

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Criminal Case No. 15-cr- 211-WJM

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. JOEL EFREN RUELAS-AVILA,  
a/k/a "Efren,"
2. JOSE LUIS RUELAS-TORRES,
3. MARIA DE JESUS ESPINOZA-RODRIGUEZ,  
a/k/a "Maria,"
4. BETITO LAST NAME UNKNOWN,
5. JOSE CARLOS BARRAZA-ACEVES,  
a/k/a "Luis 2525,"
6. HECTOR LIBRADO RIVERA-SANDOVAL,
7. LEO DELFIN,
8. PEDRO ARMANDO GUTIERREZ-NUNEZ,  
a/k/a "Carlos 4109,"
9. RAUL ESTRADA-CASTILLO,  
a/k/a "Javier Rios,"  
a/k/a "Irvin,"  
a/k/a "Ramon,"
10. IVAN HARO-PEREZ,  
a/k/a "Ivan,"
11. JOSE VIDAL LEON-PENUELAS,  
a/k/a "Vidal,"
12. CARLOS ALBERTO PEREZ-GARCIA,
13. PABEL ERBEY BERNAL-LOPEZ,
14. YAJAHIRA MELISSA LOPEZ-CALIDONIO,  
a/k/a "Melissa,"
15. LIGIA LOPEZ-PEREZ,
16. NELI YANIRA CALIDONIO-MEZA,  
a/k/a "Neli." and
17. MARTIN RODRIGUEZ-SANCHEZ,

Defendants.

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**INDICTMENT  
CHARGING STATUTES**

**18 U.S.C. § 2  
18 U.S.C. § 982(a)(1)  
18 U.S.C. § 1956(a)(1)(A)(i)  
18 U.S.C. § 1956(a)(1)(B)(i)  
18 U.S.C. § 1956(h)  
21 U.S.C. § 841(a)(1)  
21 U.S.C. § 841(b)(1)(A)(i)  
21 U.S.C. § 843(b) and (d)  
21 U.S.C. § 846  
21 U.S.C. § 848  
21 U.S.C. § 21 U.S.C. § 853(a)  
21 U.S.C. § 952(a)  
21 U.S.C. § 960(a)(1)  
21 U.S.C. § 960(b)(1)(A)  
21 U.S.C. § 963**

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**COUNT ONE**

On or about and between March 22, 2014 and February 12, 2015, both dates being approximate and inclusive, within the State and District of Colorado and elsewhere, the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” and JOSE LUIS RUELAS-TORRES, did knowingly and intentionally engage in a continuing criminal enterprise in that the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” and JOSE LUIS RUELAS-TORRES, did commit violations of Title 21, United States Code, Sections 841(a)(1), 843, 846, 952(a), 960(a)(1), 960(b)(1)(A) and 963, including but not limited to the violations set forth in Counts Two through Fifteen of this Indictment, which violations were part of a continuing series of violations of those statutes undertaken by the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” and JOSE LUIS RUELAS-TORRES, in concert with five or more other persons, with respect to whom the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” and

JOSE LUIS RUELAS-TORRES, occupied a position of organizer, supervisor or manager, and from which continuing series of violations the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” and JOSE LUIS RUELAS-TORRES, obtained substantial income and resources.

All in violation of Title 21, United States Code, Sections 848(a) and 848(c).

**COUNT TWO**

On or about and between March 22, 2014 and February 12, 2015, both dates being approximate and inclusive, within the State and District of Colorado and elsewhere, the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” JOSE LUIS RUELAS-TORRES, MARIA DE JESUS ESPINOZA-RODRIGUEZ, a/k/a “Maria,” BETITO LNU, JOSE CARLOS BARRAZA-ACEVES, a/k/a “Luis 2525,” HECTOR LIBRADO RIVERA-SANDOVAL, LEO DELFIN, and others both known and unknown to the Grand Jury, did knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance.

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

**COUNT THREE**

On or about and between March 22, 2014 and February 12, 2015, both dates being approximate and inclusive, within the State and District of Colorado and elsewhere, the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” JOSE LUIS RUELAS-TORRES, MARIA DE JESUS ESPINOZA-RODRIGUEZ, a/k/a “Maria,” BETITO LAST NAME UNKNOWN, JOSE CARLOS BARRAZA-ACEVES, a/k/a “Luis 2525,” HECTOR LIBRADO RIVERA-SANDOVAL, and others both known and unknown to the Grand Jury, did knowingly

and intentionally conspire to import into the United States, from a place outside of the United States, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance.

All in violation of Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(1)(A), and 963.

**COUNT FOUR**

On or about April 10, 2014, within the State and District of Colorado, the defendant, JOEL EFREN RUELAS-AVILA, did knowingly and intentionally use a communications device, specifically a telephone, in committing, or in causing or facilitating the commission of, a felony delineated in Title 21 of the United States Code, specifically the crime alleged in Count One of this Indictment.

All in violation of Title 21, United States Code, Sections 843(b) and 843(d).

**COUNT FIVE**

On or about May 1, 2014, within the State and District of Colorado, the defendants JOEL EFREN RUELAS-AVILA, a/k/a "Efren," and JOSE LUIS RUELAS-TORRES, did knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2.

**COUNT SIX**

On or about June 4, 2014, within the State and District of Colorado, the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” and JOSE LUIS RUELAS-TORRES, did knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2.

**COUNT SEVEN**

On or about July 18, 2014, within the State and District of Colorado, the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” and JOSE LUIS RUELAS-TORRES, did knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2.

**COUNT EIGHT**

On or about August 19, 2014, within the State and District of Colorado, the defendant JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” did knowingly and intentionally use a communications device, specifically a telephone, in committing, or in causing or facilitating the

commission of, a felony delineated in Title 21 of the United States Code, specifically the crime alleged in Count One of this Indictment.

All in violation of Title 21, United States Code, Sections 843(b) and 843(d).

