



MAURICIO SANDOVAL, )  
CHRISTINA M. RODRIGUEZ, )  
RICARDO PIZANA, JR., aka JUNIOR, )  
MELISSA GONZALEZ, )  
DAVID S. SMITH, )  
MOISES RAZO, and )  
FRANCISCO SALAZAR, )  
Defendants. )

COUNT 1

The Grand Jury charges:

Beginning in or about 2002, and continuing through the date of this Indictment, the exact dates being unknown to the Grand Jury, in the Northern District of Ohio, Western Division, and elsewhere, LIONEL PEREZ, aka LEO; BRIGIDO HERRERA, aka BRIDGI; AGUSTIN J. LARA; JOSE LARA; MARIO VASQUEZ; JUAN RESENDEZ, aka TONY; FRANCISCO RODRIGUEZ; ELIZA A. PEREZ; JAMES E. NUNN; LEOPOLDO T. PECINA; MARCUS BARRERA; JOSE C. RODRIGUEZ, III, aka JAY; JUAN LUIS VALDES; MARWIN J. PAYNE, aka TWIN; CATO HORNBEAK, aka C, aka GATO; JOE L. ARGUELLES, JR.; JOSEPH A. MALINO; ANGELO S. PECINA; REYNALDO CHAVEZ; SERGIO PEREZ; ESEQUIEL PEREZ, aka ZEKE; MAURICIO SANDOVAL; CHRISTINA M. RODRIGUEZ; RICARDO PIZANA, JR., aka JUNIOR; MELISSA GONZALEZ; DAVID S. SMITH; MOISES RAZO; and FRANCISCO SALAZAR, defendants herein, did knowingly, intentionally and unlawfully combine, conspire, confederate and agree together and with other persons, both known and unknown to the Grand Jury, to distribute and possess with intent to distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a

Schedule II controlled substance, and 100 kilograms or more of mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), (b)(1)(B) and 846.

#### PURPOSE AND OBJECT

It was the purpose and object of this conspiracy that BRIGIDO HERRERA and Alfonso Mata, who is named, but not indicted herein, obtained substantial quantities of cocaine and marijuana from suppliers in the State of Texas, and Mexico, which cocaine and marijuana was distributed throughout Northwest Ohio, by LIONEL PEREZ, MARIO VASQUEZ and others known and unknown to the Grand Jury. It was further the object of the conspiracy that cocaine and marijuana was transported to the Toledo, Ohio area by individuals, known and unknown to the Grand Jury, by means of semi-truck drivers. Once the drugs reached the Toledo, Ohio area, the drugs were distributed through various dealers and sub-dealers.

#### MANNER AND MEANS

The manner and means by which the goals of the conspiracy were met included the following: BRIGIDO HERRERA and Alfonso Mata would obtain substantial quantities of cocaine and marijuana from sources of supply in the State of Texas, and Mexico, which cocaine and marijuana was transported by JUAN LUIS VALDES, MAURICIO SANDOVAL, and other individuals unknown to the Grand Jury, to the Toledo, Ohio area. SERGIO PEREZ, ESEQUIEL PEREZ, ANGELO S. PECINA, JAMES E. NUNN, ELIZA A. PEREZ, JOSE LARA, AUGUSTIN J. LARA, LIONEL PEREZ, JUAN LUIS VALDES, FRANCISCO RODRIGUEZ, and JUAN RESENDEZ facilitated the conspiracy by transporting, collecting and storing illegal drug proceeds for the organization in the Toledo, Ohio area, and elsewhere.

A. Acting at the direction of Alfonso Mata, the cocaine and marijuana was transported to various locations in the Northwest Ohio area by JOSE LARA, AUGUSTIN J. LARA, JUAN RESENDEZ, REYNALDO CHAVEZ, MARIO VASQUEZ, MAURICIO SANDOVAL and others unknown to the Grand Jury. BRIGIDO HERRERA and LIONEL PEREZ would then distribute the drugs to persons known to the Grand Jury, who would then distribute the drugs to conspirators to include, JUAN RESENDEZ, MARWIN J. PAYNE, JOSE C. RODRIGUEZ, III, ELIZA A. PEREZ, JAMES E. NUNN, MELISSA GONZALEZ, and MARCUS BARRERA. It was further part of this conspiracy that MELISSA GONZALEZ would then distribute cocaine to DAVID S. SMITH.

