JOSEPH P. RUSSONIELLO (CABN 44332) United States Attorney

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RICHARD W. MEXING

NORTHERN DISTRICT OF SOURT

CT COURT

## SEALED BY COURT ORDER

#### UNITED STATES DISTRICT COURT

#### NORTHERN DISTRICT OF CALIFORNIA

#### SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, No

Plaintiff,

v.
GUILLERMO ALEJANDRO ZARAGOZA, )
a.k.a. Moreno,

EDUARDO ZARAGOZA,

a.k.a. Eduardo Zaragoza Ruiz, a.k.a. Lalo.

MANUEL CORONA CONTRERAS, RICHARD ALDO PARODI,

a.k.a Pelon,

MARTIN ESTRADA ZARAGOZA,

a.k.a. Manuel Guiterrez Sanchez, a.k.a. Martin E. Zaragoza,

a.k.a. Rafael Hernandez,

a.k.a. Manuel Sanchez Zaragoza,

ROBERTO ZARAGOZA RUIZ, LORENZO CARBAJAL,

DAVID BEJINES QUEZADA,

a.k.a. David Bejinez Quesada,

a.k.a. David Quesadabejines,

a.k.a. Bucana,

DAVID BLAKE WELD, JUAN ZARAGOZA,

a.k.a. Juan Manuel Zaragoza,

MARTEL MURILLO VALENCIA,

(Continued)

No. CR:

CR 08

0083

VIOLATIONS: 21 U.S.C. §§ 846, 841(a)(1), and 841(b)(1)(A)(viii) – Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine; 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii), and 841(b)(1)(B)(viii) – Distribution and Possession with Intent to Distribute Methamphetamine; 18 U.S.C. § 2 - Aiding and Abetting; and 21 U.S.C. § 853 - Criminal Forfeiture

SAN FRANCISCO VENUE

UNDER SEAL OF COURT

1 ANGELICA MARIA RODRIGUEZ, a.k.a. Chilanga, 2 a.k.a. Angelica Kozina, PAUL ANTHONY KOZINA, and 3 IRMA CORONA, a.k.a. Irma Corona Contreras 4 Defendants. 5 6 INDICTMENT 7 The Grand Jury Charges: 8 COUNT ONE: (21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)(viii)) 9 Beginning at a date unknown to the Grand Jury, but no later than March 15, 2007, and 10 continuing until November 23, 2007, both dates being approximate and inclusive, in the 11 Northern District of California and elsewhere, the defendants, 12 GUILLERMO ALEJANDRO ZARAGOZA, a.k.a. Moreno, 13 EDUARDO ZARAGÓZA, a.k.a. Eduardo Zaragoza Ruiz, a.k.a. Lalo, 14 MANUEL CORONA CONTRERAS, RICHARD ALDO PARODI, 15 a.k.a. Pelon, MARTIN ESTRADA ZARAGOZA, a.k.a. Manuel Guiterrez Sanchez, a.k.a. Martin E. Zaragoza, 16 a.k.a. Rafael Hernandez, a.k.a. Manuel Sanchez Zaragoza, 17 ROBERTO ZÁRAGOZA RUIZ, LORENZO CARBAJAL, 18 DAVID BEJINES OUEZADA. a.k.a David Bejinez Quesada, a.k.a. David Quesadabejines, a.k.a. Bucana. 19 DAVID BLAKE WELD, JUAN ZARAGOZA, 20 a.k.a. Juan Manuel Zaragoza, MARTEL MURILLO VALENCIA, 21 ANGELICA MARIA RODRIGUEZ, a.k.a. Chilanga, 22 a.k.a. Angelica Kozina, PAUL ANTHONY KOZINA, 23 IRMA CORONA. a.k.a. Irma Corona Contreras, 24 and others, did knowingly and intentionally conspire with others known and unknown to 25 distribute and possess with intent to distribute a Schedule II controlled substance, to wit: fifty 26 (50) grams or more of methamphetamine, its salts, isomers, and salts of its isomers, in violation 27 of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A)(viii).

