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CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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SEALED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

September 2016 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

SARA PORTILLA (1),
MARIA ANGELICA MENDEZ VALDIVIA (2),
JOSE DE JESUS MORA (3),
GABRIEL LOPEZ MORENO (4),
 aka Vallos,
 aka Julio Gabriel Lopez Moreno,
ALEJANDRO MADRINAN VARGAS (5),
 aka Jael,
 aka Alejandro Ramona,
 aka Joel Hernandez Vega,
ARACELI RAZO (6),
 aka Araceli Angeles Santiago Razo,
EDUARDO MADRINAN AGUIRRE (7),
 aka Eduardo Madrinan Gonzalez,
 aka Eduardo Gutierrez,
 aka Eduardo Madrinan,
CARLOS GOMEZ DAZA GUTIERREZ (8),
 aka Chapparo,
KARINA IVETTE SAMAN ROJAS (9),
JUAN MANUEL JUAREZ HERRERA (10),
 aka Jimmy,
 aka Gerardo Moreno,
 aka Juan Juarez Montano,
JAMES SANABRIA (11),
 aka Lil Villan,
JOSUE ANTONIO DAMAZO HERRERA (12),
JOSE DAMAZO HERRERA (13),
 aka Jose Luis Damazo Herrera,

Case No. _____

'17CR 251 1 GPC

I N D I C T M E N T

Title 18, U.S.C., Sec. 371 -
Conspiracy; Title 18, U.S.C.,
Sec. 2315 - Receive, Possess,
Conceal, Store, and Dispose of
Certain Stolen Goods; Title 8,
U.S.C., Sec. 1326(a) and (b) -
Removed Alien Found in the United
States; Title 18, U.S.C.,
Sec. 981(a)(1)(C), and Title 28,
U.S.C., Sec. 2461(c) - Criminal
Forfeiture

1 BRANDON RAMIREZ SALAS (14),
2 aka Brandon Razo,
3 aka Brandon Razo Salas,
4 aka Luis Razo Salas,
5 JESUS RAYMUNDO RAZO DEL ANGEL (15),
6 aka Jesus Jr.,
7 aka Raymundo Razo,
8 JACOB PALACIOS (16),
9 ROBIN MACIAS (17),
10 GIOVANI RAZO ALVAREZ (18),
11 aka Giovanni Ismael Caballero,
12 aka Erick Angeles,
13 aka Carlos Martinez,
14 aka Josue Giovanni Caballero Razo,
15 aka Josue Razo,
16 ADRIAN RAZO (19),
17 aka Jurgen Razo Hernandez,
18 SERGIO MANUEL MONTANO NAVA (20),
19 VANESSA MEDINA MUNGUIA (21),
20 aka Adriana Flores,
21 ADRIAN ULICES REYNA RODRIGUEZ (22),

22 Defendants.

23 The grand jury charges:

24 Count 1

25 18 U.S.C. § 371

26 **CONSPIRACY**

27 1. Beginning on a date unknown, but no later than October 13,
28 2005, and continuing through the filing date of this Indictment, within
the Southern District of California and elsewhere, defendants SARA
PORTILLA, MARIA ANGELICA MENDEZ VALDIVIA, JOSE DE JESUS MORA, GABRIEL
LOPEZ MORENO, aka Vallos, aka Julio Gabriel Lopez Moreno, ALEJANDRO
MADRINAN VARGAS, aka Jael, aka Alejandro Ramona, aka Joel Hernandez
Vega, ARACELI RAZO, aka Araceli Angeles Santiago Razo, EDUARDO MADRINAN
AGUIRRE, aka Eduardo Madrinan Gonzalez, aka Eduardo Gutierrez,
aka Eduardo Madrinan, CARLOS GOMEZ DAZA GUTIERREZ, aka Chapparo, KARINA
IVETTE SAMAN ROJAS, JUAN MANUEL JUAREZ HERRERA, aka Jimmy, aka Gerardo