**COUNT NINE**

On or about August 28, 2014, within the State and District of Colorado, the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” and MARIA DE JESUS ESPINOZA-RODRIGUEZ, a/k/a “Maria,” did knowingly and intentionally use a communications device, specifically a telephone, in committing, or in causing or facilitating the commission of, a felony delineated in Title 21 of the United States Code, specifically the crime alleged in Count One of this Indictment.

All in violation of Title 21, United States Code, Sections 843(b) and 843(d).

**COUNT TEN**

On or about August 31, 2014, within the State and District of Colorado, the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” JOSE LUIS RUELAS-TORRES, and JOSE CARLOS BARRAZA-ACEVES, a/k/a “Luis 2525,” did knowingly and intentionally import into the United States, from a place outside of the United States, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT ELEVEN**

On or about September 29, 2014, within the State and District of Colorado, the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” JOSE LUIS RUELAS-TORRES, JOSE CARLOS BARRAZA-ACEVES, a/k/a “Luis 2525,” and MARIA DE JESUS ESPINOZA-RODRIGUEZ, a/k/a “Maria,” did knowingly and intentionally import into the United States, from a place outside of the United States, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT TWELVE**

On or about October 1, 2014, within the State and District of Colorado, the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” JOSE LUIS RUELAS-TORRES, JOSE CARLOS BARRAZA-ACEVES, a/k/a “Luis 2525,” and MARIA DE JESUS ESPINOZA-RODRIGUEZ, a/k/a “Maria,” did knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2.

**COUNT THIRTEEN**

On or about November 15, 2014, within the State and District of Colorado, the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” JOSE LUIS RUELAS-TORRES,

and MARIA DE JESUS ESPINOZA-RODRIGUEZ, a/k/a “Maria,” did knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2.

**COUNT FOURTEEN**

On or about December 16, 2014, within the State and District of Colorado, the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” JOSE LUIS RUELAS-TORRES, and MARIA DE JESUS ESPINOZA-RODRIGUEZ, a/k/a “Maria,” did knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2.

**COUNT FIFTEEN**

On or about January 19, 2015, within the State and District of Colorado, the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” JOSE LUIS RUELAS-TORRES, and MARIA DE JESUS ESPINOZA-RODRIGUEZ, a/k/a “Maria,” did knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled



Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2.

**COUNT SIXTEEN**

On or about and between March 22, 2014 and February 12, 2015, both dates being approximate and inclusive, within the State and District of Colorado and elsewhere, the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” JOSE LUIS RUELAS-TORRES, MARIA DE JESUS ESPINOZA-RODRIGUEZ, a/k/a “Maria,” PEDRO ARMANDO GUTIERREZ-NUNEZ, a/k/a “Carlos 4109,” RAUL ESTRADA-CASTILLO, a/k/a “Javier Rios” a/k/a “Irvin,” a/k/a “Ramon,” IVAN HARO-PEREZ, a/k/a “Ivan,” JOSE VIDAL LEON-PENUELAS, a/k/a Vidal, CARLOS ALBERTO PEREZ-GARCIA, PABEL ERBEY BERNAL-LOPEZ, YAHAHIRA MELISSA LOPEZ-CALIDONIO, a/k/a “Melissa,” LIGIA LOPEZ-PEREZ, NELI YANIRA CALIDONIO-MEZA, a/k/a “Neli,” MARTIN RODRIGUEZ-SANCHEZ, and others both known and unknown to the Grand Jury, knowingly conspired to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, in that the defendants did knowingly conspire to conduct, or attempt to conduct, a financial transaction affecting interstate or foreign commerce, knowing that the transaction involved the proceeds of a specified unlawful activity (“SUA”), that SUA specifically being one or both of the conspiracies charged in Counts Two and Three of this Indictment, with the intent to promote the carrying on of the SUA, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) or with the intent to conceal or disguise the nature, the location, the source, the ownership, or the

control of the proceeds of the SUA in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

### **INTRODUCTORY ALLEGATIONS**

1. During the time period alleged in the indictment, Sigue Corporation (“Sigue”) was a money service business (“MSB”) with various agent locations doing business within the State and District of Colorado. As part of its business, Sigue provides electronic/wire money transfer remitter services which enable individuals in the United States to send money to recipients located in the Republic of Mexico and other international locations.

2. During the period of time alleged in the indictment, defendant NELI YANIRA CALIDONIO-MEZA, a/k/a “Neli,” was the registered agent for a Colorado Sigue location using the address 1350 South Chambers Road, Suite #102, Aurora, Colorado. At various times during the conspiracy, this particular Sigue agent location did business under the names: (1) “USA Cell & Envios Hispanos” (“hereinafter USA Cell & Envios”), with designated Sigue agent location #53663, and (2) USA Cell & Services LLC, with designated Sigue agent location #53756, and USA Cell & Services Inc., with designated Sigue agent location #53756 (hereinafter “USA Cell”).

3. During the period of time alleged in the indictment, Sigue did business within the State of Sinaloa in the Republic of Mexico and two such agent locations in Sinaloa, Mexico were: (1) Sigue agent location #78114, doing business under the name “Centro Naturista Eden” (“Eden”) and Sigue agent location #78103, doing business under the name “Semillas Y Agroquimicos Gerardo” (“Agroquimicos”).

4. During the time period alleged in the indictment, Sigue's policy for sending money from the United States to a foreign country, did not require the sender to present identification if the money transfer transaction involves less than \$2,000.00 USD.

5. During the time period alleged in the indictment, Mexican law did not require the beneficiary of the wire-transfer to present identification to obtain the money if the transaction involves less than \$1,000.00 USD. In order to obtain the money, the person only needed to know the specific recipient name which had been designated on the wire-transfer form.

