

DISTRICT COURT, CITY AND COUNTY OF
DENVER, COLORADO

1437 Bannock Street
Denver, CO 80202

THE PEOPLE OF THE STATE OF COLORADO,

v.

Jose DeJesus BERNAL-ZAMORA
a/k/a Gilberto Bernal MAZORAQUI
Aldo Heron PENA-BAILON a/k/a Lupe1
Roberto CARLOS-CORREA
Jose Martin CALDERON-PEREZ
Jacob Alan GARCIA
Alonso CALDERON-PEREZ
FNU LNU a/k/a Conejo
FNU LNU a/k/a Armando
Juan Carlos CORRALES
Lubomir ARABADJIEV
Eden ORTIZ
Cesar ANGULO-ACUNA
Jesus ALVAREZ-VALDEZ
Baird FISCHER
Pierce LARSEN
Tulio Josue ARTEAGA-RAMIREZ a/k/a Chiqui
Ignacio VILLALOBOS-LOPEZ
Victor Lauro GUERRERO-MERCADO
Juan Rabago BUSTAMANTE
Michael Shane FOWLER
Marcos SOLANO
Melicio ESPARZA-CHIHUAHUA
Jose Manuel LAZCANO-AGUILAR a/k/a Chavete
Fermin LUQUE-MOLINA
FNU LNU a/k/a Jaime;

Defendants.

▲ COURT USE ONLY ▲

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Case No:
GJ Case No.: 16CR01
Ctrm: 259

COLORADO STATE GRAND JURY INDICTMENT - SUPERSEDING

Of the 2016-2017 term of the Denver District Court in the year 2016; the 2016-2017 Colorado State Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

COUNT 1:
37284 COCCA – Pattern of Racketeering – Participation in an Enterprise, § 18-17-104(3), C.R.S., (F2)

Jose DeJesus BERNAL-ZAMORA
a/k/a Gilberto Bernal MAZORAQUI
Aldo Heron PENA-BAILON a/k/a Lupe1
Roberto CARLOS-CORREA
Jose Martin CALDERON-PEREZ
Jacob Alan GARCIA
Alonso CALDERON-PEREZ
FNU LNU a/k/a Conejo
FNU LNU a/k/a Armando

COUNT 2:
37284 COCCA – Conspiracy, § 18-17-104(4), C.R.S., (F2)

Jose DeJesus BERNAL-ZAMORA
a/k/a Gilberto Bernal MAZORAQUI
Aldo Heron PENA-BAILON a/k/a Lupe1
Roberto CARLOS-CORREA
Jose Martin CALDERON-PEREZ
Jacob Alan GARCIA
Alonso CALDERON-PEREZ
FNU LNU a/k/a Conejo
FNU LNU a/k/a Armando

COUNT 3:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Jose DeJesus BERNAL-ZAMORA
a/k/a Gilberto Bernal MAZORAQUI;
Aldo Heron PENA-BAILON a/k/a Lupe1;
Juan Carlos CORRALES

COUNT 4:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Juan Carlos CORRALES

COUNT 5:
8105N Conspiracy to Distribute a Controlled Substance—Heroin—
7-112 Grams; (DF2)
§ 18-18-405(1),(2)(b)(I)(B), C.R.S.,

Roberto CARLOS-CORREA;
Aldo Heron PENA-BAILON a/k/a Lupe1;
Lubomir ARABADJIEV

COUNT 6:
8105K Conspiracy to Distribute a Controlled Substance—
Schedule II—14-225 Grams; (DF2)
§ 18-18-405(1),(2)(b)(I)(A), C.R.S.,

Roberto CARLOS-CORREA;
Aldo Heron PENA-BAILON a/k/a Lupe1;
Lubomir ARABADJIEV

COUNT 7:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Jose DeJesus BERNAL-ZAMORA
 a/k/a Gilberto Bernal MAZORAQUI;
Jose Martin CALDERON-PEREZ

COUNT 8:
8105M Conspiracy to Distribute a Controlled Substance—Heroin;
(DF3)
§ 18-18-405(1),(2)(c)(II), C.R.S.,

Jose DeJesus BERNAL-ZAMORA
 a/k/a Gilberto Bernal MAZORAQUI;
Roberto CARLOS-CORREA;
Jacob Alan GARCIA

COUNT 9:
8105J Conspiracy to Distribute a Controlled Substance—
Schedule II; (DF3)
§ 18-18-405(1),(2)(c)(I), C.R.S.,

Jose DeJesus BERNAL-ZAMORA
 a/k/a Gilberto Bernal MAZORAQUI;
Roberto CARLOS-CORREA;
Jacob Alan GARCIA

COUNT 10:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Jose DeJesus BERNAL-ZAMORA
a/k/a Gilberto Bernal MAZORAQUI;
FNU LNU a/k/a Jaime; Eden ORTIZ

COUNT 11:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Jose DeJesus BERNAL-ZAMORA
a/k/a Gilberto Bernal MAZORAQUI;
Jose Martin CALDERON-PEREZ

COUNT 12:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Jose DeJesus BERNAL-ZAMORA
a/k/a Gilberto Bernal MAZORAQUI;
Jose Martin CALDERON-PEREZ;
Roberto CARLOS-CORREA

COUNT 13:
8105M Conspiracy to Distribute a Controlled Substance—Heroin;
(DF3)
§ 18-18-405(1),(2)(c)(II), C.R.S.,

Roberto CARLOS-CORREA; Jacob Alan GARCIA

COUNT 14:
8105J Conspiracy to Distribute a Controlled Substance—
Schedule II; (DF3)
§ 18-18-405(1),(2)(c)(I), C.R.S.,

Roberto CARLOS-CORREA; Jacob Alan GARCIA

COUNT 15:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Jose DeJesus BERNAL-ZAMORA
a/k/a Gilberto Bernal MAZORAQUI;
Jose Martin CALDERON-PEREZ; FNU LNU a/k/a Conejo

COUNT 16:
12214C Conspiracy to Commit Money Laundering; (F4)
 § 18-2-201(1); 18-5-309(1)(b)(I), C.R.S.,

 Jose DeJesus BERNAL-ZAMORA
 a/k/a Gilberto Bernal MAZORAQUI;
 Jose Martin CALDERON-PEREZ; FNU LNU a/k/a Conejo

COUNT 17:
12214 Money Laundering; (F3)
 § 18-2-201(1); 18-5-309(1)(b)(I), C.R.S.,

 Cesar ANGULO-ACUNA; Jesus ALVAREZ-VALDEZ

COUNT 18:
8105N Conspiracy to Distribute a Controlled Substance—Heroin—
 7-112 Grams; (DF2)
 § 18-18-405(1),(2)(b)(I)(B), C.R.S.,

 Jose DeJesus BERNAL-ZAMORA
 a/k/a Gilberto Bernal MAZORAQUI;
 Roberto CARLOS-CORREA;
 Baird FISCHER

COUNT 19:
8105K Conspiracy to Distribute a Controlled Substance—
 Schedule II—14-225 Grams; (DF2)
 § 18-18-405(1),(2)(b)(I)(A), C.R.S.,

 Jose DeJesus BERNAL-ZAMORA
 a/k/a Gilberto Bernal MAZORAQUI;
 Roberto CARLOS-CORREA;
 Baird FISCHER

COUNT 20:
8202H Distribution of a Controlled Substance—Heroin—
 7-112 Grams; (DF2)
 § 18-18-405(1),(2)(b)(I)(B), C.R.S.,

 Baird FISCHER

COUNT 21:
8104A Possession with Intent to Distribute a Controlled Substance—
 Heroin—7-112 Grams; (DF2)
 § 18-18-405(1),(2)(b)(I)(B), C.R.S.,

 Pierce LARSEN

COUNT 22:
8102C Distribution of a Controlled Substance a Controlled
 Substance—Schedule II—14-225 Grams; (DF2)
 § 18-18-405(1),(2)(b)(I)(A), C.R.S.,

 Baird FISCHER

COUNT 23:
81047 Possession with Intent to Distribute a Controlled Substance—
Schedule II—14-225 Grams; (DF2)
§ 18-18-405(1),(2)(b)(I)(A), C.R.S.,

