

RECEIVED

2000 JAN 12 P 3:46

CLERK, U.S. DISTRICT COURT
DISTRICT OF OREGON
PORTLAND, OREGON

BY _____

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,)

No. CR 98-254 (JO)

Plaintiff,)

SUPERSEDING

v.)

INDICTMENT

SANTIAGO GOICOCHEA-DIAZ)

[21 USC §§ 841 and 846;

aka: Jeronimo Diaz-Molina,)

18 USC § 1326(a), § 1956(a)(1)(A),

aka: Juan Bernardo Aguilar-Aviles,)

and § 2]

aka: Martin Perez;)

MARTIN OCHOA,)

aka: Jesus Diaz-Maldonado,)

aka: Roberto Martinez, Jr.;)

HEATHER CAMPOS;)

TAMMEE CANDALARIA;)

ALEXIS RAMIREZ-JUAREZ,)

aka: Jose Angel;)

TINA WHITE PICHARDO.)

Defendants.)

THE GRAND JURY CHARGES:

COUNT 1
(Conspiracy)

1. From about January 1, 1995, until the present, the exact dates unknown, in Portland and Salem, Oregon, and other places both within and outside the District of Oregon, **SANTIAGO GOICOCHEA-DIAZ, aka Jeronimo Diaz-Molina, aka Juan Bernardo Aguilar-Aviles, aka Martin Perez, MARTIN OCHOA, aka Jesus Diaz-Maldonado, aka Roberto Martinez, Jr.,**

HEATHER CAMPOS, TAMMEE CANDALARIA, ALEXIS RAMIREZ-JUAREZ, aka Jose Angel, and TINA WHITE PICHARDO, defendants herein, did unlawfully, knowingly and willfully combine, conspire, confederate and agree together with each other and with various other persons both known and unknown to the Grand Jury, to possess with intent to distribute and distribute cocaine and methamphetamine, Schedule II drug controlled substances, and to launder the proceeds derived therefrom.

DEFENDANTS

2. At all relevant times herein, **SANTIAGO GOICOCHEA-DIAZ, aka Jeronimo Diaz-Molina, aka Juan Bernardo Aguilar-Aviles, aka Martin Perez**, was an alien and citizen of Mexico. **HEATHER CAMPOS, TAMMEE CANDALARIA, and TINA WHITE PICHARDO** were United States citizens residing in the Salem, Oregon area. **MARTIN OCHOA, aka Jesus Diaz-Maldonado, aka Roberto Martinez, Jr.**, also frequently resided in the Salem, Oregon area.

OBJECTS OF THE CONSPIRACY

3. It was the object of the conspiracy to distribute multiple kilograms of cocaine and multiple pounds of methamphetamine from California to Oregon, Oklahoma, Arkansas and other places, for subsequent resale.

4. It was further the object of the conspiracy to launder the money generated from the sale of cocaine and methamphetamine by, among other means, smuggling currency back into California from Oregon and elsewhere.

METHODS AND MEANS OF THE CONSPIRACY

5. It was part of the conspiracy for the principals to acquire wholesale amounts of cocaine and methamphetamine in the Anaheim, California area, and to take steps to protect their

narcotics from others. The acquisition of these drugs at times involved having them smuggled across the United States border from Mexico.

6. It was further part of the conspiracy secretly to tape packages of cocaine and methamphetamine to the bodies of certain coconspirators, acting as couriers, and for these couriers to travel from California to Oregon and from California to Oklahoma and Arkansas, body-carrying illegal narcotics.

7. It was further part of the conspiracy for coconspirators, acting as couriers, to return to California with packages of currency secretly taped to their bodies or hidden in their vehicles, and to deliver this currency to other coconspirators in California.

8. It was further part of the conspiracy to recruit coconspirators to act as couriers.

OVERT ACTS

1. Between about October 31, 1994, and December 9, 1994, **SANTIAGO GOICOCHEA-DIAZ, aka Jeronimo Diaz-Molina, aka Juan Bernardo Aguilar-Aviles, aka Martin Perez**, illegally reentered the United States from Mexico.

