

FILED  
UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

17 APR 19 PM 4:52

CLERK-LAS CRUCES

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**LUIS ANGEL BRISEÑO-LOPEZ,**  
**a.k.a. "Tio," a.k.a. "Luisito,"**  
**FRANCISCO LUNA-ROSALES,**  
**a.k.a. "Durango,"**  
**OMAR FERNANDEZ,**  
**a.k.a. "Pantera,"**  
**MANUEL GERMAN IBARRA,**  
**a.k.a. "Cejas,"**  
**JUAN R. GUTIERREZ,**  
**a.k.a. "Juanito,"**  
**GUSTAVO HERNANDEZ-LOAIZA,**  
**a.k.a. "Borrego,"**  
**JOSHUA JANDE CARMONA,**  
**ALBERTO TERRAZAS-IGNACIO,**  
**JOSE MANUEL ORTIZ-CAMPOS,**  
**DIEGO ARMANDO RIVAS-AGUILAR,**  
**EDGAR DOMINGUEZ-CUELLAR,**  
**ROSA M. DE SANTIAGO,**  
**GEORGINA RAMIREZ,**  
**JESUS A. FLORES,**  
**ALFONSO RIOS,**  
**VANESSA REYES,**  
**RODERICA T. BAHE,**  
**MARTIN J. CONTRERAS,**  
**ELIZABETH MONROY,**  
**DAISY HIDALGO,**  
**JAZMIN LUCIA SOTO,**  
**RICARDO TERRAZAS-IGNACIO,**  
 and **DULCE VIRIDIANA RODRIGUEZ,**

Defendants.

)  
 )  
 ) CRIMINAL NO. 17CR1032 RB  
 )  
 ) Count 1: 21 U.S.C. § 846: Conspiracy;  
 )  
 ) Count 2: 18 U.S.C. § 1956(h): International  
 ) Money Laundering Conspiracy;  
 )  
 ) Counts 3, 20, 21, 31 and 39: 18 U.S.C. §  
 ) 1956(a)(2)(A): International Money  
 ) Laundering; 18 U.S.C. § 2: Aiding and  
 ) Abetting;  
 )  
 ) Counts 4, 5, 7, 8, 10, 11, 13, 15, 17, 18, 22-  
 ) 24, 27, 28, 30, 32, and 33: 21 U.S.C. §  
 ) 843(b): Use of a Communication Facility to  
 ) Further the Commission of a Drug  
 ) Trafficking Crime;  
 )  
 ) Counts 6 and 29: 21 U.S.C. §§ 841(a)(1)  
 ) and (b)(1)(A): Possession with Intent to  
 ) Distribute 500 Grams and More of a Mixture  
 ) and Substance Containing a Detectable  
 ) Amount of Methamphetamine;  
 ) 18 U.S.C. § 2: Aiding and Abetting;  
 )  
 ) Count 9: 21 U.S.C. §§ 841(a)(1) and  
 ) (b)(1)(B): Distribution of 50 Grams  
 ) and More of a Mixture and Substance  
 ) Containing a Detectable Amount of  
 ) Methamphetamine; 18 U.S.C. § 2:  
 ) Aiding and Abetting;  
 )  
 ) Count 12: 21 U.S.C. §§ 841(a)(1) and  
 ) (b)(1)(A): Distribution of 50 Grams  
 ) and More of Methamphetamine;  
 ) 18 U.S.C. § 2: Aiding and Abetting;  
 )  
 ) Counts 14, 25, 35, and 36: 21 U.S.C. §§  
 ) 841(a)(1) and (b)(1)(A): Possession with  
 ) Intent to Distribute 50 Grams and More of  
 ) Methamphetamine; 18 U.S.C. § 2:  
 ) Aiding and Abetting;

- ) Counts 16, 19, 26, 34, 37, 38, 40 and 44: 21
- ) U.S.C. §§ 841(a)(1) and (b)(1)(A):
- ) Possession with Intent to Distribute 1
- ) Kilogram and More of Heroin; 18 U.S.C. §
- ) 2: Aiding and Abetting;
- )
- ) Count 41: 18 U.S.C. § 924(c)(1): Carrying
- ) and Possessing a Firearm During and in
- ) Relation to and in Furtherance of a Drug
- ) Trafficking Crime;
- )
- ) Count 42: 21 U.S.C. § 856(a)(2): Managing
- ) or Controlling a Residence for the Purpose
- ) of Storing a Controlled Substance;
- )
- ) Count 43: 21 U.S.C. §§ 841(a)(1)
- ) and (b)(1)(B): Possession with Intent
- ) to Distribute 500 Grams and More of
- ) Cocaine; 18 U.S.C. § 2: Aiding and
- ) Abetting.