**MANNER AND MEANS OF THE MONEY LAUNDERING CONSPIRACY**

6. It was part of this money-laundering conspiracy that RUELAS-AVILA DTO Colorado-based drug traffickers, including but not limited to defendants PEDRO ARMANDO GUTIERREZ-NUNEZ, RAUL ESTRADA-CASTILLO, IVAN HARO-PEREZ, JOSE VIDAL LEON-PENUELAS, CARLOS ALBERTO PEREZ-GARCIA, and PABEL ERBEY BERNAL-LOPEZ, on a routine and consistent basis, collected and possessed large sums of money ("bulk cash drug proceeds") generated from sales of DTO's supplied heroin.

7. It was part of this conspiracy that RUELAS-AVILA DTO Colorado-based money couriers, including but not limited to defendant YAJAHIRA MELISSA LOPEZ-CALIDONIO, a/k/a "Melissa," on a routine and consistent basis, collected, stored, and ultimately transported the bulk cash drug proceeds to MSBs in Colorado, including but not limited to Sigue MSB agent location USA Cell & Envios/USA Cell.

8. It was part of this money-laundering conspiracy that RUELAS-AVILA DTO Colorado-based money senders/remitters, including but not limited to defendants YAJAHIRA MELISSA LOPEZ-CALIDONIO, a/k/a "Melissa," LIGIA LOPEZ-PEREZ, and NELI YANIRA CALIDONIO-MEZA, a/k/a "Neli," on a routine and consistent basis, sent the bulk cash drug

proceeds, using electronic wire-transfer transactions, from these Colorado-based money service businesses, to either Sinaloa Mexican Sigue agent location #78114 (“Eden”) or Mexican Sigue agent location #78103 (“Agroquimicos”).

9. It was part of this money-laundering conspiracy that defendant MARIA DE JESUS ESPINOZA-RODRIGUEZ, a/k/a “Maria,” a DTO accountant in Mexico, and others, on a routine and consistent basis, communicated with the money senders, and others in the DTO, and gave them a list of specific names to use on the wire-transfer forms.

10. It was part of this money-laundering conspiracy that the money senders/remitters would fill out the wire-transfer transaction forms and use the specific names which had been provided to designate the name of the person receiving the money in Mexico.

11. It was part of this laundering conspiracy that the RUELAS-AVILA DTO money senders/remitters, on a routine and consistent basis, used fake sender and recipient names, addresses, and telephone numbers in connection with these bulk cash wire-transfer transactions, in order to conceal or disguise the nature, the location, the source, the ownership, or the control of the drug proceeds.

12. It was part of this money laundering conspiracy that, in order to further disguise the nature, the location, the source, the ownership, or the control of the drug proceeds, the money senders/remitters, on a routine and consistent basis, did not send more than two or three wire-transfers from any single money service business agent location in any given day. Instead, the money senders/remitters, within a several hour time span, generally traveled between three or four various money service businesses, breaking up the transactions into smaller groups and always sending less than \$1,000.00 in each wire-transfer. Generally, each money sender/remitter would conduct around eleven separate wire-transfers per day, at four or five different money service

business branch locations. The total amount of bulk cash drug proceeds generally laundered by each money sender/remitter, per day, was around \$10,000.00.

13. It was part of this money laundering conspiracy that, after a particular wire-transfer was complete, the money sender/remitter collected a receipt from the money service business which detailed: the money service business agent sending and receiving location; the date and time of the transmission; the transmission order number; the sender and beneficiary information; the amount of United States currency sent plus fees; and the amount of Mexican Pesos to be paid to the beneficiary/recipient.

14. It was part of this money laundering conspiracy that the money senders/remitters, on a routine and consistent basis, took pictures of the receipts and sent the pictures to DTO members in Mexico as part of the accounting process.

15. It was part of this money laundering conspiracy that members of the RUELAS-AVILA DTO communicated with each other via cellular telephones and other communication devices and applications, such as WhatsApp Instant Messaging, to coordinate the collection, delivery, and transfer of the bulk cash drug proceeds.

16. It was part of this money laundering conspiracy that members of the RUELAS-AVILA DTO, on a routine and consistent basis, used coded-language in their communications in an effort to conceal their criminal activities.

17. It was part of this money laundering conspiracy that, during the period of time alleged in the indictment, members of the conspiracy located in Colorado conducted, or caused to be conducted, more than 2,000 individual wire-transfer transactions from Colorado-based MSBs and sent more than \$2,000,000.00 USD to Sigue agents Eden and Agroquimicos in Sinaloa, Mexico.

**OVERT ACTS**

In furtherance of this money laundering conspiracy, on or about the dates set forth below, one or more of the defendants specified below committed, or attempted to commit, one or more of the overt acts set forth below.

Overt Act	Date	Wire Transmission Number	Total \$USD Involved in Transaction	MSB Sending Agent Name	State	Sigue Payment Agent Name & Location	Defendants
1	04/11/2014	53663-3944	\$950.00	"USA Cell & Envious"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
2	04/16/2014	53663-4062	\$945.00	"USA Cell & Envious"	CO	"Agroquimicos" #78103	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
3	04/24/2014	53663-4173	\$950.00	"USA Cell & Envious"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
4	07/21/2014	53578-4059	\$980.00	"New MexMall"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.

5	07/22/2014	53733-78	\$940.00	"Shoe Fashion LLC"	CO	"Agroquimicos" #78103	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
6	07/23/2014	53756-834	\$870.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
7	07/24/2014	53756-850	\$910.00	"USA Cell"	CO	"Agroquimicos" #78103	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
8	07/28/2014	53756-925	\$930.00	"USA Cell"	CO	"Agroquimicos" #78103	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
9	07/30/2014	53756-953	\$950.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.

10	08/25/2014	53756-1469	\$940.00	"USA Cell"	CO	"Eden" #78114	Jose Vidal Leon-Penuelas Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
11	09/15/2014	53756-1896	\$920.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
12	09/16/2014	53756-1901	\$880.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
13	09/18/2014	53756-1933	\$940.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.



