

DISTRICT COURT, CITY AND COUNTY OF  
DENVER, COLORADO

1437 Bannock Street  
Denver, CO 80202

THE PEOPLE OF THE STATE OF COLORADO,

v.

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Victor Antonio BAUTISTA-CERVANTES

a/k/a NEGRI

Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO

Baltazar IBARRA-ALVAREZ a/k/a IBARRA

Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS

Miriam RIVERA

Tawnia WHITE

Denise RIVERA-REYES

Dolores IBARRA-ESPINOZA

Jose Ignacio VALDEZ-SOLIS

a/k/a Jesus URIAS-LOPEZ a/k/a PELON

Anakaren PEREZ

Janett SANCHEZ-RUIZ

Adiel ACOSTA-LEYVA

Karla VILLA-CEBALLOS

Maximiliano ACOSTA

Samuel QUINONEZ-HERRERA

FNU LNU a/k/a NARICLES

Omar BAUTISTA-CUEVAS

Alfredo NUNEZ-TARANGO

Ivan ABOYTE-VALDEZ

FNU LNU a/k/a Unidentified Male #1207

Jesus Alberto LOPEZ-MEDINA

Ossler MARQUEZ-GUZMAN a/k/a OLDER

Erubiel IBARRA-ALVAREZ a/k/a HUACHE

FNU LNU a/k/a Unidentified Male #5123

Jesus BARBA-OCHOA

Ivan Felix QUINTERO a/k/a CHAYANNE

Gerardo MURILLO a/k/a GERA

Jose Luis SALAS-LUGO a/k/a CABIN

Eladio MORENO-OLIVAS a/k/a LAYO

Jose Luis QUINTERO-SOLANO

Jaziel QUINTERO-SOLANO

Defendants.

▲ COURT USE ONLY ▲

PHILIP J. WEISER, Attorney General ANNEMARIE L. BRAUN* Senior Assistant Attorney General Registration Number: 39877 ALISON CONNAUGHTY* Senior Assistant Attorney General Registration Number: 42548 1300 Broadway, 9 <sup>th</sup> Floor Denver, CO 80203 720-508-6701 *Counsel of Record	Case No: GJ Case No.: 20CR01  Ctrm: 259
<b>COLORADO STATE GRAND JURY INDICTMENT –          SUPERSEDING 2-11-21</b>	

Of the 2020-2021 term of the Denver District Court in the year 2021; 2020-2021 Colorado State Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

COUNT 1:            COCCA – Pattern of Racketeering –  
 37284                Participation in an Enterprise; § 18-17-104(3), C.R.S., (F2)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
 Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI  
 Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO  
 Baltazar IBARRA-ALVAREZ a/k/a IBARRA  
 Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS

COUNT 2:            COCCA – Conspiracy; § 18-17-104(4), C.R.S., (F2)  
 37284

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
 Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI  
 Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO  
 Baltazar IBARRA-ALVAREZ a/k/a IBARRA  
 Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS

COUNT 3: Conspiracy to Distribute a Controlled Substance—  
8105P Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI  
Miriam RIVERA  
Tawnia WHITE

COUNT 4: Possession with Intent to Distribute a Controlled Substance—  
8104B Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI  
Miriam RIVERA  
Tawnia WHITE

COUNT 5: Conspiracy to Commit Money Laundering;  
12213C § 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI  
Miriam RIVERA  
Tawnia WHITE

COUNT 6: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI  
Miriam RIVERA  
Tawnia WHITE

COUNT 7: Conspiracy to Distribute a Controlled Substance—Schedule II—  
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO  
Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS  
Denise RIVERA-REYES

COUNT 8: Possession with Intent to Distribute a Controlled Substance—  
8104B Heroin—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Baltazar IBARRA-ALVAREZ a/k/a IBARRA  
Dolores IBARRA-ESPINOZA

COUNT 9: Possession with Intent to Distribute a Controlled Substance—  
8104B Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Baltazar IBARRA-ALVAREZ a/k/a IBARRA  
Dolores IBARRA-ESPINOZA

COUNT 10: Possession with Intent to Distribute a Controlled Substance—  
81047 Schedule II—14 to 225 Grams;  
§ 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)