2. On or about May 16, 1995, **SANTIAGO GOICOCHEA-DIAZ, aka Jeronimo Diaz-Molina, aka Juan Bernardo Aguilar-Aviles, aka Martin Perez**, bought a 1987 Mercury Cougar with drug proceeds.

3. On or about September 18, 1995, **MARTIN OCHOA, aka Jesus Diaz-Maldonado, aka Roberto Martinez, Jr.**, attempted to send \$116,850 to **SANTIAGO GOICOCHEA-DIAZ, aka Jeronimo Diaz-Molina, aka Juan Bernardo Aguilar-Aviles, aka Martin Perez**, by causing it to be hidden in the 1987 Mercury Cougar described above.

4. On or about September 26, 1995, two residences associated with various conspirators contained firearms, currency, and laboratory equipment associated with the manufacture of methamphetamine.

5. From about January 1995 through July 1998, **HEATHER CAMPOS, TAMMEE CANDALARIA, and TINA WHITE PICHARDO**, along with unindicted coconspirators Kimberly Ann McCaughey, Christina Mendoza, and Jai Dene Carpenter, made numerous trips to Oregon from California and back, and to Oklahoma and Arkansas, carrying cocaine and methamphetamine hidden on their persons, and occasionally returning to California with hidden U.S. currency.

6. On June 9, 1998, **HEATHER CAMPOS** attempted to travel to California from Oregon body carrying \$23,556 in U.S. currency.

7. On June 16, 1998, Jai Dene Carpenter and Christina Mendoza attempted to transport approximately twelve (12) pounds of methamphetamine from California to Tulsa, Oklahoma and Arkansas.

8. From about January, 1997, through about April, 1998, when various coconspirators would travel from Portland, Oregon to Anaheim, California for the purpose of transporting both currency and narcotics, **SANTIAGO GOICOCHEA-DIAZ, aka Jeronimo Diaz-Molina, aka Juan Bernardo Aguilar-Aviles, aka Martin Perez, MARTIN OCHOA, aka Jesus Diaz-Maldonado, aka Roberto Martinez, Jr., ALEXIS RAMIREZ-JUAREZ, aka Jose Angel, HEATHER CAMPOS** and others would arrange to pay cash for their stay at the Red Roof Inn, in Anaheim, California;

All of the above in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNTS 2-20
(Distribution)

On or about each of the following dates, in the District of Oregon and elsewhere, **SANTIAGO GOICOCHEA-DIAZ, aka Jeronimo Diaz-Molina, aka Juan Bernardo Aguilar-Aviles, aka Martin Perez, and MARTIN OCHOA, aka Jesus Diaz-Maldonado, aka Roberto Martinez, Jr.**, did knowingly and intentionally possess with intent to distribute and distribute a

Schedule II controlled substance, and did aid and abet in the distribution thereof; all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2:

Count	Date
Count 2	January 26, 1997
Count 3	April 8, 1997
Count 4	April 23, 1997
Count 5	April 29, 1997
Count 6	June 3, 1997
Count 7	July 5, 1997
Count 8	July 28, 1997
Count 9	August 3, 1997
Count 10	October 11, 1997
Count 11	October 14, 1997
Count 12	October 28, 1997
Count 13	November 17, 1997
Count 14	December 1, 1997
Count 15	January 5, 1998
Count 16	January 18, 1998
Count 17	March 26, 1998
Count 18	April 12, 1998
Count 19	April 14, 1998
Count 20	April 26, 1998

COUNT 21
(Distribution)

