

AUG 10 2016

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**ENRIQUE S. CAVAZOS,
LINDSEY A. CAVAZOS,
JOAQUIN ALANIZ,
DANIEL NIETO,
ANTONIO M. RUELAS,
ELIBERTO NAVIA,
ROBERT D. MORENO,
a.k.a. "Frost,"
STEVEN BECERRA,
GLEN LUCERO, and
DEBORAH GUTIERREZ,**

Defendants.

)
) CRIMINAL NO. 15-4087 MCA
)
) Count 1: 21 U.S.C. § 846: Conspiracy;
)
) Count 2: 21 U.S.C. § 846: Attempt to
) Possess with Intent to Distribute Marijuana;
)
) Count 3-5, 7: 21 U.S.C. §§ 841(a)(1) and
) (b)(1)(D): Distribution of Marijuana;
)
) Count 6: 21 U.S.C. §§ 841(a)(1) and
) (b)(1)(D): Distribution of Marijuana; 18
) U.S.C. § 2: Aiding and Abetting;
)
) Count 8: 21 U.S.C. §§ 841(a)(1) and
) (b)(1)(D): Possession with Intent to
) Distribute Hashish Oil;
)
) Count 9: 18 U.S.C. § 924(c): Using and
) Carrying a Firearm During and in Relation to
) a Drug Trafficking Crime, and Possessing a
) Firearm in Furtherance of Such Crime;
)
) Count 10: 21 U.S.C. § 856(a): Maintaining a
) Drug-Involved Premises; 18 U.S.C. § 2:
) Aiding and Abetting;
)
) Counts 11-13: 21 U.S.C. § 843(b): Use of a
) Communication Facility to Further the
) Commission of a Drug Trafficking Crime;
)
) Count 14: 18 U.S.C. § 1956(h): Conspiracy;
)
) Counts 15-16: 18 U.S.C. § 1956(a)(1)(B)(i):
) Money Laundering;
)
) Counts 17-19: 18 U.S.C. § 1956(a)(1)(B)(ii):
) Money Laundering;
)
) Count 20: 31 U.S.C. § 5324(a)(3):
) Structuring Transactions to Avoid Reporting
) Requirements;
)

-) Counts 21-22: 18 U.S.C. § 1956(a)(1)(B)(ii):
-) Money Laundering;
-)
-) Count 23: 31 U.S.C § 5324(a)(3):
-) Structuring Transactions to Avoid Reporting
-) Requirements; 18 U.S.C. § 2: Aiding and
-) Abetting;
-)
-) Counts 24-26: 18 U.S.C. § 1957: Money
-) Laundering.
-)

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges:

Count 1

Beginning on a date unknown, but no later than January 1, 2008, and continuing to on or about November 17, 2015, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **ENRIQUE S. CAVAZOS, LINDSEY A. CAVAZOS, JOAQUIN ALANIZ, DANIEL NIETO, ANTONIO M. RUELAS, ELIBERTO NAVIA, and ROBERT D. MORENO**, 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 an offense against the United States, specifically, distribution of a controlled substance, 1000 kilograms and more of a mixture and substance containing a detectable amount of marijuana, contrary to 21 U.S.C. §§ 841(a)(1).

Quantity of Marijuana Involved in the Conspiracy

With respect to **ENRIQUE S. CAVAZOS, LINDSEY A. CAVAZOS, JOAQUIN ALANIZ, and DANIEL NIETO**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 1000 kilograms and more of a mixture and substance containing a detectable amount of marijuana, contrary to 21 U.S.C. § 841(b)(1)(A).

With respect to **ANTONIO M. RUELAS, ELIBERTO NAVIA, ROBERT D. MORENO**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 100 kilograms and more of a mixture and substance containing a detectable amount of marijuana, contrary to 21 U.S.C. § 841(b)(1)(B).

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

Enrique S. Cavazos began distributing marijuana on or before the year 2008.

Overt Act Two

Between 2010 and 2013, a person known to the Grand Jury delivered high-grade marijuana to Antonio Ruelas and Joaquin Alaniz, among others, on behalf of Enrique S. Cavazos.

Overt Act Three

Between 2010 and 2013, Antonio Ruelas distributed high-grade marijuana from Algodones, New Mexico.

Overt Act Four

Between 2010 and 2013, Joaquin Alaniz distributed high-grade marijuana from southern New Mexico.

Overt Act Five

In approximately 2011, Enrique S. Cavazos sold 50 pounds of high-grade marijuana to a person known to the Grand Jury.

Overt Act Six

In approximately 2011, Robert D. Moreno signed a promissory note for \$425,000.00 for a property located at 60701 North Highway 101, Leggett, California, for the purpose of growing and manufacturing marijuana.

