knowingly and willfully exported and caused to
11 exported from the United States to Mexico a defense article, that is 10 pistol upper half assemblies
12 chambered in 5.56 mm and 10 M-4 stocks from Model 1 Sales located in Whitewright, Texas, which
13 were designated as a defense article on the United States Munitions List, without having first obtained
14 from the Department of State a license for such export or written authorization for such export, in
15 violation of 22 U.S.C. §§ 2778(b)(2) and 2778(c), and 22, C.F.R. §§ 121.1, 123.1, and 127.1.

16 FORFEITURE ALLEGATION: (21 U.S.C. § 853(a))

17 The allegations contained above are hereby re-alleged and incorporated by reference for the
18 purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a).

19 Upon conviction of any of the offenses alleged in Counts One through Seventeen above, the
20 defendants,

21 DAVID CAMPOY,
22 JOSE MELCHOR CAMPOY,
23 DAVID WOLCOTT GREENMAN,
24 KIMBERLY CARRASCO,
25 LAMBERTO LNU,
26 JUAN CARLOS VELAZQUEZ ORTIZ,
27 IGNACIO ESPINOZA, a/k/a "Nacho,"
28 JOSE MANUEL RODRIGUEZ NARANJO,
NICHOLAS ARDANUY,
MICHAEL OZUNA GUIZAR, and
MIGUEL ANGEL CARRIZAL ZAMORA,

shall forfeit to the United States all right, title, and interest in any property constituting and derived from
any proceeds defendant obtained, directly or indirectly, as a result of such violations, and any property

1 used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such
2 violations, including but not limited to a forfeiture money judgment.

3 If any of the property described above, as a result of any act or omission of the defendant:

- 4 a. cannot be located upon exercise of due diligence;
- 5 b. has been transferred or sold to, or deposited with, a 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 divided without
9 difficulty.

10 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
11 United States Code, Section 853(p).

12 All pursuant to Title 21, United States Code, Section 853, and Federal Rule of Criminal
13 Procedure 32.2.

14 FORFEITURE ALLEGATION: (18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

15 The allegations contained in this Superseding Indictment are re-alleged and incorporated by
16 reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)
17 and Title 28, United States Code, Section 2461(c).

18 Upon conviction of any the offenses set forth in Counts Eighteen through Twenty or Count
19 Twenty-Two of this Superseding Indictment, the defendants,

20 DAVID CAMPOY,
21 MICHAEL OZUNA GUIZAR,
22 ROBERTO CAMPOY ROBLES,
LUIS GUILLERMO SENDINO, and
IVAN CAMPOY MORALES,

23 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28,
24 United States Code, Section 2461(c), any firearm and ammunition involved in the commission of the
25 offense, including, but not limited to, the following property:

- 26 • Remington 12-gauge shotgun, serial number 514153
- 27 • Kimber Pro Carry II, serial number KR261180
- 28 • EAA .357 Revolver, serial number 1067202

- 1 • Silver Taurus PT 92, serial number TKC86906
- 2 • Beretta Nano, serial number: NUO51426
- 3 • Gold Colt 1911, serial number 896313
- 4 • Glock 34 Gen 4, serial number YET956
- 5 • RIA, M1911, serial number RIA1350504
- 6 • HK USP Compact .40, serial number 26-068582
- 7 • FN Five-Seven Handgun, serial number 386317105
- 8 • 5 x AR-15 lower receivers "M16A2" Markings
- 9 • AR-15, No Serial Numbers
- 10 • ammunition

11 If any of the property described above, as a result of any act or omission of the defendant:

- 12 a. cannot be located upon exercise of due diligence;
- 13 b. has been transferred or sold to, or deposited with, a third party;
- 14 c. has been placed beyond the jurisdiction of the court;
- 15 d. has been substantially diminished in value; or
- 16 e. has been commingled with other property which cannot be divided without
- 17 difficulty,

18 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
19 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

20 FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

21 The allegations contained in this Superseding Indictment are re-alleged and incorporated by
22 reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section
23 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

24 Upon conviction of any of the offenses set forth in Counts Twenty-One or Twenty-Three of this
25 Superseding Indictment, the defendants,

26 DAVID CAMPOY,
27 MICHAEL OZUNA GUIZAR,
28 ROBERTO CAMPOY ROBLES,
LUIS GUILLERMO SENDINO, and
IVAN CAMPOY MORALES,

1 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and
2 Title 28, United States Code, Section 2461(c), any property, real or personal, constituting or derived
3 from proceeds traceable to the offense, and any weapons involved in the commission of the offense,
4 including but not limited to a money judgment.

5 If any of the property described above, as a result of any act or omission of the defendant:

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

12 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
13 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

14
15
16 DATED: February 4, 2021

A TRUE BILL.

17
18 /s/
19 FOREPERSON
20 San Francisco

21 DAVID L. ANDERSON
22 United States Attorney

23 Daniel Kaleba
24 DANIEL KALEBA
25 ALEXANDRA SHEPARD
26 Assistant United States Attorneys
27
28