B. It was further part of this conspiracy that a person known to the Grand Jury would distribute the drugs to JOSE C. RODRIGUEZ, III, LEOPOLDO T. PECINA, and CATO HORNBEAK. JOSE C. RODRIGUEZ, III, would further re-distribute the drugs to JOSEPH A. MALINO and CHRISTINA M. RODRIGUEZ.

C. It was further part of this conspiracy that MARIO VASQUEZ would distribute the drugs to FRANCISCO RODRIGUEZ, and JOE L. ARGUELLES, JR.

D. It was further part of this conspiracy that JOE L. ARGUELLES, JR., would distribute drugs to RICARDO PIZANA, JR., and FRANCISCO SALAZAR. It was further part of this conspiracy that FRANCISCO RODRIGUEZ would distribute drugs to MOISES RAZO. During the course of the conspiracy, over 1,000 kilograms of cocaine and over 100 kilograms of marijuana were distributed in the Northwest, Ohio area.

### OVERT ACTS

In furtherance of the conspiracy, and to achieve its objects and purposes, the defendants and others undertook the following acts, among others in the Northern District of Ohio and elsewhere:

1. From 2002 to approximately 2003, LIONEL PEREZ supplied person number 5, who is known to the Grand Jury, with more than 20 kilograms of cocaine in the Toledo, Ohio area.
2. From 2002 to July 2007, LEOPOLDO T. PECINA sold approximately 20 kilograms of cocaine to person number 7, who is known to the Grand Jury, in the Toledo, Ohio area.
3. In and between 2003 and 2004, CHRISTINA M. RODRIGUEZ supplied confidential informant number 1 with at least \$4,000 in counterfeit U.S. currency as partial payment for six kilograms of cocaine.
4. In or about 2004, ELIZA A. PEREZ and JAMES E. NUNN, supplied person number 3, who is known to the Grand Jury, with at least 12 kilograms of cocaine in the Toledo, Ohio area.
5. Beginning in or about 2004 to at least 2010, MAURICIO SANDOVAL delivered multiple kilograms of cocaine and collected and delivered monies derived from the sale of that cocaine.
6. From in or about 2004 until in or around July 2006, LIONEL PEREZ obtained more than 50 kilograms of cocaine from confidential informant number 1, in the presence of

person number 1, who is known to the Grand Jury, at various locations in the Northwest Ohio area.

7. From in or about 2004 until July 2, 2009, MARCUS BARRERA obtained more than 25 kilograms of cocaine from confidential informant number 1, in the presence of person number 1, who are known to the Grand Jury.

8. On or about April 28, 2004, MAURICIO SANDOVAL possessed approximately \$15,102 in a hidden compartment of a semi-tractor trailer near Swanton, Ohio. The face plate of the hidden compartment tested positive for cocaine residue.

9. On or about May 26, 2004, ELIZA A. PEREZ and JAMES E. NUNN possessed \$11,400 and a small amount of marijuana in a vehicle near Oakdale Street in Toledo, Ohio.

10. From in or about June 2004 to in or about July 2006, LIONEL PEREZ, MARCUS BARRERA, and a person known to the Grand Jury distributed multiple kilograms of cocaine in the Toledo, Ohio area.

11. From in or about June 2004 to in or about the middle of 2006, LIONEL PEREZ, MARCUS BARRERA, ELIZA A. PEREZ, and a person known to the Grand Jury, delivered illegal drug proceeds from the sale of cocaine to confidential informant number 1 and person number 1, who is known to the Grand Jury, at various locations in Northwest Ohio.

12. Between June 2004 to in or about July 2006, AGUSTIN J. LARA delivered multiple kilograms of cocaine to confidential informant number 1 and person number 1, who is known to the Grand Jury, in the Northwest Ohio area.

13. From in or about June 2004 through October 2004, MARCUS BARRERA delivered between \$40,000 to \$60,000 in illegal drug proceeds on numerous occasions to

confidential informant number 1 in the presence of person number 1, who is known to the Grand Jury, at a residence in Curtice, Ohio.

14. On or about November 12, 2004, LIONEL PEREZ, and JUAN RESENDEZ were at RESENDEZ' residence on Main Street in Toledo, Ohio where approximately two pounds of marijuana, two firearms and approximately \$42,000 was seized by law enforcement.

15. In approximately 2005, JOSE C. RODRIGUEZ, III and LIONEL PEREZ sold person number 3, who is known to the Grand Jury, one kilogram of cocaine near a Home Depot store in the Toledo, Ohio area.