Overt Act Seven

In approximately 2011, Enrique S. Cavazos made payments on the property located at 60701 North Highway 101, Leggett, California, for the purpose of growing and manufacturing marijuana.

Overt Act Eight

Between the approximate years of 2012 and 2014, within the State of New Mexico, Enrique S. Cavazos directed a person known to the Grand Jury to make bulk cash deliveries to California and return with loads of marijuana.

Overt Act Nine

Between the approximate years of 2008 and 2015, Lindsey A. Cavazos provided marijuana to a person known to the Grand Jury in exchange for a sum of money.

Overt Act Ten

Between 2012 and 2013, on a monthly basis, Enrique S. Cavazos sold to a person known to the Grand Jury twenty (20) pounds of marijuana.

Overt Act Eleven

On February 19, 2014, while inside the Albuquerque International Airport, Enrique S. Cavazos attempted to transport \$20,859.00 of drug proceeds to Las Vegas, Nevada.

Overt Act Twelve

During the summer of 2014, in Villanueva, New Mexico, Felix Cavazos drove Enrique S. Cavazos to meet a person known to the Grand Jury for the purpose of selling that person a load of marijuana.

Overt Act Thirteen

On July 11, 2014, Enrique S. Cavazos met with a person known to the Grand Jury at 219 Central NW in Albuquerque, New Mexico and Cavazos delivered nine (9) pounds of marijuana to that person.

Overt Act Fourteen

On July 24, 2014, Enrique S. Cavazos received from a person known to the Grand Jury \$15,000.00 in cash for payment of a previous \$8,300.00 drug debt owed to Enrique S. Cavazos with the remaining \$6,700 as a down payment for a new supply of marijuana.

Overt Act Fifteen

On July 24, 2014, in a garage located at the intersection of 6th and Gold in Albuquerque, New Mexico, Enrique S. Cavazos delivered to a person known to the Grand Jury sixteen (16) pounds of marijuana.

Overt Act Sixteen

On August 1, 2014, at 219 Central NW in Albuquerque, New Mexico, Enrique S. Cavazos received \$7,000.00 from a person known to the Grand Jury for payment of a drug debt.

Overt Act Seventeen

On August 1, 2014, at 219 Central NW in Albuquerque, New Mexico, Enrique S. Cavazos detailed to a person known to the Grand Jury the best practices in reporting profits and losses for businesses used to launder drug proceeds.

Overt Act Eighteen

On August 29, 2014, in a garage located at the intersection of 6th and Gold in Albuquerque, New Mexico, Enrique S. Cavazos delivered to a person known to the Grand Jury ten (10) pounds of marijuana.

Overt Act Nineteen

On September 5, 2014, at 4316 The 25 Way in Albuquerque, New Mexico, Enrique S. Cavazos received \$8,000 from a person known to the Grand Jury for payment of a drug debt.

Overt Act Twenty

On or about October 14, 2014, the exact date being uncertain, Enrique S. Cavazos and a person known to the grand jury discussed plans for the delivery of \$200,000.00 in drug proceeds from New Mexico to California.

Overt Act Twenty-One

On October 14, 2015, Enrique S. Cavazos paid approximately \$200,000.00 to a person known to the Grand Jury to settle a drug debt.

Overt Act Twenty-Two

On October 17, 2014, Enrique S. Cavazos received \$9,000 from a person known to the Grand Jury for payment of a prior drug debt.

Overt Act Twenty-Three

On November 24, 2014, at 3899 Cerrillos Rd. in Santa Fe, New Mexico, Antonio Ruelas and Enrique S. Cavazos sold twenty (20) pounds of marijuana to a person known to the Grand Jury.

Overt Act Twenty-Four

On December 12, 2014, at 4500 Central SE in Albuquerque, New Mexico, Enrique S. Cavazos received \$10,000 from a person known to the Grand Jury for payment of a drug debt.

Overt Act Twenty-Five

On or about January 2015, Felix Cavazos moved into 1004 Matador SE in Albuquerque, New Mexico, a stash house for Enrique S. Cavazos.

Overt Act Twenty-Six

On January 9, 2015, in Las Vegas, New Mexico, Enrique S. Cavazos received \$9,000 for payment of a drug debt.

Overt Act Twenty-Seven

On January 9, 2015, in Las Vegas, New Mexico, Enrique S. Cavazos stated to a person known to the Grand Jury that if that person could pay for twenty (20) pounds of marijuana that Cavazos would provide that person with a total of fifty (50) pounds, thirty (30) of those being provided on consignment.

