

FILED
UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CORINA ANGELA CHAVEZ,
ROSARIO GUADALUPE PADILLA-
RABAGO,
a/k/a "Pelon,"
a/k/a "Lupe,"
FRANCISCO RAMON OCHOA-
CORRALES,
a/k/a "Güido,"
a/k/a "Diego,"
LUIS CARLOS QUEZADA-
BUSTILLOS,
MAURO BARRERA-ESTRADA,
a/k/a "Cholo,"
GUSTAVO BARRERA-ESTRADA,
a/k/a "Tavo,"
FEDERICO SOTO,
JULIO CARO,
JAYNE MARIE LOPEZ,
SHANAE SEIKO MARIA VASCO,
a/k/a Shanae M. Speed,
BRANDI AGUIRRE,
MICHELLE LAVERN SANDOVAL,
JAMES ROBERT FENDER,
a/k/a "Moose,"
JUSTIN R. SERGEANT,
MANUEL PAUL BLACKMON, and
GRACIELA ALVAREZ-LARA,

Defendants.

)
)
) **CRIMINAL NO. 12-2006 RB**
)
) **Count 1: 21 U.S.C. § 846: Conspiracy;**
)
) **Counts 2 and 3: 21 U.S.C. §§ 841(a)(1) and**
) **(b)(1)(B): Distribution of 5 Grams and More of**
) **Methamphetamine; 18 U.S.C. § 2: Aiding and**
) **Abetting;**
)
) **Count 4: 21 U.S.C. §§ 841(a)(1) and (b)(1)(A):**
) **Distribution of 50 Grams and More of**
) **Methamphetamine; 18 U.S.C. § 2: Aiding and**
) **Abetting;**
)
) **Counts 5, 7-11, 13-16, 22-23, and 25-26: 21 U.S.C.**
) **§ 843(b): Use of a Communication Facility to Further**
) **the Commission of a Drug Trafficking Crime; 18**
) **U.S.C. § 2: Aiding and Abetting;**
)
) **Counts 6, 20, and 24: 21 U.S.C. §§ 841(a)(1) and**
) **841(b)(1)(C): Possession With Intent to Distribute a**
) **Mixture and Substance Containing**
) **Methamphetamine; and 18 U.S.C. § 2: Aiding and**
) **Abetting;**
)
) **Count 12: 21 U.S.C. §§ 841(a)(1) and (b)(1)(D):**
) **Possession With Intent to Distribute Marijuana; 18**
) **U.S.C. § 2: Aiding and Abetting;**
)
) **Counts 17-18 and 27: 21 U.S.C. §§ 841(a)(1)**
) **and (b)(1)(B): Possession With Intent to Distribute**
) **50 Grams and More of a Mixture and Substance**
) **Containing Methamphetamine; 18 U.S.C. § 2: Aiding**
) **and Abetting;**
)
) **Count 19: 21 U.S.C. §§ 841(a)(1) and (b)(1)(C):**
) **Possession With Intent to Distribute Cocaine; 18**
) **U.S.C. § 2: Aiding and Abetting; and**

) Counts 21 and 28: 21 U.S.C. §§ 841(a)(1)
) and (b)(1)(B): Distribution of 50 Grams and More of
) a Mixture and Substance Containing
) Methamphetamine; 18 U.S.C. § 2: Aiding and
) Abetting

INDICTMENT

The Grand Jury charges:

Count 1

Beginning on or about November 29, 2011, and continuing to and including August 15, 2012, in Lincoln County, in the District of New Mexico and elsewhere, the defendants, **CORINA ANGELA CHAVEZ, ROSARIO GUADALUPE PADILLA-RABAGO, a/k/a "Pelon," a/k/a "Lupe," FRANCISCO RAMON OCHOA-CORRALES, a/k/a "Güido," a/k/a "Diego," LUIS CARLOS QUEZADA-BUSTILLOS, MAURO BARRERA-ESTRADA, a/k/a "Cholo," GUSTAVO BARRERA-ESTRADA, a/k/a "Tavo," FEDERICO SOTO, JULIO CARO, JAYNE MARIE LOPEZ, SHANAE SEIKO MARIA VASCO, a/k/a Shanae M. Speed, BRANDI AGUIRRE, MICHELLE LAVERN SANDOVAL, JAMES ROBERT FENDER, a/k/a "Moose," JUSTIN R. SERGEANT, MANUEL PAUL BLACKMON, and GRACIELA ALVAREZ-LARA, unlawfully, knowingly, and intentionally did combine, conspire, confederate, and agree with each other and with other persons whose names are known and unknown to the Grand Jury to commit the following offenses against the United States, to wit: possession with intent to distribute controlled substances, 50 grams and more of methamphetamine, contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), a mixture and substance containing a detectable amount of cocaine, contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and marijuana, contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(D).**