## INDICTMENT

The Grand Jury charges:

### Count 1

From on or about April 17, 2016, and continuing to on or about April 19, 2017, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ, FRANCISCO LUNA-ROSALES, OMAR FERNANDEZ, MANUEL GERMAN IBARRA, JUAN R. GUTIERREZ, GUSTAVO HERNANDEZ-LOAIZA, JOSHUA JANDE CARMONA, ALBERTO TERRAZAS-IGNACIO, JOSE MANUEL ORTIZ-CAMPOS, DIEGO ARMANDO RIVAS-AGUILAR, EDGAR DOMINGUEZ-CUELLAR, ROSA M. DE SANTIAGO, GEORGINA RAMIREZ, JESUS A. FLORES, ALFONSO RIOS, VANESSA REYES, RODERICA T. BAHE, MARTIN J.**

**CONTRERAS, ELIZABETH MONROY, DAISY HIDALGO, JAZMIN LUCIA SOTO, RICARDO TERRAZAS-IGNACIO, and DULCE VIRIDIANA RODRIGUEZ**, unlawfully, knowingly and intentionally combined, conspired, confederated, agreed and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit offenses defined in 21 U.S.C. § 841(a)(1), specifically, distribution of controlled substances: 1 kilogram and more of a mixture and substance containing a detectable amount of heroin; 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine; and 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

Overt Acts

In furtherance of the conspiracy, and to accomplish the objectives of the conspiracy, the following acts, among others, were committed:

Overt Act One

On April 17, 2016, at the direction of Luis Angel Briseño-Lopez and Joshua Jande Carmona, a courier transported \$15,300 in drug proceeds from Kentucky to New Mexico, which was ultimately to be delivered to Luis Angel Briseño-Lopez in Mexico.

Overt Act Two

On April 17, 2016, Luis Angel Briseño-Lopez called and instructed a courier to get back from law enforcement \$15,300 in seized drug proceeds and told the courier that Luis Angel Briseño-Lopez intended to use part of that money to pay the courier and Joshua Jande Carmona for their drug trafficking activities.

Overt Act Three

On April 17, 2016, Joshua Jande Carmona called and instructed a courier to get back from law enforcement \$15,300 in drug proceeds that had been seized, and advised the courier how to do so.

Overt Act Four

On May 18, 2016, over the course of three telephone calls, Luis Angel Briseño-Lopez and Joshua Jande Carmona discussed the details of three drug loads that were to be transported to Albuquerque, New Mexico, Big Spring, Texas, and elsewhere.

Overt Act Five

On May 18, 2016, in a telephone call, Joshua Jande Carmona directed an unidentified courier to leave “eight halves” which was “four whole ones” of drugs with Vanessa Reyes, in El Paso, Texas.

Overt Act Six

On May 19, 2016, at the direction Luis Angel Briseño-Lopez, Joshua Jande Carmona and Alberto Terrazas-Ignacio met with another drug transporter and assisted in the transportation of methamphetamine that was destined for delivery in Ohio, but was seized in Illinois before it could be delivered.

Overt Act Seven

On May 19, 2016, at the direction of Luis Angel Briseño-Lopez, Joshua Jande Carmona and Alberto Terrazas-Ignacio delivered “eight halves and one whole one” of drugs to a courier in Albuquerque, New Mexico, who delivered the drugs to Manuel German Ibarra.

Overt Act Eight

On May 20, 2016, in a telephone call, Joshua Jande Carmona discussed with a distributor in Big Spring, Texas, the upcoming delivery of five pounds of methamphetamine in exchange for \$25,000.

Overt Act Nine

On May 20, 2016, in a telephone call, Luis Angel Briseño-Lopez and Joshua Jande Carmona arranged for the delivery of drug proceeds.

Overt Act Ten

On May 20, 2016, in a series of text messages, Joshua Jande Carmona and Jose Manuel Ortiz-Campos arranged to transfer drug proceeds in El Paso, Texas.

Overt Act Eleven

On June 15, 2016, Alberto Terrazas-Ignacio was traffic stopped in Oklahoma and arrested for transporting 4.44 kilograms of a mixture and substance containing a detectable amount of methamphetamine.

Overt Act Twelve

On June 17, 2016, Joshua Jande Carmona delivered a load of drugs to Gustavo Hernandez-Loaiza in Albuquerque, New Mexico.

Overt Act Thirteen

On June 24, 2016, in a telephone call, Joshua Jande Carmona and Edgar Dominguez-Cuellar discussed arrangements for returning a Ford F-150 to Joshua Jande Carmona which would contain drug proceeds, and decided that Edgar Dominguez-Cuellar's brother would deliver the truck and drug money the following day.

Overt Act Fourteen

On June 25, 2016, Edgar Dominguez-Cuellar sent his brother to deliver to Joshua Jande Carmona drug proceeds that Edgar Dominguez-Cuellar brought back from Albuquerque, New Mexico, the day before.

Overt Act Fifteen

On June 28, 2016, in a series of text messages, Luis Angel Briseño-Lopez instructed Jose Manuel Ortiz-Campos to deliver drugs to Joshua Jande Carmona, which Jose Manuel Ortiz-Campos subsequently did.