Pierce LARSEN

COUNT 24:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Jose Martin CALDERON-PEREZ;
Tulio Josue ARTEAGA-RAMIREZ a/k/a Chiqui

COUNT 25:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Jose Martin CALDERON-PEREZ; FNU LNU a/k/a Conejo

COUNT 26:
8104B Possession with Intent to Distribute a Controlled Substance—
Heroin—More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Ignacio VILLALOBOS-LOPEZ

COUNT 27:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Jose DeJesus BERNAL-ZAMORA
a/k/a Gilberto Bernal MAZORAQUI;
Jose Martin CALDERON-PEREZ;
Alonso CALDERON-PEREZ; FNU LNU a/k/a Conejo;
Victor Lauro GUERRERO-MERCADO;
Juan Rabago BUSTAMANTE

COUNT 28:
12214C Conspiracy to Commit Money Laundering; (F4)
§ 18-2-201(1); 18-5-309(1)(b)(I), C.R.S.,

Jose DeJesus BERNAL-ZAMORA
a/k/a Gilberto Bernal MAZORAQUI;
Jose Martin CALDERON-PEREZ;
Alonso CALDERON-PEREZ; FNU LNU a/k/a Conejo;
Victor Lauro GUERRERO-MERCADO;
Juan Rabago BUSTAMANTE

COUNT 29:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Alonso CALDERON-PEREZ; FNU LNU a/k/a Armando;
Michael Shane FOWLER

COUNT 30:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Jose Martin CALDERON-PEREZ; FNU LNU a/k/a Conejo;
Marcos SOLANO

COUNT 31:
12214C Conspiracy to Commit Money Laundering; (F4)
§ 18-2-201(1); 18-5-309(1)(b)(I), C.R.S.,

Jose Martin CALDERON-PEREZ; FNU LNU a/k/a Conejo;
Marcos SOLANO

COUNT 32:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Jose DeJesus BERNAL-ZAMORA
a/k/a Gilberto Bernal MAZORAQUI;
Melicio ESPARZA-CHIHUAHUA;
Jose Manuel LAZCANO-AGUILAR a/k/a Chavete

COUNT 33:
8105J Conspiracy to Distribute a Controlled Substance—
Schedule II; (DF3)
§ 18-18-405(1),(2)(c)(I), C.R.S.,

Jose DeJesus BERNAL-ZAMORA
a/k/a Gilberto Bernal MAZORAQUI;
Melicio ESPARZA-CHIHUAHUA;
Jose Manuel LAZCANO-AGUILAR a/k/a Chavete

COUNT 34:
8105P Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Alonso CALDERON-PEREZ; FNU LNU a/k/a Armando;
Michael Shane FOWLER; Fermin LUQUE-MOLINA

COUNT 35:
12214C Conspiracy to Commit Money Laundering; (F4)
 § 18-2-201(1); 18-5-309(1)(b)(I), C.R.S.,

 Alonso CALDERON-PEREZ; FNU LNU a/k/a Armando;
 Michael Shane FOWLER; Fermin LUQUE-MOLINA

COUNT 36:
8104B Possession with Intent to Distribute a Controlled Substance—
 Heroin—More than 112 Grams; (DF1)
 § 18-18-405(1),(2)(a)(I)(B), C.R.S.,

 Jose DeJesus BERNAL-ZAMORA
 a/k/a Gilberto Bernal MAZORAQUI

COUNT 37:
81047 Possession with Intent to Distribute a Controlled Substance—
 Schedule II—14-225 Grams; (DF2)
 § 18-18-405(1),(2)(b)(I)(A), C.R.S.,

 Jose DeJesus BERNAL-ZAMORA
 a/k/a Gilberto Bernal MAZORAQUI

COUNT 38:
12214C Conspiracy to Commit Money Laundering; (F4)
 § 18-2-201(1); 18-5-309(1)(b)(I), C.R.S.,

 Jose DeJesus BERNAL-ZAMORA
 a/k/a Gilberto Bernal MAZORAQUI

COUNT 39:
8104B Possession with Intent to Distribute a Controlled Substance—
 Heroin—More than 112 Grams; (DF1)
 § 18-18-405(1),(2)(a)(I)(B), C.R.S.,

 Jose Martin CALDERON-PEREZ;
 Alonso CALDERON-PEREZ; Fermin LUQUE-MOLINA

COUNT 40:
8104A Possession with Intent to Distribute a Controlled Substance—
 Methamphetamine—7-112 Grams; (DF2)
 § 18-18-405(1),(2)(b)(I)(B), C.R.S.,

 Jose Martin CALDERON-PEREZ;
 Alonso CALDERON-PEREZ; Fermin LUQUE-MOLINA

COUNT 41:
12214C Conspiracy to Commit Money Laundering; (F4)
 § 18-2-201(1); 18-5-309(1)(b)(I), C.R.S.,

 Jose Martin CALDERON-PEREZ;
 Alonso CALDERON-PEREZ; Fermin LUQUE-MOLINA

- COUNT 42:
8104A Possession with Intent to Distribute a Controlled Substance—
Heroin—7-112 Grams; (DF2)
§ 18-18-405(1),(2)(b)(I)(B), C.R.S.,

Jacob GARCIA
- COUNT 43:
8104A Possession with Intent to Distribute a Controlled Substance—
Methamphetamine—7-112 Grams; (DF2)
§ 18-18-405(1),(2)(b)(I)(B), C.R.S.,

Jacob GARCIA
- COUNT 44:
8104B Possession with Intent to Distribute a Controlled Substance—
Heroin—More than 112 Grams; (DF1)
§ 18-18-405(1),(2)(a)(I)(B), C.R.S.,

Tulio Josue Arteaga-Ramirez a/k/a Chiqui
- COUNT 45:
8104A Possession with Intent to Distribute a Controlled Substance—
Methamphetamine—7-112 Grams; (DF2)
§ 18-18-405(1),(2)(b)(I)(B), C.R.S.,

Tulio Josue Arteaga-Ramirez a/k/a Chiqui
- COUNT 46:
81047 Possession with Intent to Distribute a Controlled Substance—
Schedule II—14-225 Grams; (DF2)
§ 18-18-405(1),(2)(b)(I)(A), C.R.S.,

Tulio Josue Arteaga-Ramirez a/k/a Chiqui
- COUNT 47:
12214C Conspiracy to Commit Money Laundering; (F4)
§ 18-2-201(1); 18-5-309(1)(b)(I), C.R.S.,

Tulio Josue Arteaga-Ramirez a/k/a Chiqui

Defendant:	Charges:
Jose DeJesus BERNAL-ZAMORA a/k/a Gilberto Bernal MAZORAQUI	1, 2, 3, 7, 8, 9, 10, 11, 12, 15, 16, 18, 19, 27, 28, 32, 33, 36, 37, 38
Aldo Heron PENA-BAILON a/k/a Lupe1	1, 2, 3, 5, 6
Roberto CARLOS-CORREA	1, 2, 5, 6, 8, 9, 12, 13, 14, 18, 19
Jose Martin CALDERON-PEREZ	1, 2, 7, 11, 12, 15, 16, 24, 25, 27, 28, 30, 31, 39, 40, 41
Jacob Alan GARCIA	1, 2, 8, 9, 13, 14, 42, 43
Alonso CALDERON-PEREZ	1, 2, 27, 28, 29, 34, 35, 39, 40, 41
FNU LNU a/k/a Conejo	1, 2, 15, 16, 25, 27, 28, 30, 31
FNU LNU a/k/a Armando	1, 2, 29, 34, 35
Juan Carlos CORRALES	3, 4
Lubomir ARABADJIEV	5, 6
Eden ORTIZ	10
Cesar ANGULO-ACUNA	17
Jesus ALVAREZ-VALDEZ	17
Baird FISCHER	18, 19, 20, 22
Pierce LARSEN	21, 23
Tulio Josue ARTEAGA-RAMIREZ a/k/a Chiqui	24, 44, 45, 46, 47

Ignacio VILLALOBOS-LOPEZ	26
Victor GUERRERO-MERCADO	27, 28
Juan Rabago BUSTAMANTE	27, 28
Michael Shane FOWLER	29, 34
Marcos SOLANO	30, 31
Melicio ESPARZA-CHIHUAHUA	32, 33
Jose Manuel LAZCANO-AGUILAR a/k/a Chavete	32, 33
Fermin LUQUE-MOLINA	34, 39, 40, 41
FNU LNU a/k/a Jaime;	10

COUNT 1
**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT —
PATTERN OF RACKETEERING—PARTICIPATION IN AN ENTERPRISE,
C.R.S. 18-17-104(3) and 18-17-105 (F2)**

Between the dates of September 1, 2015, and July 7, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora a/k/a Gilberto Bernal Mazoraqui; Aldo Heron Pena-Bailon a/k/a Lupe1; Roberto Carlos-Correa; Jose Martin Calderon-Perez; Jacob Garcia; Alonso Calderon-Perez; FNU LNU a/k/a Conejo; FNU LNU a/k/a Armando;** and others both known and unknown, while employed by or associated with an enterprise, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity: in violation of sections 18-17-104(3) and 18-17-105, C.R.S.