Baltazar IBARRA-ALVAREZ a/k/a IBARRA  
Dolores IBARRA-ESPINOZA

COUNT 11: Conspiracy to Distribute a Controlled Substance—  
8105P Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS  
Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO  
Jose Ignacio VALDEZ-SOLIS a/k/a URIAS-LOPEZ a/k/a PELON  
Anakaren PEREZ

COUNT 12: Possession with Intent to Distribute a Controlled Substance—  
8104B Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO  
Jose Ignacio VALDEZ-SOLIS  
a/k/a Jesus URIAS-LOPEZ a/k/a PELON

COUNT 13: Possession with Intent to Distribute a Controlled Substance—  
8104B Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Anakaren PEREZ

COUNT 14: Conspiracy to Distribute a Controlled Substance—  
8105P Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Janett SANCHEZ-RUIZ  
Adiel ACOSTA-LEYVA  
Karla VILLA-CEBALLOS  
Tawnia WHITE

COUNT 15: Distribution of a Controlled Substance—Methamphetamine—  
8202J More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jose Roberto MORENO-OLIVAS a/k/a PAUL

COUNT 16: Possession with Intent to Distribute a Controlled Substance—  
8104B Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Adiel ACOSTA-LEYVA  
Karla VILLA-CEBALLOS

COUNT 17: Conspiracy to Commit Money Laundering;  
12213C § 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Janett SANCHEZ-RUIZ  
Adiel ACOSTA-LEYVA  
Karla VILLA-CEBALLOS  
Tawnia WHITE

COUNT 18: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Janett SANCHEZ-RUIZ  
Adiel ACOSTA-LEYVA  
Karla VILLA-CEBALLOS  
Tawnia WHITE

COUNT 19: Conspiracy to Distribute a Controlled Substance—Heroin—  
8105P More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Maximiliano ACOSTA

COUNT 20: Possession with Intent to Distribute a Controlled Substance—  
8104B Heroin—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Maximiliano ACOSTA

COUNT 21: Conspiracy to Distribute a Controlled Substance—Heroin—  
8105P More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Samuel QUINONEZ-HERRERA

COUNT 22: Conspiracy to Distribute a Controlled Substance—Schedule II—  
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Samuel QUINONEZ-HERRERA

COUNT 23: Possession with Intent to Distribute a Controlled Substance—  
8104B Heroin—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Samuel QUINONEZ-HERRERA

COUNT 24: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§18-18-405(1),(2)(a)(I)(A), C.R.S. (DF1)

Samuel QUINONEZ-HERRERA

COUNT 25: Conspiracy to Distribute a Controlled Substance—Heroin—  
8105P More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS  
FNU LNU a/k/a NARICLES  
Omar BAUTISTA-CUEVAS  
Alfredo NUNEZ-TARANGO

COUNT 26: Conspiracy to Distribute a Controlled Substance—  
8105P Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS  
FNU LNU a/k/a NARICLES  
Omar BAUTISTA-CUEVAS  
Alfredo NUNEZ-TARANGO

COUNT 27: Possession with Intent to Distribute a Controlled Substance—  
8104B Heroin—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Omar BAUTISTA-CUEVAS  
Alfredo NUNEZ-TARANGO

COUNT 28: Possession with Intent to Distribute a Controlled Substance—  
8104B Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Omar BAUTISTA-CUEVAS  
Alfredo NUNEZ-TARANGO

COUNT 29: Conspiracy to Distribute a Controlled Substance—  
8105P Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO  
Ivan ABOYTE-VALDEZ

COUNT 30: Distribution of a Controlled Substance—Methamphetamine—  
8202J More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO  
Ivan ABOYTE-VALDEZ

COUNT 31: Conspiracy to Distribute a Controlled Substance—  
8105P Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI  
FNU LNU a/k/a Unidentified Male #1207  
Jesus Alberto LOPEZ-MEDINA  
Ossler MARQUEZ-GUZMAN a/k/a OLDER

COUNT 32: Possession with Intent to Distribute a Controlled Substance—  
8104B Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI  
Jesus Alberto LOPEZ-MEDINA

COUNT 33: Conspiracy to Distribute a Controlled Substance—  
8105P Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Baltazar IBARRA-ALVAREZ  
Erubiel IBARRA-ALVAREZ a/k/a HUACHE  
Dolores IBARRA-ESPINOZA a/k/a SUPE  
FNU LNU a/k/a Unidentified Male #5123