Overt Act Twenty-Eight

On January 9, 2015, in Las Vegas, New Mexico, Enrique S. Cavazos stated to a person known to the Grand Jury that if that person demonstrated the ability to sell one-hundred (100) pounds of marijuana per month then Enrique S. Cavazos would provide that amount of product to that person.

Overt Act Twenty-Nine

On January 30, 2015, at a roadside location two blocks south of 600 Central Avenue SE in Albuquerque, New Mexico, Enrique S. Cavazos provided twenty (20) pounds of marijuana to a person known to the Grand Jury and received \$10,000.00 towards partial payment for the marijuana.

Overt Act Thirty

On February 16, 2015, Enrique S. Cavazos summoned a person known to the grand jury to 400 Central Avenue SW in Albuquerque, New Mexico, to discuss that person's future role in the Cavazos Drug Trafficking Organization.

Overt Act Thirty-One

On April 8, 2015, in New York, New York, Enrique S. Cavazos instructed a person known to the grand jury to purchase a 2007 or newer Chevy Avalanche for the purpose of making regular deliveries of marijuana to different destinations across the country for which that person would be paid \$20,000.00 per trip.

Overt Act Thirty-Two

On April 17, 2015, Cavazos instructed a person known to the Grand Jury to drive to Madera, California to pick up a load of marijuana and deliver it to Kansas for which that person would be paid \$15,000.00.

Overt Act Thirty-Three

As of April 17, 2015, Joaquin Alaniz was selling approximately 100 pounds of high-grade marijuana per month.

Overt Act Thirty-Four

As of April 17, 2015, Joaquin Alaniz was paying Enrique S. Cavazos \$1500.00 per pound of marijuana.

Overt Act Thirty-Five

On April 19, 2015, Cavazos sent a text to a person known to the Grand Jury informing that person that the stash house in California from where that person would pick up marijuana was located at 18928 Rhine Drive, Madera, California.

Overt Act Thirty-Six

On April 19, 2015, a person known to the Grand Jury drove to Madera, California and picked up 75 pounds of marijuana at a home on behalf of Enrique S. Cavazos.

Overt Act Thirty-Seven

On April 27, 2015, Joaquin Alaniz attempted to purchase \$100,000.00 worth of high-grade marijuana from a person known to the Grand Jury.

Overt Act Thirty-Eight

Daniel Nieto sold marijuana and marijuana wax between approximately 2008 and 2015.

Overt Act Thirty-Nine

On or between 2008 and 2015, Joaquin Alaniz supplied Daniel Nieto with his marijuana.

Overt Act Forty

As of approximately May 2015, Daniel Nieto was selling 50 pounds of marijuana per month and selling it for \$3,000 to \$3,500 per pound.

Overt Act Forty-One

On August 31, 2015, Eliberto Navia was growing 104 marijuana plants at his home located at 18928 Rhine Drive, Madera, California and admitted that the plants were his.

Overt Act Forty-Two

Lindsey Cavazos has handled all of the bookkeeping for the businesses she and Enrique S. Cavazos have established since approximately 2009.

Overt Act Forty-Three

On October 25, 2015, Antonio Ruelas backed his vehicle up to the garage at 1004 Matador SE, Albuquerque, New Mexico and loaded two large black bags into the trunk of his car.

In violation of 21 U.S.C. § 846.

Count 2

On or about April 27, 2015, in Eddy County, in the District of New Mexico, the defendant, **JOAQUIN ALANIZ**, attempted to possess with intent to distribute a controlled substance, specifically, a mixture and substance containing a detectible amount of marijuana, which, if said crime was completed, would have been contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(D), and the defendant intended to commit such crime and took a substantial step toward the commission of that crime.

In violation of 21 U.S.C. § 846.

Count 3

On or about July 11, 2014, in Bernalillo County, in the District of New Mexico, the defendant, **ENRIQUE S. CAVAZOS**, unlawfully, knowingly and intentionally distributed a controlled substance, marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).

Count 4

On or about July 24, 2014, in Bernalillo County, in the District of New Mexico, the defendant, **ENRIQUE S. CAVAZOS**, unlawfully, knowingly and intentionally distributed a controlled substance, marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).

Count 5

On or about August 29, 2014, in Bernalillo County, in the District of New Mexico, the defendant, **ENRIQUE S. CAVAZOS**, unlawfully, knowingly and intentionally distributed a controlled substance, marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).

Count 6

On or about November 24, 2014, in Santa Fe County, in the District of New Mexico, the defendants, **ENRIQUE S. CAVAZOS** and **ANTONIO M. RUELAS**, unlawfully, knowingly and intentionally distributed a controlled substance, marijuana.

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

Count 7

On or about January 30, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **ENRIQUE S. CAVAZOS**, unlawfully, knowingly and intentionally distributed a controlled substance, marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).

