

SEALED SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

From at least in or about February 2002 to on or about the date of the indictment in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

JOSE CARLOS HINOJOSA aka Charlie aka Sobrino,

RAYMUNDO EDGAR GONZALEZ aka Marrana aka Globo,

SERGIO IVAN OLIVAREZ-FLORES aka Loba,

SAUL MENDEZ, JR.,

MARIO ALBERTO MASCORRO aka Mayito,

JOSE ALONSO BARRERA aka Pelon aka Luis Velasquez,

LUIS FERNANDO GARZA SAENZ,

JOSE DE JESUS HERNANDEZ,

MAYRA TREVINO FLORES,

SERGIO SILVA TREVINO

JESUS FABIEL MENDOZA aka Primo,

YANIRA BARRERA,

JAIME HERRERA,

JOHN LOUIS JORDAN,

SHARLETHA WOODARD,

SAN JUANITA M. GARCIA,

TARSILA VILLARREAL VIDAL,

and

REYMUNDO GUERRA aka Tio

defendants herein, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the grand jury, to possess with intent to distribute controlled substances. The overall scope of the conspiracy involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 1000 kilograms or more of a mixture and substance containing a

detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

COUNT TWO

On or about October 18, 2005, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

**JOSE CARLOS HINOJOSA aka Charlie aka Sobrino,
JOSE ALONSO BARRERA aka Pelon aka Luis Velasquez,
and
LUIS FERNANDO GARZA SAENZ**

defendants herein, aided and abetted by each other and by other persons known and unknown to the grand jury, did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 1000 kilograms or more, that is approximately 1,575 kilograms of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

COUNT THREE

On or about October 30, 2005, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

**JOSE CARLOS HINOJOSA aka Charlie aka Sobrino
and
JOSE ALONSO BARRERA aka Pelon aka Luis Velasquez**

defendants herein, aided and abetted by each other and by other persons known and unknown to the grand jury, did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is,

approximately 216 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

COUNT FOUR

On or about June 26, 2007, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

**JOSE CARLOS HINOJOSA aka Charlie aka Sobrino,
JOSE DE JESUS HERNANDEZ,
MAYRA TREVINO FLORES,
and
SERGIO SILVA TREVINO**

defendants herein, aided and abetted by each other and by other persons known and unknown to the grand jury, did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 100 kilograms or more but less than 1000 kilograms, that is, approximately 314 kilograms, of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, and 500 grams or more but less than 5 kilograms, that is, approximately 1140 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT FIVE

On or about June 27, 2007, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

REYMUNDO GUERRA aka Tio

defendant herein, knowing that an offense against the United States has been committed, to wit,

possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), did relieve, comfort, and assist the offender, Jose De Jesus Hernandez, in order to hinder and prevent the offender's apprehension, trial and punishment, by suggesting the production of fraudulent lease documents. The controlled substance involved was 100 kilograms or more but less than 1000 kilograms, that is, approximately 314 kilograms, of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, and 500 grams or more but less than 5 kilograms, that is, approximately 1140 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 18, United States Code, Section 3.

COUNT SIX

On or about August 17, 2007, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

**YANIRA BARRERA,
JAIME HERRERA,
JOHN LOUIS JORDAN,**

SHARLETHA WOODARD

defendants herein, aided and abetted by each other and by other persons known and unknown to the grand jury, did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is, approximately 10 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about December 1, 2007, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

**JOSE CARLOS HINOJOSA aka Charlie aka Sobrino,
RAYMUNDO EDGAR GONZALEZ aka Marrana aka Globo,
JESUS FABIEL MENDOZA aka Primo,**

**JOHN LOUIS JORDAN,
and**

defendants herein, aided and abetted by each other and by other persons known and unknown to the grand jury, did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is, approximately 37 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

COUNT EIGHT

On or about July 8, 2008, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

**JOSE CARLOS HINOJOSA aka Charlie aka Sobrino,
RAYMUNDO EDGAR GONZALEZ aka Marrana aka Globo,
SERGIO IVAN OLIVAREZ-FLORES aka Loba,**

defendants herein, aided and abetted by each other and by other persons known and unknown to the grand jury, did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is, approximately 14 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

COUNT NINE

On or about July 9, 2008, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

**JOSE CARLOS HINOJOSA aka Charlie aka Sobrino,
RAYMUNDO EDGAR GONZALEZ aka Marrana aka Globo,
SAN JUANITA M. GARCIA,
and
TARSILA VILLARREAL VIDAL**

defendants herein, aided and abetted by each other and by other persons known and unknown to the grand jury, did unlawfully, knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is, approximately 22 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

COUNT TEN

On or about October 13, 2007, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

REYMUNDO GUERRA aka Tio

defendant herein, at approximately 4:11 p.m., did knowingly and intentionally use any communication facility, to wit, a telephone, in facilitating the commission of any act or acts constituting a felony under Title 21, United States Code, Section 846, that is, offenses set forth in Count One of this indictment incorporated by reference herein.