COUNT 34: Possession with Intent to Distribute a Controlled Substance—  
8104B Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Baltazar IBARRA-ALVAREZ  
Erubiel IBARRA-ALVAREZ a/k/a HUACHE  
Dolores IBARRA-ESPINOZA a/k/a SUPE

COUNT 35: Conspiracy to Commit Money Laundering;  
12213C § 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)

Baltazar IBARRA-ALVAREZ  
FNU LNU a/k/a Unidentified Male #5123  
Jesus BARBA-OCHOA

COUNT 36: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)

Baltazar IBARRA-ALVAREZ  
FNU LNU a/k/a Unidentified Male #5123  
Jesus BARBA-OCHOA

COUNT 37: Conspiracy to Distribute a Controlled Substance—  
8105P Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Ivan Felix QUINTERO a/k/a CHAYANNE  
Gerardo MURILLO a/k/a GERA

COUNT 38: Possession with Intent to Distribute a Controlled Substance—  
8104B Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Ivan Felix QUINTERO a/k/a CHAYANNE  
Gerardo MURILLO a/k/a GERA

COUNT 39: Possession of a Weapon by a Previous Offender  
3007A § 18-12-108(1) (F6)

Tawnia WHITE

COUNT 40: Possession with Intent to Distribute a Controlled Substance—  
8104B Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Baltazar IBARRA-ALVAREZ

COUNT 41: Possession with Intent to Distribute a Controlled Substance—  
8104B Heroin—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Baltazar IBARRA-ALVAREZ

COUNT 42: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§18-18-405(1),(2)(a)(I)(A), C.R.S. (DF1)

Baltazar IBARRA-ALVAREZ

COUNT 43: Special Offender - Firearm;  
33A46 § 18-18-407(1)(D)(II), C.R.S., (DF1)

Baltazar IBARRA-ALVAREZ

COUNT 44: Possession with Intent to Distribute a Controlled Substance—  
8104B Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jose Luis SALAS-LUGO a/k/a CABIN

COUNT 45: Possession with Intent to Distribute a Controlled Substance—  
8104B Heroin—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jose Luis SALAS-LUGO a/k/a CABIN

COUNT 46: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§18-18-405(1),(2)(a)(I)(A), C.R.S. (DF1)

Jose Luis SALAS-LUGO a/k/a CABIN

- COUNT 47: Special Offender - Firearm;  
33A46 § 18-18-407(1)(D)(II), C.R.S., (DF1)
- Jose Luis SALAS-LUGO a/k/a CABIN
- COUNT 48: Possession with Intent to Distribute a Controlled Substance—  
8104B Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)
- Adiel ACOSTA-LEYVA  
Karla VILLA-CEBALLOS
- COUNT 49: Possession with Intent to Distribute a Controlled Substance—  
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§ 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)
- Adiel ACOSTA-LEYVA  
Karla VILLA-CEBALLOS
- COUNT 50: Possession with Intent to Distribute a Controlled Substance—  
81047 Schedule II—14 to 225 Grams;  
§ 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)
- Adiel ACOSTA-LEYVA
- COUNT 51: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)
- Adiel ACOSTA-LEYVA
- COUNT 52: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§18-18-405(1),(2)(a)(I)(A), C.R.S. (DF1)
- Eladio MORENO-OLIVAS a/k/a LAYO
- COUNT 53: Possession with Intent to Distribute a Controlled Substance—  
8104A Methamphetamine—7 to 112 Grams;  
§ 18-18-405(1),(2)(b)(I)(B), C.R.S., (DF2)
- Eladio MORENO-OLIVAS a/k/a LAYO

COUNT 54: Special Offender - Distributing on School Grounds,  
33A49 Public Housing, or School Bus;  
§ 18-18-407(1)(G), C.R.S., (DF1)

Eladio MORENO-OLIVAS a/k/a LAYO

COUNT 55: Possession with Intent to Distribute a Controlled Substance—  
8104A Heroin—7 to 112 Grams;  
§ 18-18-405(1),(2)(b)(I)(B), C.R.S., (DF2)