Count 8

On or about May 20, 2015, in Eddy County, in the District of New Mexico, the defendant, **DANIEL NIETO**, unlawfully, knowingly, and intentionally possessed with the intent to distribute a controlled substance, hashish oil.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).

Count 9

On or about May 20, 2015, in Eddy County, in the District of New Mexico, the defendant **DANIEL NIETO**, during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, specifically, possession with the intent to distribute

hashish oil as charged in Count 8 of this indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed said firearm.

In violation of 18 U.S.C. § 924(c).

Count 10

Between on or about January 2015, and continuing to on or about November 17, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **ENRIQUE S. CAVAZOS**, knowingly used and maintained a place, 1004 Matador Drive, SE, Albuquerque, New Mexico, for the purpose of distributing controlled substances, specifically, marijuana.

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

Count 11

On or about October 10, 2014, in Bernalillo County, in the District of New Mexico, the defendant, **ENRIQUE S. CAVAZOS**, 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 October 28, 2014, in Bernalillo County, in the District of New Mexico, the defendant, **ENRIQUE S. CAVAZOS**, 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 13

On or about October 28, 2014, in Bernalillo County, in the District of New Mexico, the defendant, **ENRIQUE S. CAVAZOS**, 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

Beginning on a date unknown, but no later than January 2, 2009, and continuing to on or about November 17, 2015, in Bernalillo County, in the District of New Mexico and elsewhere, the defendants, **ENRIQUE S. CAVAZOS, LINDSEY A. CAVAZOS, JOAQUIN ALANIZ, STEVEN BECERRA, GLEN LUCERO, and DEBORAH GUTIERREZ**, knowingly combined, conspired, agreed and acted interdependently with each other and with other persons known and unknown to the Grand Jury to commit the following offense against the United States, specifically, money laundering, contrary to 18 U.S.C. § 1956(a)(1).

In violation of 18 U.S.C. § 1956(h).

Counts 15-16

On or about the dates set forth below, in Bernalillo County, in the District of New Mexico, the following defendants did knowingly conduct the following financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, the unlawful distribution of controlled substances, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature and source of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity:

Count	Date	Defendant	Transaction	Description	Amount
15	2/7/2013	Lindsey A. Cavazos	Currency Deposit & Money Order	Deposit at Bank of America, Account #439005117394 in the name of CVZS, LLC	\$6,675.00
16	4/3/2013	Enrique S. Cavazos	Currency Deposit	Deposit at Bank of America Account #439004790767 in the name of NLB Entertainment, LLC	\$8,000.00

In violation of 18 U.S.C. § 1956(a)(1)(B)(i).

Counts 17-19

On or about December 10, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **ENRIQUE S. CAVAZOS**, did knowingly conduct the following financial transactions affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is, the unlawful distribution of controlled substances, knowing that the transactions were designed in whole and in part to avoid a transaction reporting requirement under Federal law and that while conducting such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity:

Count	Transaction	Description	Amount
17	Currency Deposit	Deposit at BBVA Compass Bank, Albuquerque Main Branch, Account #2520000480 in the name of MBC Choice Trucking, LLC	\$5,000.00
18	Currency Deposit	Deposit at BBVA Compass Bank, Branch located at 4 th Street and Griegos, Account #2520000480 in the name of MBC Choice Trucking, LLC	\$3,500.00
19	Currency Deposit	Deposit at BBVA Compass Bank, Albuquerque Main Branch, Account #2508743311 in the name of Lindsey A. Arellanes	\$2,000.00

In violation of 18 U.S.C. § 1956(a)(1)(B)(ii).

Count 20

On or about December 10, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **ENRIQUE S. CAVAZOS**, did knowingly and for the purpose of evading the

reporting requirements of section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, structure, the following transactions with domestic financial institutions:

Transaction	Description	Amount
Currency Deposit	Deposit at BBVA Compass Bank, Albuquerque Main Branch, Account #2520000480 in the name of MBC Choice Trucking, LLC	\$5,000.00
Currency Deposit	Deposit at BBVA Compass Bank, Branch located at 4 th Street and Griegos, Account #2520000480 in the name of MBC Choice Trucking, LLC	\$3,500.00
Currency Deposit	Deposit at BBVA Compass Bank, Albuquerque Main Branch, Account #2508743311 in the name of Lindsey A. Arellanes	\$2,000.00
	Total:	\$10,500.00

In violation of 31 U.S.C. § 5324(a)(3).

