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SEALED

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LUIS CUNA-VIGIL,
JESUS AVILA-GARCIA,
JOE ROBERT RAEL, aka "Jojo,"
JERRY PHILIP VIGIL, aka "Nino,"
JENNIFER LOPEZ-LOPEZ,
MARIA ISLAS-AVILA, aka "Sky,"
MARTIN VERDUZCO-MURO, aka
"Lalo,"
EDWARD DAVID LUCERO,
LINDA HERNANDEZ-ALVAREZ,
BRIAN MICHAEL FIORAVANTI,
JEFFREY KRAIG ELLIS,
PATRICE RAELYNN ESTES,
LEANDRO CORTEZ OCHOA
LOVATO-HOWELLS,
MARIO ALBERTO LOVATO, aka
"Grump,"
JOSEPH RAYMOND TRUJILLO, aka
"Qujo,"
CELINA ALEXANDRA GARCIA, aka
"Baby G,"
PETE VINCE ESPINOZA,
JUDY ANN MAESTAS, aka "Juicy
Judy,"

INDICTMENT

COUNT 1 – 21 U.S.C. § 848:
Continuing Criminal Enterprise
(Cuna-Vigil)

COUNT 2 – 21 U.S.C. §§ 841(a)(1) &
846: Conspiracy to Distribute
Methamphetamine
(All but R. Trujillo)

COUNT 3 – 21 U.S.C. §§ 841(a)(1) &
846: Conspiracy to Distribute Heroin
(All but Ellis, Estes, L. Lovato-Howells,
J. Trujillo, M. Lovato, J. Maestas, J.L.
Vigil, Runion)

COUNT 4 – 21 U.S.C. §§ 841(a)(1) &
846: Conspiracy to Distribute Fentanyl
(Cuna-Vigil, Rael, J.P. Vigil, J.L. Vigil,
Lucero, Ellis, Jurado)

COUNT 5 – 18 U.S.C. § 1956(h):
Conspiracy to Launder Money
(Cuna-Vigil, Avila, J. Lopez, Rael, J.P.
Vigil, Verduzco, Lucero, L. Hernandez,
Fioravanti)

COUNT 6 – 21 U.S.C. § 841(a)(1):
Distribution of Fentanyl (J.P. Vigil)

FELICIA NICOLE MINGURA, aka
“Fela,”
ERIKA RACHELLE VIGIL,
JESSICA LEEANN VIGIL,
ANTHONY JAMES RUNION, aka “Lil
Ace,”
RICHARD LAWRENCE TRUJILLO,
BRANDON JAY PERRAULT, aka
“Trip,”
PEDRO JURADO, and
KYLEE JIMENEZ-CUNA,

Defendants.

COUNTS 7-9 – 21 U.S.C. § 841(a)(1):
Distribution of Methamphetamine
(J.P. Vigil)

COUNT 10 – 21 U.S.C. § 841(a)(1):
Distribution of Methamphetamine
(J.P. Vigil & J.L. Vigil)

COUNT 11 – 21 U.S.C. § 841(a)(1):
Distribution of Fentanyl (J.P. Vigil &
J.L. Vigil)

COUNT 12 – 18 U.S.C. § 922(g)(1):
Felon in Possession of Firearm
(R. Trujillo)

COUNT 13 – 21 U.S.C. § 841(a)(1):
Distribution of Fentanyl (J.P. Vigil)

COUNT 14 – 21 U.S.C. § 841(a)(1):
Distribution of Methamphetamine
(J.P. Vigil)

COUNT 15 – 18 U.S.C. § 924(c):
Possession of a Firearm in Furtherance of
a Drug Trafficking Crime (J.P. Vigil)

COUNT 16 – 18 U.S.C. §§ 922(g)(1):
Felon in Possession of a Firearm
(J.P. Vigil)

COUNT 17 – 21 U.S.C. § 841(a)(1):
Possession of Methamphetamine with
Intent to Distribute (J.P. Vigil)

COUNT 18 – 21 U.S.C. § 841(a)(1):
Possession of Heroin with Intent to
Distribute (J.P. Vigil)

COUNT 19 – 21 U.S.C. § 841(a)(1):
Possession of Methamphetamine with
Intent to Distribute (Rael)

COUNT 20 – 21 U.S.C. § 841(a)(1):
Possession of Heroin with Intent to
Distribute (Rael)