16. From in or about 2005 to mid 2006, JOSE C. RODRIGUEZ, III supplied more than a total of 30 kilograms of cocaine to person number 5, who is known to the Grand Jury, at a location near Main Street in Toledo, Ohio.

17. From in or about 2005 to mid 2006, JUAN RESENDEZ transported at least 30 kilograms of cocaine from Texas to Oak and Navarre streets in Toledo, Ohio.

18. From in or about 2005 to mid 2006, LEOPOLDO T. PECINA supplied at least ten kilograms of cocaine to person number 5, who is known to the Grand Jury, in or near Toledo, Ohio.

19. Between 2005 and early 2006, BRIGIDO HERRERA and SERGIO PEREZ possessed approximately 20 kilograms of cocaine in Matamoros, Mexico in the presence of person number 4, who is known to the Grand Jury.

20. From 2005 to 2006, CHRISTINA M. RODRIGUEZ obtained five to 15 kilograms of cocaine in Perrysburg, Ohio, from confidential informant number 1 and person number 1, who is known to the Grand Jury.

21. On or about October 9, 2005, LIONEL PEREZ transported approximately \$18,945 to a business in Oregon, Ohio.

22. In or about first part of 2006, JOSE C. RODRIGUEZ, III supplied approximately 12 kilograms of cocaine to JOSEPH A. MALINO in the presence of person number 5, who is known to the Grand Jury.

23. On or about November 25, 2005, digital scales, drug packaging material, drug documents, and a money counter were seized from an address associated with person number 1, who is known to the Grand Jury, confidential informant number 1, and SERGIO PEREZ on Route 579 in Ottawa County, Ohio.

24. From July 2006 to February 22, 2008, AGUSTIN J. LARA and JOSE LARA delivered multiple kilograms of cocaine to LIONEL PEREZ, and subsequently collected illegal drug proceeds from LIONEL PEREZ at an address in Perrysburg, Ohio.

25. Between August 2006 and November 2006, ELIZA A. PEREZ and JAMES E. NUNN arranged for two shipments of multiple kilograms of cocaine and two shipments of multiple pounds of marijuana from Texas to a location near Chicago, Illinois. Such shipments were coordinated between BRIGIDO HERRERA and confidential informant number 1.

26. On or about September 17, 2006, JAMES E. NUNN and ELIZA A. PEREZ possessed \$185,625 in illegal drug proceeds in a vehicle in Lincoln County, Oklahoma.

27. In or about mid to late 2007, a person known to the Grand Jury and confidential informant number 1 facilitated the delivery of approximately 60 kilograms of cocaine to the residence of LEOPOLDO T. PECINA near Genoa, Ohio.



28. On or about January 10, 2007, at approximately 3:59 p.m., BRIGIDO HERRERA and confidential informant number 1 discussed a previous delivery of approximately 17 kilograms of cocaine. BRIGIDO HERRERA told confidential informant number 1 that another 30 kilograms of cocaine was available for sale.

29. On or about January 11, 2007, BRIGIDO HERRERA directed confidential informant number 1 to wire transfer money to Mexico as partial payment for the previous delivery of 17 kilograms of cocaine which was seized by law enforcement in Fremont, Ohio on January 9, 2007.

30. On or about February 8, 2007, BRIGIDO HERRERA directed confidential informant number 1 to pick up ten kilograms of cocaine in Chicago, Illinois.

31. On or about March 13, 2007, AGUSTIN J. LARA possessed approximately five grams of cocaine and \$10,000 near Charlotte, Tennessee.

32. On or about April 27, 2007, at approximately 4:23 p.m., MARWIN J. PAYNE and confidential informant number 1 met in a parking lot in Toledo, Ohio where MARWIN J. PAYNE and confidential informant number 1 discussed PAYNE purchasing more than 10 kilograms of cocaine from confidential informant number 1.

33. On or about May 1, 2007, at approximately 4:00 p.m., MARWIN J. PAYNE asked confidential informant number 1 when the ten kilograms of cocaine would be delivered.

34. On or about May 8, 2007, MARCUS BARRERA and confidential informant number 1 discussed purchasing approximately five kilograms of cocaine from confidential informant number 1.

35. From June 2007 through July 2, 2009, CHRISTINA RODRIGUEZ obtained

approximately six to seven kilograms of cocaine from a person known to the Grand Jury.

36. From in or about August, 2007, through the end of November, 2007, JOSEPH A. MALINO purchased approximately five kilograms of cocaine from person number 6, who is known to the Grand Jury, in Toledo, Ohio.