1 Moreno, aka Juan Juarez Montano, JAMES SANABRIA, aka Lil Villan, JOSUE
2 ANTONIO DAMAZO HERRERA, JOSE DAMAZO HERRERA, aka Jose Luis Damazo
3 Herrera, BRANDON RAMIREZ SALAS, aka Brandon Razo, aka Brandon Razo Salas,
4 aka Luis Razo Salas, JESUS RAYMUNDO RAZO DEL ANGEL, aka Jesus Jr.,
5 aka Raymundo Razo, JACOB PALACIOS, ROBIN MACIAS, GIOVANI RAZO ALVAREZ,
6 aka Giovanni Ismael Caballero, aka Erick Angeles, aka Carlos Martinez,
7 aka Josue Giovanni Caballero Razo, aka Josue Razo, ADRIAN RAZO,
8 aka Jurgen Razo Hernandez, SERGIO MANUEL MONTANO NAVA, VANESSA MEDINA
9 MUNGUIA, aka Adriana Flores, and ADRIAN ULICES REYNA RODRIGUEZ knowingly
10 and intentionally conspired and agreed with each other, and persons
11 known and unknown to the grand jury, to commit an offense against the
12 United States, that is, to transport stolen goods in interstate and
13 foreign commerce, in violation of Title 18, United States Code,
14 Section 2314.

15 **MANNERS AND MEANS**

16 2. It was a part of the conspiracy that, at various times,
17 defendants SARA PORTILLA (aided by JOSE DE JESUS MORA) and MARIA ANGELICA
18 MENDEZ VALDIVIA operated as "fences," that is, persons who received and
19 sold stolen merchandise, mainly in Mexico. The fences received stolen
20 merchandise from the other defendants and periodically requested that
21 the other defendants steal particular merchandise to be sold in Mexico.

22 3. It was a further part of the conspiracy that, at various times,
23 the remaining defendants formed crews of thieves to steal merchandise
24 from retail stores throughout the United States, including San Diego
25 County. Much of the merchandise was transported across state lines or
26 to Mexico for resale by the fences. The fences paid the crews for the
27 thefts, either upon delivery or on consignment.

1 Overt Act 2: On or about August 13, 2008, defendant GABRIEL
2 LOPEZ MORENO, aka Vallos, aka Julio Gabriel Lopez Moreno, assaulted a
3 police officer and two loss prevention officers while attempting to flee
4 after committing multiple thefts at the Horton Plaza Mall in San Diego,
5 California.

6 Overt Act 3: On or about November 14, 2009, defendant SERGIO
7 MANUEL MONTANO NAVA and others attempted to steal merchandise from a
8 Hollister store in Schaumburg, Illinois, for delivery to defendant MARIA
9 ANGELICA MENDEZ VALDIVIA in San Diego, California.

10 Overt Act 4: On or about November 14, 2009, defendant SERGIO
11 MANUEL MONTANO NAVA knocked over an infant in its stroller and injured
12 the infant's father, M.F., to avoid arrest from a theft at a Hollister
13 store in Schaumburg, Illinois.

14 Overt Act 5: On or about December 16, 2010, defendants
15 ADRIAN RAZO, aka Jurgen Razo Hernandez, JAMES SANABRIA, aka Lil Villan,
16 and others stole approximately \$5,026 in merchandise from an American
17 Eagle store in Visalia, California.

18 Overt Act 6: In or about 2012, defendant MARIA ANGELICA
19 MENDEZ VALDIVIA directed thieves to supply her with merchandise sold
20 outside of the state of California because certain merchandise she wanted
21 was not sold in California stores.

22 Overt Act 7: On or about May 02, 2012, defendant JACOB
23 PALACIOS and others attempted to steal merchandise from a Hollister
24 store in Vancouver, Washington.