Counts 21 - 22

On or about March 25, 2013, in Bernalillo County, in the District of New Mexico, the following defendants did knowingly conduct the following financial transactions affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is, unlawful distribution of controlled substances, knowing that the transactions were designed in whole and in part to avoid a transaction reporting requirement under Federal law and that while conducting such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity:

Count	Defendant	Transaction	Description	Amount
21	ENRIQUE S. CAVAZOS	Currency Deposit	Deposit at Wells Fargo Bank Account #2734041169 in the name of Love Auto, LLC	\$9,000.00
22	LINDSEY A. CAVAZOS	Currency Deposit	Deposit at Wells Fargo Bank Account #2734041169 in the name of Love Auto, LLC	\$9,000.00

In violation of 18 U.S.C. § 1956(a)(1)(B)(ii).

Count 23

On or about March 25, 2013, in Bernalillo County, in the District of New Mexico, the defendants, **ENRIQUE S. CAVAZOS** and **LINDSEY A. CAVAZOS**, did knowingly and for the purpose of evading the reporting requirements of section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, structure, the following transactions with domestic financial institutions:

Transaction	Description	Amount
Currency Deposit	Deposit at Wells Fargo Bank Account #2734041169 in the name of Love Auto, LLC	\$9,000.00
Currency Deposit	Deposit at Wells Fargo Bank Account #2734041169 in the name of Love Auto, LLC	\$9,000.00
	Total:	\$18,000.00

In violation of 31 U.S.C. § 5324(a)(3), 18 U.S.C. § 2.

Counts 24-26

On or about the dates set forth below, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **ENRIQUE CAVAZOS**, did knowingly engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that being the deposit, transfer, and exchange of funds, such property having been derived from the unlawful distribution of controlled substances, a specified unlawful activity:

Count	Date	Transaction	Description	Amount
24	11/26/2012	Currency Deposit	Deposit into Wells Fargo Bank, NA, Love Auto Account #2734041169	\$18,000.00
25	1/6/2013	Currency Wager	Wager by Enrique Cavazos at Caesar's Palace Casino	\$31,100.00
26	5/24/2014	Currency Deposit	Deposit into Wells Fargo Bank, NA, Love Auto Account #2734041169	\$16,500.00

In violation of 18 U.S.C. § 1957.

FORFEITURE ALLEGATIONS

Forfeiture Related to 21 U.S.C. §§ 841 or 846

Counts 1 through 8 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, **ENRIQUE S. CAVAZOS, LINDSEY A. CAVAZOS, JOAQUIN ALANIZ, DANIEL NIETO, ANTONIO M. RUELAS, FELIX CAVAZOS, ELIBERTO NAVIA**, 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. MONEY JUDGMENT

A sum of money representing the proceeds obtained, directly or indirectly, as a result of the offenses set forth in Counts 1 through 8, for which the Defendants are jointly and severally liable.

2. REAL PROPERTY

a. 15 Amy Court, Tijeras, NM - Lot Numbered Eighty-two (82) of the plat of Richland Meadows Subdivision, a subdivision situate within the Northeast One-quarter (NE 1/4) of Section 4, Township 10 North, Range 6 East, N.M.P.M., Bernalillo County, New Mexico, as the same is shown and designated on the plat thereof, filed in the office of the County Clerk of Bernalillo County, New Mexico, on May 28, 1998, in Plat Book 98C, Folio 151.

b. 726 Grand Avenue, Las Vegas, NM - Lot 33, and the South 22 feet of Lot 34, in Block 19, of the San Miguel Town Company's Addition to Las Vegas, San Miguel County, New Mexico. Less and Except: A tract of land within Lot 34 of Block 19 of the San Miguel Town Company's Addition to Las Vegas, San Miguel County, New Mexico. Said tract being more particularly described as follows: Beginning at the New Mexico State "Radio" Triangulation Station, thence S 79 degrees 55'12" E a distance 1775.42 feet to a 1/2" rebar being the SE'ly corner of a tract of land surveyed by Drissel & Associates, P.A., for Geidenberger/Harper, Plat Number 75248. Thence N 76 degrees 36'51" W along the S'ly boundary line of Said Geidenberger/Harper plat a distance of 94.60 feet to the true point of the beginning of this tract. Thence S 13 degrees 23'09" W a distance of .050 feet to the SE'ly corner of this tract. Thence N 75 degrees 53'53" W a distance of 40.00 feet to the most W'ly point of this tract. Thence S 76 degrees 36'51" E a distance of 40.00 feet to the true point of beginning of this tract. Said tract contains 10.00 square feet, more or less.