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COUNT TWO: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii); 18 U.S.C. § 2)

On or about March 20, 2007, in the Northern District of California, the defendants,

#### RICHARD ALDO PARODI, a.k.a. Pelon, MARTIN ESTRADA ZARAGOZA,

a.k.a. Manuel Guiterrez Sanchez, a.k.a. Martin É. Zaragoza, a.k.a. Rafael Hernandez, a.k.a. Manuel Sanchez Zaragoza, and ROBERTO ZARAGOZA RUIZ,

did knowingly and intentionally distribute and possess with intent to distribute a Schedule II controlled substance, to wit: fifty (50) grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, and did knowingly aid and abet such distribution and possession with intent to distribute the aforementioned controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii), and Title 18, United States Code, Section 2.

COUNT THREE: (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(viii); 18 U.S.C. § 2)

On or about June 19, 2007, in the Northern District of California, the defendants,

#### MARTIN ESTRADA ZARAGOZA, a.k.a. Manuel Guiterrez Sanchez, a.k.a. Martin E. Zaragoza, a.k.a. Rafael Hernandez, a.k.a. Manuel Sanchez Zaragoza

a.k.a. Rafael Hernandez, a.k.a. Manuel Sanchez Zaragoza, LORENZO CARBAJAL, and DAVID BLAKE WELD,

did knowingly and intentionally distribute and possess with intent to distribute a Schedule II controlled substance, to wit: fifty (50) grams or more of methamphetamine, its salts, isomers, and salts of its isomers, and did knowingly aid and abet such distribution and possession with intent to distribute the aforementioned controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii), and Title 18, United States Code, Section 2.

COUNT FOUR: (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(viii); 18 U.S.C. § 2)

On or about August 15, 2007, in the Northern District of California, the defendants,

GUILLERMO ALEJANDRO ZARAGOZA, a.k.a. Moreno, MANUEL CORONA CONTRERAS, and IRMA CORONA, a.k.a. Irma Corona Contreras,

did knowingly and intentionally distribute and possess with intent to distribute a Schedule II 1 controlled substance, to wit: five hundred (500) grams or more of a mixture or substance 2 containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, 3 and did knowingly aid and abet such distribution and possession with intent to distribute the 4 aforementioned controlled substance, in violation of Title 21, United States Code, Sections 5 841(a)(1) and (b)(1)(A)(viii), and Title 18, United States Code, Section 2. 6 7 COUNT FIVE: (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(viii); 18 U.S.C. § 2) 8 On or about September 22, 2007, in the Northern District of California, the defendants, 9 GUILLERMO ALEJANDRO ZARAGOZA, 10 a.k.a. Moreno, JUAN ZARAGOZA, 11 a.k.a. Juan Manuel Zaragoza. EDUARDO ZARAGOZA, 12 a.k.a. Eduardo Zaragoza Ruiz, a.k.a. Lalo, and MARTEL MURILLO VALENCIA, 13 did knowingly and intentionally distribute and possess with intent to distribute a Schedule II 14 controlled substance, to wit: fifty (50) grams or more of methamphetamine, its salts, isomers, 15 and salts of its isomers, and did knowingly aid and abet such distribution and possession with 16 intent to distribute the aforementioned controlled substance, in violation of Title 21, United 17 States Code, Sections 841(a)(1) and (b)(1)(A)(viii), and Title 18, United States Code, Section 2. 18 19 COUNT SIX: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii); 18 U.S.C. § 2) 20 On or about September 28, 2007, in the Northern District of California, the defendants, 21 GUILLERMO ALEJANDRO ZARAGOZA, 22 a.k.a. Moreno, EDUARDO ZARAGOZA, 23 a.k.a. Eduardo Zaragoza Ruiz, a.k.a. Lalo, ANGELICA MARIA RODRIGUEZ, 24 a.k.a. Chilanga, a.k.a. Angelica Kozina, and 25 PAUL ANTHONY KOZINA, 26 did knowingly and intentionally distribute and possess with intent to distribute a Schedule II 27 controlled substance, to wit: five (5) grams or more of methamphetamine, its salts, isomers, and

salts of its isomers, and did knowingly aid and abet such distribution and possession with intent

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to distribute the aforementioned controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii), and Title 18, United States Code, Section 2.