25 Overt Act 8: On or about May 02, 2012, defendant JACOB
26 PALACIOS punched Hollister employee N.H. while attempting to flee the
27 scene of a theft.

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1 Overt Act 9: On or about November 13, 2012, defendants JOSE
2 DAMAZO HERRERA, aka Jose Luis Damazo Herrera, ROBIN MACIAS, and others
3 attempted to steal merchandise from a Hollister store in San Diego,
4 California,

5 Overt Act 10: On or about November 13, 2012, defendants JOSE
6 DAMAZO HERRERA, aka Jose Luis Damazo Herrera, ROBIN MACIAS, and others
7 drove vehicles through a crowd while fleeing a theft from a Hollister
8 store in the Fashion Valley Mall in San Diego, California.

9 Overt Act 11: On or about March 17, 2013, defendant JAMES
10 SANABRIA, aka Lil Villan, stole approximately \$790 in merchandise from
11 the Hollister store in the Plaza Bonita mall in National City,
12 California.

13 Overt Act 12: On or about March 17, 2013, defendant JAMES
14 SANABRIA, aka Lil Villan, grabbed Abercrombie and Fitch Loss Prevention
15 Officer K.L. by the throat and threw her to the ground while fleeing
16 from a theft at the Plaza Bonita Mall in National City, California

17 Overt Act 13: On or about October 23, 2013, in San Diego,
18 California, defendant MARIA ANGELICA MENDEZ VALDIVIA possessed for
19 transport to Mexico approximately \$482,275 worth of merchandise stolen
20 from at least 57 retailers.

21 Overt Act 14: On or about September 12, 2014, defendants
22 JOSUE ANTONIO DAMAZO HERRERA, JOSE DAMAZO HERRERA, aka Jose Luis Damazo
23 Herrera, and others stole approximately \$3,043 in merchandise from a
24 Banana Republic store in La Jolla, California.

25 Overt Act 15: On or about August 21, 2015, defendants ARACELI
26 RAZO, aka Araceli Angeles Santiago and JESUS RAYMUNDO RAZO DEL ANGEL,
27 aka Jesus Jr., aka Raymundo Razo, stole approximately \$4,500 in
28 merchandise from a Victoria's Secret store in Escondido, California.

1 Overt Act 22: On or about April 16, 2016, defendants EDUARDO
2 MADRINAN AGUIRRE, aka Eduardo Madrinan Gonzalez, aka Eduardo Gutierrez,
3 aka Eduardo Madrinan, VANESSA MEDINA MUNGUIA, aka Adriana Flores, and
4 others stole approximately \$10,617 in merchandise from a Tommy Hilfiger
5 store in San Clemente, California.

6 Overt Act 23: On or about June 23, 2016, defendant GABRIEL
7 LOPEZ MORENO, aka Vallos, aka Julio Gabriel Lopez Moreno, ordered ADRIAN
8 ULICES REYNA RODRIGUEZ to intimate E.D., a witness, from speaking with
9 law enforcement about the involvement of defendants ADRIAN ULICES REYNA
10 RODRIGUEZ, GABRIEL LOPEZ MORENO, aka Vallos, aka Julio Gabriel Lopez
11 Moreno, and others in thefts carried out as part of the conspiracy.

12 Overt Act 24: On or about June 23, 2016, defendant ADRIAN
13 ULICES REYNA RODRIGUEZ, acting on orders from defendant GABRIEL LOPEZ
14 MORENO, aka Vallos, aka Julio Gabriel Lopez Moreno, threw a rock into
15 the window of a vehicle, occupied by a member of E.D.'s family, in order
16 to intimate E.D. from speaking with law enforcement about the conspiracy.

17 Overt Act 25: On or about July 10, 2016, defendant SARA
18 PORTILLA instructed defendant JOSE DE JESUS MORA to pay defendant
19 ALEJANDRO MADRINAN VARGAS, aka Jael, aka Alejandro Ramona, aka Joel
20 Hernandez Vega, for stolen merchandise previously delivered.