COUNT 21 – 21 U.S.C. § 841(a)(1):
Possession of Methamphetamine with
Intent to Distribute (J. Lopez & M. Islas)

COUNT 22 – 21 U.S.C. § 841(a)(1):
Possession of Heroin with Intent to
Distribute (J. Lopez & M. Islas)

COUNT 23 – 21 U.S.C. § 841(a)(1):
Possession of Methamphetamine with
Intent to Distribute (Hernandez &
Fioravanti)

COUNT 24 – 21 U.S.C. § 841(a)(1):
Possession of Heroin with Intent to
Distribute (J. Trujillo)

COUNT 25 – 21 U.S.C. § 841(a)(1):
Possession of Methamphetamine with
Intent to Distribute (J. Trujillo)

COUNT 26 – 18 U.S.C. § 922(g)(1):
Felon in Possession of Firearm
(J. Trujillo)

COUNT 27 - 18 U.S.C. § 924(c):
Possession of a Firearm in Furtherance of
a Drug Trafficking Crime (J. Trujillo)

COUNT 28 – 21 U.S.C. § 841(a)(1):
Possession of Heroin with Intent to
Distribute (Verduzco & Jimenez)

COUNT 29 – 18 U.S.C. § 922(g)(5):
Illegal Alien in Possession of Firearm
(Verduzco)

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| | COUNT 30 – 21 U.S.C. § 841(a)(1): Possession of Methamphetamine with Intent to Distribute (Lucero & Jurado) |
| | COUNT 31 – 21 U.S.C. § 841(a)(1): Possession of Heroin with Intent to Distribute (Lucero & Jurado) |
| | COUNT 32 – 21 U.S.C. § 841(a)(1): Possession of Fentanyl with Intent to Distribute (Lucero & Jurado) |
| | COUNT 33 – 21 U.S.C. § 841(a)(1): Possession of Methamphetamine with Intent to Distribute (Ellis) |
| | COUNT 34 – 18 U.S.C. § 922(g)(1): Felon in Possession of Firearm (Espinoza) |

The Grand Jury Charges:

COUNT 1
21 U.S.C. § 848
(Continuing Criminal Enterprise)

Beginning on a date unknown, and at least as far back as May 10, 2020, and continuing to on or about May 12, 2021, in the District of Utah, and elsewhere,

LUIS CUNA-VIGIL,

defendant herein, did knowingly and willfully engage in a continuing criminal enterprise, that is, the defendant did violate 21 U.S.C. §§ 841(a)(1) and 846, which violations, including but not limited to those set forth in Counts 2-5 of this Indictment, were part of a continuing series of violations of Title 21 of the United States Code from which the defendant obtained substantial income and resources, and which were undertaken by the

defendant in concert with at least five other persons over whom the defendant occupied a position of organizer or supervisor, or occupied any other position of management; all in violation of 21 U.S.C. § 848.

COUNT 2

**21 U.S.C. §§ 841(a)(1) & 846
(Conspiracy to Distribute Methamphetamine)**

Beginning on a date unknown, and at least as far back as May 10, 2020, and continuing to on or about May 12, 2021, in the District of Utah, and elsewhere,

LUIS CUNA-VIGIL, JESUS AVILA-GARCIA, JOE ROBERT RAEL, aka “Jojo,” JERRY PHILIP VIGIL, aka “Nino,” JENNIFER LOPEZ-LOPEZ, MARIA ISLAS-AVILA, aka “Sky,” MARTIN VERDUZCO-MURO, aka “Lalo,” EDWARD DAVID LUCERO, LINDA MABEL HERNANDEZ-ALVAREZ, BRIAN MICHAEL FIORAVANTI, JEFFREY KRAIG ELLIS, PATRICE RAELYNN ESTES, LEANDRO CORTEZ OCHOA LOVATO-HOWELLS, MARIO ALBERTO LOVATO, aka “Grump,” JOSEPH RAYMOND TRUJILLO, aka “Qujo,” CELINA ALEXANDRA GARCIA, aka “Baby G,” PETE VINCE ESPINOZA, JUDY ANN MAESTAS, aka “Juicy Judy,” FELICIA NICOLE MINGURA, aka “Fela,” ERIKA RACHELLE VIGIL, JESSICA LEEANN VIGIL, ANTHONY JAMES RUNION, aka “Lil Ace,” BRANDON JAY PERRAULT, aka “Trip,” PEDRO JURADO, and KYLEE JIMENEZ-CUNA, the defendants herein, did knowingly and intentionally conspire with each other and others known and unknown, to distribute controlled substances, to wit: five hundred (500) grams or more of a mixture or substance containing a detectable amount of Methamphetamine, a

Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. §§ 841(a)(1) and 846 and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

COUNT 3

**21 U.S.C. §§ 841(a)(1) & 846
(Conspiracy to Distribute Heroin)**

Beginning on a date unknown, and at least as far back as May 10, 2020, and continuing to on or about May 7, 2021, in the District of Utah, and elsewhere,

LUIS CUNA-VIGIL, JESUS AVILA-GARCIA, JOE ROBERT RAEL, aka “Jojo,”
JERRY PHILIP VIGIL, aka “Nino,” JENNIFER LOPEZ-LOPEZ, MARIA ISLAS-
AVILA, aka “Sky,” MARTIN VERDUZCO-MURO, aka “Lalo,” EDWARD DAVID
LUCERO, LINDA MABEL HERNANDEZ-ALVAREZ, BRIAN MICHAEL
FIORAVANTI, CELINA ALEXANDRA GARCIA, aka “Baby G,” PETE VINCE
ESPINOZA, FELICIA NICOLE MINGURA, aka “Fela,” ERIKA RACHELLE VIGIL,
RICHARD LAWRENCE TRUJILLO, BRANDON JAY PERRAULT, aka “Trip,”
PEDRO JURADO, and KYLEE JIMENEZ-CUNA,

the defendants herein, did knowingly and intentionally conspire with each other and others known and unknown, to distribute controlled substances, to wit: one (1) kilogram or more of Heroin, a Schedule I Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. §§ 841(a)(1) and 846 and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

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COUNT 4

**21 U.S.C. §§ 841(a)(1) & 846
(Conspiracy to Distribute Fentanyl)**

Beginning on a date unknown, and at least as far back as May 10, 2020, and continuing to on or about May 7, 2021, in the District of Utah, and elsewhere,

LUIS CUNA-VIGIL, JOE ROBERT RAEL, aka “Jojo,” JERRY PHILIP VIGIL, aka “Nino,” EDWARD DAVID LUCERO, JEFFREY KRAIG ELLIS, JESSICA LEEANN VIGIL, and PEDRO JURADO,

the defendants herein, did knowingly and intentionally conspire with each other and others known and unknown, to distribute controlled substances, to wit: Fentanyl, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. §§ 841(a)(1) and 846 and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 5

**18 U.S.C. § 1956(h)
(Conspiracy to Launder Money)**

Beginning on a date unknown, and at least as far back as May 10, 2020, and continuing to on or about May 12, 2021, in the District of Utah, and elsewhere,

LUIS CUNA-VIGIL, JESUS AVILA-GARCIA, JOE ROBERT RAEL, aka “Jojo,” JERRY PHILIP VIGIL, aka “Nino,” JENNIFER LOPEZ-LOPEZ, MARTIN VERDUZCO-MURO, aka “Lalo,” EDWARD DAVID LUCERO, LINDA HERNANDEZ-ALVAREZ, and BRIAN MICHAEL FIORAVANTI,

the defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to commit the following offenses against the United States of America in violation of 18 U.S.C. § 1956:

(a) to knowingly conduct and attempt to conduct financial transactions, affecting interstate or foreign commerce, which involved the proceeds of a specified unlawful activity, specifically, the illegal distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1) & 846, with the intent to promote the carrying on of specified unlawful activity, that is, the illegal distribution of controlled substances, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. §§ 1956(h) & 1956(a)(1)(A)(i);

(b) to knowingly conduct and attempt to conduct financial transactions, affecting interstate or foreign commerce, which involved the proceeds of specified unlawful activity, specifically, the unlawful distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1) & 846, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. §§ 1956(h) & 1956(a)(1)(B)(i);

(c) to transport, transmit, and transfer, and attempt to transport, transmit, and transfer funds from a place in the United States to and through a place outside the United States or to a place in the United States from or through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, that is, the unlawful

distribution of a controlled substance in violation of 21 U.S.C. §§ 841(a)(1) & 846, all in violation of 18 U.S.C. §§ 1956(h) & 1956(a)(2)(A); and,

(d) to transport, transmit, and transfer, and attempt to transport, transmit, and transfer funds from a place in the United States, that is the State of Utah, to and through a place outside the United States, that is Mexico, and knowing that the monetary instruments or funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity, that is, the unlawful distribution of a controlled substance in violation of 21 U.S.C. §§ 841(a)(1) & 846 and knowing that such transportation was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity; all in violation of 18 U.S.C. §§ 1956(h) & 1956(a)(2)(B)(i).