Overt Acts

In furtherance of the conspiracy, and to accomplish the objectives of the conspiracy, the following acts, among others, were committed:

Overt Act One

On December 8, 2011, Corina Angela Chavez sold 26.2 net grams of methamphetamine to an Undercover Agent for \$1,400 at the Inn of the Mountain Gods near Mescalero, New Mexico.

Overt Act Two

On January 11, 2012, Corina Angela Chavez told an Undercover Agent that the cost of an ounce of methamphetamine went from \$1,200 to \$1,600, and that she has therefore been selling a quarter ounce for \$500 and a half ounce for \$800.

Overt Act Three

On January 19, 2012, Corina Angela Chavez and Rosario Guadalupe Padilla-Rabago sold an Undercover Agent 55.2 net grams of methamphetamine for \$3,200 in the parking lot of the Chaparral Hotel in Carrizozo, New Mexico.

Overt Act Four

On March 15, 2012, Corina Angela Chavez obtained 110.0 net grams of methamphetamine for Rosario Guadalupe Padilla-Rabago and then sold the methamphetamine to an Undercover Agent for \$5,600 in the parking lot of the Lowe's Grocery Store in Tularosa, New Mexico.

Overt Act Five

On March 23, 2012, Corina Angela Chavez told an Undercover Agent that she had a new source of supply for methamphetamine.

Overt Act Six

On April 12, 2012, Rosario Guadalupe Padilla-Rabago provided an Undercover Agent with his new phone number and told the Undercover Agent to call him if the Undercover Agent needed anything.

Overt Act Seven

On April 25, 2012, Michelle Lavern Sandoval obtained approximately one half ounce of methamphetamine from her source of supply and then resold the methamphetamine to Corina Angela Chavez for approximately \$1,000.

Overt Act Eight

On April 25, 2012, Justin R. Sergeant offered to go to Corina Angela Chavez's house the following day and to pick up and then sell the half ounce of methamphetamine that Corina Angela Chavez had obtained from Michelle Lavern Sandoval.

Overt Act Nine

On April 26, 2012, Brandi Aguirre asked Corina Angela Chavez for \$60 worth of methamphetamine and \$20 worth of methamphetamine and stated that she wanted it in two separate packages, implying that she would be selling it to two different individuals.

Overt Act Ten

On April 27, 2012, when Corina Angela Chavez complained about only having four grams of methamphetamine left after delivering methamphetamine to Brandi Aguirre and another female, Mauro Barrera-Estrada assured her that he had already purchased additional methamphetamine for them to sell.

Overt Act Eleven

On April 27, 2012, Corina Angela Chavez questioned Brandi Aguirre about whether she had sold all of her methamphetamine, and Brandi Aguirre responded that she had sold most of it.

Overt Act Twelve

On April 27, 2012, Corina Angela Chavez and Graciela Alvarez-Lara discussed the possibility of Corina Angela Chavez obtaining a supply of marijuana from Graciela Alvarez-Lara's boyfriend so that Corina Angela Chavez could sell the marijuana to others.

Overt Act Thirteen

On April 28, 2012, Graciela Alvarez-Lara delivered a quantity of marijuana to Corina Angela Chavez in exchange for \$20 worth of methamphetamine.

Overt Act Fourteen

On April 29, 2012, Brandi Aguirre told Corina Angela Chavez that she had someone who wanted to buy one half ounce of methamphetamine, and Corina Angela Chavez stated that she had the methamphetamine and that the price would be \$800.