37. On or about October 24, 2007, LEOPOLDO T. PECINA sold approximately 153.1 grams of cocaine to person number 7, who is known to the Grand Jury, in Genoa, Ohio. PECINA received \$2,500 from person number 7, who is known to the Grand Jury as a partial payment for the cocaine.

38. On or about December 13, 2007, BRIGIDO HERRERA met with a person known to the Grand Jury in or near San Benito, Texas concerning a future shipment of 45 kilograms of cocaine to the Toledo, Ohio area.

39. In or about 2008, CATO HORNBEAK delivered a bag containing a shoe box with illegal drug proceeds to a person known to the Grand Jury on Greenwood Avenue in Toledo, Ohio. This also occurred in the presence of person number 1, who is known to the Grand Jury.

40. In or about 2008, REYNALDO CHAVEZ delivered approximately 50 kilograms of cocaine to JOSE C. RODRIGUEZ, III in the Toledo, Ohio area.

41. Beginning in or about 2008 until in or about 2009, REYNALDO CHAVEZ obtained a total of more than 50 kilograms of cocaine at a truck stop off Interstate 280 near Toledo, Ohio, which cocaine he delivered to the residence of confidential informant number 1, in the presence of person number 1, who are known to the Grand Jury.

42. Beginning in or about late 2008, until in or about early 2009, JOSE C. RODRIGUEZ, III supplied person number 5, who is known to the Grand Jury, with at least three kilograms of cocaine on Woodville Road, in Toledo, Ohio.

43. On or about February 2, 2008, at approximately 11:09 a.m., JUAN RESENDEZ drove a white Ford Escape to ANGELO S. PECINA's residence in Oregon, Ohio.

44. On or about February 2, 2008, at approximately 11:18 a.m., JUAN RESENDEZ, driving a white Ford Escape, and JOSE LARA, driving a maroon Ford Contour, departed ANGELO S. PECINA's residence in Oregon, Ohio.

45. On or about February 2, 2008, at approximately 11:52 a.m., JOSE LARA possessed approximately \$209,070 in a hidden compartment of a maroon Ford Contour in Sandusky County, Ohio.

46. On or about February 21, 2008, at approximately 9:53 a.m., JUAN RESENDEZ left ANGELO S. PECINA's residence in Oregon, Ohio, and went to a residential trailer where AGUSTIN J. LARA and JOSE LARA lived on Clark Drive in Sandusky County, Ohio.

47. On or about February 22, 2008, JOSE LARA and AGUSTIN J. LARA possessed approximately 3.3 grams of cocaine, a firearm, \$739,630 in U.S. currency, a money counter and drug related documents in a residential trailer off Clark Drive in Sandusky County, Ohio.

48. On or about April 11, 2008, JOE L. ARGUELLES, JR. sold approximately 28 grams of cocaine to confidential informant number 2 for \$900 in Oak Harbor, Ohio.

49. On or about April 18, 2008, JOE L. ARGUELLES, JR. sold approximately 126.4 grams of cocaine to confidential informant number 2 for \$3,820 in Oak Harbor, Ohio.

50. In or about June 2008, MARIO VASQUEZ obtained approximately ten kilograms of cocaine at a hotel parking lot off Miami Street in Toledo, Ohio from confidential informant number 1 and person number 1, who are known to the Grand Jury.

51. On or about August 15, 2008, DAVID S. SMITH received a package from MELISSA GONZALEZ, and delivered it to a person unknown to the Grand Jury in exchange for \$1,000 in Toledo, Ohio.

52. On or about August 21, 2008, MELISSA GONZALEZ sent approximately three kilograms of cocaine to DAVID S. SMITH at an address on South Avenue in Toledo, Ohio, which cocaine was seized later that day by an United States Postal Inspector.

53. On or about August 25, 2008, DAVID S. SMITH attempted to possess approximately three kilograms of cocaine at a residence on South Avenue in Toledo, Ohio.

54. On or about September 17, 2008, LEOPOLDO T. PECINA gave person number 7, who is known to the Grand Jury, approximately 127.1 grams of cocaine in satisfaction for an outstanding drug debt.

55. On or about September 23, 2008, at approximately 7:43 p.m., MARCUS BARRERA arranged to sell an ounce of cocaine to confidential informant number 1 at MARCUS BARRERA's residence near Terrace Drive in Toledo, Ohio.