21 Overt Act 26: On or about July 22, 2016, defendant JOSE
22 DAMAZO HERRERA, aka Jose Luis Damazo Herrera, and others stole
23 approximately \$6,750 in merchandise from a Victoria's Secret store in
24 Las Vegas, Nevada.

25 Overt Act 27: On or about August 24, 2016, defendant EDUARDO
26 MADRINAN AGUIRRE, aka Eduardo Madrinan Gonzalez, aka Eduardo Gutierrez,
27 aka Eduardo Madrinan, received an order from defendant SARA PORTILLA for
28 various merchandise, including Tommy Hilfiger merchandise.

1 Overt Act 28: On or about August 24, 2016, defendant VANESSA
2 MEDINA MUNGUIA, aka Adriana Flores, and others received an order for
3 Express store merchandise from defendant SARA PORTILLA.

4 Overt Act 29: On or about August 26, 2016, defendant EDUARDO
5 MADRINAN AGUIRRE, aka Eduardo Madrinan Gonzalez, aka Eduardo Gutierrez,
6 aka Eduardo Madrinan and others stole approximately \$15,000 in
7 merchandise, from stores in Ventura, California; Oxnard, California;
8 City of Industry, California; Orange, California; and Mission Viejo,
9 California.

10 Overt Act 30: On or about August 26, 2016, defendant EDUARDO
11 MADRINAN AGUIRRE, aka Eduardo Madrinan Gonzalez, aka Eduardo Gutierrez,
12 aka Eduardo Madrinan, and others transported and stored approximately
13 \$15,000 in stolen merchandise in a residence in Lemon Grove, California.

14 Overt Act 31: On or about August 31, 2016, defendants EDUARDO
15 MADRINAN AGUIRRE, aka Eduardo Madrinan Gonzalez, aka Eduardo Gutierrez,
16 aka Eduardo Madrinan, and JOSE DE JESUS MORA, on behalf of defendant
17 SARA PORTILLA, coordinated the delivery of approximately \$15,000 in
18 stolen merchandise for transport to Mexico.

19 Overt Act 32: On or about September 07, 2016, defendant
20 VANESSA MEDINA MUNGUIA, aka Adriana Flores and others attempted to steal
21 approximately \$23,729 in merchandise from multiple stores including an
22 Express store, in Camarillo, California.

23 Overt Act 33: On or about October 11, 2016, defendant BRANDON
24 RAMIREZ SALAS, aka Brandon Razo, aka Brandon Razo Salas, aka Luis Razo
25 Salas, delivered approximately \$6,825 in stolen merchandise to defendant
26 JOSE DE JESUS MORA, on behalf of defendant SARA PORTILLA, for transport
27 to Mexico.

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1 Overt Act 34: On or about October 28, 2016, defendant BRANDON
2 RAMIREZ SALAS, aka Brandon Razo, aka Brandon Razo Salas, aka Luis Razo
3 Salas, delivered approximately \$10,000 worth of stolen merchandise to
4 defendant JOSE DE JESUS MORA, on behalf of defendant SARA PORTILLA, for
5 transport to Mexico.

6 Overt Act 35: In or about 2017, defendant SARA PORTILLA
7 operated a store in Tijuana, Mexico, where PORTILLA sold merchandise
8 stolen by the defendants and exported to Mexico by PORTILLA and defendant
9 JOSE DE JESUS MORA.

10 Overt Act 36: On or about April 20, 2017, defendant ROBIN
11 MACIAS and others stole approximately \$8,083 in merchandise from
12 multiple stores in Las Vegas, Nevada.

13 Overt Act 37: On or about April 20, 2017, defendant ROBIN
14 MACIAS and others fled after the theft of merchandise from multiple
15 stores in Las Vegas, Nevada, leading police on a vehicle and foot
16 pursuit.