Overt Act Sixteen

On June 29, 2016, in a telephone call, Edgar Dominguez-Cuellar agreed to transport drugs to Albuquerque, New Mexico, for Joshua Jande Carmona, in exchange for \$2,000.

Overt Act Seventeen

On June 29, 2016, in a telephone call, Joshua Jande Carmona told an unknown male that Joshua Jande Carmona transported three kilograms of cocaine.

Overt Act Eighteen

On June 30, 2016, in a telephone call, Joshua Jande Carmona told Edgar Dominguez-Cuellar that Joshua Jande Carmona “already got it,” referring to one pound of methamphetamine that Edgar Dominguez-Cuellar would sell to an undercover agent later that day.

Overt Act Nineteen

On June 30, 2016, Edgar Dominguez-Cuellar sold one pound of methamphetamine to an undercover agent for \$3,000.

Overt Act Twenty

On July 1, 2016, on behalf of Joshua Jande Carmona, Edgar Dominguez-Cuellar delivered “one red one” and “one black one” of drugs to customers in Albuquerque, New Mexico.

Overt Act Twenty-One

On July 1, 2016, in a telephone call, Joshua Jande Carmona and Edgar Dominguez-Cuellar discussed \$23,000 in drug proceeds that Edgar Dominguez-Cuellar was transporting to Joshua Jande Carmona.

Overt Act Twenty-Two

On July 2, 2016, Joshua Jande Carmona delivered drug proceeds to Jose Manuel Ortiz-Campos.

Overt Act Twenty-Three

On July 2, 2016, in a series of text messages, Luis Angel Briseño-Lopez and Jose Manuel Ortiz-Campos discussed drug proceeds that had been delivered by Joshua Jande Carmona and that Jose Manuel Ortiz-Campos was to take to Mexico and deliver to Luis Angel Briseño-Lopez.

Overt Act Twenty-Four

On July 9, 2016, at the direction of Joshua Jande Carmona, Alfonso Rios delivered drugs to Manuel German Ibarra in Albuquerque, New Mexico, and received drug proceeds from Manuel German Ibarra, which Alfonso Rios then transported back to Joshua Jande Carmona.

Overt Act Twenty-Five

On July 12, 2016, in a telephone call, Alfonso Rios indicated he was about an hour's drive away from Albuquerque, New Mexico, and Joshua Jande Carmona confirmed that Alfonso Rios had "three big ones" of drugs to deliver.

Overt Act Twenty-Six

On July 12, 2016, Alfonso Rios delivered drugs from Joshua Jande Carmona to Manuel German Ibarra in Albuquerque, New Mexico.

Overt Act Twenty-Seven

On July 12, 2016, Edgar Dominguez-Cuellar delivered drugs to Albuquerque, New Mexico, and received drug proceeds that he then transported back to Joshua Jande Carmona.

Overt Act Twenty-Eight

On July 13, 2016, in a telephone call, Edgar Dominguez-Cuellar said that his brother had "the money" and would deliver it to Joshua Jande Carmona.

Overt Act Twenty-Nine

On July 27, 2016, Edgar Dominguez-Cuellar sold 898.6 grams of methamphetamine to an undercover agent in exchange for \$6,000.

Overt Act Thirty

On July 28, 2016, on behalf of Luis Angel Briseño-Lopez and at the direction of Joshua Jande Carmona, Alfonso Rios delivered nine pounds of methamphetamine to Albuquerque, New Mexico.

Overt Act Thirty-One

On July 29, 2016, Joshua Jande Carmona and Alberto Terrazas-Ignacio provided two couriers with an AR-15 and \$15,556 in drug proceeds, including \$5,000 that had been provided to Edgar Dominguez-Cuellar by an undercover agent in exchange for 898.6 grams of methamphetamine, all of which was to be transported to Mexico.

Overt Act Thirty-Two

On August 1, 2016, in a telephone call, Edgar Dominguez-Cuellar explained that he had a customer who wanted to purchase large amounts of methamphetamine, and Luis Angel Briseño-Lopez agreed to sell the customer 10 pounds of methamphetamine at a time.

Overt Act Thirty-Three

On August 1, 2016, in a telephone call, Joshua Jande Carmona said that Luis Angel Briseño-Lopez needed a load of drugs transported to Albuquerque, New Mexico, and Alberto Terrazas-Ignacio agreed take it the next day.

Overt Act Thirty-Four

On August 3, 2016, Joshua Jande Carmona was stopped at a Border Patrol checkpoint while he was transporting 7.87 kilograms of methamphetamine on behalf of Luis Angel Briseño-Lopez.



Overt Act Thirty-Five

On October 5, 2016, Luis Angel Briseño-Lopez and Alberto Terrazas-Ignacio exchanged text messages to arrange the pick-up of drug proceeds in Albuquerque, New Mexico, that needed to be transported back to Mexico.

