

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MAR 13 2008

SEALED

Holding a Criminal Term

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

Grand Jury Sworn in on November 15, 2007

UNITED STATES OF AMERICA :

Plaintiff, :

v. :

Antonio Ezequiel Cardenas-Guillen (1) :
a.k.a. "Tony Tormenta," :

Jorge Eduardo Costilla-Sanchez, (2) :
a.k.a. "El Cos," :

Heriberto Lazcano-Lazcano (3) :
a.k.a. "Lazca," :

Miguel Trevino Morales (4) :
a.k.a. "40," :

Jaime Gonzalez-Duran (5) :
a.k.a. "Hummer," :

Samuel Flores Borrego (6) :
a.k.a. "Tres," :

Mario Ramirez-Trevino (7) :
a.k.a. "Mario Pelon," a.k.a. "X-20," :

Alfredo Rangel Buendia (8) :
a.k.a. "Chicles," :

First Name Unknown (9) :
Last Name Unknown, a.k.a. "Lino," :

Gilberto Barragan, a.k.a. "Tocayo," (10) :

Juan Reyes Mejia-Gonzalez (11) :
a.k.a. "R-1," a.k.a. "Kike," :

Defendants.

CRIMINAL NO. 08 - 057

VIOLATIONS:

21 U.S.C. §§959, 960, 963
(Conspiracy to Manufacture and
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)

21 U.S.C. § 959
(Distribution of Five Kilograms or
More of Cocaine Intending and Knowing
that the Cocaine Will be Unlawfully
Imported Into the United States)

18 U.S.C. § 2
(Aiding and Abetting)

21 U.S.C. § 853
(Forfeiture)

21 U.S.C. § 970

WILLIAM KOTELLY, J. CKK

MAR 13 2008

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 **Antonio Ezequiel Cardenas-Guillen, a.k.a. "Tony Tormenta," Jorge Eduardo Costilla-Sanchez, a.k.a. "El Cos," Heriberto Lazcano-Lazcano, a.k.a. "Lazca," Miguel Trevino Morales, a.k.a. "40," Jaime Gonzalez-Duran a.k.a. "Hummer," Samuel Flores Borrego, a.k.a. "Tres, Mario Ramirez-Trevino, a.k.a. "Mario Pelon," a.k.a. "X-20," Alfredo Rangel Buendia, a.k.a. "Chicles," First Name Unknown, Last Name Unknown, a.k.a. "Lino," Gilberto Barragan, a.k.a. "Tocayo," Juan Reyes Mejia-Gonzalez, a.k.a. "R-1," a.k.a. "Kike,"** and others 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 manufacture and 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)

COUNT TWO

On or about October 5, 2007, in Mexico and elsewhere, the defendants, **Antonio Ezequiel Cardenas-Guillen,** a.k.a. **"Tony Tormenta,"** **Jorge Eduardo Costilla-Sanchez,** a.k.a. **"El Cos,"** **Heriberto Lazcano-Lazcano,** a.k.a. **"Lazca,"** **Miguel Trevino Morales,** a.k.a. **"40,"** **Samuel Flores Borrego,** a.k.a. **"Tres,"** **Mario Ramirez-Trevino,** a.k.a. **"Mario Pelon,"** a.k.a. **"X20,"** **Alfredo Rangel Buendia,** a.k.a. **"Chicles,"** **First Name Unknown, Last Name Unknown,** a.k.a. **"Lino,"** **Juan Reyes Mejia-Gonzalez,** a.k.a. **"R-1,"** a.k.a. **"Kike,"** did unlawfully, knowingly, and intentionally distribute and cause the distribution of five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending and knowing that such cocaine would be unlawfully imported into the United States.

(Distributing Five (5) Kilograms or More of Cocaine Intending and Knowing that the Cocaine Will Be Unlawfully Imported Into the United States, in violation of Title 21, United States Code, Section 959, and Aiding and Abetting, in violation of Title 18, United States Code, Section 2)

COUNT THREE

On or about November 30, 2007, in Mexico and elsewhere, the defendants, **Jorge Eduardo Costilla-Sanchez,** a.k.a. **"El Cos,"** **Mario Ramirez-Trevino,** a.k.a. **"Mario Pelon,"** a.k.a. **"X-20,"** **Samuel Flores Borrego,** a.k.a. **"Tres,"** **Gilberto Barragan,** a.k.a. **"Tocayo,"** and did unlawfully, knowingly, and intentionally distribute and cause the distribution of five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending and knowing that such cocaine would be unlawfully imported into the United States.

(Distributing Five (5) Kilograms or More of Cocaine Intending and Knowing that the Cocaine Will Be Unlawfully Imported Into the United States, in violation of Title 21, United States Code, Section 959, and Aiding and Abetting, in violation of Title 18, United States Code, Section 2)

FORFEITURE ALLEGATION

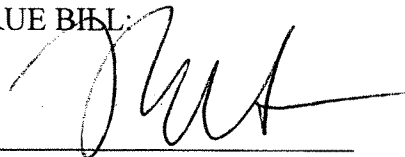
The violations alleged in Count One, Count Two and Count Three are re-alleged and incorporated by reference herein. As a result of the offenses alleged in Count One, Count Two and Count Three, the defendants Antonio Ezequiel Cardenas-Guillen, a.k.a. "Tony Tormenta," Jorge Eduardo Costilla-Sanchez, a.k.a. "El Cos," Heriberto Lazcano-Lazcano, a.k.a. "Lazca," Miguel Trevino Morales, a.k.a. "40," Jaime Gonzalez-Duran a.k.a. "Hummer," Samuel Flores Borrego, a.k.a. "Tres," Mario Ramirez-Trevino, a.k.a. "Mario Pelon," a.k.a. "X-20," Alfredo Rangel Buendia, a.k.a. "Chicles," First Name Unknown, Last Name Unknown, a.k.a. "Lino," Gilberto Barragan, a.k.a. "Tocayo," Juan Reyes Mejia-Gonzalez, a.k.a. "R-1," a.k.a. "Kike," 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, Count Two and Count Three, 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 Counts One and Two 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)

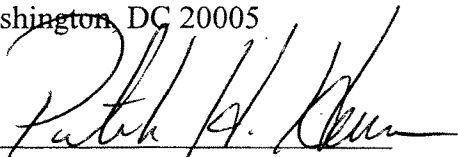
A TRUE BILL:



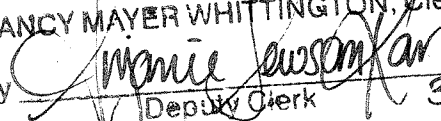
FOREPERSON

KENNETH A. BLANCO, Chief
Narcotic and Dangerous Drug Section
Criminal Division
U.S. Department of Justice
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By:



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United States District Court
For the District of Columbia
A TRUE COPY
NANCY MAYER WHITTINGTON, Clerk
By 
Deputy Clerk 3/14/08