17 Overt Act 38: On or about July 27, 2017, defendants GABRIEL
18 LOPEZ MORENO, aka Vallos, aka Julio Gabriel Lopez Moreno, JUAN MANUEL
19 JUAREZ HERRERA, aka Jimmy, aka Gerardo Moreno, aka Juan Juarez Montano,
20 JOSUE ANTONIO DAMAZO HERRERA, and ADRIAN ULICES REYNA RODRIGUEZ stole
21 approximately \$5,530 in merchandise from an Abercrombie & Fitch store
22 in San Diego, California.

23 All in violation of Title 18, United States Code, Section 371.

24 Count 2

25 8. On or about October 23, 2013, within the Southern District of
26 California, defendant MARIA ANGELICA MENDEZ VALDIVIA did receive,
27 possess, conceal, store, and dispose of certain goods, wares, and
28 merchandise of the value of at least \$5,000 which had crossed a State

1 boundary after being stolen, knowing the same to have been stolen; in
2 violation of Title 18, United States Code, Section 2315.

3 Count 3

4 9. On or about February 9, 2017, within the Southern District of
5 California, defendant GABRIEL LOPEZ MORENO, aka Vallos, aka Julio
6 Gabriel Lopez Moreno, an alien, who previously had been excluded,
7 deported and removed from the United States to Mexico, was found in the
8 United States, without the Attorney General of the United States or
9 his/her designated successor, the Secretary of the Department of
10 Homeland Security (Title 6, United States Code, Sections 202(3) and (4),
11 and 557), having expressly consented to the defendant's reapplication
12 for admission to the United States; in violation of Title 8,
13 United States Code, Sections 1326(a) and (b).

14 It is further alleged that defendant was removed from the United
15 States subsequent to August 13, 2008.

16 Count 4

17 10. On or about March 18, 2017, within the Southern District of
18 California, defendant ALEJANDRO MADRINAN VARGAS, aka Jael, aka Alejandro
19 Ramona, aka Joel Hernandez Vega, an alien, who previously had been
20 excluded, deported and removed from the United States to Mexico, was
21 found in the United States, without the Attorney General of the
22 United States or his/her designated successor, the Secretary of the
23 Department of Homeland Security (Title 6, United States Code,
24 Sections 202(3) and (4), and 557), having expressly consented to the

1 defendant's reapplication for admission to the United States; in
2 violation of Title 8, United States Code, Sections 1326(a) and (b).

3 It is further alleged that defendant was removed from the United
4 States subsequent to March 13, 2012.

5 Count 5

6 11. On or about August 26, 2016, within the Southern District of
7 California, defendant EDUARDO MADRINAN AGUIRRE, aka Eduardo Madrinan
8 Gonzalez, aka Eduardo Gutierrez, aka Eduardo Madrinan, an alien, who
9 previously had been excluded, deported and removed from the
10 United States to Mexico, was found in the United States, without the
11 Attorney General of the United States or his/her designated successor,
12 the Secretary of the Department of Homeland Security (Title 6, United
13 States Code, Sections 202(3) and (4), and 557), having expressly
14 consented to the defendant's reapplication for admission to the United
15 States; in violation of Title 8, United States Code, Sections 1326(a)
16 and (b).

17 It is further alleged that defendant was removed from the
18 United States subsequent to July 03, 2015.

19 Count 6

20 12. On or about July 11, 2017, within the Southern District of
21 California, defendant CARLOS GOMEZ DAZA GUTIERREZ, aka Chapparo, an
22 alien, who previously had been excluded, deported and removed from the
23 United States to Mexico, was found in the United States, without the
24 Attorney General of the United States or his/her designated successor,
25 the Secretary of the Department of Homeland Security (Title 6, United
26 States Code, Sections 202(3) and (4), and 557), having expressly
27 consented to the defendant's reapplication for admission to the United
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1 States; in violation of Title 8, United States Code, Sections 1326(a)
2 and (b).