Overt Act Fifteen

On April 30, 2012, Justin R. Sergeant told Corina Angela Chavez that he had an order for \$40 worth of methamphetamine if she wanted it, and Corina Angela Chavez stated that she did want the order.

Overt Act Sixteen

On May 1, 2012, Brandi Aguirre and Corina Angela Chavez exchanged a series of text messages regarding Brandi Aguirre buying 3.5 grams of methamphetamine from Corina Angela Chavez.

Overt Act Seventeen

On May 2, 2012, Corina Angela Chavez complained to Fernando LNU (last name unknown) regarding the quality of methamphetamine that she had been purchasing from him, saying that her clients were complaining and did not like the methamphetamine that she had gotten from him.

Overt Act Eighteen

On May 5, 2012, "Lencho" asked Corina Angela Chavez if she had an ounce of marijuana for sale, and Corina Angela Chavez replied that she did and that she would call "Lencho" back with a price.

Overt Act Nineteen

On May 7, 2012, Jesus LNU asked Mauro Barrera-Estrada if he had \$20 worth of marijuana for sale, and Mauro Barrera-Estrada replied that he did.

Overt Act Twenty

On May 8, 2012, Ashley LNU picked up a quantity of methamphetamine at the Ruidoso Downs Race Track and turned the methamphetamine over to Corina Angela Chavez.

Overt Act Twenty-One

On May 10, 2012, Corina Angela Chavez asked Michelle Lavern Sandoval to send her a photograph of a gun that Michelle Lavern Sandoval had in her possession because Corina Angela Chavez had someone at the racetrack who wanted to buy the gun.

Overt Act Twenty-Two

On May 10, 2012, Corina Angela Chavez asked Federico Soto if he would sell her one half ounce of methamphetamine for \$700, and Federico Soto agreed to do so.

Overt Act Twenty-Three

On May 16, 2012, Corina Angela Chavez asked Justin R. Sergeant to go to her house and taste the methamphetamine that she had purchased from Federico Soto.

Overt Act Twenty-Four

On May 16, 2012, Mauro Barrera-Estrada told Corina Angela Chavez that he had spoken to his brother, Gustavo Barrera-Estrada, and that Gustavo Barrera-Estrada had half a pound of very pure methamphetamine ready for them to pick up in Los Angeles, California, for the price of \$6,000.

Overt Act Twenty-Five

On May 16, 2012, Corina Angela Chavez argued with Federico Soto over her belief that Federico Soto was selling methamphetamine he had obtained from Rosario Guadalupe Padilla-Rabago.

Overt Act Twenty-Six

On May 17, 2012, Justin R. Sergeant and Corina Angela Chavez exchanged text messages in which they discussed Justin R. Sergeant purchasing 11 grams of methamphetamine from Corina Angela Chavez in exchange for \$900.

Overt Act Twenty-Seven

On May 19, 2012, Corina Angela Chavez flew from El Paso, Texas, to Los Angeles, California, for the purpose of picking up eight ounces of methamphetamine from a source of supply from whom Gustavo Barrera-Estrada obtained the methamphetamine.

Overt Act Twenty-Eight

On May 20-21, 2012, Corina Angela Chavez and Gustavo Barrera-Estrada drove from California to Ruidoso, New Mexico, with approximately eight ounces of methamphetamine, which

Corina Angela Chavez and Mauro Barrera-Estrada then distributed in the Ruidoso, New Mexico area.

Overt Act Twenty-Nine

In late May 2012, Corina Angela Chavez and Mauro Barrera-Estrada made arrangements for Gustavo Barrera-Estrada to bring them approximately eight ounces of methamphetamine and two ounces of cocaine from Los Angeles, California.

Overt Act Thirty

On May 31, 2012, Corina Angela Chavez sent \$100 to Gustavo Barrera-Estrada via Western Union so that he could purchase gasoline to finish his trip from Los Angeles, California, to deliver approximately eight ounces of methamphetamine and two ounces of cocaine to Corina Angela Chavez and Mauro Barrera-Estrada.

Overt Act Thirty-One

On May 31, 2012, Gustavo Barrera-Estrada was arrested near Carrizozo, New Mexico when law enforcement officers discovered approximately eight ounces of methamphetamine and two ounces of cocaine in the vehicle he was driving.