COUNT SEVEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(viii); 18 U.S.C. § 2)

On or about October 10, 2007, in the Northern District of California, the defendant MANUEL CORONA CONTRERAS,

did knowingly and intentionally distribute and possess with intent to distribute a Schedule II controlled substance, to wit: fifty (50) grams or more of methamphetamine, its salts, isomers, and salts of its isomers, and did knowingly aid and abet such distribution and possession with intent to distribute the aforementioned controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii), and Title 18, United States Code, Section 2.

COUNT EIGHT: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii); 18 U.S.C. § 2)

On or about November 6, 2007, in the Northern District of California, the defendants,

# MARTEL MURILLO VALENCIA, and DAVID BEJINES QUEZADA,

a.k.a David Bejinez Quesada, a.k.a. David Quesadabejines, a.k.a. Bucana, did knowingly and intentionally distribute and possess with intent to distribute a Schedule II controlled substance, to wit: fifty (50) grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, and did knowingly aid and abet such distribution and possession with intent to distribute the aforementioned controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii), and Title 18, United States Code, Section 2.

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

- 1. The allegations of Counts One through Eight of this Indictment are realleged and incorporated herein.
- 2. Upon conviction of any of the offenses alleged in Counts One through Eight above, the defendants,

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GUILLERMO ALEJANDRO ZARAGOZA, a.k.a. Moreno, EDUARDO ZARAGOZA, a.k.a. Eduardo Zaragoza Ruiz, a.k.a. Lalo, MANUEL CORONA CONTRERAS, RICHARD ALDO PARODI,

a.k.a. Pelon, MARTIN ESTRADA ZARAGOZA,

a.k.a. Manuel Guiterrez Sanchez, a.k.a. Martin É. Zaragoza, a.k.a. Rafael Hernandez, a.k.a. Manuel Sanchez Zaragoza, ROBERTO ZARAGOZA RUIZ,

LORENZO CARBAJAL, DAVID BEJINES QUEZADA,

a.k.a David Bejinez Quesada, a.k.a. David Quesadabejines, a.k.a. Bucana,

DAVID BLAKE WELD, JUAN ZARAGOZA, a.k.a. Juan Manuel Zaragoza,

MARTEL MURILLO VALENCIA, ANGELICA MARIA RODRIGUEZ,

a.k.a. Chilanga, a.k.a. Angelica Kozina, PAUL ANTHONY KOZINA, IRMA CORONA, a.k.a. Irma Corona Contreras,

shall forfeit to the United States all property constituting and derived from any proceeds the defendants obtained, directly or indirectly, as a result of said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, including, but not limited to the following property:

- a. a money judgment of not less than \$600,000, which represents the value of narcotics distributed by the defendants; and
- b. \$10,720 in U.S. currency, which was seized pursuant to a search warrant executed on Manuel CORONA's residence at 3085 Balgray Court, San Jose, California on or about October 10, 2007.
- 2. If, as a result of any act or omission of the defendant, any of said property
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to or deposited with a third person;
  - c. has been placed beyond the jurisdiction of the Court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which without difficulty cannot be subdivided;

any and all interest defendants have in any other property (not to exceed the value of the above forfeitable property) shall be forfeited to the United States.

All in violation of Title 21, United States Code, Sections 853(a)(1), (a)(2) and (p).

A TRUE BILL

JOSEPH P. RUSSONIELLO

United States Attorney

Chief, Criminal Division

(Approved as to form:

AUSA Nicole M. Kim