On or about June 16, 1998, in the District of Oregon and elsewhere, **SANTIAGO GOICOCHEA-DIAZ**, aka **Jeronimo Diaz-Molina**, aka **Juan Bernardo Aguilar-Aviles**, aka **Martin Perez**, and **MARTIN OCHOA**, aka **Jesus Diaz-Maldonado**, aka **Roberto Martinez, Jr.**

did knowingly and intentionally possess with intent to distribute and distribute approximately twelve (12) pounds of methamphetamine, a Schedule II controlled substance; all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 22
(Money Laundering)

On or about May 16, 1995, in the District of Oregon, **SANTIAGO GOICOCHEA-DIAZ, aka Jeronimo Diaz-Molina, aka Juan Bernardo Aguilar-Aviles, aka Martin Perez**, defendant herein, did knowingly and willfully conduct a financial transaction affecting interstate commerce, that being the purchase of a 1987 Mercury Cougar for approximately \$5,000, which involved the proceeds of a specified unlawful activity, that being the sale and distribution of a controlled substance, with the intent to promote the carrying on of that specified unlawful activity, and that while conducting such financial transaction defendant knew that the property involved in the financial transaction, that is funds in the amount of \$5,000, represented proceeds of some form of unlawful activity; all in violation of Title 18, United States Code, Sections 1956(a)(1)(A) and (2).

COUNT 23
(Money Laundering)

On or about September 18, 1995, in the District of Oregon and elsewhere, **SANTIAGO GOICOCHEA-DIAZ, aka Jeronimo Diaz-Molina, aka Juan Bernardo Aguilar-Aviles, aka Martin Perez, and MARTIN OCHOA, aka Jesus Diaz-Maldonado, aka Roberto Martinez, Jr.**, defendants herein, did knowingly and willfully conduct a financial transaction affecting interstate commerce, that being the shipment of \$116,850 in U.S. currency from Oregon to California, which involved the proceeds of a specified unlawful activity, that being the sale and distribution of a controlled substance, with the intent to promote the carrying on of said specified unlawful activity, well knowing that the funds involved in the financial transaction represented the proceeds of unlawful activity; all in violation of Title 18, United States Code, Sections 1956(a)(1)(A) and (2).

COUNT 24
(Money Laundering)

On or about June 9, 1998, in the District of Oregon and elsewhere, **SANTIAGO GOICOCHEA-DIAZ, aka Jeronimo Diaz-Molina, aka Juan Bernardo Aguilar-Aviles, aka Martin Perez, MARTIN OCHOA, aka Jesus Diaz-Maldonado, aka Roberto Martinez, Jr., and HEATHER CAMPOS**, defendants herein, did knowingly and willfully conduct a financial transaction affecting interstate commerce, that being the shipment of \$23,556 in U.S. currency from Oregon to California, which involved the proceeds of a specified unlawful activity, that being the sale and distribution of a controlled substance with the intent to promote the carrying on of said unlawful activity, well knowing that the funds involved in the financial transaction represented the proceeds of unlawful activity; and attempted so to do, all in violation of Title 18, United States Code, Section 1956(a)(1)(A) and (2).

COUNT 25

On or about December 9, 1994, in the District of Oregon, **SANTIAGO GOICOCHEA-DIAZ, aka Jeronimo Diaz-Molina, aka Juan Bernardo Aguilar-Aviles, aka Martin Perez**, defendant herein, an alien and citizen of Mexico, was found in the United States, having previously been arrested and deported from the United States as an alien on or about October 31, 1994, said

defendant having knowingly and unlawfully reentered the United States without the express consent of the Attorney General to his reentry into the United States; all in violation of Title 18, United States Code, Section 1326(a).

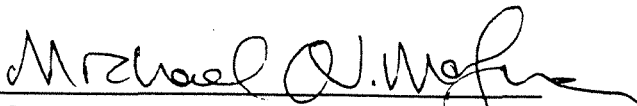
DATED this 12th day of ~~December~~, ^{January, 2000} 1999.

A TRUE BILL:

/s/ PETER HETTINGA

FOREPERSON

KRISTINE OLSON
United States Attorney



MICHAEL W. MOSMAN, OSB #87111
Assistant United States Attorney