COUNT 2
**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT —
CONSPIRACY, C.R.S. 18-17-104(4) (F2)**

Between the dates of September 1, 2015, and July 7, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora a/k/a Gilberto Bernal Mazoraqui; Aldo Heron Pena-Bailon a/k/a Lupe1; Roberto Carlos-Correa; Jose Martin Calderon-Perez; Jacob Garcia; Alonso Calderon-Perez; FNU LNU a/k/a Conejo; FNU LNU a/k/a Armando;** and others both known and unknown, unlawfully, knowingly, and feloniously conspired to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity in violation of C.R.S. § 18-17-104(4) and § 18-17-104(3), C.R.S.

The offenses alleged in Counts 1 and 2 were committed in the following manner:

The Enterprise

The criminal enterprise alleged in Counts 1 and Two was primarily a group of individuals, associated in fact, although not a legal entity. The enterprise included, but was not limited to, the following associated in fact individuals and/or legal entities: **Jose DeJesus Bernal-Zamora a/k/a Gilberto Bernal Mazoraqui; Aldo Heron Pena-Bailon a/k/a Lupe1; Roberto Carlos-Correa; Jose Martin Calderon-Perez; Jacob Garcia; Alonso Calderon-Perez; FNU LNU a/k/a Conejo; FNU LNU a/k/a Armando;** and others both known and unknown to the Grand Jury.

The individuals associated with the enterprise had a primary objective and a common purpose to import illegal controlled substances, including heroin, into the state of Colorado, and to further distribute these illegal controlled substances to various customers throughout the Denver Metro, Colorado area. A secondary and related objective and common purpose of the criminal enterprise was to collect and transport the proceeds generated from the sale of these illegal controlled substances to the original sources of supply of the illegal controlled substances, who are based in the Republic of Mexico, in a manner that conceals the illegal nature of these proceeds.

Each of the members of the criminal enterprise relied upon and utilized a complex system of cellular telephones to arrange and execute the importation, the transportation, and the distribution of these illegal controlled substances both into the state of Colorado, and throughout the Denver Metro area. Because the members of the criminal enterprise used cellular telephones so extensively to conduct the business and operations of the enterprise, the members often utilized coded terminology when speaking to each other on the telephone in order to conceal their criminal activities.

Pattern of Racketeering Activity

Jose DeJesus Bernal-Zamora a/k/a Gilberto Bernal Mazoraqui; Aldo Heron Pena-Bailon a/k/a Lupe1; Roberto Carlos-Correa; Jose Martin Calderon-Perez; Jacob Garcia; Alonso Calderon-Perez; FNU LNU a/k/a Conejo; FNU LNU a/k/a Armando; and others both known and unknown to the Grand Jury directly and in concert, engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, including any lesser offenses, related to the conduct of the enterprise, with at least one of which took place in the state of Colorado after July 1, 1981 and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

Distribution of a Controlled Substance (Colorado Revised Statutes)
Conspiracy to Distribute a Controlled Substance (Colorado Revised Statutes)
Possession with Intent to Distribute a Controlled Substance (Colorado Revised Statutes)
Conspiracy to Commit Money Laundering (Colorado Revised Statutes)
Money Laundering (Colorado Revised Statutes)
Unlawful Use of a Telecommunications Facility (United States Code)

Pursuant to C.R.S. § 18-17-103(5)(a), "**Racketeering Activity**" includes any conduct defined as "racketeering activity" under 18 U.S.C. 1961 (1)(A), (1)(B), (1)(C), and (1)(D), including the act of Unlawful Use of a Telecommunications Facility, in violation of 21 U.S.C. § 843.

Racketeering Activity

The acts of racketeering activity that the above named persons committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated another person to commit, consist of the following predicate acts, including any lesser included offenses:

PREDICATE ACT 1
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of November 5, 2015, and November 20, 2015, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Aldo Heron Pena-Bailon a/k/a Lupe1,** and Juan Carlos Corrales unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE ACT 2
Unlawful Use of a Communication Facility

Between the dates of November 5, 2015, and November 20, 2015, in the state of Colorado, **Jose DeJesus Bernal-Zamora and Aldo Heron Pena-Bailon a/k/a Lupe1** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 3
**Conspiracy to Distribute a Controlled Substance—Heroin—
7-112 Grams, (DF2)**

Between the dates of January 5, 2016, and January 8, 2016, in the state of Colorado, **Roberto Carlos-Correa, Aldo Heron Pena-Bailon a/k/a Lupe1,** and Lubomir Arabadjiev unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but less than one hundred twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

PREDICATE ACT 4
**Conspiracy to Distribute a Controlled Substance—Schedule II—
14-225 Grams, (DF2)**

Between the dates of January 5, 2016, and January 8, 2016, in the state of Colorado, **Roberto Carlos-Correa, Aldo Heron Pena-Bailon a/k/a Lupe1**, and Lubomir Arabadjiev unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute a Schedule II controlled substance, cocaine.

Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but less than two hundred twenty-five grams; in violation of section 18-18-405(1),(2)(b)(I)(A), C.R.S.

PREDICATE ACT 5
Unlawful Use of a Communication Facility

Between the dates of January 5, 2016, and January 8, 2016, in the state of Colorado, **Roberto Carlos-Correa** and **Aldo Heron Pena-Bailon a/k/a Lupe1** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 6
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of January 19, 2016, and January 23, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** and **Jose Martin Calderon-Perez** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE ACT 7
Unlawful Use of a Communication Facility

Between the dates of January 19, 2016, and January 23, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** and **Jose Martin Calderon-Perez** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 8

Conspiracy to Distribute a Controlled Substance—Heroin (DF3)

On or about January 20, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Roberto Carlos-Correa, and Jacob Garcia** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II), C.R.S.

PREDICATE ACT 9

Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about January 20, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Roberto Carlos-Correa, and Jacob Garcia** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute a Schedule II controlled substance, cocaine; in violation of section 18-18-405(1),(2)(c)(I), C.R.S.

PREDICATE ACT 10

Unlawful Use of a Communication Facility

On or about January 20, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Roberto Carlos-Correa, and Jacob Garcia** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 11

**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of February 2, 2016, and February 9, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, FNU LNU a/k/a Jaime, and Eden Ortiz** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE ACT 12
Unlawful Use of a Communication Facility

Between the dates of February 2, 2016, and February 9, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 13
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of February 18, 2016, and February 22, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** and **Jose Martin Calderon-Perez** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE ACT 14
Unlawful Use of a Communication Facility

Between the dates of February 18, 2016, and February 22, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** and **Jose Martin Calderon-Perez** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 15
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

On or about March 8, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora**, **Jose Martin Calderon-Perez**, and **Roberto Carlos-Correa** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE ACT 16
Unlawful Use of a Communication Facility

On or about March 8, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Jose Martin Calderon-Perez,** and **Roberto Carlos-Correa** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 17
Conspiracy to Distribute a Controlled Substance—Heroin (DF3)

On or about April 12, 2016, in the state of Colorado, **Roberto Carlos-Correa** and **Jacob Garcia** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II), C.R.S.