Overt Act Thirty-Six

On October 5, 2016, at the direction of Luis Angel Briseño-Lopez, Omar Fernandez provided drug proceeds to Alberto Terrazas-Ignacio in Albuquerque, New Mexico, that were ultimately to be delivered to Luis Angel Briseño-Lopez in Mexico.

Overt Act Thirty-Seven

On October 5, 2016, at the direction of Luis Angel Briseño-Lopez, Francisco Luna-Rosales provided drug proceeds to Alberto Terrazas-Ignacio in Albuquerque, New Mexico, that were ultimately to be delivered to Luis Angel Briseño-Lopez in Mexico.

Overt Act Thirty-Eight

On October 6, 2016, Alberto Terrazas-Ignacio sent Ricardo Terrazas-Ignacio to the stash house where Diego Armando Rivas-Aguilar provided to Ricardo Terrazas-Ignacio a load of drugs from Luis Angel Briseño-Lopez that was to be transported to Albuquerque, New Mexico.

Overt Act Thirty-Nine

On October 6, 2016, on behalf of Luis Angel Briseño-Lopez, Alberto Terrazas-Ignacio and Ricardo Terrazas-Ignacio transported a drug load to Albuquerque, New Mexico, including three pounds of heroin that was delivered to Juan R. Gutierrez, in Belen, New Mexico, on October 7, 2016.

Overt Act Forty

On October 7, 2016, Luis Angel Briseño-Lopez and Alberto Terrazas-Ignacio exchanged text messages to arrange the delivery of drugs and the pick-up of drug proceeds in Albuquerque, New Mexico, that needed to be transported back to Mexico.

Overt Act Forty-One

On October 7, 2016, Alberto Terrazas-Ignacio and Juan R. Gutierrez exchanged a series of text messages and telephone calls to arrange the delivery of three pounds of heroin from Luis Angel Briseño-Lopez to Juan R. Gutierrez in Belen, New Mexico.

Overt Act Forty-Two

On October 7, 2016, at the direction of Luis Angel Briseño-Lopez, Alberto Terrazas-Ignacio delivered three pounds of heroin to Juan R. Gutierrez in Belen, New Mexico.

Overt Act Forty-Three

On October 7, 2016, Juan R. Gutierrez provided \$9,200 in drug proceeds to Alberto Terrazas-Ignacio that was ultimately to be delivered to Luis Angel Briseño-Lopez in Mexico.

Overt Act Forty-Four

On October 7, 2016, Gustavo Hernandez-Loaiza provided \$24,000 in drug proceeds to Alberto Terrazas-Ignacio that was ultimately to be delivered to Luis Angel Briseño-Lopez in Mexico.

Overt Act Forty-Five

On October 7, 2016, Luis Angel Briseño-Lopez and Alberto Terrazas-Ignacio exchanged a series of text messages confirming that Alberto Terrazas-Ignacio had picked up \$33,200 in drug proceeds in Albuquerque, New Mexico, that he would transport back to Luis Angel Briseño-Lopez in exchange for payment of \$4,000.

Overt Act Forty-Six

On October 9, 2016, in a series of text messages, Alberto Terrazas-Ignacio and Manuel German Ibarra negotiated the price of approximately 113 grams of cocaine for \$4,500.

Overt Act Forty-Seven

On October 10, 2016, Luis Angel Briseño-Lopez and Alberto Terrazas-Ignacio exchanged a series of text messages in which they agreed that Alberto Terrazas-Ignacio would pick up 15 units of drugs that were ready to be transported to Albuquerque, New Mexico.

Overt Act Forty-Eight

On October 10, 2016, in a telephone call, Omar Fernandez told Alberto Terrazas-Ignacio that five pounds of methamphetamine was in the United States and Alberto Terrazas-Ignacio said he was going to El Paso, Texas, to pick it up.

Overt Act Forty-Nine

On October 10, 2016, on behalf of Luis Angel Briseño-Lopez, Diego Armando Rivas-Aguilar provided Alberto Terrazas-Ignacio with 4.8 kilograms of methamphetamine and 2.38 kilograms of heroin to transport to Francisco Luna-Rosales and Omar Fernandez in Albuquerque, New Mexico.

Overt Act Fifty

On October 10, 2016, Alberto Terrazas-Ignacio and Martin J. Contreras transported 4.82 kilograms of pure methamphetamine on behalf of Luis Angel Briseño-Lopez, in an attempt to deliver the drugs to Francisco Luna-Rosales and Omar Fernandez.

Overt Act Fifty-One

On October 10, 2016, Alberto Terrazas-Ignacio and Martin J. Contreras transported 2.38 kilograms of heroin on behalf of Luis Angel Briseño-Lopez, in an attempt to deliver the drugs to Francisco Luna-Rosales.

Overt Act Fifty-Two

On October 12, 2016, in a telephone call, Francisco Luna-Rosales inquired of Alberto Terrazas-Ignacio about the status of a car that contained 4.82 kilograms of methamphetamine and 2.38 kilograms of heroin that was seized, because Francisco Luna-Rosales was being pressured and needed Alberto Terrazas-Ignacio to get the get the car back and deliver the drugs.