14	09/21/2014	53756-2018	\$900.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
15	09/23/2014	53756-2037	\$940.00	"USA Cell"	CO	"Agroquimicos" #78103	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
16	09/24/2014	53680-277	\$920.00	"OK Boots Western Wear LLC"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
17	09/25/2014	53756-2084	\$940.00	"USA Cell"	CO	"Agroquimicos" #78103	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
18	09/28/2014	53756 - 2175	\$800.00	"USA Cell"	CO	"Eden" #78114	Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.

19	12/15/2014	53756-3635	\$980.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
20	01/04/2015	53756-3916	\$900.00	"USA Cell"	CO	"Agroquimicos" #78103	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
21	01/07/2015	53493-3730	\$970.00	"El Angel Market"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.
22	09/03/2014	\$119,953.00	Members of the Ruelas-Avila DTO, including but not limited to defendants Ivan Haro-Perez and Ligia Lopez-Perez, collected, transferred, transported, moved, or delivered bulk cash drug proceeds or attempted to do any of the above, or aided aiding, abetting, counseling, commanding or inducing the same.				Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.

All in violation of Title 18, United States Section 1956(h).

**COUNTS SEVENTEEN THROUGH THIRTY-EIGHT**

On or about the dates set forth below, within the State and District of Colorado, the defendants, as specifically identified below, did knowingly conduct, or attempt to conduct, a financial transaction affecting interstate or foreign commerce, which transaction involved the

proceeds of a specified unlawful activity (“SUA”), that SUA specifically being one or both of the conspiracies charged in Counts Two and Three of this Indictment, with the intent to promote the carrying on of the SUA, or with the intent to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the SUA, or did knowingly and intentionally aid, abet, counsel, command, induce, or procure the same.

All in violation of Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

Count	Date	Wire Transmission Number	Total \$USD Involved in Transaction	MSB Sending Agent Name	State	Sigue Payment Agent Name & Location #	Defendants
17	04/11/2014	53663-3944	\$950.00	“USA Cell & Envious”	CO	“Eden” #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Jose Vidal Leon-Penuelas, Neli Yanira Calidonio-Meza
18	04/16/2014	53663-4062	\$945.00	“USA Cell & Envious”	CO	“Agroquimicos” #78103	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Jose Vidal Leon-Penuelas, Neli Yanira Calidonio-Meza
19	04/24/2014	53663-4173	\$950.00	“USA Cell & Envious”	CO	“Eden” #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Jose Vidal Leon-Penuelas, Neli Yanira Calidonio-Meza
20	07/21/2014	53578-4059	\$980.00	“New MexMall”	CO	“Eden” #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Jose Vidal Leon-Penuelas, Ivan Haro-Perez
21	07/22/2014	53733-78	\$940.00	“Shoe Fashion LLC”	CO	“Agroquimicos” #78103	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Jose Vidal Leon-Penuelas, Ivan Haro-Perez
22	07/23/2014	53756-834	\$870.00	“USA Cell”	CO	“Eden” #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Jose Vidal Leon-Penuelas, Ivan Haro-Perez, Neli Yanira Calidonio-Meza

23	07/24/2014	53756-850	\$910.00	"USA Cell"	CO	"Agroquimicos" #78103	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Jose Vidal Leon-Penuelas, Ivan Haro-Perez, Neli Yanira Calidonio-Meza
24	07/28/2014	53756-925	\$930.00	"USA Cell"	CO	"Agroquimicos" #78103	Jose Vidal Leon-Penuelas Ivan Haro-Perez Melissa Lopez-Calidonia, Neli Yanira Calidonio-Meza
25	07/30/2014	53756-953	\$950.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Jose Vidal Leon-Penuelas, Ivan Haro-Perez, Melissa Lopez-Calidonia, Neli Yanira Calidonio-Meza
26	08/25/2014	53756-1469	\$940.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Jose Vidal Leon-Penuelas, Ivan Haro-Perez, Melissa Lopez-Calidonia, Neli Yanira Calidonio-Meza
27	09/15/2014	53756-1896	\$920.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Melissa Lopez-Calidonia, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza
28	09/16/2014	53756-1901	\$880.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Melissa Lopez-Calidonia, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza
29	09/18/2014	53756-1933	\$940.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Melissa Lopez-Calidonia, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza

30	09/21/2014	53756-2018	\$900.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Melissa Lopez-Calidonia, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza
31	09/23/2014	53756-2037	\$940.00	"USA Cell"	CO	"Agroquimicos" #78103	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Melissa Lopez-Calidonia, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza
32	09/24/2014	53680-277	\$920.00	"OK Boots Western Wear LLC"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Ligia Lopez-Perez
33	09/25/2014	53756-2084	\$940.00	"USA Cell"	CO	"Agroquimicos" #78103	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Melissa Lopez-Calidonia, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza
34	09/28/2014	53756 - 2175	\$940.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Melissa Lopez-Calidonia, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza
35	12/15/2014	53756-3635	\$980.00	"USA Cell"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Melissa Lopez-Calidonia, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza
36	01/04/2015	53756-3916	\$900.00	"USA Cell"	CO	"Agroquimicos" #78103	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Melissa Lopez-Calidonia, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza

37	01/07/2015	53493-3730	\$970.00	"El Angel Market"	CO	"Eden" #78114	Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Melissa Lopez-Calidonia, Ligia Lopez-Perez
38	09/03/2014	\$119,953.00	Members of the Ruelas-Avila DTO, including but not limited to defendants Ivan Haro-Perez and Ligia Lopez-Perez, collected, transferred, transported, moved, or delivered bulk cash drug proceeds or attempted to do any of the above, or aided aiding, abetting, counseling, commanding or inducing the same.			Joel Efren Ruelas-Avila, Jose Luis Ruelas-Torres, Maria De Jesus Espinoza-Rodriguez, Pedro Armando Gutierrez-Nunez, Raul Estrada-Castillo, Ivan Haro-Perez, Jose Vidal Leon-Penuelas, Carlos Alberto Perez-Garcia, Pabel Erbey Bernal-Lopez, Yajahira Melissa Lopez-Calidonio, Ligia Lopez-Perez, Neli Yanira Calidonio-Meza, Martin Rodriguez-Sanchez.	