PREDICATE ACT 18
Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about April 12, 2016, in the state of Colorado, **Roberto Carlos-Correa** and **Jacob Garcia** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute a Schedule II controlled substance, cocaine; in violation of section 18-18-405(1),(2)(c)(I), C.R.S.

PREDICATE ACT 19
Unlawful Use of a Communication Facility

On or about April 12, 2016, in the state of Colorado, **Roberto Carlos-Correa** and **Jacob Garcia** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 20
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of April 16, 2016, and April 22, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Jose Martin Calderon-Perez, and FNU LNU a/k/a Conejo** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE ACT 21
Conspiracy to Commit Money Laundering, (F4)

Between the dates of April 16, 2016, and April 22, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Jose Martin Calderon-Perez, and FNU LNU a/k/a Conejo**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering; in violation of section 18-2-201(1); and 18-5-309(1)(b)(I), C.R.S.

PREDICATE ACT 22
Unlawful Use of a Communication Facility

Between the dates of April 16, 2016, and April 22, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Jose Martin Calderon-Perez, and FNU LNU a/k/a Conejo** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 23
**Conspiracy to Distribute a Controlled Substance—Heroin—
7-112 Grams, (DF2)**

On or about May 3, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Roberto Carlos-Correa**, and Baird Fischer unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but less than one hundred twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

PREDICATE ACT 24
**Conspiracy to Distribute a Controlled Substance—Schedule II—
14-225 Grams, (DF2)**

On or about May 3, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Roberto Carlos-Correa**, and Baird Fischer unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute a Schedule II controlled substance, cocaine.

Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but less than two hundred twenty-five grams; in violation of section 18-18-405(1),(2)(b)(I)(A), C.R.S.

PREDICATE ACT 25
Unlawful Use of a Communication Facility

On or about May 3, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** and **Roberto Carlos-Correa** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 26
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of May 8, 2016, and May 9, 2016, in the state of Colorado, **Jose Martin Calderon-Perez** and Tulio Josue Arteaga-Ramirez a/k/a Chiqui unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE ACT 27
Unlawful Use of a Communication Facility

Between the dates of May 8, 2016, and May 9, 2016, in the state of Colorado, **Jose Martin Calderon-Perez** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 28
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of May 13, 2016, and May 17, 2016, in the state of Colorado, **Jose Martin Calderon-Perez** and **FNU LNU a/k/a Conejo** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE ACT 29
Unlawful Use of a Communication Facility

Between the dates of May 13, 2016, and May 17, 2016, in the state of Colorado, **Jose Martin Calderon-Perez** and **FNU LNU a/k/a Conejo** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 30
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

On or about May 28, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Jose Martin Calderon-Perez, Alonso Calderon-Perez, FNU LNU a/k/a Conejo**, Victor Lauro Guerrero-Mercado, and Juan Rabago Bustamante unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE ACT 31
Conspiracy to Commit Money Laundering, (F4)

On or about May 28, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Jose Martin Calderon-Perez, Alonso Calderon-Perez, FNU LNU a/k/a Conejo**, Victor Lauro Guerrero-Mercado, and Juan Rabago Bustamante, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of section 18-2-201(1); and 18-5-309(1)(b)(I), C.R.S.

PREDICATE ACT 32
Unlawful Use of a Communication Facility

On or about May 28, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Jose Martin Calderon-Perez, Alonso Calderon-Perez, and FNU LNU a/k/a Conejo** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 33
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of June 1, 2016, and June 2, 2016, in the state of Colorado, **Alonso Calderon-Perez, FNU LNU a/k/a Armando**, and Michael Shane Fowler unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE ACT 34
Unlawful Use of a Communication Facility

Between the dates of June 1, 2016, and June 2, 2016, in the state of Colorado, **Alonso Calderon-Perez** and **FNU LNU a/k/a Armando** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 35
**Conspiracy to Distribute a Controlled Substance—Methamphetamine—
More than 112 Grams, (DF1)**

On or about June 4, 2016, in the state of Colorado, **Jose Martin Calderon-Perez, FNU LNU a/k/a Conejo**, and Marcos Solano unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute methamphetamine, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE ACT 36
Conspiracy to Commit Money Laundering, (F4)

On or about June 4, 2016, in the state of Colorado, **Jose Martin Calderon-Perez, FNU LNU a/k/a Conejo**, and Marcos Solano, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of section 18-2-201(1); and 18-5-309(1)(b)(I), C.R.S.

PREDICATE ACT 37
Unlawful Use of a Communication Facility

On or about June 4, 2016, in the state of Colorado, **Jose Martin Calderon-Perez and FNU LNU a/k/a Conejo** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 38
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

On or about June 16, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Melicio Esparza-Chihuahua, and Jose Manuel Lazcano-Aguilar a/k/a Chavete** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE ACT 39
Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about June 16, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Melicio Esparza-Chihuahua, and Jose Manuel Lazcano-Aguilar a/k/a Chavete** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute a Schedule II controlled substance, cocaine; in violation of section 18-18-405(1),(2)(c)(I), C.R.S.

PREDICATE ACT 40
Unlawful Use of a Communication Facility

On or about June 16, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT 41
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of June 18, 2016, and June 22, 2016, in the state of Colorado, **Alonso Calderon-Perez, FNU LNU a/k/a Armando**, Michael Shane Fowler, and Fermin Luque-Molina, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE ACT 42
Conspiracy to Commit Money Laundering, (F4)

Between the dates of June 18, 2016, and June 22, 2016, in the state of Colorado, **Alonso Calderon-Perez** and **FNU LNU a/k/a Armando**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of section 18-2-201(1); and 18-5-309(1)(b)(I), C.R.S.

PREDICATE ACT 43
Unlawful Use of a Communication Facility

Between the dates of June 18, 2016, and June 22, 2016, in the state of Colorado, **Alonso Calderon-Perez** and **FNU LNU a/k/a Armando** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE 44

**Possession with Intent to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

On or about July 27, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** unlawfully, feloniously, and knowingly possessed with the intent to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE 45

**Possession with Intent to Distribute a Controlled Substance—Schedule II—
14-225 Grams, (DF2)**

On or about July 27, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** unlawfully, feloniously, and knowingly possessed with the intent to distribute a Schedule II controlled substance, cocaine.

Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but less than two hundred twenty-five grams; in violation of section 18-18-405(1),(2)(b)(I)(A), C.R.S.

PREDICATE 46

Conspiracy to Commit Money Laundering, (F4)

On or about July 27, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** with the intent to promote or facilitate the commission of the crime of money laundering, agreed with one or more persons, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of section 18-2-201(1); and 18-5-309(1)(b)(I), C.R.S.

PREDICATE 47

**Possession with Intent to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

On or about July 27, 2016, in the state of Colorado, **Jose Martin Calderon-Perez, Alonso Calderon-Perez**, and Fermin Luque-Molina unlawfully, feloniously, and knowingly possessed with the intent to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

PREDICATE 48

**Possession with Intent to Distribute a Controlled Substance—
Methamphetamine—7-112 Grams, (DF2)**

On or about July 27, 2016, in the state of Colorado, **Jose Martin Calderon-Perez, Alonso Calderon-Perez**, and Fermin Luque-Molina unlawfully, feloniously, and knowingly possessed with the intent to distribute methamphetamine, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but less than one hundred twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

PREDICATE 49

Conspiracy to Commit Money Laundering, (F4)

On or about July 27, 2016, in the state of Colorado, **Jose Martin Calderon-Perez, Alonso Calderon-Perez**, and Fermin Luque-Molina with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and with others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of section 18-2-201(1); and 18-5-309(1)(b)(I), C.R.S.