56. On or about September 23, 2008, at approximately 7:49 p.m., MARCUS BARRERA sold approximately 27.6 grams of cocaine to confidential informant number 1.

57. From in or about October 2008 through July 2009, LIONEL PEREZ accepted delivery of approximately \$450,000 in drug proceeds from person number 8, who is known to the Grand Jury, to a residence in Oregon, Ohio.

58. From in or about October 2008 to July 2009, CATO HORNBEAK was supplied cocaine totaling at least eight kilograms by person number 8, who is known to the Grand Jury.

59. From in or about October 2008 to July 2009, CATO HORNBEAK paid more than \$200,000 in illegal drug proceeds to person number 8, who is known to the Grand Jury, which money was to be delivered to a person known to the Grand Jury.

60. From about the end of 2008 to early 2009, JOSE C. RODRIGUEZ, III sold approximately two kilograms of cocaine to person number 5, who is known to the Grand Jury, in the Toledo, Ohio area.

61. On or about November 19, 2008, MOISES RAZO arranged to sell two ounces of cocaine for \$2,000 to person number 2, who is known to the Grand Jury.

62. On or about November 20, 2008, MOISES RAZO sold approximately 55.8 grams of cocaine to person number 2, who is known to the Grand Jury, for \$2,000 near Fremont, Ohio.

63. Between November 28, 2008, and February 23, 2009, JUAN RESENDEZ and person number 1, who is known to the Grand Jury, sent two packages, via FedEx, containing illegal drug proceeds to ESEQUIEL PEREZ' residence on 1174 Leal Street in San Benito, Texas.

64. In or about December 2008, MARIO VASQUEZ obtained approximately 89 kilograms of cocaine from confidential informant number 1 and person number 1, who is known to the Grand Jury at a hotel parking lot off Miami Street in Toledo, Ohio.

65. On or about December 2, 2008, at approximately 3:54 p.m., MOISES RAZO arranged to sell two ounces of cocaine to person 2, who is known to the Grand Jury.

66. On or about December 2, 2008, at approximately 3:57 p.m., MOISES RAZO sold 56.1 grams of cocaine to person number 2, who is known to the Grand Jury, for \$2,000 near Fremont, Ohio.

67. On or about December 10, 2008, at approximately 12:27 p.m., ELIZA A. PEREZ talked to person number 3, who is known to the Grand Jury, and arranged a meeting to make a partial payment on a \$22,000 drug debt.

68. On or about December 10, 2008, at approximately 12:49 p.m., ELIZA A. PEREZ received \$2,000 from person number 3, who is known to the Grand Jury, as partial payment for an outstanding drug debt owed to a person known to the Grand Jury.

69. On or about December 16, 2008, MOISES RAZO told person number 2, who is known to the Grand Jury, during a telephone conversation that he had a large amount of cocaine but was not permitted to open the packages of cocaine until later that week.

70. On or about January 27, 2009, at approximately 3:08 p.m., MOISES RAZO arranged to sell four ounces of cocaine to person number 2, who is known to the Grand Jury.

71. On or about January 27, 2009, at approximately 3:50 p.m., MOISES RAZO sold 112.7 grams of cocaine to person number 2, who is known to the Grand Jury, for \$4,000 near Fremont, Ohio.

72. On or about February 12, 2009, FRANCISCO RODRIGUEZ possessed approximately 14.5 kilograms of cocaine, a digital scale, \$18,990, and a money counter in a residence near Gibsonburg, Ohio.

73. On or about February 12, 2009, MOISES RAZO possessed approximately 10.6 grams of cocaine in a vehicle at his residence in Fremont, Ohio.

74. On or about March 19, 2009, ESEQUIEL PEREZ expected to receive a FedEx package containing \$60,100 at an address associated with ESEQUIEL PEREZ on Leal Street in San Benito, Texas, which package was seized by law enforcement.

75. On or about March 26, 2009, LEOPOLDO T. PECINA gave approximately 132.6 grams of cocaine to person number 7, who is known to the Grand Jury, in satisfaction for an outstanding drug debt, near Front Street in Toledo, Ohio.

76. On or about June 2, 2009, SERGIO PEREZ, ESEQUIEL PEREZ and JUAN RESENDEZ, possessed approximately 320 pounds of marijuana seized by law enforcement in Willacy County, Texas.

77. On or about June 18, 2009, MARWIN J. PAYNE obtained five kilograms of cocaine from confidential informant number 1 and person number 1, who are known to the Grand Jury in the Toledo, Ohio area.