Overt Act Fifty-Three

On October 12, 2016, in a telephone call, Omar Fernandez inquired of Alberto Terrazas-Ignacio about the status of a car that contained 4.82 kilograms of methamphetamine and 2.38 kilograms of heroin that was seized, because Omar Fernandez was getting telephone calls from the source of supply in Sinaloa, Mexico.

Overt Act Fifty-Four

On October 14, 2016, at the direction of Luis Angel Briseño-Lopez and Joshua Jande Carmona, Vanessa Reyes transported 11 pounds of methamphetamine to Francisco Luna-Rosales in Albuquerque, New Mexico.

Overt Act Fifty-Five

On October 14, 2016, Luis Angel Briseño-Lopez instructed Joshua Jande Carmona to direct Vanessa Reyes to pick up drug proceeds from Manuel German Ibarra after she delivered 11 pounds of methamphetamine to Francisco Luna-Rosales.

Overt Act Fifty-Six

On October 14, 2016, in a telephone call, Joshua Jande Carmona directed Vanessa Reyes to deliver methamphetamine to Francisco Luna-Rosales and then pick up drug proceeds.

Overt Act Fifty-Seven

On October 14, 2016, Vanessa Reyes delivered 11 pounds of methamphetamine to Francisco Luna-Rosales in Albuquerque, New Mexico.

Overt Act Fifty-Eight

On October 14, 2016, Manuel German Ibarra delivered drug proceeds to Vanessa Reyes that she was to transport to Joshua Jande Carmona for delivery to Luis Angel Briseño-Lopez in Mexico.

Overt Act Fifty-Nine

On October 25, 2016, in a series of text messages, Luis Angel Briseño-Lopez and Joshua Jande Carmona agreed that Joshua Jande Carmona would transport a load of drugs to Albuquerque, New Mexico, later in the week.

Overt Act Sixty

On October 26, 2016, Vanessa Reyes offered to transport drugs for Joshua Jande Carmona.

Overt Act Sixty-One

On October 26, 2016, Alberto Terrazas-Ignacio and Luis Angel Briseño-Lopez exchanged a series of text messages about customers who wanted four pounds of methamphetamine that Luis Angel Briseño-Lopez was in the process of shipping into the United States.

Overt Act Sixty-Two

On October 27, 2016, in a telephone call, Alberto Terrazas-Ignacio and Diego Armando Rivas-Aguilar discussed four pounds of methamphetamine that Luis Angel Briseño-Lopez sent into the United States, and Alberto Terrazas-Ignacio told Diego Armando Rivas-Aguilar that he only needed one pound of methamphetamine, instead.

Overt Act Sixty-Three

On October 28, 2016, Joshua Jande Carmona transported six kilograms of heroin for Luis Angel Briseño-Lopez that was seized by Border Patrol.

Overt Act Sixty-Four

On October 28, 2016, Joshua Jande Carmona transported 3.56 kilograms of methamphetamine for Luis Angel Briseño-Lopez that was seized by Border Patrol.

Overt Act Sixty-Five

On November 22, 2016, on behalf of Luis Angel Briseño-Lopez, Jose Manuel Ortiz-Campos and Rosa M. De Santiago picked up methamphetamine and heroin from Diego Armando Rivas-Aguilar at the stash house.

Overt Act Sixty-Six

On November 22, 2016, Elizabeth Monroy, Daisy Hidalgo, Georgina Ramirez, and Jazmin Lucia Soto traveled in tandem and transported 6.82 kilograms of methamphetamine that they had received from Jose Manuel Ortiz-Campos and Rosa M. De Santiago in an attempt to deliver the drugs to Omar Fernandez in Albuquerque, New Mexico, on behalf of Luis Angel Briseño-Lopez.

Overt Act Sixty-Seven

On November 22, 2016, Elizabeth Monroy, Daisy Hidalgo, Georgina Ramirez, and Jazmin Lucia Soto traveled in tandem and transported three kilograms of heroin that they had received from Jose Manuel Ortiz-Campos and Rosa M. De Santiago in an attempt to deliver the drugs to Omar Fernandez in Albuquerque, New Mexico, on behalf of Luis Angel Briseño-Lopez.

Overt Act Sixty-Eight

On November 22, 2016, in a telephone call, Luis Angel Briseño-Lopez told Omar Fernandez that the methamphetamine and heroin load that was on its way had been seized by law enforcement.

Overt Act Sixty-Nine

On November 23, 2016, in a telephone call, Omar Fernandez told Alberto Terrazas-Ignacio that the methamphetamine he was waiting on had been seized, and that they would have to wait for “the merchandise” to be sent again.