COUNT 6

**21 U.S.C. § 841(a)(1)
(Distribution of Fentanyl)**

On or about October 27, 2020, in the District of Utah,

JERRY PHILIP VIGIL, aka “Nino,”

the defendant herein, did knowingly and intentionally distribute Fentanyl, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

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COUNT 7

**21 U.S.C. § 841(a)(1)
(Distribution of Methamphetamine)**

On or about November 18, 2020, in the District of Utah,

JERRY PHILIP VIGIL, aka “Nino,”

the defendant herein, did knowingly and intentionally distribute fifty (50) grams or more of a mixture or substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

COUNT 8

**21 U.S.C. § 841(a)(1)
(Distribution of Methamphetamine)**

On or about December 10, 2020, in the District of Utah,

JERRY PHILIP VIGIL, aka “Nino,”

the defendant herein, did knowingly and intentionally distribute fifty (50) grams or more of a mixture or substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

COUNT 9

**21 U.S.C. § 841(a)(1)
(Distribution of Methamphetamine)**

On or about January 5, 2021, in the District of Utah,

JERRY PHILIP VIGIL, aka “Nino,”

the defendant herein, did knowingly and intentionally distribute fifty (50) grams or more of a mixture or substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

COUNT 10

**21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(Distribution of Methamphetamine)**

On or about January 12, 2021, in the District of Utah,

JERRY PHILIP VIGIL, aka “Nino,” and JESSICA LEEANN VIGIL, the defendants herein, did knowingly and intentionally distribute fifty (50) grams or more of a mixture or substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

COUNT 11

**21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(Distribution of Fentanyl)**

On or about January 12, 2021, in the District of Utah,

JERRY PHILIP VIGIL, aka “Nino,” and JESSICA LEEANN VIGIL, the defendants herein, did knowingly and intentionally distribute Fentanyl, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 12

**18 U.S.C. § 922(g)(1)
(Felon in Possession of a Firearm)**

On or about January 26, 2021, in the District of Utah,

RICHARD LAWRENCE TRUJILLO,

defendant herein, knowing he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, to wit: a Springfield XDS .45 caliber pistol, and the firearm was in and affecting commerce; all in violation of 18 U.S.C. § 922(g)(1).

COUNT 13

**21 U.S.C. § 841(a)(1)
(Distribution of Fentanyl)**

On or about February 9, 2021, in the District of Utah,

JERRY PHILIP VIGIL, aka “Nino,”

the defendant herein, did knowingly and intentionally distribute Fentanyl, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 14

**21 U.S.C. § 841(a)(1)
(Distribution of Methamphetamine)**

On or about February 12, 2021, in the District of Utah,

JERRY PHILIP VIGIL, aka “Nino,”

the defendant herein, did knowingly and intentionally distribute fifty (50) grams or more of a mixture or substance containing a detectable amount of Methamphetamine, a

Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

COUNT 15
18 U.S.C. § 924(c)
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about February 12, 2021, in the District of Utah,

JERRY PHILIP VIGIL, aka “Nino,”

defendant herein, did knowingly possess a firearm, to wit: a Ruger P95DC 9mm firearm, in furtherance of a narcotics trafficking offense for which he may be prosecuted in a court of the United States as set forth in Count 14 and incorporated herein, that is, knowingly and intentionally distributing Methamphetamine, in violation of 21 U.S.C. § 841(a)(1); all in violation of 18 U.S.C. § 924(c)(1)(A).

COUNT 16
18 U.S.C. § 922(g)(1)
(Felon in Possession of Firearm)

On or about February 12, 2021 in the District of Utah,

JERRY PHILIP VIGIL, aka “Nino,”

defendant herein, knowing he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed a firearm and ammunition, to wit: a Ruger P95DC 9mm firearm and associated ammunition, and the firearm and ammunition were in and affecting commerce; in violation of 18 U.S.C. § 922(g)(1).