3 It is further alleged that defendant was removed from the
4 United States subsequent to July 30, 2013.

5 Count 7

6 13. On or about February 9, 2017, within the Southern District of
7 California, defendant JUAN MANUEL JUAREZ HERRERA, aka Jimmy, aka Gerardo
8 Moreno, aka Juan Juarez Montano, an alien, who previously had been
9 excluded, deported and removed from the United States to Mexico, was
10 found in the United States, without the Attorney General of the United
11 States or his/her designated successor, the Secretary of the Department
12 of Homeland Security (Title 6, United States Code, Sections 202(3) and
13 (4), and 557), having expressly consented to the defendant's
14 reapplication for admission to the United States; in violation of
15 Title 8, United States Code, Sections 1326(a) and (b).

16 It is further alleged that defendant was removed from the
17 United States subsequent to September 24, 2010.

18 Count 8

19 14. On or about February 9, 2017, within the Southern District of
20 California, defendant JOSUE ANTONIO DAMAZO HERRERA, an alien, who
21 previously had been excluded, deported and removed from the United States
22 to Mexico, was found in the United States, without the Attorney General
23 of the United States or his/her designated successor, the Secretary of
24 the Department of Homeland Security (Title 6, United States Code,
25 Sections 202(3) and (4), and 557), having expressly consented to the
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1 defendant's reapplication for admission to the United States; in
2 violation of Title 8, United States Code, Sections 1326(a) and (b).

3 It is further alleged that defendant was removed from the United
4 States subsequent to May 6, 2015.

5 Count 9

6 15. On or about July 22, 2016, within the Southern District of
7 California, defendant JOSE DAMAZO HERRERA, aka Jose Luis Damazo Herrera,
8 an alien, who previously had been excluded, deported and removed from
9 the United States to Mexico, was found in the United States, without the
10 Attorney General of the United States or his/her designated successor,
11 the Secretary of the Department of Homeland Security (Title 6, United
12 States Code, Sections 202(3) and (4), and 557), having expressly
13 consented to the defendant's reapplication for admission to the United
14 States; in violation of Title 8, United States Code, Sections 1326(a)
15 and (b).

16 It is further alleged that defendant was removed from the United
17 States subsequent to December 10, 2014.

18 FORFEITURE ALLEGATIONS

19 16. Upon conviction of the felony offenses alleged in Counts 1
20 and 2 of this Indictment and pursuant to Title 18, United States Code,
21 Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and
22 Rule 32.2, Federal Rules of Criminal Procedure, defendants SARA
23 PORTILLA, MARIA ANGELICA MENDEZ VALDIVIA, JOSE DE JESUS MORA, GABRIEL
24 LOPEZ MORENO, aka Vallos, aka Julio Gabriel Lopez Moreno, ALEJANDRO
25 MADRINAN VARGAS, aka Jael, aka Alejandro Ramona, aka Joel Hernandez
26 Vega, ARACELI RAZO, aka Araceli Angeles Santiago Razo, EDUARDO MADRINAN
27 AGUIRRE, aka Eduardo Madrinan Gonzalez, aka Eduardo Gutierrez,
28 aka Eduardo Madrinan, CARLOS GOMEZ DAZA GUTIERREZ, aka Chapparo, KARINA