Overt Act Seventy

On January 19, 2017, Jose Manuel Ortiz-Campos, Rosa M. De Santiago, Georgina Ramirez, and Jesus A. Flores transported 1.28 kilograms heroin on behalf of Luis Angel Briseño-Lopez to Francisco Luna-Rosales’ stash house in Albuquerque, New Mexico, where it was unloaded, repackaged, and then delivered to Dulce Viridiana Rodriguez.

Overt Act Seventy-One

On February 1, 2017, Jose Manuel Ortiz-Campos and Rosa M. De Santiago transported at least \$28,360 in drug proceeds that Jose Manuel Ortiz-Campos and his wife attempted to smuggle into Mexico and deliver to Luis Angel Briseño-Lopez.

Overt Act Seventy-Two

On February 18, 2017, Jose Manuel Ortiz-Campo and Rosa M. De Santiago, with the help of a courier driving a white Nissan Sentra, transported a multi-pound load of heroin to the stash house that was managed by Francisco Luna-Rosales, in Albuquerque, New Mexico, where they re-packaged the load for distribution, evidence of which was discovered by agents later that night during the execution of a search warrant.

Overt Act Seventy-Three

On February 18, 2017, Francisco Luna-Rosales, possessed six firearms, hidden in his stash house, close to the area where drugs were processed, and easily accessible to protect members of the conspiracy and their drug trafficking operations, which were discovered by agents later that night during the execution of a search warrant.

Overt Act Seventy-Four

On February 20, 2017, Francisco Luna-Rosales disposed of packing material, with heroin residue, consistent with approximately 35 pound-sized packages.

Overt Act Seventy-Five

From January 16, 2017, to March 16, 2017, Francisco Luna-Rosales operated a stash house on Camino San Martin SW, in Albuquerque, New Mexico, where drugs were repackaged for further distribution.

Overt Act Seventy-Six

On February 19, 2017, Georgina Ramirez and Jesus A. Flores transported approximately 3.7 kilograms of cocaine in a vehicle they obtained from Jesus Manuel Ortiz-Campos, on behalf of Luis Angel Briseño-Lopez.

Overt Act Seventy-Seven

On March 10, 2017, Alberto Terrazas-Ignacio and Roderica T. Bahe hired a courier to transport approximately 11 kilograms of heroin in a rental vehicle on behalf of Luis Angel Briseño-Lopez.

In violation of 21 U.S.C. § 846.

Count 2

From on or about April 17, 2016, and continuing to on or about April 19, 2017, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ, MANUEL GERMAN IBARRA, JUAN R. GUTIERREZ, GUSTAVO HERNANDEZ-LOAIZA, JOSHUA JANDE CARMONA, ALBERTO TERRAZAS-IGNACIO, JOSE MANUEL ORTIZ-CAMPOS, ROSA M. DE SANTIAGO, and VANESSA REYES**, knowingly, combined, conspired, agreed and acted interdependently with



each other and with other persons known and unknown to the Grand Jury to commit an offense defined in 18 U.S.C. § 1956(a)(2), specifically, international money laundering.

In violation of 18 U.S.C. § 1956(h).

Count 3

On or about April 17, 2016, in Otero County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ** and **JOSHUA JANDE CARMONA**, did knowingly and intentionally transport, transmit, and transfer, and did attempt to transport, transmit, and transfer, United States currency from a place in the United States to and through a place outside the United States, with the intent to promote the carrying on of a specified unlawful activity, that is, distribution of a controlled substance.

In violation of 18 U.S.C. §§ 1956(a)(2) and 2.

Count 4

On or about April 17, 2016, in Otero County, in the District of New Mexico, and elsewhere, the defendant, **LUIS ANGEL BRISEÑO-LOPEZ**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 5

On or about April 17, 2016, in Otero County, in the District of New Mexico, and elsewhere, the defendant, **JOSHUA JANDE CARMONA**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 6

On or about May 19, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere the defendants, **LUIS ANGEL BRISEÑO-LOPEZ, JOSHUA JANDE CARMONA**, and **ALBERTO TERRAZAS-IGNACIO** unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 7

On or about June 24, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **JOSHUA JANDE CARMONA** and **EDGAR DOMINGUEZ-CUELLAR**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 8

On or about June 30, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **JOSHUA JANDE CARMONA** and **EDGAR DOMINGUEZ-CUELLAR**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 9

On or about June 30, 2016, in Doña Ana County, in the District of New Mexico, the defendant, **EDGAR DOMINGUEZ-CUELLAR**, unlawfully, knowingly and intentionally distributed a controlled substance, 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 10

On or about July 1, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **JOSHUA JANDE CARMONA** and **EDGAR DOMINGUEZ-CUELLAR**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 11

On or about July 12, 2016, in Socorro County, in the District of New Mexico, and elsewhere, the defendants, **JOSHUA JANDE CARMONA** and **ALFONSO RIOS**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 12

On or about July 27, 2016, in Doña Ana County, in the District of New Mexico, the defendant, **EDGAR DOMINGUEZ-CUELLAR**, unlawfully, knowingly and intentionally distributed a controlled substance, 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 13