c. 508 12th Street, Las Vegas, NM - The North forty-five (45) feet of Lots Fifteen (15), Sixteen (16), Seventeen (17) and Eighteen (18), Block Three (3) of the Blanchard Addition to the Town of Las Vegas, San Miguel County, New Mexico, as shown on plat of survey by Douglas J. McFaul, dated November 7, 2012, filed for record in the Office of the San Miguel County Clerk, November 19, 2012, in Plat Book 68, page 12, document no. 2186.

d. 511 Grant St., Las Vegas, NM - Beginning at the northwest corner of the tract, from whence the intersection of the said south line of Grant Street and the east line of New Mexico bears; Westerly 271.80 feet; thence from said point and place of beginning, continuing along the following bearings and distances: Easterly 110 feet along said south line of Grant Street to the northeast corner; Southerly 116 feet along the property now or formerly of Carmen Quintana to the southeast corner; Westerly 110 feet along the property now or formerly of Mike

Baca, Manuel Casuas, and Jose Lino Rivera to southeast corner; Northerly 117.50 feet along the property now or formerly of Leroy Martinez, to the point and place beginning.

e. 716 Grand Ave., Las Vegas, NM (Samaritan House) - Lot 28 and the South twelve and one half feet of Lot 29, Block 19 of the An Miguel Townsite company's Addition to Las Vegas, San Miguel County, New Mexico.

f. 8th Street and Sperry, Las Vegas, NM (14-acre planned subdivision) - Lots Nos. Two (2) through Eleven (11), Block "J" and Lots Nos. Two (2) through Twenty-three (23), Block "K", of the University Heights, First Filing, Subdivision, as the same are shown and delineated on the Plat thereof filed as Document No. 8075 on August 16, 1963 in Plat Book 2, Page 127, in the office of the Clerk of San Miguel County, New Mexico.

g. 219 Central, Suite 301, Albuquerque, NM - Units '301' and '302', of The Banque, a Condominium, as such Unit is designated in the Condominium Declaration for The Banque, a Condominium, recorded August 17, 2006, in Book A122, Page 3917, as Doc. No. 2006124255, and in Condominium Boundary Survey recorded August 17, 2006, in Book A122, Page 3916, as Doc. No. 2006124254, records of Bernalillo County, New Mexico. The Banque, a Condominium is located within the exterior boundaries of Lots numbered Twenty-one (21), Twenty-two (22), Twenty-three (23) and Twenty-four (24) in Block numbered Nine (9) of New Mexico Town Company's Original Townsite, an Addition to the City of Albuquerque, Bernalillo County, New Mexico, as the same is shown and designated on the plat thereof, filed in the Probate Clerk and Ex Officio Recorder of Bernalillo County, New Mexico, on December 29, 1882, in Plat Book D, Folio 140. Together with a non-exclusive appurtenant easement as described in the Easement Agreements by and between the City of Albuquerque, New Mexico, and Prlnova Investments, Ltd., a New Mexico corporation, recorded October 30, 2000, in Book

A11, Page 6878, as Doc. No. 2000107297, and recorded December 18, 2000, in Book A13, Page 4719, as Doc. No. 2000125179, records of Bernalillo County, New Mexico.

3. PERSONAL PROPERTY

- a. Compass Bank Acct. #2520000480 - MBC Choice Trucking
- b. Wells Fargo Acct. #2734041169 - Love Auto, LLC
- c. Bank of America Acct. #439005117394 - CVZS, LLC
- d. Bank of America Acct #439004904744 - Sozavac Management, LLC
- e. Bank of America Acct. #439004790767 - NLB Entertainment, LLC
- f. Bank of America Account #325018112953 - Novus Content LLC
- g. NM Bank and Trust Account #120120738 - Café Bien
- h. Wells Fargo Bank Account #5823738520 - Addian Development Company
- i. Southwest Capital Bank Account #7090587 - C&L Enterprises
- j. 2005 Acura RL automobile, VIN# JH4KB16515C002078
- k. 2009 Toyota Corolla, VIN# JTDDBL40E899039656
- l. 2008 GMC Acadia SLE, VIN# 1GKEV13768J207671
- m. 2010 Hyundai Santa Fe, VIN# 5NMSKDAG0AH367553
- n. 2014 Ford Fusion, VIN# 3FA6P0H75ER301660
- o. 2007 Lexus IS250, VIN# JTHBK262172052628
- p. 2009 Chevrolet Malibu LTZ, VIN# 1G1ZK57799F126233
- q. 2008 BMW 335xi, VIN# WBAWC73528E067292
- r. 2010 Cadillac STS, VIN# 1G6DU6EA4A0141460
- s. 2009 Hyundai Genesis, VIN# KMHGC46E79U026094
- t. 2013 Hyundai Sonata, VIN# 5NPEB4AC6DH724297
- u. 2007 Nissan Altima, VIN# 1N4AL21EX7N439257