PREDICATE 50

**Possession with Intent to Distribute a Controlled Substance—Heroin—
7-112 Grams, (DF2)**

On or about July 27, 2016, in the state of Colorado, **Jacob Alan Garcia** unlawfully, feloniously, and knowingly possessed with the intent to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but less than one hundred twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

PREDICATE 51

**Possession with Intent to Distribute a Controlled Substance—
Methamphetamine—7-112 Grams, (DF2)**

On or about July 27, 2016, in the state of Colorado, **Jacob Alan Garcia** unlawfully, feloniously, and knowingly possessed with the intent to distribute methamphetamine, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but less than one hundred twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

COUNT 3
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of November 5, 2015, and November 20, 2015, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Aldo Heron Pena-Bailon a/k/a Lupe1, and Juan Carlos Corrales** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The offenses alleged in Predicate Acts 1-2 and Count 3 were committed in the following manner:

Between the dates of November 5, 2015, and November 20, 2015, in a series of telephone conversations utilizing cellular telephones, Jose DeJesus Bernal-Zamora made an agreement with Juan Carlos Corrales and Aldo Heron Pena-Bailon a/k/a Lupe1 to distribute a large quantity of heroin. In furtherance of this agreement, Bernal-Zamora arranged to receive a quantity of heroin from Corrales by directing Pena-Bailon to meet with Corrales and receive the heroin from Corrales for further distribution.

COUNT 4
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of November 17, 2015, and November 19, 2015, in the state of Colorado, **Juan Carlos Corrales** unlawfully, feloniously, and knowingly conspired with an unidentified male referred to as Unknown Male #1705 and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The offense alleged in Count 4 was committed in the following manner:

Between the dates of November 17, 2015, and November 19, 2015, in a series of telephone conversations utilizing cellular telephones, Juan Carlos Corrales made an agreement with UM1705 to distribute a large quantity of heroin. In furtherance of this agreement, UM1705 arranged to send Corrales a FedEx package to his residence. On November 18, 2015, law enforcement officers intercepted a FedEx package that had been sent to Corrales' residence located at 4452 West Center Avenue, Denver, CO 80219. After obtaining a search warrant, investigators opened the package and recovered approximately 2.12 pounds (960 grams) heroin from the package.

COUNT 5
**Conspiracy to Distribute a Controlled Substance—Heroin—
7-112 Grams, (DF2)**

Between the dates of January 5, 2016, and January 8, 2016, in the state of Colorado, **Roberto Carlos-Correa, Aldo Heron Pena-Bailon a/k/a Lupe1, and Lubomir Arabadjiev** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but less than one hundred twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

COUNT 6
**Conspiracy to Distribute a Controlled Substance—Schedule II—
14-225 Grams, (DF2)**

Between the dates of January 5, 2016, and January 8, 2016, in the state of Colorado, **Roberto Carlos-Correa, Aldo Heron Pena-Bailon a/k/a Lupe1, and Lubomir Arabadjiev** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute a Schedule II controlled substance, cocaine.

Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but less than two hundred twenty-five grams; in violation of section 18-18-405(1),(2)(b)(I)(A), C.R.S.

The offenses alleged in Predicate Acts 3-5 and Counts 5-6 were committed in the following manner:

Between the dates of January 5, 2016, and January 8, 2016, in a series of telephone conversations utilizing cellular telephones, Roberto Carlos-Correa made an agreement with Aldo Heron Pena-Bailon a/k/a Lupe1 and Lubomir Arabadjiev to distribute a quantity of heroin and a quantity of cocaine. In a related agreement, Carlos-Correa and Arabadjiev agreed that Arabadjiev would receive the quantities of controlled substances from Pena-Bailon . In furtherance of this agreement, Carlos-Correa directed Arabadjiev to meet with Pena-Bailon at the Furniture Row stores located at 58th Avenue and Broadway, Denver, Colorado, in order to receive the quantity of heroin and the quantity of cocaine from Pena-Bailon. On January 7, 2015, Pena-Bailon met with Arabadjiev at that location and delivered the quantity of heroin and cocaine to Arabadjiev. Shortly after this meeting, law enforcement officers conducted a traffic stop of the vehicle in which Arabadjiev was driving, a white Nissan Altima sedan, and subsequently seized the vehicle. After obtaining a search warrant, investigators recovered approximately 78 grams heroin and 38.1 grams cocaine from the center console of the vehicle.

COUNT 7
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of January 19, 2016, and January 23, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** and **Jose Martin Calderon-Perez** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The offenses alleged in Predicate Acts 6-7 and Count 7 were committed in the following manner:

Between the dates of January 19, 2016, and January 23, 2016, in a series of telephone conversations utilizing cellular telephones, Jose DeJesus Bernal-Zamora made an agreement with Jose Martin Calderon-Perez to distribute a large quantity of heroin. In furtherance of this agreement, Bernal-Zamora arranged to meet with Calderon-Perez at Lupe's Auto Body Shop, located at 5105 West Mississippi Avenue, Denver, CO. At that location, Bernal-Zamora and Calderon-Perez prepared a package containing at least three kilograms of heroin to be transported to third parties located outside the state of Colorado.

COUNT 8
Conspiracy to Distribute a Controlled Substance—Heroin (DF3)

On or about January 20, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora**, **Roberto Carlos-Correa**, and **Jacob Garcia** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II), C.R.S.

COUNT 9

Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about January 20, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Roberto Carlos-Correa, and Jacob Garcia** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute a Schedule II controlled substance, cocaine; in violation of section 18-18-405(1),(2)(c)(I), C.R.S.

The offenses alleged in Predicate Acts 8-10 and Counts 8-9 were committed in the following manner:

On or about January 20, 2016, in a series of telephone conversations utilizing cellular telephones, Roberto Carlos-Correa made an agreement with Jacob Garcia and Jose DeJesus Bernal-Zamora to distribute a quantity of heroin and a quantity of cocaine. In furtherance of this agreement, Carlos-Correa directed Bernal-Zamora to meet with Garcia at 3555 Olive Street, Denver, CO, and to deliver the illegal controlled substances to Garcia.

COUNT 10

**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of February 2, 2016, and February 9, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, FNU LNU a/k/a Jaime, and Eden Ortiz** and unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The offenses alleged in Predicate Acts 11-12 and Count 10 were committed in the following manner:

Between the dates of February 2, 2016, and February 9, 2016, in a series of telephone conversations utilizing cellular telephones, Jose DeJesus Bernal-Zamora made an agreement with FNU LNU a/k/a Jaime and Eden Ortiz to distribute a large quantity of heroin. As part of this agreement, Bernal-Zamora arranged to receive a quantity of heroin from Jaime that was to be transported by Ortiz. In furtherance of this agreement, on February 4, 2016, Ortiz transported a large load of heroin to Colorado and Bernal-Zamora arranged to meet Ortiz at the Denny's Restaurant located at Alameda Ave., and Santa Fe Drive, Denver, CO.

COUNT 11
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of February 18, 2016, and February 22, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** and **Jose Martin Calderon-Perez** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The offenses alleged in Predicate Acts 13-14 and Count 11 were committed in the following manner:

Between the dates of February 18, 2016, and February 22, 2016, in a series of telephone conversations utilizing cellular telephones, Jose Martin Calderon-Perez and Jose DeJesus Bernal-Zamora made an agreement with each other to distribute a large quantity of heroin. As part of this agreement, Calderon-Perez arranged with a third party to receive a large quantity of heroin from a courier, Felizardo Vega Berrelleza, whom the third party had directed to transport the load of heroin to Calderon-Perez in Colorado. In furtherance of this agreement, on February 19, 2016, Calderon-Perez and Bernal-Zamora met with courier, Felizardo Vega Berrelleza, at Lupe's Auto Body Shop located at 5105 West Mississippi Avenue, Denver, CO. At that time, Calderon-Perez and Bernal-Zamora received the load of heroin from Vega Berrelleza.

COUNT 12
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

On or about March 8, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora**, **Jose Martin Calderon-Perez**, and **Roberto Carlos-Correa** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The offenses alleged in Predicate Acts 15-16 and Count 12 were committed in the following manner:

On or about March 8, 2016, in a series of telephone conversations utilizing cellular telephones, Jose DeJesus Bernal-Zamora, Jose Martin Calderon-Perez, and Roberto Carlos-Correa made an agreement with each other to distribute a large quantity of heroin. As part of this agreement, Felizardo Vega Berrelleza transported a load of heroin

to Bernal-Zamora and Calderon-Perez in Colorado. In furtherance of this agreement, on March 8, 2016, Calderon-Perez and Bernal-Zamora met with courier, Felizardo Vega Berrelleza, at Lupe's Auto Body Shop located at 5105 West Mississippi Avenue, Denver, CO. At that time, Calderon-Perez and Bernal-Zamora received the load of heroin from Vega Berrelleza.