All in violation of Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i).

### **FORFEITURE ALLEGATIONS**

The allegations contained in Counts One through Fifteen of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853. The allegations contained in Counts Sixteen through Thirty-Eight of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982(a)(1).

Upon conviction of the violations alleged in Counts One through Fifteen of this indictment, including violations of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), 843, 846, 848, 952(a), 960(a)(1), 960(b)(1)(A) and 963, defendants, JOEL EFREN RUELAS-AVILA, a/k/a "Efren," JOSE LUIS RUELAS-TORRES, MARIA DE JESUS ESPINOZA-RODRIGUEZ, a/k/a "Maria," BETITO LAST NAME UNKNOWN, JOSE CARLOS BARRAZA-ACEVES, a/k/a "Luis 2525," HECTOR LIBRADO RIVERA-SANDOVAL, LEO DELFIN, PEDRO ARMANDO GUTIERREZ-NUNEZ, a/k/a "Carlos

4109,” RAUL ESTRADA-CASTILLO, a/k/a “Javier Rios,” a/k/a “Irvin,” a/k/a “Ramon,” IVAN HARO-PEREZ, a/k/a “Ivan,” JOSE VIDAL LEON-PENUELAS, a/k/a “Vidal,” CARLOS ALBERTO PEREZ-GARCIA, PABEL ERBEY BERNAL-LOPEZ, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all of the defendants’ right, title and interest in all property constituting and derived from any proceeds obtained directly and indirectly as a result of such offense, and in all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense, including, but not limited to:

1. \$119,953.00 seized on September 3, 2014.
2. \$109,325.00 seized on September 29, 2014.
3. A money judgment in the amount of \$2,000,000.00 obtained by the conspiracy and by the defendants, for which the defendants are joint and severally liable.

Upon conviction of the violations alleged in Counts Sixteen through Thirty-Eight of this Indictment, including violations of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 1956(h), the defendants JOEL EFREN RUELAS-AVILA, a/k/a “Efren,” JOSE LUIS RUELAS-TORRES, MARIA DE JESUS ESPINOZA-RODRIGUEZ, a/k/a “Maria,” PEDRO ARMANDO GUTIERREZ-NUNEZ, a/k/a “Carlos 4109,” RAUL ESTRADA-CASTILLO, a/k/a “Javier Rios” a/k/a “Irvin,” a/k/a “Ramon,” IVAN HARO-PEREZ, a/k/a “Ivan,” JOSE VIDAL LEON-PENUELAS, a/k/a Vidal, CARLOS ALBERTO PEREZ-GARCIA, PABEL ERBEY BERNAL-LOPEZ, YAJAHIRA MELISSA LOPEZ-CALIDONIO, a/k/a “Melissa,” LIGIA LOPEZ-PEREZ, NELI YANIRA CALIDONIO-MEZA, a/k/a “Neli,” and MARTIN RODRIGUEZ-SANCHEZ, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1) any and all of the defendants’ right, title and interest in all

property, real or personal, involved in such offense, or all property traceable to such property, including, but not limited to:

1. \$119,953.00 seized on September 3, 2014.
2. \$109,325.00 seized on September 29, 2014.
3. A money judgment in the amount of \$2,000,000.00 obtained by the conspiracy and by the defendants, for which the defendants are joint and severally liable.

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

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

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), incorporated by Title 18, United States Code, Section 982, to seek forfeiture of any other property of said defendant[s] up to the value of the forfeitable property.



All in violation of Title 18, United States Code, Section 982(a)(1) and Title 21, United States Code, Section 853.

A TRUE BILL

Ink signature on file in Clerk's office  
FOREPERSON

APPROVED:

JOHN F. WALSH,  
United States Attorney  
District of Colorado

By: s/Stephanie Podolak \_\_\_\_\_  
Stephanie Podolak  
Assistant United States Attorney  
U.S. Attorney's Office  
1225 17<sup>th</sup> St., Suite 700  
Denver, CO 80202  
Telephone (303) 454-0309  
Fax: (303) 454-0401  
e-mail: Stephanie.podolak@usdoj.gov  
Attorney for the Government

DEFENDANT 1: JOEL EFREN RUELAS-AVILA,  
a/k/a "Efren"

YEAR OF BIRTH: 1978

ADDRESS: Sinaloa, Mexico

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_ X \_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_ YES \_\_\_ X \_\_\_ NO

OFFENSE: **COUNT ONE:** Title 21, United States Code, Sections 848(a) and 848(c) - occupied a position of organizer, supervisor or manager, and from which continuing series of violations, obtained substantial income and resources

**COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

**COUNT THREE:** Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(1)(A), and 963 - knowingly and intentionally conspire to import into the United States, from a place outside of the United States, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

**COUNTS FOUR, EIGHT, and NINE:** Title 21, United States Code, Sections 843(b) and 843(d) - knowingly and intentionally use a communications device, specifically a telephone, in committing, or in causing or facilitating the commission of, a felony delineated in Title 21 of the United States Code

**COUNTS FIVE, SIX, SEVEN, and TWELVE:** Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2 - knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**COUNTS TEN and ELEVEN:** Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(1)(A), and Title 18, United States Code, Section 2 - knowingly and intentionally import into the United States, from a place outside of the United States, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**COUNTS THIRTEEN, FOURTEEN, and FIFTEEN:** Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2 - knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**COUNT SIXTEEN:** Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h) – Conspiracy to Launder Money

**COUNTS SEVENTEEN through TWENTY-THREE and TWENTY-FIVE through THIRTY-EIGHT:** Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i) - Conspiracy to Launder Money and knowingly and intentionally aid, abet, counsel, command, induce or procure the same

#### **NOTICE OF FORFEITURE**

##### LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT ONE:** NLT 20 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release

**COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

**COUNT THREE:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

**COUNTS FOUR, EIGHT, and NINE:** NMT 4 years imprisonment, \$250,000.00 fine, or both; NMT 1 year supervised release; and a \$100 Special Assessment Fee (per count)

**COUNTS FIVE, SIX, SEVEN, and TWELVE:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee (per count)

**COUNTS TEN and ELEVEN:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee (per count)

**COUNTS THIRTEEN, FOURTEEN, and FIFTEEN:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee (per count)

**COUNT SIXTEEN:** NMT 20 years imprisonment, \$500,000 fine (or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee

**COUNTS SEVENTEEN through TWENTY-THREE and TWENTY-FIVE through THIRTY-EIGHT:** NMT 20 years imprisonment, \$500,000 fine or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee (per count)

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 631

DEFENDANT 2: JOSE LUIS RUELAS-TORRES

YEAR OF BIRTH: 1953

ADDRESS: Guasave, Mexico

COMPLAINT FILED? \_\_\_\_\_ YES  X  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_ YES  X  NO

OFFENSE: **COUNT ONE:** Title 21, United States Code, Sections 848(a) and 848(c) - occupied a position of organizer, supervisor or manager, and from which continuing series of violations, obtained substantial income and resources

**COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

**COUNT THREE:** Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(1)(A), and 963 - knowingly and intentionally conspire to import into the United States, from a place outside of the United States, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

**COUNTS FIVE, SIX, SEVEN, and TWELVE:** Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2 - knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**COUNTS TEN and ELEVEN:** Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(1)(A), and Title 18, United States Code, Section 2 - knowingly and intentionally import into the United States, from a place outside of the United States, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**COUNTS THIRTEEN, FOURTEEN, and FIFTEEN:** Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2 - knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**COUNT SIXTEEN:** Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h) – Conspiracy to Launder Money

**COUNTS SEVENTEEN through TWENTY-THREE and TWENTY-FIVE through THIRTY-EIGHT:** Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i) - Conspiracy to Launder Money and knowingly and intentionally aid, abet, counsel, command, induce or procure the same

#### **NOTICE OF FORFEITURE**

##### LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT ONE:** NLT 20 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release

**COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

**COUNT THREE:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

**COUNTS FIVE, SIX, SEVEN, and TWELVE:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee (per count)

**COUNTS TEN and ELEVEN:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee (per count)

**COUNTS THIRTEEN, FOURTEEN, and FIFTEEN:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee (per count)

**COUNT SIXTEEN:** NMT 20 years imprisonment, \$500,000 fine (or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee

**COUNTS SEVENTEEN through TWENTY-THREE and TWENTY-FIVE through THIRTY-EIGHT:** NMT 20 years imprisonment, \$500,000 fine or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee (per count)

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 631

DEFENDANT 3: MARIA DE JESUS ESPINOZA-RODRIGUEZ  
a/k/a "Maria"

YEAR OF BIRTH: 1990

ADDRESS: Sinaloa, Mexico

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_ X \_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_ YES \_\_\_ X \_\_\_ NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

**COUNT THREE:** Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(1)(A), and 963 - knowingly and intentionally conspire to import into the United States, from a place outside of the United States, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

**COUNT NINE:** Title 21, United States Code, Sections 843(b) and 843(d) - knowingly and intentionally use a communications device, specifically a telephone, in committing, or in causing or facilitating the commission of, a felony delineated in Title 21 of the United States Code

**COUNT ELEVEN:** Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(1)(A), and Title 18, United States Code, Section 2 - knowingly and intentionally import into the United States, from a place outside of the United States, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**COUNT TWELVE:** Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2 - knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same



**COUNTS THIRTEEN, FOURTEEN, and FIFTEEN:** Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2 - knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**COUNT SIXTEEN:** Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h) – Conspiracy to Launder Money

**COUNTS SEVENTEEN through TWENTY-THREE and TWENTY-FIVE through THIRTY-EIGHT:** Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i) - Conspiracy to Launder Money and knowingly and intentionally aid, abet, counsel, command, induce or procure the same

#### **NOTICE OF FORFEITURE**

##### LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

**COUNT THREE:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

**COUNT NINE:** NMT 4 years imprisonment, \$250,000.00 fine, or both; NMT 1 year supervised release; and a \$100 Special Assessment Fee

**COUNT ELEVEN:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

**COUNT TWELVE:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

**COUNTS THIRTEEN, FOURTEEN, and FIFTEEN:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee (per count)

**COUNT SIXTEEN:** NMT 20 years imprisonment, \$500,000 fine (or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee

**COUNTS SEVENTEEN through TWENTY-THREE and TWENTY-FIVE through THIRTY-EIGHT:** NMT 20 years imprisonment, \$500,000 fine or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee (per count)

Forfeiture

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDEF case: Yes - WC CO 631

DEFENDANT 4: BETITO LAST NAME UNKNOWN

YEAR OF BIRTH: Unknown

ADDRESS: Sinaloa, Mexico

COMPLAINT FILED? \_\_\_\_\_ YES  X  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES  X  NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

**COUNT THREE:** Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(1)(A), and 963 - knowingly and intentionally conspire to import into the United States, from a place outside of the United States, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

**NOTICE OF FORFEITURE**

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

**COUNT THREE:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDEF case: Yes - WC CO 631

DEFENDANT 5: JOSE CARLOS BARRAZA-ACEVES,  
a/k/a "Luis 2525"

YEAR OF BIRTH: 1982

ADDRESS: Nogales, Sonora, Mexico

COMPLAINT FILED? \_\_\_\_\_ YES  X  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES  X  NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

**COUNT THREE:** Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(1)(A), and 963 - knowingly and intentionally conspire to import into the United States, from a place outside of the United States, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

**COUNTS TEN and ELEVEN:** Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(1)(A), and Title 18, United States Code, Section 2 - knowingly and intentionally import into the United States, from a place outside of the United States, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**COUNT TWELVE:** Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i), and Title 18, United States Code, Section 2 - knowingly and intentionally distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and did knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**NOTICE OF FORFEITURE**