78. On or about June 19, 2009, FRANCISCO SALAZAR and RICARDO PIZANA, JR. sold approximately 25.7 grams of cocaine to person number 2, who is known to the Grand Jury, for \$1,100 in Fremont, Ohio. During this transaction in Fremont, Ohio, RICARDO PIZANA, JR. told person number 2, who is known to the Grand Jury, that he had additional ounces of cocaine for sale. FRANCISCO SALAZAR also told person number 2 that he had a customer interested in purchasing additional ounces of cocaine.

79. On or about June 25, 2009, FRANCISCO SALAZAR and RICARDO PIZANA, JR. sold approximately 53.8 grams of cocaine to person number 2, who is known to the Grand Jury, for \$2,200 in Fremont, Ohio. During this transaction, RICARDO PIZANA, JR. told person

number 2, who is known to the Grand Jury, that he (RICARDO PIZANA, JR.) had less than a kilogram of cocaine remaining in supply.

80. On or about July 2, 2009, ANGELO S. PECINA stored approximately 49 kilograms of cocaine for confidential informant number 1 at a residence on Patchen Street in Oregon, Ohio.

81. On or about July 2, 2009, ESEQUIEL PEREZ took approximately five kilograms of cocaine from a storage unit on Oakdale Street in Toledo, Ohio.

82. On or about July 9, 2009, at approximately 6:51 p.m., RICARDO PIZANA, JR. arranged to sell two ounces of cocaine to person number 2, who is known to the Grand Jury.

83. On or about July 9, 2009, at approximately 7:49 p.m., RICARDO PIZANA, JR. sold approximately 55 grams of cocaine to person number 2, who is known to the Grand Jury, for \$2,200 in Fremont, Ohio.

84. On or about July 21, 2009, at approximately 12:28 p.m., RICARDO PIZANA, JR. arranged to sell cocaine to person number 2, who is known to the Grand Jury.

85. On or about July 21, 2009, at approximately 2:49 p.m., RICARDO PIZANA, JR. sold approximately 56 grams of cocaine to person number 2, who is known to the Grand Jury, for \$2,200 in Fremont, Ohio.

86. On or about July 21, 2009, at 2:54 p.m., RICARDO PIZANA, JR. was observed arriving at JOE L. ARGUELLES, JR.'s residence in Fremont, Ohio

87. On or about September 22, 2009 at approximately 1:15 p.m., RICARDO PIZANA JR. arranged to sell two ounces of cocaine to person number 2, who is known to the Grand Jury.



88. On or about September 22, 2009, at approximately 2:22 p.m., RICARDO PIZANA, JR. was observed arriving at JOE L. ARGUELLES, JR.'s residence in Fremont, Ohio.

89. On or about September 22, 2009, at approximately 2:27 p.m., RICARDO PIZANA, JR. sold approximately 56 grams of cocaine to person number 2, who is known to the Grand Jury, for \$2,200 in Fremont, Ohio.

90. On or about September 22, 2009, at approximately 2:28 p.m., RICARDO PIZANA, JR. was observed returning to JOE L. ARGUELLES, JR.'s residence in Fremont, Ohio.

91. On or about November 3, 2009, at approximately 12:09 p.m., JOE L. ARGUELLES, JR. was observed arriving at MARIO VASQUEZ' residence on Herman Place in Toledo, Ohio.

92. On or about November 3, 2009, at approximately 1:11 p.m., JOE L. ARGUELLES, JR. possessed approximately one kilogram of cocaine in a vehicle on the Ohio Turnpike in Ottawa County.

93. On or about November 5, 2009, RICARDO PIZANA, JR. told person number 2, who is known to the Grand Jury, that something happened a couple of days earlier and that RICARDO PIZANA, JR. would not have a supply of cocaine.

94. On or about December 29, 2009, at approximately 5:54 p.m., LIONEL PEREZ instructed confidential informant number 1 to pick up approximately \$30,000, which money was illegal drug proceeds, from ELIZA A. PEREZ and JAMES E. NUNN.

95. On or about December 29, 2009, at approximately 6:10 p.m., ELIZA A. PEREZ and JAMES E. NUNN gave confidential informant number 1, \$24,980 as partial payment for an outstanding drug debt.

96. On or about December 29, 2009, at approximately 7:07 p.m., ELIZA A. PEREZ and JAMES E. NUNN gave confidential informant number 1, \$6,000 in partial payment of an existing drug debt.