Overt Act Thirty-Two

On June 5, 2012, Corina Angela Chavez told Mike LNU that she wanted to purchase three ounces of methamphetamine from a source of supply in Los Lunas, New Mexico.

Overt Act Thirty-Three

On June 10, 2012, with the assistance of Mike LNU, Corina Angela Chavez and Mauro Barrera-Estrada purchased three ounces of methamphetamine from a source of supply in Los Lunas, New Mexico.

Overt Act Thirty-Four

On June 15, 2012, Corina Angela Chavez told another individual that she had received a shipment of marijuana which she needed to put away because it was smelling up her house.

Overt Act Thirty-Five

On June 17, 2012, Manuel Paul Blackmon assured Corina Angela Chavez that he did not "cut" or dilute the methamphetamine which he sells and stated that he would not work with anyone who diluted the methamphetamine that he sold to them.

Overt Act Thirty-Six

On June 20, 2012, Manuel Paul Blackmon called Corina Angela Chavez to ask how much a quarter ounce of methamphetamine would cost and then purchased one eighth ounce of methamphetamine from Corina Angela Chavez for \$550.

Overt Act Thirty-Seven

Between June 6, 2012, and June 21, 2012, Francisco Ramon Ochoa-Corrales spoke with an Undercover Agent multiple times to arrange for the Undercover Agent to purchase two ounces of methamphetamine from Rosario Guadalupe Padilla-Rabago and Francisco Ramon Ochoa-Corrales.

Overt Act Thirty-Eight

On June 21, 2012, Rosario Guadalupe Padilla-Rabago and Francisco Ramon Ochoa-Corrales sold an Undercover Agent approximately two ounces of methamphetamine in a parking lot in Tularosa, New Mexico, for \$2,800.

Overt Act Thirty-Nine

At approximately 3:44 p.m. on June 21, 2012, Graciela Alvarez-Lara agreed to sell methamphetamine for Corina Angela Chavez, and Corina Angela Chavez explained to Graciela

Alvarez-Lara that she was to sell 7 grams of methamphetamine for \$550, 3.5 grams of methamphetamine for \$250, and 1.75 grams of methamphetamine for \$135.

Overt Act Forty

At approximately 5:06 p.m. on June 21, 2012, Graciela Alvarez-Lara told Corina Angela Chavez that she needed \$135 worth of methamphetamine, and they agreed to meet at the laundromat so that Corina Angela Chavez could provide the methamphetamine to Graciela Alvarez-Lara.

Overt Act Forty-One

On June 28, 2012, Corina Angela Chavez told Jesus LNU that she wanted to purchase three ounces of methamphetamine from him because she and Mauro Barrera-Estrada only had four ounces of methamphetamine left.

Overt Act Forty-Two

On June 29, 2012, on behalf of Corina Angela Chavez, Manuel Paul Blackmon used Corina Angela Chavez's phone to call an unknown male and ask if he could purchase two or three ounces of methamphetamine from the unknown male.

Overt Act Forty-Three

On July 1, 2012, Corina Angela Chavez and Mauro Barrera-Estrada traveled from Ruidoso, New Mexico, to Los Lunas, New Mexico, for the purpose of purchasing two ounces of methamphetamine.

Overt Act Forty-Four

On July 1, 2012, Corina Angela Chavez and Mauro Barrera-Estrada abandoned their plans to purchase two ounces of methamphetamine in Los Lunas, New Mexico, after observing two marked police cars in the area in which they were planning to purchase the methamphetamine.

Overt Act Forty-Five

On July 16, 2012, James Robert Fender purchased approximately one half ounce of methamphetamine from Corina Angela Chavez for \$800.

Overt Act Forty-Six

On July 22, 2012, Corina Angela Chavez asked James Robert Fender if he wanted her to order one half ounce of methamphetamine for him for \$800 because she was going to place an order for two ounces of methamphetamine for herself with her source of supply.