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COUNT 17

21 U.S.C. § 841(a)(1)

(Possession of Methamphetamine with Intent to Distribute)

On or about February 23, 2021, in the District of Utah,

JERRY PHILIP VIGIL, aka “Nino,”

the defendant herein, did knowingly and intentionally possess with intent to distribute five hundred (500) grams or more of a mixture or substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

COUNT 18

21 U.S.C. § 841(a)(1)

(Possession of Heroin with Intent to Distribute)

On or about February 23, 2021, in the District of Utah,

JERRY PHILIP VIGIL, aka “Nino,”

the defendant herein, did knowingly and intentionally possess with intent to distribute one hundred (100) grams or more of a mixture or substance containing a detectable amount of Heroin, a Schedule I Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

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COUNT 19

**21 U.S.C. § 841(a)(1)
(Possession of Methamphetamine with Intent to Distribute)**

On or about February 23, 2021, in the District of Utah,

JOE ROBERT RAEL, aka “Jojo,”

the defendant herein, did knowingly and intentionally possess with intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

COUNT 20

**21 U.S.C. § 841(a)(1)
(Possession of Heroin with Intent to Distribute)**

On or about February 23, 2021, in the District of Utah,

JOE ROBERT RAEL, aka “Jojo,”

the defendant herein, did knowingly and intentionally possess with intent to distribute Heroin, a Schedule I Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 21

**21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(Possession of Methamphetamine with Intent to Distribute)**

On or about February 24, 2021, in the District of Utah,

JENNIFER LOPEZ-LOPEZ and MARIA ISLAS-AVILA, aka “Sky,”

the defendants herein, did knowingly and intentionally possess with intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812 and did aid and abet therein; all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

COUNT 22

**21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(Possession of Heroin with Intent to Distribute)**

On or about February 24, 2021, in the District of Utah,

JENNIFER LOPEZ-LOPEZ and MARIA ISLAS-AVILA, aka "Sky,"

the defendants herein, did knowingly and intentionally possess with intent to distribute one kilogram or more of a mixture or substance containing a detectable amount of Heroin, a Schedule I Controlled Substance, within the meaning of 21 U.S.C. § 812 and did aid and abet therein; all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

COUNT 23

**21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(Possession of Methamphetamine with Intent to Distribute)**

On or about February 24, 2021, in the District of Utah,

LINDA HERNANDEZ-ALVAREZ and BRIAN MICHAEL FIORAVANTI,

the defendants herein, did knowingly and intentionally possess with intent to distribute fifty (50) grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, within the meaning of 21 U.S.C.

§ 812, and did aid and abet therein; all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

COUNT 24

**21 U.S.C. § 841(a)(1)
(Possession of Heroin with Intent to Distribute)**

On or about May 3, 2021, in the District of Utah,

JOSEPH RAYMOND TRUJILLO, aka “Qujo,”

the defendant herein, did knowingly and intentionally possess with intent to distribute one hundred (100) grams or more of a mixture or substance containing a detectable amount of Heroin, a Schedule I Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

COUNT 25

**21 U.S.C. § 841(a)(1)
(Possession of Methamphetamine with Intent to Distribute)**

On or about May 3, 2021, in the District of Utah,

JOSEPH RAYMOND TRUJILLO, aka “Qujo,”

the defendant herein, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

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COUNT 26

**18 U.S.C. § 922(g)(1)
(Felon in Possession of a Firearm)**

On or about May 3, 2021, in the District of Utah,

JOSEPH RAYMOND TRUJILLO, aka “Qujo,”

defendant herein, knowing he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, to wit: a Glock 19X 9mm pistol, and the firearm was in and affecting commerce; all in violation of 18 U.S.C. § 922(g)(1).

COUNT 27

**18 U.S.C. § 924(c)
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

On or about May 3, 2021, in the District of Utah,

JOSEPH RAYMOND TRUJILLO, aka “Qujo,”

defendant herein, did knowingly possess a firearm, to wit: a Glock 19X 9mm pistol in furtherance of a narcotics trafficking offense for which he may be prosecuted in a court of the United States as set forth in Count 24 and incorporated herein, that is, knowingly and intentionally possessing Heroin with intent to distribute, in violation of 21 U.S.C. § 841(a)(1); all in violation of 18 U.S.C. § 924(c)(1)(A).