LOCATION OF OFFENSE  
(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO**: NLT 10 years, NMT life in prison, \$10 million fine, or both;  
NLT 5 years supervised release, \$100 Special Assessment Fee

**COUNT THREE**: NLT 10 years, NMT life in prison, \$10 million fine, or both;  
NLT 5 years supervised release, \$100 Special Assessment Fee

**COUNTS TEN and ELEVEN**: NLT 10 years, NMT life in prison, \$10 million  
fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee (per  
count)

**COUNT TWELVE**: NLT 10 years, NMT life in prison, \$10 million fine, or both;  
NLT 5 years supervised release, \$100 Special Assessment Fee

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 631

DEFENDANT 6: HECTOR LIBRADO RIVERA-SANDOVAL

YEAR OF BIRTH: 1982

ADDRESS: Sinaloa, Mexico

COMPLAINT FILED? \_\_\_\_\_ YES  X  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES  X  NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

**COUNT THREE:** Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(1)(A), and 963 - knowingly and intentionally conspire to import into the United States, from a place outside of the United States, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

**NOTICE OF FORFEITURE**

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

**COUNT THREE:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 631

DEFENDANT 7: LEO DELFIN

YEAR OF BIRTH: 1981

ADDRESS: Salt Lake County, UT

COMPLAINT FILED? \_\_\_\_\_ YES  X  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES  X  NO

OFFENSE: **COUNT TWO:** Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(i), and 846 - knowingly and intentionally conspire to distribute, or possess with the intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance

**NOTICE OF FORFEITURE**

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT TWO:** NLT 10 years, NMT life in prison, \$10 million fine, or both; NLT 5 years supervised release, \$100 Special Assessment Fee

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 631

DEFENDANT 8: PEDRO ARMANDO GUTIERREZ-NUNEZ,  
a/k/a "Carlos 4109"

YEAR OF BIRTH: 1988

ADDRESS: Piedras Negras, Mexico

COMPLAINT FILED? \_\_\_\_\_ YES  X  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES  X  NO

OFFENSE: **COUNT SIXTEEN**: Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h) – Conspiracy to Launder Money

**COUNTS SEVENTEEN through TWENTY-THREE and TWENTY-FIVE through THIRTY-EIGHT**: Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i) - Conspiracy to Launder Money and knowingly and intentionally aid, abet, counsel, command, induce or procure the same

#### **NOTICE OF FORFEITURE**

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT SIXTEEN**: NMT 20 years imprisonment, \$500,000 fine (or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee

**COUNTS SEVENTEEN through TWENTY-THREE and TWENTY-FIVE through THIRTY-EIGHT**: NMT 20 years imprisonment, \$500,000 fine or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee (per count)

#### **Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney



ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDEF case: Yes - WC CO 631

DEFENDANT 9: RAUL ESTRADA-CASTILLO,  
a/k/a "Javier Rios,"  
a/k/a "Irvin,"  
a/k/a "Ramon,"

YEAR OF BIRTH: 1986

ADDRESS: Clark County, NV

COMPLAINT FILED? \_\_\_\_\_ YES  X  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES  X  NO

OFFENSE: **COUNT SIXTEEN:** Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h) – Conspiracy to Launder Money

**COUNTS SEVENTEEN through TWENTY-THREE and TWENTY-FIVE through THIRTY-EIGHT:** Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i) - Conspiracy to Launder Money and knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**NOTICE OF FORFEITURE**

LOCATION OF OFFENSE  
(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT SIXTEEN:** NMT 20 years imprisonment, \$500,000 fine (or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee

**COUNTS SEVENTEEN through TWENTY-THREE and TWENTY-FIVE through THIRTY-EIGHT:** NMT 20 years imprisonment, \$500,000 fine or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee (per count)

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 631

DEFENDANT 10: IVAN HARO-PEREZ,  
a/k/a "Ivan,"

YEAR OF BIRTH: 1982

ADDRESS: Mexico

COMPLAINT FILED? \_\_\_\_\_ YES  X  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_\_\_ YES  X  NO

OFFENSE: **COUNT SIXTEEN:** Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h) – Conspiracy to Launder Money

**COUNTS TWENTY through TWENTY-SIX and THIRTY-EIGHT:** Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i) - Conspiracy to Launder Money and knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**NOTICE OF FORFEITURE**

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT SIXTEEN:** NMT 20 years imprisonment, \$500,000 fine (or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee

**COUNTS TWENTY through TWENTY-SIX and THIRTY-EIGHT:**  
NMT 20 years imprisonment, \$500,000 fine or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee (per count)

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 631

DEFENDANT 11: JOSE VIDAL LEON-PENUELAS,  
a/k/a "Vidal,"

YEAR OF BIRTH: 1989

ADDRESS: Sinaloa, Mexico

COMPLAINT FILED? \_\_\_\_\_ YES \_\_\_ X \_\_\_ NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_ YES \_\_\_ X \_\_\_ NO

OFFENSE: **COUNT SIXTEEN:** Title 18, United States Code, Sections 1956(a)(1)(A)(i),  
1956(a)(1)(B)(i) and 1956(h) – Conspiracy to Launder Money

**COUNTS SEVENTEEN through TWENTY-SIX and THIRTY-EIGHT:**  
Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i) -  
Conspiracy to Launder Money and knowingly and intentionally aid, abet, counsel,  
command, induce or procure the same

#### **NOTICE OF FORFEITURE**

LOCATION OF OFFENSE  
(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT SIXTEEN:** NMT 20 years imprisonment, \$500,000 fine (or twice the  
value of the property, whichever is greater), or both; NLT 3 years supervised  
release, \$100 Special Assessment Fee

**COUNTS SEVENTEEN through TWENTY-SIX and THIRTY-EIGHT:**  
NMT 20 years imprisonment, \$500,000 fine or twice the value of the property,  
whichever is greater), or both; NLT 3 years supervised release, \$100 Special  
Assessment Fee (per count)