- v. 2009 Infiniti G37, VIN# JNKCV61E89M011621
- w. 2007 Mercedes Benz C230, VIN# WDBRF52H27F915346
- x. 2003 Toyota 4Runner, VIN# JTEBT17R130005668
- y. 2006 Honda Pilot EL-L, VIN# 2HKYF18636H538000
- z. 2006 Pontiac Solstice, VIN# 1G2MB35B46Y118588
- aa. 2007 Advantage Fifth Wheel, VIN# 1ED5R352064286169
- bb. Three pieces of sapphire and diamond jewelry purchased from Jared, The Galleria of Jewelry dated December 22, 2012 for \$5,777.97
- cc. Lindsey Cavazos - diamond engagement style ring
- dd. \$185,020 in U.S. Currency
- ee. \$75,330 in U.S. Currency
- ff. \$265,440 in U.S. Currency
- gg. \$22,580 in U.S. Currency
- hh. Fixtures and restaurant equipment located at Café Bien, 400 Central Avenue, SW, Albuquerque, New Mexico
- ii. Lettuce Crispers (commercial grade) located at 15 Amy Court, Tijeras, New Mexico

Forfeiture Related to 18 U.S.C. §§ 1956 or 1957

Counts 14 through 19, 21 through 22, and 24 through 26 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 Title 18, United States Code, Sections 982(a)(1).

Upon conviction of an offense in violation of 18 U.S.C. §§ 1956 or 1957, the defendants, **ENRIQUE S. CAVAZOS, LINDSEY A. CAVAZOS, JOAQUIN ALANIZ, STEVEN**

BECERRA, GLEN LUCERO, and DEBORAH GUTIERREZ, shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited to the United States includes, but is not limited to, the following:

1. MONEY JUDGMENT

A sum of money representing the proceeds derived from or involved in the offenses set forth in Counts 14 through 19, 21 through 22, and 24 through 26, for which the Defendants are jointly and severally liable.

2. REAL PROPERTY

a. 15 Amy Court, Tijeras, NM - Lot Numbered Eighty-two (82) of the plat of Richland Meadows Subdivision, a subdivision situate within the Northeast One-quarter (NE 1/4) of Section 4, Township 10 North, Range 6 East, N.M.P.M., Bernalillo County, New Mexico, as the same is shown and designated on the plat thereof, filed in the office of the County Clerk of Bernalillo County, New Mexico, on May 28, 1998, in Plat Book 98C, Folio 151.

b. 726 Grand Avenue, Las Vegas, NM - Lot 33, and the South 22 feet of Lot 34, in Block 19, of the San Miguel Town Company's Addition to Las Vegas, San Miguel County, New Mexico. Less and Except: A tract of land within Lot 34 of Block 19 of the San Miguel Town Company's Addition to Las Vegas, San Miguel County, New Mexico. Said tract being more particularly described as follows: Beginning at the New Mexico State "Radio" Triangulation Station, thence S 79 degrees 55'12" E a distance 1775.42 feet to a 1/2" rebar being the SE'ly corner of a tract of land surveyed by Drissel & Associates, P.A., for Geidenberger/Harper, Plat Number 75248. Thence N 76 degrees 36'51" W along the S'ly boundary line of Said Geidenberger/Harper plat a distance of 94.60 feet to the true point of the beginning of this tract. Thence S 13 degrees 23'09" W a distance of .0.50 feet to the SE'ly corner of this tract. Thence

N 75 degrees 53'53" W a distance of 40.00 feet to the most W'ly point of this tract. Thence S 76 degrees 36'51" E a distance of 40.00 feet to the true point of beginning of this tract. Said tract contains 10.00 square feet, more or less.

c. 508 12th Street, Las Vegas, NM - The North forty-five (45) feet of Lots Fifteen (15), Sixteen (16), Seventeen (17) and Eighteen (18), Block Three (3) of the Blanchard Addition to the Town of Las Vegas, San Miguel County, New Mexico, as shown on plat of survey by Douglas J. McFaul, dated November 7, 2012, filed for record in the Office of the San Miguel County Clerk, November 19, 2012, in Plat Book 68, page 12, document no. 2186.

d. 511 Grant St., Las Vegas, NM - Beginning at the northwest corner of the tract, from whence the intersection of the said south line of Grant Street and the east line of New Mexico bears; Westerly 271.80 feet; thence from said point and place of beginning, continuing along the following bearings and distances: Easterly 110 feet along said south line of Grant Street to the northeast corner; Southerly 116 feet along the property now or formerly of Carmen Quintana to the southeast corner; Westerly 110 feet along the property now or formerly of Mike Baca, Manuel Casuas, and Jose Lino Rivera to southeast corner; Northerly 117.50 feet along the property now or formerly of Leroy Martinez, to the point and place beginning.