On or about August 1, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ** and **EDGAR DOMINGUEZ-CUELLAR**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 14

On or about August 3, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ** and **JOSHUA JANDE CARMONA**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 15

On or about October 5, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ** and **ALBERTO TERRAZAS-IGNACIO**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 16

On or about October 6, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ, ALBERTO TERRAZAS-IGNACIO** and **RICARDO TERRAZAS-IGNACIO**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 1 kilogram and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 17

On or about October 7, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ** and **ALBERTO TERRAZAS-IGNACIO**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 18

On or about October 7, 2016, in Valencia County, in the District of New Mexico, and elsewhere, the defendants, **JUAN R. GUTIERREZ** and **ALBERTO TERRAZAS-IGNACIO**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 19

On or about October 7, 2016, in Valencia County, in the District of New Mexico, the defendant, **JUAN R. GUTIERREZ**, unlawfully, knowingly and intentionally possessed with

intent to distribute a controlled substance, 1 kilogram and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 20

On or about October 7, 2016, in Valencia County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ**, **JUAN R. GUTIERREZ**, and **ALBERTO TERRAZAS-IGNACIO**, did knowingly and intentionally transport, transmit, and transfer, and did attempt to transport, transmit, and transfer, United States currency from a place in the United States to and through a place outside the United States, with the intent to promote the carrying on of a specified unlawful activity, that is, distribution of a controlled substance.

In violation of 18 U.S.C. §§ 1956(a)(2) and 2.

Count 21

On or about October 7, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ**, **GUSTAVO HERNANDEZ-LOAIZA**, and **ALBERTO TERRAZAS-IGNACIO**, did knowingly and intentionally transport, transmit, and transfer, and did attempt to transport, transmit, and transfer, United States currency from a place in the United States to and through a place outside the United States, with the intent to promote the carrying on of a specified unlawful activity, that is, distribution of a controlled substance.

In violation of 18 U.S.C. §§ 1956(a)(2) and 2.

Count 22

On or about October 9, 2016, in Bernalillo County, in the District of New Mexico, the defendants, **MANUEL GERMAN IBARRA** and **ALBERTO TERRAZAS-IGNACIO**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further

the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 23

On or about October 10, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ** and **ALBERTO TERRAZAS-IGNACIO**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 24

On or about October 10, 2016, in Bernalillo County, in the District of New Mexico, the defendants, **OMAR FERNANDEZ** and **ALBERTO TERRAZAS-IGNACIO**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 25

On or about October 10, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ**, **ALBERTO TERRAZAS-IGNACIO**, and **MARTIN J. CONTRERAS**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 26

On or about October 10, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ, ALBERTO TERRAZAS-IGNACIO, and MARTIN J. CONTRERAS**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 1 kilogram and more of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 27

On or about October 12, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **FRANCISCO LUNA-ROSALES and ALBERTO TERRAZAS-IGNACIO**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 28

On or about October 12, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **OMAR FERNANDEZ and ALBERTO TERRAZAS-IGNACIO**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 29

On or about October 14, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ, FRANCISCO LUNA-ROSALES, JOSHUA JANDE CARMONA, and VANESSA REYES** unlawfully, knowingly



and intentionally possessed with intent to distribute a controlled substance, 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 30

On or about October 14, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **JOSHUA JANDE CARMONA** and **VANESSA REYES**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 31

On or about October 14, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ**, **MANUEL GERMAN IBARRA**, **JOSHUA JANDE CARMONA**, and **VANESSA REYES**, did knowingly and intentionally transport, transmit, and transfer, and did attempt to transport, transmit, and transfer, United States currency from a place in the United States to and through a place outside the United States, with the intent to promote the carrying on of a specified unlawful activity, that is, distribution of a controlled substance.

In violation of 18 U.S.C. §§ 1956(a)(2) and 2.

Count 32

On or about October 26, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ** and **ALBERTO TERRAZAS-IGNACIO**, unlawfully, knowingly and intentionally used a communication facility, a telephone,

to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 33

On or about October 27, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **ALBERTO TERRAZAS-IGNACIO** and **DIEGO ARMANDO RIVAS-AGUILAR**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 34

On or about October 28, 2016, in Doña Ana County, in the District of New Mexico, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ** and **JOSHUA JANDE CARMONA**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 1 kilogram and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 35

On or about October 28, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ** and **JOSHUA JANDE CARMONA**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 36

On or about November 22, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ, JOSE MANUEL ORTIZ-CAMPOS, ROSA M. DE SANTIAGO, GEORGINA RAMIREZ, ELIZABETH MONROY, DAISY HIDALGO,** and **JAZMIN LUCIA SOTO**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 37

On or about November 22, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ, JOSE MANUEL ORTIZ-CAMPOS, ROSA M. DE SANTIAGO, GEORGINA RAMIREZ, ELIZABETH MONROY, DAISY HIDALGO,** and **JAZMIN LUCIA SOTO**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 1 kilogram and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 38

