**SEALED** 

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on November 15, 2007

UNITED STATES OF AMERICA

Plaintiff,

CRIMINAL NO. CR - 08 - 270

Omar Trevino Morales,

a.k.a. "42,"

Jesus Enrique Rejon Aguilar,

a.k.a. "Mamito,"

Hector Manuel Sauceda Gamboa,

a.k.a. "El Karis,"

Alfonso Lam-Liu, a.k.a. "Gordo Lam,"

Eleazar Medina Rojas, a.k.a. "El Chelelo,"

Aurelio Cano-Flores, a.k.a. "Yankee,"

KOLLAR-KOTELLY, J. CKK

Defendants.

**VIOLATIONS:** 

21 U.S.C. §§959, 960, 963

(Conspiracy to

Distribute Five Kilograms or

More of Cocaine and 1000 Kilograms

or More of Marihuana Knowing and Intending that it would be Imported into the United States)

18 U.S.C. § 2

(Aiding and Abetting) FILED IN OPEN COURT

21 U.S.C. § 853

21 U.S.C. § 970

(Forfeiture)

SEP 0 2 2008

CLERK, U.S. DISTRICT COURT DISTRICT OF COLUMBIA

## **INDICTMENT**

THE GRAND JURY CHARGES THAT:

## **COUNT I**

From in or about June 2006 and continuing thereafter up to and including the date of the filing of this Indictment, the exact dates being unknown to the Grand Jury, in Mexico, Colombia and elsewhere, defendants Omar Trevino Morales, a/k/a "42," Jesus Enrique Rejon Aguilar,

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a/k/a "Mamito," Hector Manuel Speeda Gamboa, a/k/a "El Karis," Alfonso Lam-Liu, a/k/a "Gordo Lam," Eleazar Medina Rojas, a/k/a "El Chelelo," and Aurelio Cano-Flores, a/k/a "Yankee," and others known and unknown to the Grand Jury and not indicted herein, did knowingly and intentionally combine, conspire, confederate, and agree to commit the following offense against the United States: (1) to knowingly and intentionally distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, knowing and intending that such substance would be imported into the United States from Mexico, and (2) to knowingly and intentionally manufacture and distribute 1,000 kilograms or more of a mixture and substance containing a detectable amount of marihuana, a Schedule I controlled substance, knowing and intending that such substance would be imported into the United States from Mexico; all in violation of Title 21, United States Code, Sections 959, 960, 963, and Title 18, United States Code, Section 2.

(Conspiracy to Distribute Five Kilograms of Cocaine and 1000 Kilograms of Marihuana Knowing and Intending that the Cocaine and Marihuana Would Be Imported into the United States, in violation of Title 21, United States Code, Sections 959, 960, and 963, and Title 18, United States Code, Section 2)

## FORFEITURE ALLEGATION

The violations alleged in Count One are re-alleged and incorporated by reference herein.

As a result of the offenses alleged in Count One, the defendants Omar Trevino Morales, a/k/a

"42," Jesus Enrique Rejon Aguilar, a/k/a "Mamito," Hector Manuel Sauceda Gamboa,

a/k/a "El Karis," Alfonso Lam-Liu, a/k/a "Gordo Lam," Eleazar Medina Rojas, a/k/a "El

Chelelo," and Aurelio Cano-Flores, a/k/a "Yankee," shall forfeit to the United States,

pursuant to Title 21, United States Code, Sections 853 and 970, any and all respective right, title,

or interest which such defendants may have in (1) any and all money and/or property

constituting, or derived from any proceeds which such defendants obtained, directly or indirectly, as the result of the violations alleged in Count One of this Indictment; and (2) any and all property used, in any manner or part, to commit, or to facilitate the commission of the violations alleged in Count One of this Indictment.

If any of said forfeitable property, as a result of any act or omission of the defendants, (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be subdivided without difficulty; it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the said property. Criminal forfeiture, in violation of Title 21, United States Code, Sections 853 and 970.

(Criminal Forfeiture, in violation of Title 21, United States Code, Sections 853 and 970)

A TRUE BILL:

FOREPERSON

WAYNE RAABE, Acting Chief Narcotic and Dangerous Drug Section Criminal Division U.S. Department of Justice Washington, DC 20005

By:

Paul Laymon

Trial Attorney
Narcotic and Dangerous Drug Section
Criminal Division
U.S. Department of Justice