1 IVETTE SAMAN ROJAS, JUAN MANUEL JUAREZ HERRERA, aka Jimmy, aka Gerardo
2 Moreno, aka Juan Juarez Montano, JAMES SANABRIA, aka Lil Villan, JOSUE
3 ANTONIO DAMAZO HERRERA, JOSE DAMAZO HERRERA, aka Jose Luis Damazo
4 Herrera, BRANDON RAMIREZ SALAS, aka Brandon Razo, aka Brandon Razo Salas,
5 aka Luis Razo Salas, JESUS RAYMUNDO RAZO DEL ANGEL, aka Jesus Jr.,
6 aka Raymundo Razo, JACOB PALACIOS, ROBIN MACIAS, GIOVANI RAZO ALVAREZ,
7 aka Giovanni Ismael Caballero, aka Erick Angeles, aka Carlos Martinez,
8 aka Josue Giovanni Caballero Razo, aka Josue Razo, ADRIAN RAZO,
9 aka Jurgen Razo Hernandez, SERGIO MANUEL MONTANO NAVA, VANESSA MEDINA
10 MUNGUIA, aka Adriana Flores, and ADRIAN ULICES REYNA RODRIGUEZ shall
11 forfeit to the United States any property, real or personal, which
12 constitutes or was derived from proceeds traceable to such violations.

13 17. If any of the above-described forfeited property, as a result
14 of any act or omission of defendants SARA PORTILLA, MARIA ANGELICA MENDEZ
15 VALDIVIA, JOSE DE JESUS MORA, GABRIEL LOPEZ MORENO, aka Vallos, aka Julio
16 Gabriel Lopez Moreno, ALEJANDRO MADRINAN VARGAS, aka Jael, aka Alejandro
17 Ramona, aka Joel Hernandez Vega, ARACELI RAZO, aka Araceli Angeles
18 Santiago Razo, EDUARDO MADRINAN AGUIRRE, aka Eduardo Madrinan Gonzalez,
19 aka Eduardo Gutierrez, aka Eduardo Madrinan, CARLOS GOMEZ DAZA
20 GUTIERREZ, aka Chapparo, KARINA IVETTE SAMAN ROJAS, JUAN MANUEL JUAREZ
21 HERRERA, aka Jimmy, aka Gerardo Moreno, aka Juan Juarez Montano, JAMES
22 SANABRIA, aka Lil Villan, JOSUE ANTONIO DAMAZO HERRERA, JOSE DAMAZO
23 HERRERA, aka Jose Luis Damazo Herrera, BRANDON RAMIREZ SALAS, aka Brandon
24 Razo, aka Brandon Razo Salas, aka Luis Razo Salas, JESUS RAYMUNDO RAZO
25 DEL ANGEL, aka Jesus Jr., aka Raymundo Razo, JACOB PALACIOS, ROBIN
26 MACIAS, GIOVANI RAZO ALVAREZ, aka Giovanni Ismael Caballero, aka Erick
27 Angeles, aka Carlos Martinez, aka Josue Giovanni Caballero Razo,
28 aka Josue Razo, ADRIAN RAZO, aka Jurgen Razo Hernandez, SERGIO MANUEL

1 MONTANO NAVA, VANESSA MEDINA MUNGUIA, aka Adriana Flores, and ADRIAN
2 ULICES REYNA RODRIGUEZ, cannot be located upon the exercise of due
3 diligence; has been transferred or sold to, or deposited with, a third
4 person; has been placed beyond the jurisdiction of the Court; has been
5 substantially diminished in value; or has been commingled with other
6 property which cannot be subdivided without difficulty, it is the intent
7 of the United States, pursuant to Title 21, United States Code,
8 Section 853(p), made applicable herein by Title 28, United States Code,
9 Section 2461(c), to seek forfeiture of any other property of the
10 defendant up to the value of the property described above subject to
11 forfeiture.

12 All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and
13 Title 28, United States Code, Section 2461(c).

14 DATED: August 25, 2017.

15 A TRUE BILL:

16 James Calleska
17 Preperson

18 ALANA W. ROBINSON
19 Acting United States Attorney

20 By: Stephen H. Wong
21 STEPHEN H. WONG
22 Assistant U.S. Attorney

23 I hereby attest and certify on 8/28/2017
24 That the foregoing document is a full, true and correct
25 copy of the original on file in my office and in my legal
26 custody.

27 CLERK, U.S. DISTRICT COURT
28 SOUTHERN DISTRICT OF CALIFORNIA

By: [Signature] Deputy