COUNT 28

**21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(Possession of Heroin with Intent to Distribute)**

On or about May 7, 2021, in the District of Utah,

MARTIN VERDUZCO-MURO, aka “Lalo,” and KYLEE JIMENEZ-CUNA,

the defendants herein, did knowingly and intentionally possess with intent to distribute one hundred (100) grams or more of a mixture or substance containing a detectable amount of Heroin, a Schedule I Controlled Substance, within the meaning of 21 U.S.C. § 812, and did aid and abet therein; all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

COUNT 29

**18 U.S.C. § 922(g)(1)
(Illegal Alien in Possession of a Firearm)**

On or about May 7, 2021, in the District of Utah,

MARTIN VERDUZCO-MURO, aka “Lalo,”

the defendant herein, knowing he was an alien illegally or unlawfully in the United States, did knowingly possess a firearm, to wit: a Hi-Point CF380 .380 caliber pistol, and the firearm was in and affecting commerce; all in violation of 18 U.S.C. § 922(g)(5).

COUNT 30

**21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(Possession of Methamphetamine with Intent to Distribute)**

On or about May 7, 2021, in the District of Utah,

EDWARD LUCERO and PEDRO JURADO,

the defendants herein, did knowingly and intentionally possess with intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812, and did aid and abet therein; all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

COUNT 31

**21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(Possession of Heroin with Intent to Distribute)**

On or about May 7, 2021, in the District of Utah,

EDWARD LUCERO and PEDRO JURADO,

the defendants herein, did knowingly and intentionally possess with intent to distribute one hundred (100) grams or more of a mixture or substance containing a detectable amount of Heroin, a Schedule I Controlled Substance, within the meaning of 21 U.S.C. § 812, and did aid and abet therein; all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

COUNT 32

**21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2
(Possession of Fentanyl with Intent to Distribute)**

On or about May 7, 2021, in the District of Utah,

EDWARD LUCERO and PEDRO JURADO,

the defendants herein, did knowingly and intentionally possess with intent to distribute Fentanyl, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812, and did aid and abet therein; all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 33

**21 U.S.C. § 841(a)(1)
(Possession of Methamphetamine with Intent to Distribute)**

On or about May 12, 2021, in the District of Utah,

JEFFREY CRAIG ELLIS,

the defendant herein, did knowingly and intentionally possess with intent to distribute fifty (50) grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(B).

COUNT 34
18 U.S.C. § 922(g)(1)
(Felon in Possession of a Firearm)

On or about May 12, 2021, in the District of Utah,

PETE VINCE ESPINOZA,

the defendant herein, knowing he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, to wit: a Taurus PT111 9mm caliber pistol, and the firearm was in and affecting commerce; all in violation of 18 U.S.C. § 922(g)(1).

NOTICE OF SENTENCING ENHANCEMENTS

- LUIS CUNA-VIGIL

Before defendant LUIS CUNA-VIGIL, committed the offenses charged in this indictment, he was convicted of Use/Carry Firearm in Relation to Drug Trafficking (18 U.S.C. § 924(c)) in the District of Utah, in Case No. 2:06-CR-759 TS, judgment date March 23, 2007 (under the name “Luis Francisco Cuna”), which is a serious drug felony, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

- JOE ROBERT RAEL, aka “Jojo”

Before defendant JOE ROBERT RAEL, aka “Jojo,” committed the offenses charged in this indictment, he was convicted of Possession With Intent to Distribute Controlled Substance, in the Third District Court of Utah, Salt Lake County, in Case No. 091900591, judgment date of May 4, 2009, which is a serious drug felony, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

Furthermore, before defendant JOE ROBERT RAEL, aka “Jojo,” committed the offenses charged in this indictment, he was convicted of Possession With Intent to Distribute Controlled Substance, in the Third District Court of Utah, Salt Lake County, in Case No. 121906015, judgment date of September 21, 2012, which is a serious drug felony, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

Finally, before defendant JOE ROBERT RAEL, aka “Jojo,” committed the offenses charged in this indictment, he was convicted of Possession With Intent to Distribute Controlled Substance, in the Third District Court of Utah, Salt Lake County, in Case No. 121905440, judgment date of September 21, 2012, which is a serious drug felony, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

- JERRY PHILIP VIGIL, aka “Nino,”

Before defendant JERRY PHILIP VIGIL, aka “Nino,” committed the offenses charged in this indictment, he was convicted of Attempted Possession With Intent to Distribute Controlled Substance, in the Third District Court of Utah, Salt Lake County, in Case No. 131900866, judgment date of September 23, 2013, which is a serious drug felony, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