Overt Act Forty-Seven

On July 22, 2012, James Robert Fender told Corina Angela Chavez that he did want to purchase one half ounce of methamphetamine, and Michelle Lavern Sandoval later told Corina Angela Chavez that James Robert Fender had the money ready to pay for the methamphetamine.

Overt Act Forty-Eight

On July 24, 2012, Corina Angela Chavez made arrangements to travel to Los Lunas, New Mexico, with Mauro Barrera-Estrada to purchase two ounces of methamphetamine for herself and Mauro Barrea-Estrada and one ounce of methamphetamine for James Robert Fender, at a price of \$1,400 per ounce.

Overt Act Forty-Nine

On July 24, 2012, Corina Angela Chavez told James Robert Fender that she was no longer traveling to Los Lunas, New Mexico, because she had gotten in a fight with Mauro Barrera-Estrada and that the methamphetamine from Los Lunas, New Mexico, was now going to cost approximately \$1,500 per ounce because her source of supply would be delivering it to her in Ruidoso, New Mexico.

Overt Act Fifty

On July 24, 2012, Julio Caro, Jayne Marie Lopez, and Shanae Seiko Maria Vasco were arrested with approximately three ounces of methamphetamine which they were en route to deliver to Corina Angela Chavez in Ruidoso, New Mexico.

Overt Act Fifty-One

On August 10, 2012, at the direction of Rosario Guadalupe Padilla-Rabago, Luis Carlos Quezada-Bustillos delivered approximately 17 ounces of methamphetamine to two Undercover Agents in Tularosa, New Mexico.

In violation of 21 U.S.C. § 846.

Count 2

On or about December 8, 2011, in Otero County, in the District of New Mexico, the defendant, **CORINA ANGELA CHAVEZ**, unlawfully, knowingly and intentionally distributed a controlled substance, 5 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 3

On or about January 19, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **ROSARIO GUADALUPE PADILLA-RABAGO**, a/k/a "Pelon," a/k/a "Lupe," unlawfully, knowingly and intentionally distributed a controlled substance, 5 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 4

On or about March 15, 2012, in Otero County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **ROSARIO GUADALUPE PADILLA-RABAGO**, a/k/a

“Pelon,” a/k/a “Lupe,” unlawfully, knowingly and intentionally distributed a controlled substance, 50 grams and more of methamphetamine.

In violation of 21 U.S.C. § § 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 5

On or about April 25, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **MICHELLE LAVERN SANDOVAL**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 6

On or about April 25, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **MICHELLE LAVERN SANDOVAL**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. § § 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 7

On or about April 25, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **JUSTIN R. SERGEANT**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 8

On or about April 26, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **BRANDI AGUIRRE**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 9

On or about April 27, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **MAURO BARRERA-ESTRADA**, a/k/a "**Cholo**," unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 10

On or about April 27, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **BRANDI AGUIRRE**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 11

On or about April 27, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **GRACIELA ALVAREZ-LARA**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 12

On or about April 28, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **GRACIELA ALVAREZ-LARA**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D), and 18 U.S.C. § 2.

Count 13

On or about April 29, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **BRANDI AGUIRRE**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 14

On or about April 30, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **JUSTIN R. SERGEANT**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of

a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 15

On or about May 10, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **FEDERICO SOTO**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 16

On or about May 17, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **JUSTIN R. SERGEANT**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 17

On or about May 21, 2012, in Lincoln County, in the District of New Mexico and elsewhere, the defendants, **CORINA ANGELA CHAVEZ**, **MAURO BARRERA-ESTRADA**, a/k/a "Cholo," and **GUSTAVO BARRERA-ESTRADA**, a/k/a "Tavo," unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. § § 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 18

On or about May 31, 2012, in Lincoln County, in the District of New Mexico and elsewhere, the defendants, **CORINA ANGELA CHAVEZ, MAURO BARRERA-ESTRADA, a/k/a "Cholo,"** and **GUSTAVO BARRERA-ESTRADA, a/k/a "Tavo,"** unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. § § 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 19

On or about May 31, 2012, in Lincoln County, in the District of New Mexico and elsewhere, the defendants, **CORINA ANGELA CHAVEZ, MAURO BARRERA-ESTRADA, a/k/a "Cholo,"** and **GUSTAVO BARRERA-ESTRADA, a/k/a "Tavo,"** unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of cocaine.