97. On or about December 29, 2009, at approximately 7:44 p.m., LIONEL PEREZ instructed confidential informant number 1 to send him (LIONEL PEREZ) \$1,000 via a Green Dot Money Pack, which Green Dot Money Pack confidential informant number 1 purchased at Walmart on Navarre Avenue in Oregon, Ohio, at approximately 8:14 p.m.

98. On or about January 2, 2010, LIONEL PEREZ directed confidential informant number 1 to pick up approximately \$11,860 of illegal drug proceeds from REYNALDO CHAVEZ at the Comfort Inn on Oregon Road in Northwood, Ohio.

99. On or about January 9, 2010, ELIZA A. PEREZ sent \$2,500, via Western Union, under a false name to MAURICIO SANDOVAL as payment for cocaine supplied by LIONEL PEREZ.

100. On or about January 11, 2010, LIONEL PEREZ offered to sell three kilograms of cocaine to confidential informant number 1.

101. On or about January 11, 2010, JOSE C. RODRIGUEZ, III, offered to buy ten kilograms of cocaine from confidential informant number 1 for cash on delivery.

102. On or about January 14, 2010, LIONEL PEREZ directed confidential informant number 1 to deliver approximately \$42,000 in illegal drug proceeds to a person known to the Grand Jury in the Meijer parking lot on Curtice Road in Oregon, Ohio.

103. On or about January 15, 2010, at approximately 1:12 a.m., JUAN LUIS VALDES possessed \$286,539.00 in a hidden compartment of a semi-truck on Hagman and Alexis Roads in Toledo, Ohio.

104. On or about June 24, 2010, at approximately 12:30 p.m., ANGELO S. PECINA possessed a small amount of marijuana, two firearms and \$149,995 in his residence on Patchen Street in Oregon, Ohio.

105. On or about March 19, 2012, MARIO VASQUEZ attempted to possess eight kilograms of cocaine near Northwood, Ohio, which cocaine was seized by law enforcement.

All in violation of Title 21, United States Code, Section 846.

#### COUNT 2

The Grand Jury further charges:

On or about October 24, 2007, in the Northern District of Ohio, Western Division, LEOPOLDO T. PECINA, defendant herein, did knowingly and intentionally possess with intent to distribute approximately 153.1 grams of a mixture or 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)(C).

COUNT 3

The Grand Jury further charges:

On or about February 22, 2008, in the Northern District of Ohio, Western Division, JOSE LARA and AGUSTIN J. LARA, defendants herein, did knowingly and intentionally possess with intent to distribute approximately 3.3 grams of a mixture or 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)(C), and Title 18, United States Code, Section 2.

COUNT 4

The Grand Jury further charges:

On or about April 11, 2008, in the Northern District of Ohio, Western Division, JOE L. ARGUELLES, JR., defendant herein, did knowingly and intentionally possess with intent to distribute approximately 28 grams of a mixture or 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)(C).

COUNT 5

The Grand Jury further charges:

On or about April 18, 2008, in the Northern District of Ohio, Western Division, JOE L. ARGUELLES, JR., defendant herein, did knowingly and intentionally possess with intent to distribute approximately 126.4 grams of a mixture or 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)(C).

COUNT 6

The Grand Jury further charges:

On or about August 25, 2008, in the Northern District of Ohio, Western Division, DAVID S. SMITH, defendant herein, did knowingly and intentionally attempt to possess with intent to distribute approximately three kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 846.

COUNT 7

The Grand Jury further charges:

On or about September 17, 2008, in the Northern District of Ohio, Western Division, LEOPOLDO T. PECINA, defendant herein, did knowingly and intentionally possess with intent to distribute approximately 127.1 grams of a mixture or 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)(C).

COUNT 8

The Grand Jury further charges:

On or about September 23, 2008, in the Northern District of Ohio, Western Division, MARCUS BARRERA, defendant herein, did knowingly and intentionally possess with intent to distribute approximately 27.6 grams of a mixture or 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)(C).

COUNT 9

The Grand Jury further charges:

On or about November 20, 2008, in the Northern District of Ohio, Western Division, MOISES RAZO, defendant herein, did knowingly and intentionally possess with intent to distribute approximately 55.8 grams of a mixture or 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)(C).

COUNT 10

The Grand Jury further charges:

On or about December 2, 2008, in the Northern District of Ohio, Western Division, MOISES RAZO, defendant herein, did knowingly and intentionally possess with intent to distribute approximately 56.1 grams of a mixture or 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)(C).