e. 716 Grand Ave., Las Vegas, NM (Samaritan House) - Lot 28 and the South twelve and one half feet of Lot 29, Block 19 of the An Miguel Townsite company's Addition to Las Vegas, San Miguel County, New Mexico.

f. 8th Street and Sperry, Las Vegas, NM (14-acre planned subdivision) - Lots Nos. Two (2) through Eleven (11), Block "J" and Lots Nos. Two (2) through Twenty-three (23), Block "K", of the University Heights, First Filing, Subdivision, as the same are shown and delineated on the Plat thereof filed as Document No. 8075 on August 16, 1963 in Plat Book 2, Page 127, in the office of the Clerk of San Miguel County, New Mexico.

g. 219 Central, Suite 301, Albuquerque, NM - Units '301' and '302', of The Banque, a Condominium, as such Unit is designated in the Condominium Declaration for The Banque, a Condominium, recorded August 17, 2006, in Book A122, Page 3917, as Doc. No. 2006124255, and in Condominium Boundary Survey recorded August 17, 2006, in Book A122, Page 3916, as Doc. No. 2006124254, records of Bernalillo County, New Mexico. The Banque, a Condominium is located within the exterior boundaries of Lots numbered Twenty-one (21), Twenty-two (22), Twenty-three (23) and Twenty-four (24) in Block numbered Nine (9) of New Mexico Town Company's Original Townsite, an Addition to the City of Albuquerque, Bernalillo County, New Mexico, as the same is shown and designated on the plat thereof, filed in the Probate Clerk and Ex Officio Recorder of Bernalillo County, New Mexico, on December 29, 1882, in Plat Book D, Folio 140. Together with a non-exclusive appurtenant easement as described in the Easement Agreements by and between the City of Albuquerque, New Mexico, and Prlnova Investments, Ltd., a New Mexico corporation, recorded October 30, 2000, in Book A11, Page 6878, as Doc. No. 2000107297, and recorded December 18, 2000, in Book A13, Page 4719, as Doc. No. 2000125179, records of Bernalillo County, New Mexico.

3. PERSONAL PROPERTY

- a. Compass Bank Acct. #2520000480 - MBC Choice Trucking
- b. Wells Fargo Acct. #2734041169 - Love Auto, LLC
- c. Bank of America Acct. #439005117394 - CVZS, LLC
- d. Bank of America Acct # 439004904744 - Sozavac Management, LLC
- e. Bank of America Acct. #439004790767 - NLB Entertainment, LLC
- f. Bank of America Account #325018112953 - Novus Content LLC
- g. NM Bank and Trust Account #120120738 - Café Bien
- h. Wells Fargo Bank Account #5823738520 - Addian Development Company

- i. Southwest Capital Bank Account #7090587 - C&L Enterprises
- j. 2005 Acura RL automobile, VIN# JH4KB16515C002078
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- m. 2010 Hyundai Santa Fe, VIN# 5NMSKDAG0AH367553
- n. 2014 Ford Fusion, VIN# 3FA6P0H75ER301660
- o. 2007 Lexus IS250, VIN# JTHBK262172052628
- p. 2009 Chevrolet Malibu LTZ, VIN# 1G1ZK57799F126233
- q. 2008 BMW 335xi, VIN# WBAWC73528E067292
- r. 2010 Cadillac STS, VIN# 1G6DU6EA4A0141460
- s. 2009 Hyundai Genesis, VIN# KMHGC46E79U026094
- t. 2013 Hyundai Sonata, VIN# 5NPEB4AC6DH724297
- u. 2007 Nissan Altima, VIN# 1N4AL21EX7N439257
- v. 2009 Infiniti G37, VIN# JNKCV61E89M011621
- w. 2007 Mercedes Benz C230, VIN# WDBRF52H27F915346
- x. 2003 Toyota 4Runner, VIN# JTEBT17R130005668
- y. 2006 Honda Pilot EL-L, VIN# 2HKYF18636H538000
- z. 2006 Pontiac Solstice, VIN# 1G2MB35B46Y118588
- aa. Lindsey Cavazos diamond engagement style ring
- bb. \$185,020.00 in U.S. Currency
- cc. Fixtures and restaurant equipment located at Café Bien, 400 Central Avenue, SW,
Albuquerque, New Mexico
- dd. Lettuce Crispers (commercial grade) located at 15 Amy Court, Tijeras, New
Mexico

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:

15/
FOREPERSON OF THE GRAND JURY


Assistant United States Attorney

8/10/2016 2:40 PM