In violation of 21 U.S.C. § § 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 20

On or about June 20, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **MANUEL PAUL BLACKMON**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. § § 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 21

On or about June 21, 2012, in Otero County, in the District of New Mexico, the defendants, **ROSARIO GUADALUPE PADILLA-RABAGO**, a/k/a "Pelon," a/k/a "Lupe," and **FRANCISCO RAMON OCHOA-CORRALES**, a/k/a "Güido," a/k/a "Diego," unlawfully, knowingly and intentionally distributed a controlled substance, 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 22

On or about June 21, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **GRACIELA ALVAREZ-LARA**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 23

On or about June 29, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **MANUEL PAUL BLACKMON**, unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 24

On or about July 16, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **JAMES ROBERT FENDER, a/k/a "Moose,"** unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. § § 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 25

On or about July 22, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ, JAMES ROBERT FENDER, a/k/a "Moose,"** and **MICHELLE LAVERN SANDOVAL,** unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 26

On or about July 24, 2012, in Lincoln County, in the District of New Mexico, the defendants, **CORINA ANGELA CHAVEZ** and **JAMES ROBERT FENDER, a/k/a "Moose,"** unlawfully, knowingly and intentionally did use a communication facility, to wit: a telephone, to further the commission of a drug trafficking crime, to wit: conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2.

Count 27

On or about July 24, 2012, in Lincoln County, in the District of New Mexico, the defendants, **JULIO CARO, JAYNE MARIE LOPEZ,** and **SHANAE SEIKO MARIA VASCO, a/k/a**

Shanae M. Speed, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. § § 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 28

On or about August 10, 2012, in Otero County, in the District of New Mexico, the defendants, **ROSARIO GUADALUPE PADILLA-RABAGO**, a/k/a "Pelon," a/k/a "Lupe," and **LUIS CARLOS QUEZADA-BUSTILLOS** unlawfully, knowingly and intentionally distributed a controlled substance, 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. § § 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

FORFEITURE ALLEGATION

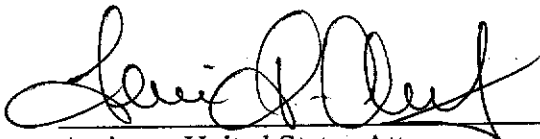
Counts 1 through 28 of this Indictment are incorporated as part of this section of the indictment as if fully re-alleged herein for the purpose of alleging forfeiture to the United States pursuant to 21 U.S.C. § 853.

Upon conviction of any offense in violation of 21 U.S.C. §§ 841, 843, or 846, the defendants, **CORINA ANGELA CHAVEZ**, **ROSARIO GUADALUPE PADILLA-RABAGO**, a/k/a "Pelon," a/k/a "Lupe," **FRANCISCO RAMON OCHOA-CORRALES**, a/k/a "Güido," a/k/a "Diego," **LUIS CARLOS QUEZADA-BUSTILLOS**, **MAURO BARRERA-ESTRADA**, a/k/a "Cholo," **GUSTAVO BARRERA-ESTRADA**, a/k/a "Tavo," **FEDERICO SOTO**, **JULIO CARO**, **JAYNE MARIE LOPEZ**, **SHANAE SEIKO MARIA VASCO**, a/k/a Shanae M. Speed, **BRANDI AGUIRRE**, **MICHELLE LAVERN SANDOVAL**, **JAMES ROBERT FENDER**, a/k/a "Moose," **JUSTIN R. SERGEANT**, **MANUEL PAUL BLACKMON**, and **GRACIELA**

ALVAREZ-LARA, shall forfeit to the United States pursuant to 21 U.S.C. § 853 any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of each offense for which the defendants are convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offenses.

The property to be forfeited to the United States includes but is not limited to a sum of money equal to at least \$75,000 in U.S. currency, including any interest accruing to the date of the judgment, representing the amount of money derived from or involved in the offenses, or traceable to property involved in the offenses, for which the defendants are jointly and severally liable.

A TRUE BILL:


Assistant United States Attorney
hlc 08/15/12 11:32am

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FOREPERSON OF THE GRAND JURY