COUNT 11

The Grand Jury further charges:

On or about January 27, 2009, in the Northern District of Ohio, Western Division, MOISES RAZO, defendant herein, did knowingly and intentionally possess with intent to distribute approximately 112.7 grams of a mixture or 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)(C).

COUNT 12

The Grand Jury further charges:

On or about February 12, 2009, in the Northern District of Ohio, Western Division, MOISES RAZO, defendant herein, did knowingly and intentionally possess with intent to distribute approximately 10.6 grams of a mixture or 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)(C).

COUNT 13

The Grand Jury further charges:

On or about February 12, 2009, in the Northern District of Ohio, Western Division, FRANCISCO RODRIGUEZ, defendant herein, did knowingly and intentionally possess with intent to distribute approximately 14.5 kilograms of a mixture or 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).

COUNT 14

The Grand Jury further charges:

On or about March 26, 2009, in the Northern District of Ohio, Western Division, LEOPOLDO T. PECINA, defendant herein, did knowingly and intentionally possess with intent to distribute approximately 132.6 grams of a mixture or 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)(C).

COUNT 15

The Grand Jury further charges:

On or about June 19, 2009, in the Northern District of Ohio, Western Division, FRANCISCO SALAZAR and RICARDO PIZANA JR., defendants herein, did knowingly and intentionally possess with intent to distribute approximately 25.7 grams of a mixture or 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)(C), and Title 18, United States Code, Section 2.

COUNT 16

The Grand Jury further charges:

On or about June 25, 2009, in the Northern District of Ohio, Western Division, FRANCISCO SALAZAR and RICARDO PIZANA JR., defendants herein, did knowingly and intentionally possess with intent to distribute approximately 53.8 grams of a mixture or 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)(C), and Title 18, United States Code, Section 2.

COUNT 17

The Grand Jury further charges:

On or about July 9, 2009, in the Northern District of Ohio, Western Division, RICARDO PIZANA, JR., defendant herein, did knowingly and intentionally possess with intent to distribute



approximately 55.5 grams of a mixture or 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)(C).

COUNT 18

The Grand Jury further charges:

On or about July 21, 2009, in the Northern District of Ohio, Western Division, RICARDO PIZANA JR., defendant herein, did knowingly and intentionally possess with intent to distribute approximately 56.1 grams of a mixture or 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)(C).

COUNT 19

The Grand Jury further charges:

On or about September 22, 2009, in the Northern District of Ohio, Western Division, RICARDO PIZANA JR., defendant herein, did knowingly and intentionally possess with intent to distribute approximately 56.1 grams of a mixture or 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)(C).

COUNT 20

The Grand Jury further charges:

On or about January 15, 2010, in the Northern District of Ohio, Western Division, JUAN LUIS VALDES did travel in interstate commerce from the State of Michigan to the State of Ohio, with the intent to promote, manage, establish, carry on, and facilitate the promotion,

management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and the said defendant, thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity.

All in violation of Title 18, United States Code, Section 1952(a)(3).

#### COUNT 21

The Grand Jury further charges:

On or about March 19, 2012, in the Northern District of Ohio, Western Division, MARIO VASQUEZ, defendant herein, did knowingly and intentionally attempt to possess with intent to distribute approximately eight kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846.

#### FORFEITURE SPECIFICATION

The Grand Jury further charges:

1. The allegations contained in Counts 1 through 21 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to the provisions of Title 21, United States Code, Section 853.

2. From their engagement in any or all of the violations alleged in Counts 1 through 21 of this Indictment, punishable by imprisonment for more than one year, the defendants shall forfeit the following properties to the United States pursuant to Title 21, United States Code, Sections 853(a)(1) and (2):

- (1) Any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violations;
- (2) Any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation; including but not limited to the following:

A. Assets of ANGELO S. PECINA:

- I. A Taurus 9mm handgun, serial number TPD8745; and
- II. a Russian M44 7.62mm rifle, serial number AB2089, seized from a residence on Patchen St., in Oregon, Ohio, on June 24, 2010.

B. Assets of JOSE LARA and AGUSTIN J. LARA:

- I. A Ruger .22 caliber semi-automatic handgun, serial number 13-57883, seized from a residence on Clark Drive, west of County Road 32 in Sandusky County, Ohio.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.

United States v. LIONEL PEREZ, et al.

A TRUE BILL.

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FOREPERSON

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STEVEN M. DETTELBACH  
UNITED STATES ATTORNEY