In violation of Title 21, United States Code, Section 843(b).

COUNT ELEVEN

From on or about February 21, 2007 to on or about November 21, 2007, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

YANIRA BARRERA

while managing and controlling the place located at 9707 Vermont Green Trail, Houston, Texas, as an owner, knowingly and intentionally made available for use, with and without compensation, said place for the purpose of unlawfully storing and distributing a controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT TWELVE

From at least in or about April 2002 to on or about the date of indictment in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

JOSE CARLOS HINOJOSA aka Charlie aka Sobrino,

RAYMUNDO EDGAR GONZALEZ aka Marrana aka Globo,

SERGIO IVAN OLIVAREZ-FLORES aka Loba,

SAUL MENDEZ, JR.,

MARIO ALBERTO MASCORRO aka Mayito,

JOSE ALONSO BARRERA aka Pelon aka Luis Velasquez,

LUIS FERNANDO GARZA SAENZ,

JORGE ALBERTO RAMOS aka Chucky,

JOSE DE JESUS HERNANDEZ,

MAYRA TREVINO FLORES,

JESUS FABIEL MENDOZA aka Primo,

YANIRA BARRERA,

ROBERTO EDEN MORENO,

JOHN LOUIS JORDAN,

SHARLETHA WOODARD,

SAN JUANITA M. GARCIA,

TARSILA VILLARREAL VIDAL,

and

JAVIER OSCAR SOLIS GARCIA

defendants herein, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree with others known and unknown to the Grand Jury, to commit the following offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

1. To knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce which involved the proceeds of a specified unlawful activity, that is, drug trafficking, as alleged in Counts One, Two, Three, Four, Six, Seven, Eight, Nine, and Eleven of this indictment, with the intent to promote the carrying on of said specified unlawful activity and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);

2. To knowingly transport and transfer and attempt to transport and transfer funds from a place in the United States to a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, that is, drug trafficking, as alleged in Counts One, Two, Three, Four, Six, Seven, Eight, Nine, and Eleven of this indictment, in violation of Title 18, United States Code, Section 1956(a)(2)(A);

All in violation of Title 18, United States Code, Section 1956(h).

COUNT THIRTEEN

On or about March 19, 2007, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

SAUL MENDEZ, JR.

defendant herein, aided and abetted by other persons known and unknown to the grand jury, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of monetary instruments in the amount of approximately \$771,896 in United States currency, which were the proceeds of a specified unlawful activity, that is, the distribution of controlled substances, an offense punishable under Title 21 of the laws of the United States, with the intent to promote the carrying on of the said specified unlawful activity and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

COUNT FOURTEEN

On or about July 12, 2007, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

**JOSE ALONSO BARRERA aka Pelon aka Luis Velasquez
and
LUIS FERNANDO GARZA SAENZ**

defendants herein, aided and abetted by each other and by other persons known and unknown to the grand jury, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of monetary instruments in the amount of approximately \$157,000 in United States currency, which were the proceeds of a specified unlawful activity, that is, the distribution of controlled substances, an offense punishable under Title 21 of the laws of the United States, with the intent to promote the carrying on of the said specified unlawful activity and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

COUNT FIFTEEN

On or about October 1, 2007, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

**JOSE ALONSO BARRERA aka Pelon aka Luis Velasquez
and
JORGE ALBERTO RAMOS aka Chucky**

defendants herein, aided and abetted by each other and by other persons known and unknown to the grand jury, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of monetary instruments in the amount of approximately \$131,000 in United States currency, which were the proceeds of a specified unlawful activity, that is, the distribution of controlled substances, an offense punishable under Title 21 of the laws of the United States, with the intent to promote the carrying on of the said specified unlawful activity and knowing that the property involved in the financial transaction

represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

COUNT SIXTEEN

On or about November 21, 2007, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

YANIRA BARRERA,

JOHN LOUIS JORDAN,

and

ROBERTO EDEN MORENO

defendants herein, aided and abetted by each other and by other persons known and unknown to the grand jury, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of monetary instruments in the amount of approximately \$204,060 in United States currency, which were the proceeds of a specified unlawful activity, that is, the distribution of controlled substances, an offense punishable under Title 21 of the laws of the United States, with the intent to promote the carrying on of the said specified unlawful activity and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

COUNT SEVENTEEN

On or about December 4, 2007, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

JOSE CARLOS HINOJOSA aka Charlie aka Sobrino,

MARIO ALBERTO MASCORRO aka Mayito,

and

JAVIER OSCAR SOLIS GARCIA

defendants herein, aided and abetted by each other and by other persons known and unknown to

the grand jury, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the delivery of monetary instruments in the amount of approximately \$299,920 in United States currency, which were the proceeds of a specified unlawful activity, that is, the distribution of controlled substances, an offense punishable under Title 21 of the laws of the United States, with the intent to promote the carrying on of the said specified unlawful activity and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