COUNT 13

Conspiracy to Distribute a Controlled Substance—Heroin (DF3)

On or about April 12, 2016, in the state of Colorado, **Roberto Carlos-Correa** and **Jacob Garcia** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance; in violation of section 18-18-405(1),(2)(c)(II), C.R.S.

COUNT 14

Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about April 12, 2016, in the state of Colorado, **Roberto Carlos-Correa** and **Jacob Garcia** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute a Schedule II controlled substance, cocaine; in violation of section 18-18-405(1),(2)(c)(I), C.R.S.

The offenses alleged in Predicate Acts 17-19 and Counts 13-14 were committed in the following manner:

On or about April 12, 2016, in a series of telephone conversations utilizing cellular telephones, Roberto Carlos-Correa made an agreement with Jacob Garcia to distribute a quantity of heroin and a quantity of cocaine. In furtherance of this agreement, Carlos-Correa directed Garcia to meet a third party at the Sonic Restaurant at 35th Street and Quebec Street, Denver, CO, to deliver the controlled substances to the third party.

COUNT 15

**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of April 16, 2016, and April 22, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora**, **Jose Martin Calderon-Perez** and **FNU LNU a/k/a Conejo** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

COUNT 16
Conspiracy to Commit Money Laundering, (F4)

Between the dates of April 16, 2016, and April 22, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Jose Martin Calderon-Perez** and **FNU LNU a/k/a Conejo**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of section 18-2-201(1); and 18-5-309(1)(b)(I), C.R.S.

COUNT 17
Money Laundering, (F3)

On or about April 22, 2016, **Cesar Angulo-Acuna** and **Jesus Alvarez-Valdez** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, in violation of section 18-5-309(1)(b)(I), C.R.S.

The offenses alleged in Predicate Acts 20-22 and Counts 15-17 were committed in the following manner:

Between the dates of April 16, 2016, and April 22, 2016, in a series of telephone conversations utilizing cellular telephones, Jose Martin Calderon-Perez and Jose DeJesus Bernal-Zamora made an agreement with each other to distribute a large quantity of heroin. As part of this agreement, Calderon-Perez arranged with FNU LNU a/k/a Conejo to receive from Conejo a large quantity of heroin from couriers whom Conejo had directed to transport the load of heroin to Calderon-Perez in Colorado. In a related agreement, Calderon-Perez and Bernal-Zamora agreed to collect and package a large amount of US currency that had been generated from their earlier sales of illegal controlled substances and transfer this US currency to the couriers sent by Conejo in order to be transported back to Conejo as payment for the load of heroin being received in Colorado.

In furtherance of this agreement, on April 22, 2016, Calderon-Perez and Bernal-Zamora met with Conejo's couriers, Cesar Angulo-Acuna and Jesus Alvarez-Valdez, at Lupe's Auto Body Shop located at 5105 West Mississippi Avenue, Denver, CO. At that time, Calderon-Perez and Bernal-Zamora received the load of heroin from Angulo-Acuna and Alvarez-Valdez and transferred a large amount of drug proceeds in the form of bulk US currency to Angulo-Acuna and Alvarez-Valdez.

Shortly thereafter, Angulo-Acuna and Alvarez-Valdez left the location in a blue Jeep Cherokee. Law enforcement officers then followed the vehicle and subsequently conducted a traffic stop of the Jeep. The officers then seized the vehicle and ultimately obtained a search warrant to search the vehicle. Upon execution of the search warrant,

investigators located approximately \$102,000 in bulk US currency which had been concealed in various locations throughout the vehicle.

COUNT 18
**Conspiracy to Distribute a Controlled Substance—Heroin—
7-112 Grams, (DF2)**

On or about May 3, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Roberto Carlos-Correa, and Baird Fischer** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but less than one hundred twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

COUNT 19
**Conspiracy to Distribute a Controlled Substance—Schedule II—
14-225 Grams, (DF2)**

On or about May 3, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Roberto Carlos-Correa, and Baird Fischer** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute a Schedule II controlled substance, cocaine.

Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but less than two hundred twenty-five grams; in violation of section 18-18-405(1),(2)(b)(I)(A), C.R.S.

COUNT 20
**Distribution of a Controlled Substance—Heroin—
7-112 Grams, (DF2)**

On or about May 3, 2016, **Baird Fischer** unlawfully, feloniously, and knowingly sold or distributed heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but less than one hundred twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

COUNT 21

**Possession with Intent to Distribute a Controlled Substance—Heroin—
7-112 Grams, (DF2)**

On or about May 3, 2016, **Pierce Larsen** unlawfully, feloniously, and knowingly possessed with the intent to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but less than one hundred twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

COUNT 22

**Distribution of a Controlled Substance—Schedule II—
14-225 Grams, (DF2)**

On or about May 3, 2016, in the state of Colorado, **Baird Fischer** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine.

Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but less than two hundred twenty-five grams; in violation of section 18-18-405(1),(2)(b)(I)(A), C.R.S.

COUNT 23

**Possession with Intent to Distribute a Controlled Substance—Schedule II—
14-225 Grams, (DF2)**

On or about May 3, 2016, in the state of Colorado, **Pierce Larsen** unlawfully, feloniously, and knowingly possessed with the intent to distribute a Schedule II controlled substance, cocaine.

Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but less than two hundred twenty-five grams; in violation of section 18-18-405(1),(2)(b)(I)(A), C.R.S.

The offenses alleged in Predicate Acts 23-25 and Counts 18-23 were committed in the following manner:

On or about May 3, 2016, in a series of telephone conversations utilizing cellular telephones, Jose DeJesus Bernal-Zamora made an agreement with Roberto Carlos-Correa and Baird Fischer to distribute a quantity of heroin and a quantity of cocaine. In a related agreement, Carlos-Correa and Fischer agreed that Fischer would obtain the quantities of illegal controlled substances from Bernal-Zamora in order to deliver them to a third party, Pierce Larsen. In furtherance of this agreement, Carlos-Correa directed Fischer to meet with Bernal-Zamora at the Furniture Row Stores located at 58th Avenue and Broadway, Denver, CO. After this meeting occurred, Fischer then met with Pierce Larsen and distributed the quantities of heroin and cocaine to Larsen. Shortly thereafter, Thornton Police officers recovered approximately 136.7 grams heroin and

38.7 grams cocaine from Larsen who stated that he had received the heroin and cocaine from Fischer.

COUNT 24
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of May 8, 2016, and May 9, 2016, in the state of Colorado, **Jose Martin Calderon-Perez** and **Tulio Josue Arteaga-Ramirez a/k/a Chiqui** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The offenses alleged in Predicate Acts 26-27 and Count 24 were committed in the following manner:

Between the dates of May 8, 2016, and May 9, 2016, in a series of telephone conversations utilizing cellular telephones, Jose Martin Calderon-Perez made an agreement with Tulio Josue Arteaga-Ramirez a/k/a Chiqui to distribute a large quantity of heroin. In furtherance of this agreement, Calderon-Perez arranged to supply a quantity of heroin to Chiqui and traveled to Chiqui's residence at 8000 E. 12th Avenue, Apartment A5, Denver, CO, in order to deliver the quantity of heroin to Chiqui.

COUNT 25
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of May 13, 2016, and May 17, 2016, in the state of Colorado, **Jose Martin Calderon-Perez** and **FNU LNU a/k/a Conejo** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

COUNT 26

**Possession with Intent to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

On or about May 14, 2016, in the state of Colorado, **Ignacio Villalobos-Lopez** unlawfully, feloniously, and knowingly possessed with the intent to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The offenses alleged in Predicate Acts 28-29 and Counts 25-26 were committed in the following manner:

Between the dates of May 13, 2016, and May 17, 2016, in a series of telephone conversations utilizing cellular telephones, Jose Martin Calderon-Perez and FNU LNU a/k/a Conejo made an agreement with each other to distribute a large quantity of heroin. As part of this agreement, Calderon-Perez arranged to receive from Conejo a large quantity of heroin from a courier, Ignacio Villalobos-Lopez, whom Conejo had directed to transport the load of heroin to Calderon-Perez in Colorado.