#### **Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 631

DEFENDANT 12: CARLOS ALBERTO PEREZ-GARCIA

YEAR OF BIRTH: 1993

ADDRESS: Delta Department of Corrections

COMPLAINT FILED? \_\_\_\_\_ YES  X  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_ YES  X  NO

OFFENSE: **COUNT SIXTEEN:** Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h) – Conspiracy to Launder Money

**COUNTS TWENTY-SEVEN through THIRTY-FOUR and THIRTY-EIGHT:** Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i) - Conspiracy to Launder Money and knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**NOTICE OF FORFEITURE**

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT SIXTEEN:** NMT 20 years imprisonment, \$500,000 fine (or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee

**COUNTS TWENTY-SEVEN through THIRTY-FOUR and THIRTY-EIGHT:** NMT 20 years imprisonment, \$500,000 fine or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee (per count)

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak, Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 631

DEFENDANT 13: PABEL ERBEY BERNAL-LOPEZ

YEAR OF BIRTH: 1991

ADDRESS: Sinaloa, Mexico

COMPLAINT FILED? \_\_\_\_\_ YES  X  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: \_\_\_\_\_

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? \_\_\_ YES  X  NO

OFFENSE: **COUNT SIXTEEN:** Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h) – Conspiracy to Launder Money

**COUNTS TWENTY-SEVEN through THIRTY-FOUR and THIRTY-EIGHT:** Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i) - Conspiracy to Launder Money and knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**NOTICE OF FORFEITURE**

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT SIXTEEN:** NMT 20 years imprisonment, \$500,000 fine (or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee

**COUNTS TWENTY-SEVEN through THIRTY-FOUR and THIRTY-EIGHT:** NMT 20 years imprisonment, \$500,000 fine or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee (per count)

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak, Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 631

DEFENDANT 14: YAJAHIRA MELISSA LOPEZ-CALIDONIO  
a/k/a "Melissa"

YEAR OF BIRTH: 1993

ADDRESS: Arapahoe County, CO

COMPLAINT FILED?  YES  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: 15-mj-01081-MEH

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT?  YES  NO

OFFENSE: **COUNT SIXTEEN:** Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h) – Conspiracy to Launder Money

**COUNT THIRTY-EIGHT:** Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i) - Conspiracy to Launder Money and knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**NOTICE OF FORFEITURE**

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT SIXTEEN:** NMT 20 years imprisonment, \$500,000 fine (or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee

**COUNT THIRTY-EIGHT:** NMT 20 years imprisonment, \$500,000 fine or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee (per count)

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak, Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 631



DEFENDANT 15: LIGIA LOPEZ-PEREZ

YEAR OF BIRTH: 1982

ADDRESS: Arapahoe County, CO

COMPLAINT FILED?  YES  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: 15-mj-01081-MEH

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT?  (05/11/15) YES  NO

OFFENSE: **COUNT SIXTEEN:** Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h) – Conspiracy to Launder Money

**COUNTS TWENTY-SEVEN through THIRTY-EIGHT:** Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i) - Conspiracy to Launder Money and knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**NOTICE OF FORFEITURE**

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT SIXTEEN:** NMT 20 years imprisonment, \$500,000 fine (or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee

**COUNTS TWENTY-SEVEN through THIRTY-EIGHT:** NMT 20 years imprisonment, \$500,000 fine or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee (per count)

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 631

DEFENDANT 16: NELI YANIRA CALIDONIO-MEZA,  
a/k/a "Neli"

YEAR OF BIRTH: 1983

ADDRESS: Arapahoe County, CO

COMPLAINT FILED?  YES  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: 15-mj-01081-MEH

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT?  (05/11/15) YES  NO

OFFENSE: **COUNT SIXTEEN:** Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h) – Conspiracy to Launder Money

**COUNTS SEVENTEEN through NINETEEN, TWENTY-TWO through THIRTY-ONE, THIRTY-THREE through THIRTY-SIX, and THIRTY-EIGHT:** Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i) - Conspiracy to Launder Money and knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**NOTICE OF FORFEITURE**

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT SIXTEEN:** NMT 20 years imprisonment, \$500,000 fine (or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee

**COUNTS SEVENTEEN through NINETEEN, TWENTY-TWO through THIRTY-ONE, THIRTY-THREE through THIRTY-SIX, and THIRTY-EIGHT:** NMT 20 years imprisonment, \$500,000 fine or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee (per count)

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDEF case: Yes - WC CO 631

DEFENDANT 17: MARTIN RODRIGUEZ-SANCHEZ

YEAR OF BIRTH: 1992

ADDRESS: Denver County, CO

COMPLAINT FILED?  YES  NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: 15-mj-01081-MEH

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT?  (05/11/15) YES  NO

OFFENSE: **COUNT SIXTEEN:** Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(h) – Conspiracy to Launder Money

**COUNT THIRTY-EIGHT:** Title 18, United States Code, Sections 2, 1956(a)(1)(A)(i), and 1956(a)(1)(B)(i) - Conspiracy to Launder Money and knowingly and intentionally aid, abet, counsel, command, induce or procure the same

**NOTICE OF FORFEITURE**

LOCATION OF OFFENSE

(COUNTY/STATE): Denver County, Colorado

PENALTY: **COUNT SIXTEEN:** NMT 20 years imprisonment, \$500,000 fine (or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee

**COUNT THIRTY-EIGHT:** NMT 20 years imprisonment, \$500,000 fine or twice the value of the property, whichever is greater), or both; NLT 3 years supervised release, \$100 Special Assessment Fee

**Forfeiture**

AGENTS: Kenneth R. Valdez, Special Agent, IRS-CI  
Eric Maul, Special Agent, DEA

AUTHORIZED BY: Stephanie Podolak  
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL: More than five days

THE GOVERNMENT **will** seek detention in this case.

OCDETF case: Yes - WC CO 631