COUNT EIGHTEEN

On or about December 8, 2007, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

JOSE CARLOS HINOJOSA aka Charlie aka Sobrino,

**RAYMUNDO EDGAR GONZALEZ aka Marrana,
JESUS FABIEL MENDOZA aka Primo,**

and

JAVIER OSCAR SOLIS GARCIA

defendants herein, aided and abetted by each other and by other persons known and unknown to the grand jury, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the delivery of monetary instruments in the amount of approximately \$200,230 in United States currency, which were the proceeds of a specified unlawful activity, that is, the distribution of controlled substances, an offense punishable under Title 21 of the laws of the United States, with the intent to promote the carrying on of the said specified unlawful activity and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

COUNT NINETEEN

On or about January 19, 2008, in the Southern District of Texas and elsewhere within the jurisdiction of the Court,

MAYRA TREVINO FLORES

defendant herein, aided and abetted by other persons known and unknown to the grand jury, did knowingly transport and transfer and attempt to transport and transfer funds, to wit, approximately \$30,000 in United States currency, from a place in the United States to a place outside the United States, that is, the United Mexican States, with the intent to promote the carrying on of specified unlawful activity, that is, the distribution of controlled substances, an offense punishable under Title 21 of the laws of the United States.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

NOTICE OF FORFEITURE

As a result of the foregoing violations of Title 21, United States Code, Sections 846 and/or 841(a)(1), defendants

JOSE CARLOS HINOJOSA aka Charlie aka Sobrino,

RAYMUNDO EDGAR GONZALEZ aka Marrana aka Globo,

SERGIO IVAN OLIVAREZ-FLORES aka Loba,

SAUL MENDEZ, JR.,

MARIO ALBERTO MASCORRO aka Mayito,

JOSE ALONSO BARRERA aka Pelon aka Luis Velasquez,

LUIS FERNANDO GARZA SAENZ,

JOSE DE JESUS HERNANDEZ,

MAYRA TREVINO FLORES,

SERGIO SILVA TREVINO

JESUS FABIEL MENDOZA aka Primo,

YANIRA BARRERA,

JAIME HERRERA,

JOHN LOUIS JORDAN,

SHARLETHA WOODARD,

SAN JUANITA M. GARCIA,

**TARSILA VILLARREAL VIDAL, and
REYMUNDO GUERRA aka Tio**

shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a), all of their interest in all property constituting or derived from any proceeds the defendant obtained directly or indirectly from said violations, as well as all of their interest in all property used or intended to be used in any manner to commit or to facilitate the commission of said violations.

If any property forfeitable by Title 21, United States Code, Section 853(a), as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence,
- (2) has been transferred or sold to a third party,
- (3) has been placed beyond the jurisdiction of the Court,
- (4) has been substantially diminished in value, or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any and all other property of said defendants as substitute assets for those properties whose forfeiture is impeded for the reasons (1), (2), (3), (4), or (5) described above.

As a result of the foregoing violations of Title 18, United States Code, Section 1956, defendants

**JOSE CARLOS HINOJOSA aka Charlie aka Sobrino,
RAYMUNDO EDGAR GONZALEZ aka Marrana aka Globo,
SERGIO IVAN OLIVAREZ-FLORES aka Loba,
SAUL MENDEZ, JR.,
MARIO ALBERTO MASCORRO aka Mayito,
JOSE ALONSO BARRERA aka Pelon aka Luis Velasquez,
LUIS FERNANDO GARZA SAENZ,
JORGE ALBERTO RAMOS aka Chucky,
JOSE DE JESUS HERNANDEZ,
MAYRA TREVINO FLORES,
JESUS FABIEL MENDOZA aka Primo,
YANIRA BARRERA,**

**ROBERTO EDEN MORENO,
JOHN LOUIS JORDAN,**

**SHARLETHA WOODARD,
SAN JUANITA M. GARCIA,
TARSILA VILLARREAL VIDAL,**

JAVIER OSCAR SOLIS GARCIA

shall forfeit to the United States all of their interest in all property involved in or traceable to that offense pursuant to Title 18, United States Code, Section 982(a)(1).

If any property forfeitable by Title 18, United States Code, Section 982(a)(1), as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence,
- (2) has been transferred or sold to a third party,
- (3) has been placed beyond the jurisdiction of the Court,
- (4) has been substantially diminished in value, or
- (5) has been commingled with other property which cannot be divided without difficulty;


it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any and all other property of said defendants as substitute assets for those properties whose forfeiture is impeded for the reasons (1), (2), (3), (4), or (5) described above.

A TRUE BILL

FOR PERSON OF THE GRAND JURY

DONALD J. DeGABRIELLE, JR.
United States Attorney

By:



Toni Trevino
Assistant United States Attorney