In furtherance of this agreement, on May 14, 2016, Villalobos-Lopez, driving in a gold Subaru wagon, transported the load of heroin to Colorado. On that same date, law enforcement officers conducted a traffic stop of the vehicle in the vicinity of Mile Marker 94 on Interstate 25, in Pueblo County, CO. Law enforcement officers then seized the vehicle. After obtaining a search warrant, investigators searched the vehicle and ultimately recovered approximately six pounds (2773 grams) heroin which had been concealed in the spare tire of the vehicle.

COUNT 27

**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

On or about May 28, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Jose Martin Calderon-Perez, Alonso Calderon-Perez, FNU LNU a/k/a Conejo, Victor Lauro Guerrero-Mercado, and Juan Rabago Bustamante** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

COUNT 28
Conspiracy to Commit Money Laundering, (F4)

On or about May 28, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Jose Martin Calderon-Perez, Alonso Calderon-Perez, FNU LNU a/k/a Conejo, Victor Lauro Guerrero-Mercado, and Juan Rabago Bustamante**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of section 18-2-201(1); and 18-5-309(1)(b)(I), C.R.S.

The offenses alleged in Predicate Acts 30-32 and Counts 27-28 were committed in the following manner:

On or about May 28, 2016, in a series of telephone conversations utilizing cellular telephones, Jose Martin Calderon-Perez made an agreement with Alonso Calderon-Perez, Victor Lauro Guerrero-Mercado, and Jose DeJesus Bernal-Zamora to distribute a large quantity of heroin. As part of this agreement, Jose Martin Calderon-Perez arranged with FNU LNU a/k/a Conejo to receive from Conejo a large quantity of heroin from a courier, Juan Rabago Bustamante, whom Conejo had directed to transport the load of heroin to Jose Martin Calderon-Perez in Colorado. In a related agreement, Jose Martin Calderon-Perez and Bernal-Zamora agreed to collect and package a large amount of US currency that had been generated from their earlier sales of illegal controlled substances and transfer this US currency to Bustamante in order to be transported back to Conejo as payment for the load of heroin being received in Colorado. In furtherance of this agreement, on May 28, 2016, Jose Martin Calderon-Perez and Bernal-Zamora met with Conejo's courier, Bustamante, at the residence located at 3340 Custer Place, Denver, CO. At that time, Jose Martin Calderon-Perez and Bernal-Zamora received the load of heroin from Bustamante who had utilized a white GMC pickup truck to transport the load of heroin to Colorado, and transferred a package of bulk US currency to Bustamante.

COUNT 29
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of June 1, 2016, and June 2, 2016, in the state of Colorado, **Alonso Calderon-Perez, FNU LNU a/k/a Armando, and Michael Shane Fowler** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

The offenses alleged in Predicate Acts 33-34 and Count 29 were committed in the following manner:

Between the dates of June 1, 2016, and June 2, 2016, in a series of telephone conversations utilizing cellular telephones, Alonso Calderon-Perez and FNU LNU a/k/a Armando made an agreement with each other to distribute a large quantity of heroin. In a related agreement, Michael Shane Fowler agreed with Armando to transport the large quantity of heroin to Calderon-Perez in Colorado. In furtherance of this agreement, on June 2, 2016, Calderon-Perez and his associate, Fermin Luque-Molina met with Fowler and a fourth unidentified party in order to receive the quantity of heroin at the El Tapatio restaurant located at 9281 E Arapahoe Rd., Greenwood Village, Colorado.

COUNT 30

Conspiracy to Distribute a Controlled Substance—Methamphetamine— More than 112 Grams, (DF1)

On or about June 4, 2016, in the state of Colorado, **Jose Martin Calderon-Perez, FNU LNU a/k/a Conejo**, and **Marcos Solano** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute methamphetamine, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

COUNT 31

Conspiracy to Commit Money Laundering (F4)

On or about June 4, 2016, in the state of Colorado, **Jose Martin Calderon-Perez, FNU LNU a/k/a Conejo**, and **Marcos Solano**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of section 18-2-201(1); and 18-5-309(1)(b)(I), C.R.S.

The offense alleged in Predicate Act 35-37 and Counts 30-31 were committed in the following manner:

On or about June 4, 2016, in a series of telephone conversations utilizing cellular telephones, Jose Martin Calderon-Perez made an agreement with FNU LNU a/k/a Conejo to collect and package a large amount of US currency that had been generated from the earlier sales of illegal controlled substances and transfer this US currency to a courier, Marcus Solano, whom Conejo had sent in order for the courier to transport the US currency back to Conejo as payment for a quantity of illegal controlled substances which Conejo previously had sent to Calderon-Perez in Colorado. In a related

agreement, Conejo agreed to supply Calderon-Perez with a quantity of methamphetamine which was being transported by Conejo's courier, Solano.

In furtherance of these agreements, on June 1, 2016, Calderon-Perez met with Conejo's courier, Marcus Solano, in the parking lot of Cobitco, Inc., 5301 Bannock Street, Denver, CO. At that time, Calderon-Perez transferred a sum of drug proceeds in the form of bulk US currency to Solano so that Solano could transport the moneys to Conejo and also received from Solano a quantity of methamphetamine.

Solano left this meeting driving a white semi tractor-trailer. Law enforcement officers subsequently conducted a traffic stop of this vehicle. Shortly thereafter, Solano gave consent to the officers to search the vehicle's cab. The officers, while searching the cab, recovered approximately \$30,000 in US currency, which had been concealed in a red bag in the cab of the semi tractor-trailer. Solano admitted to law enforcement officers that the bulk currency did not belong to him.

COUNT 32
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

On or about June 16, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Melicio Esparza-Chihuahua, and Jose Manuel Lazcano-Aguilar a/k/a Chavete** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

COUNT 33
Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about June 16, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora, Melicio Esparza-Chihuahua, and Jose Manuel Lazcano-Aguilar a/k/a Chavete** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute a Schedule II controlled substance, cocaine; in violation of section 18-18-405(1),(2)(c)(I), C.R.S.

The offenses alleged in Predicate Acts 38-40 and Counts 32-33 were committed in the following manner:

On or about June 16, 2016, in a series of telephone conversations utilizing cellular telephones, Jose DeJesus Bernal-Zamora made an agreement with Melicio Esparza-Chihuahua and Jose Manuel Lazcano-Aguilar a/k/a Chavete to distribute a large quantity of heroin and cocaine. In furtherance of this agreement, Bernal-Zamora directed Lazcano-Aguilar to pick up a quantity of heroin and cocaine from Esparza-Chihuahua. Also in furtherance of the agreement, Lazcano-Aguilar traveled to Esparza-

Chihuahua's residence at 3340 W. Custer Place, Denver, CO, and at that location, received the quantities of heroin and cocaine from Esparza-Chihuahua.

COUNT 34
**Conspiracy to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

Between the dates of June 18, 2016, and June 22, 2016, in the state of Colorado, **Alonso Calderon-Perez, FNU LNU a/k/a Armando, Michael Shane Fowler, and Fermin Luque-Molina** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

COUNT 35
Conspiracy to Commit Money Laundering (F4)

Between the dates of June 18, 2016, and June 22, 2016, in the state of Colorado, **Alonso Calderon-Perez and FNU LNU a/k/a Armando**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of section 18-2-201(1); and 18-5-309(1)(b)(I), C.R.S.