On or about January 19, 2017, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ, FRANCISCO LUNA-ROSALES, JOSE MANUEL ORTIZ-CAMPOS, ROSA M. DE SANTIAGO, GEORGINA RAMIREZ, JESUS A. FLORES,** and **DULCE VIRIDIANA RODRIGUEZ**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 1 kilogram and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 39

On or about February 1, 2017, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ, JOSE MANUEL ORTIZ-CAMPOS,** and **ROSA M. DE SANTIAGO,** did knowingly and intentionally transport, transmit, and transfer, and did attempt to transport, transmit, and transfer, United States currency from a place in the United States to and through a place outside the United States, with the intent to promote the carrying on of a specified unlawful activity, that is, distribution of a controlled substance.

In violation of 18 U.S.C. §§ 1956(a)(2) and 2.

Count 40

On or about February 18, 2017, in Bernalillo County, in the District of New Mexico, the defendant, **FRANCISCO LUNA-ROSALES, JOSE MANUEL ORTIZ-CAMPOS,** and **ROSA M. DE SANTIAGO** unlawfully, knowingly and intentionally possessed with intent to distribute 1 kilogram and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 41

On or about February 18, 2017, in Bernalillo County, in the District of New Mexico, the defendant, **FRANCISCO LUNA-ROSALES,** during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, specifically, conspiracy to distribute controlled substances: 1 kilogram and more of a mixture and substance containing a detectable amount of heroin; 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine; and 500 grams and more of a mixture and substance

containing a detectable amount of methamphetamine as charged in Count 1 of this Indictment, knowingly carried a firearm, and in furtherance of such crime, possessed said firearm.

In violation of 18 U.S.C. § 924(c)(1).

Count 42

From on or about January 16, 2017, and continuing to on or about March 16, 2017, in Bernalillo County, in the District of New Mexico, the defendant, **FRANCISCO LUNA-ROSALES**, while managing or controlling a residence at 8704 Camino San Martin SW, Albuquerque, New Mexico, knowingly and intentionally did make it available for the purpose of unlawfully storing a controlled substance, heroin.

In violation of 21 U.S.C. § 856(a)(2), and 18 U.S.C. § 2.

Count 43

On or about February 19, 2017, in Otero County, in the District of New Mexico, the defendants, **GEORGINA RAMIREZ**, and **JESUS A. FLORES**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 500 grams and more of a mixture and substance containing a detectable amount of cocaine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 44

On or about March 10, 2017, in Doña Ana County, in the District of New Mexico, the defendants, **ALBERTO TERRAZAS-IGNACIO**, and **RODERICA T. BAHE**, unlawfully, knowingly and intentionally possessed with intent to distribute 1 kilogram and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

FORFEITURE ALLEGATION

Counts 1 through 44 of this indictment are incorporated as part of this section of the indictment as if fully re-alleged herein for the purpose of alleging forfeiture to the United States pursuant to 21 U.S.C. § 853.

Upon conviction of any offense in violation of 21 U.S.C. §§ 841 or 846, the defendants, **LUIS ANGEL BRISEÑO-LOPEZ, FRANCISCO LUNA-ROSALES, OMAR FERNANDEZ, MANUEL GERMAN IBARRA, JUAN R. GUTIERREZ, GUSTAVO HERNANDEZ-LOAIZA, JOSHUA JANDE CARMONA, ALBERTO TERRAZAS-IGNACIO, JOSE MANUEL ORTIZ-CAMPOS, DIEGO ARMANDO RIVAS-AGUILAR, EDGAR DOMINGUEZ-CUELLAR, ROSA M. DE SANTIAGO, GEORGINA RAMIREZ, JESUS A. FLORES, ALFONSO RIOS, VANESSA REYES, RODERICA T. BAHE, MARTIN J. CONTRERAS, ELIZABETH MONROY, DAISY HIDALGO, JAZMIN LUCIA SOTO, RICARDO TERRAZAS-IGNACIO, and DULCE VIRIDIANA RODRIGUEZ**, shall forfeit to the United States pursuant to 21 U.S.C. § 853 any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of each offense for which the defendant is convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense(s) of conviction.

The property to be forfeited to the United States includes, but is not limited to, the following:

1. PERSONAL PROPERTY

- a. \$15,556, seized by the Drug Enforcement Administration on July 29, 2016;
- b. \$28,360, seized by the Drug Enforcement Administration on February 1, 2017;
- and
- c. \$12,640, seized by the Drug Enforcement Administration on April 7, 2017.

**2. MONEY JUDGMENT**

A sum of money equal to at least \$1,400,000, for which the Defendants are jointly and severally liable, representing the amount of money derived from or involved in the offenses, or traceable to property involved in the offenses.

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

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

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), 18 U.S.C. § 982(b), and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

**A TRUE BILL:**

Assistant United States Attorney

*Rew*

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        /s/    
**FOREPERSON OF THE GRAND JURY**