- PATRICE RAELYNN ESTES

Before defendant PATRICE RAELYNN ESTES committed the offenses charged in this indictment, she was convicted of Conspiracy to Possess with Intent to Distribute and Distribution of Methamphetamine, in the District of Wyoming, in Case No. 09CR135-01-D, judgment date of May 11, 2010, which is a serious drug felony, for which she served more than 12 months of imprisonment and for which she was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

- BRANDON PERRAULT, aka “Trip”

Before defendant BRANDON PERRAULT, aka “Trip,” committed the offenses charged in this indictment, he was convicted of Possession of Methamphetamine with Intent to Distribute and Possession of a Firearm in Furtherance of a Drug Trafficking Crime, in the District of Utah, in Case No. 2:13-CR-262 TC, judgment date of March 10, 2015, which are both serious drug felonies, for which he served more than 12 months of

imprisonment and for which he was released from serving any term of imprisonment related to those offenses within 15 years of the commencement of the instant offense.

All of these notices above are pursuant to 21 U.S.C. § 851(a)(1).

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 21 U.S.C. § 853, upon conviction of any offense violating 21 U.S.C. §§ 841, 846, or 848, the defendants shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to:

- \$11,079 in U.S. Currency (seized on February 23, 2021 from JOE ROBERT RAEL, aka “Jojo”)
- \$10,236 in U.S. Currency (seized on February 24, 2021 from JENNIFER LOPEZ-LOPEZ and MARIA ISLAS-AVILA, aka “Sky”)
- \$3,706 in U.S. Currency (seized on May 3, 2021 from JOSEPH RAYMOND TRUJILLO, aka “Qujo,”)
- a Springfield XDS .45 caliber pistol (R. TRUJILLO on January 26, 2021)
- a Glock 19X 9mm pistol (J. TRUJILLO on May 3, 2021)
- a Hi-Point CF380 .380 caliber pistol (VERDUZCO on May 7, 2021)
- a Taurus PT111 9mm caliber pistol (ESPINOZA on May 13, 2021)
- Any associated ammunition, magazines, or holsters

Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction of any offense in violation of 18 U.S.C. §§ 922 or 924, as set forth in this indictment, the defendants listed in the relevant counts of the indictment shall forfeit to the United States of America any firearm or ammunition involved in or used in the commission of the offenses, including, but not limited to:

- a Springfield XDS .45 caliber pistol (R. TRUJILLO on January 26, 2021)
- a Glock 19X 9mm pistol (J. TRUJILLO on May 3, 2021)
- a Hi-Point CF380 .380 caliber pistol (VERDUZCO on May 7, 2021)
- a Taurus PT111 9mm caliber pistol (ESPINOZA on May 13, 2021)
- any associated ammunition, magazines, and holsters

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of any offense in violation of 18 U.S.C. §§ 1956 or 1956(h), the defendants shall forfeit to the United States of America any property, real or personal, involved in such violations, and any property traceable to such property. The property to be forfeited includes, but is not limited to:

- \$11,079 in U.S. Currency (seized on February 23, 2021 from JOE ROBERT RAEL, aka “Jojo”)
- \$10,236 in U.S. Currency (seized on February 24, 2021 from JENNIFER LOPEZ-LOPEZ and MARIA ISLAS-AVILA, aka “Sky”)
- \$3,706 in U.S. Currency (seized on May 3, 2021 from JOSEPH RAYMOND TRUJILLO, aka “Qujo,”)
- a Springfield XDS .45 caliber pistol (R. TRUJILLO on January 26, 2021)

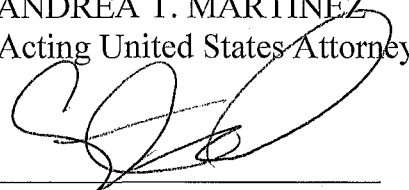
- a Glock 19X 9mm pistol (J. TRUJILLO on May 3, 2021)
- a Hi-Point CF380 .380 caliber pistol (VERDUZCO on May 7, 2021)
- a Taurus PT111 9mm caliber pistol (ESPINOZA on May 13, 2021)
- Any associated ammunition, magazines, or holsters
- A money judgment equal to the value of all property not available for forfeiture as a result of any act or omission of the defendant(s) for one or more of the reasons listed in 21 U.S.C. § 853(p); and
- Substitute property as allowed by 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p).

A TRUE BILL:



FOREPERSON OF GRAND JURY

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