The offenses alleged in Predicate Acts 41-43 and Counts 32-33 were committed in the following manner:

Between the dates of June 18, 2016, and June 22, 2016, in a series of telephone conversations utilizing cellular telephones, Alonso Calderon-Perez and FNU LNU a/k/a Armando made an agreement with each other to distribute a large quantity of heroin. In a related agreement, Michael Shane Fowler agreed with Armando to transport the large quantity of heroin to Calderon-Perez in Colorado. In another related agreement, Fermin Luque-Molina agreed to assist Calderon-Perez in receiving the shipment of heroin sent by Armando. As part of the agreement to receive the quantity of heroin from Armando, Calderon-Perez agreed to provide Armando's courier, Fowler, with a quantity of US currency which had been generated from the sale of illegal controlled substances as partial payment for the anticipated load of heroin. In furtherance of this agreement, on June 19, 2016, Fowler transported a load of heroin into the state of Colorado while he was driving a silver BMW sedan. On that date, law enforcement officers conducted a traffic stop of the silver BMW sedan in the vicinity of Alameda Avenue and Federal Boulevard, Denver, CO. At that time, the officers contacted the driver, whom they identified as Fowler. Shortly thereafter, law enforcement officers seized the silver BMW

sedan. After obtaining a search warrant, investigators searched the BMW sedan and recovered approximately three kilograms (3100 grams) heroin, which had been located in a box in the trunk of the vehicle.

COUNT 36

**Possession with Intent to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

On or about July 27, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** unlawfully, feloniously, and knowingly possessed with the intent to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

COUNT 37

**Possession with Intent to Distribute a Controlled Substance—Schedule II—
14-225 Grams, (DF2)**

On or about July 27, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** unlawfully, feloniously, and knowingly possessed with the intent to distribute a Schedule II controlled substance, cocaine.

Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but less than two hundred twenty-five grams; in violation of section 18-18-405(1),(2)(b)(I)(A), C.R.S.

COUNT 38

Conspiracy to Commit Money Laundering, (F4)

On or about July 27, 2016, in the state of Colorado, **Jose DeJesus Bernal-Zamora** with the intent to promote or facilitate the commission of the crime of money laundering, agreed with one or more persons, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering; in violation of section 18-2-201(1); and 18-5-309(1)(b)(I), C.R.S.

The offenses alleged in Predicate Acts 44-46 and Counts 36-38 were committed in the following manner:

On July 27, 2016, law enforcement officers executed a search warrant at the residence of Jose DeJesus Bernal-Zamora, located at 9053 S. Yosemite, #1207, Lone Tree, Douglas County, CO. At that location, officers recovered approximately 1015 grams (slightly more than one kilogram) heroin from various locations within the residence;

approximately 131.3 grams cocaine from a desk in the first bedroom; a 9 millimeter Beretta pistol from underneath the sofa in the living room; and \$10,498 in bulk US currency from various locations within the residence. At that time, Bernal-Zamora was present at the residence and gave a statement to officers in which he acknowledged that all of the items within the residence were his.

COUNT 39

**Possession with Intent to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

On or about July 27, 2016, in the state of Colorado, **Jose Martin Calderon-Perez, Alonso Calderon-Perez, and Fermin Luque-Molina** unlawfully, feloniously, and knowingly possessed with the intent to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

COUNT 40

**Possession with Intent to Distribute a Controlled Substance—
Methamphetamine—7-112 Grams, (DF2)**

On or about July 27, 2016, in the state of Colorado, **Jose Martin Calderon-Perez, Alonso Calderon-Perez, and Fermin Luque-Molina** unlawfully, feloniously, and knowingly possessed with the intent to distribute methamphetamine, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but less than one hundred twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

COUNT 41

Conspiracy to Commit Money Laundering, (F4)

On or about July 27, 2016, in the state of Colorado, **Jose Martin Calderon-Perez, Alonso Calderon-Perez, and Fermin Luque-Molina** with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and with others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of section 18-2-201(1); and 18-5-309(1)(b)(I), C.R.S.

The offenses alleged in Predicate Acts 47-49 and Counts 39-41 were committed in the following manner:

On July 27, 2016, law enforcement officers executed a search warrant at the residence of Jose Martin Calderon-Perez, Alonso Calderon-Perez, and Fermin Luque-Molina, located at 221 S. Clay Street, Denver, CO. At that location, officers recovered approximately 2178.4 grams (more than two kilograms) heroin from various locations within the residence; approximately 44.8 grams methamphetamine from the first bedroom; a Ruger .357 magnum pistol from the first bedroom; a Smith & Wesson 9 millimeter semi-automatic pistol from the second bedroom; and \$50,838 in bulk US currency from various locations within the residence. At that time, Jose Martin Calderon-Perez, Alonso Calderon-Perez, and Fermin Luque-Molina were all present within the residence.

COUNT 42

**Possession with Intent to Distribute a Controlled Substance—Heroin—
7-112 Grams, (DF2)**

On or about July 27, 2016, in the state of Colorado, **Jacob Alan Garcia** unlawfully, feloniously, and knowingly possessed with the intent to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but less than one hundred twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

COUNT 43

**Possession with Intent to Distribute a Controlled Substance—
Methamphetamine—7-112 Grams, (DF2)**

On or about July 27, 2016, in the state of Colorado, **Jacob Alan Garcia** unlawfully, feloniously, and knowingly possessed with the intent to distribute methamphetamine, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but less than one hundred twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The offenses alleged in Predicate Acts 51-51 and Counts 42-43 were committed in the following manner:

On July 27, 2016, law enforcement officers executed a search warrant at the residence of Jacob Alan Garcia, located at 3555 Olive Street, Denver, CO. At that location, officers recovered approximately 44.1 grams heroin; approximately 43.7 grams methamphetamine; and 8 firearms, including three assault rifles, one shotgun, and four handguns. At that time, Garcia was present within the residence.

COUNT 44

**Possession with Intent to Distribute a Controlled Substance—Heroin—
More than 112 Grams, (DF1)**

On or about July 27, 2016, in the state of Colorado, **Tulio Josue Arteaga-Ramirez a/k/a Chiqui** unlawfully, feloniously, and knowingly possessed with the intent to distribute heroin, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

COUNT 45

**Possession with Intent to Distribute a Controlled Substance—
Methamphetamine—7-112 Grams, (DF2)**

On or about July 27, 2016, in the state of Colorado, **Tulio Josue Arteaga-Ramirez a/k/a Chiqui** unlawfully, feloniously, and knowingly possessed with the intent to distribute methamphetamine, a controlled substance.

Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but less than one hundred twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

COUNT 46

**Possession with Intent to Distribute a Controlled Substance—Schedule II—
14-225 Grams, (DF2)**

On or about July 27, 2016, in the state of Colorado, **Tulio Josue Arteaga-Ramirez a/k/a Chiqui** unlawfully, feloniously, and knowingly possessed with the intent to distribute a Schedule II controlled substance, cocaine.

Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but less than two hundred twenty-five grams; in violation of section 18-18-405(1),(2)(b)(I)(A), C.R.S.

COUNT 47
Conspiracy to Commit Money Laundering, (F4)

On or about July 27, 2016, in the state of Colorado, **Tulio Josue Arteaga-Ramirez a/k/a Chiqui** with the intent to promote or facilitate the commission of the crime of money laundering, agreed with one or more persons, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of section 18-2-201(1); and 18-5-309(1)(b)(I), C.R.S.

The offenses alleged in Counts 43-46 were committed in the following manner:

On July 27, 2016, law enforcement officers arrested Tulio Josue Arteaga-Ramirez a/k/a Chiqui outside of his residence at 1860 Grove Street, Denver, CO. At that time, officers recovered from a bag that Chiqui was carrying approximately 1172.1 (more than one kilogram) heroin; 17.3 grams methamphetamine; and 93.8 grams cocaine. Shortly thereafter, law enforcement officers executed a search warrant at the 1860 Grove Street #3F residence of Chiqui. At that location, officers recovered approximately \$18,998 in bulk US currency from within the residence.

CYNTHIA H. COFFMAN
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Senior Assistant Attorney General
Special Prosecutions Unit
Criminal Justice Section

The 2016-2017 Colorado Statewide Grand Jury presents the within
Superseding Indictment, and the same is hereby ORDERED FILED this
11th day of August, 2016.

Pursuant to § 13-73-107, C.R.S., the Court designates
Douglas County, Colorado as the county of venue for the purposes of
trial.

Dated this 11th day of August, 2016.



Michael S. Vallejos
Judge, Second Judicial District
Denver, Colorado