Ivan Felix QUINTERO a/k/a CHAYANNE

COUNT 56: Possession with Intent to Distribute a Controlled Substance—  
8104A Methamphetamine —7 to 112 Grams;  
§ 18-18-405(1),(2)(b)(I)(B), C.R.S., (DF2)

Ivan Felix QUINTERO a/k/a CHAYANNE

COUNT 57: Possession with Intent to Distribute a Controlled Substance—  
81047 Schedule II—14 to 225 Grams;  
§ 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)

Ivan Felix QUINTERO a/k/a CHAYANNE

COUNT 58: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§18-18-405(1),(2)(a)(I)(A), C.R.S. (DF1)

Ivan Felix QUINTERO a/k/a CHAYANNE

COUNT 59: Possession of a Dangerous Weapon;  
30011 §18-12-102(3), C.R.S. (F5)

Ivan Felix QUINTERO a/k/a CHAYANNE

COUNT 60: Special Offender - Firearm;  
33A46 § 18-18-407(1)(D)(II), C.R.S., (DF1)

Ivan Felix QUINTERO a/k/a CHAYANNE

COUNT 61: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§18-18-405(1),(2)(a)(I)(A), C.R.S. (DF1)

Jose Luis QUINTERO-SOLANO  
Jaziel QUINTERO-SOLANO

COUNT 62: Possession with Intent to Distribute a Controlled Substance—  
8104B Methamphetamine—More than 112 Grams;  
§ 18-18-405(1),(2)(a)(I)(B), C.R.S., (DF1)

Jose Luis QUINTERO-SOLANO  
Jaziel QUINTERO-SOLANO

COUNT 63: Possession with Intent to Distribute a Controlled Substance—  
8104A Heroin—7 to 112 Grams;  
§ 18-18-405(1),(2)(b)(I)(B), C.R.S., (DF2)

Jose Luis QUINTERO-SOLANO  
Jaziel QUINTERO-SOLANO

COUNT 64: Possession of a Dangerous Weapon;  
30011 §18-12-102(3), C.R.S. (F5)

Jose Luis QUINTERO-SOLANO  
Jaziel QUINTERO-SOLANO

COUNT 65: Special Offender - Firearm;  
33A46 § 18-18-407(1)(D)(II), C.R.S., (DF1)

Jose Luis QUINTERO-SOLANO  
Jaziel QUINTERO-SOLANO

COUNT 66: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Anakaren PEREZ

COUNT 67: Conspiracy to Commit Money Laundering;  
12213C § 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Anakaren PEREZ

COUNT 68: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Maximilliano ACOSTA

COUNT 69: Conspiracy to Commit Money Laundering;  
12213C § 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Maximilliano ACOSTA

COUNT 70: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Janett SANCHEZ-RUIZ

COUNT 71: Conspiracy to Commit Money Laundering;  
12213C § 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)

Jose Roberto MORENO-OLIVAS a/k/a PAUL  
Janett SANCHEZ-RUIZ

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**COUNT 1**  
**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT —  
PATTERN OF RACKETEERING—  
PARTICIPATION IN AN ENTERPRISE, (F2)**

Between and including the dates of January 1, 2020, and February 11, 2021, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL; Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI; Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO; Baltazar IBARRA-ALVAREZ a/k/a IBARRA; Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS;** and others both known and unknown, while employed by or associated with an enterprise, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity; in violation of § 18-17-104(3) and § 18-17-105, C.R.S.

**COUNT 2**  
**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT —  
CONSPIRACY, (F2)**

Between and including the dates of January 1, 2020, and February 11, 2021, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL; Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI; Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO; Baltazar IBARRA-ALVAREZ a/k/a IBARRA; Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS;** and others both known and unknown, unlawfully, knowingly, and feloniously conspired to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity; in violation of § 18-17-104(4) and § 18-17-105, C.R.S.

The offenses alleged in Counts One and Two were committed in the following manner:

**The Enterprise**

The criminal enterprise alleged in Counts One and Two was primarily a group of individuals, associated in fact, although not a legal entity. The enterprise included, but was not limited to, the following associated in fact individuals: **Jose Roberto MORENO-OLIVAS a/k/a PAUL; Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI; Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO; Baltazar IBARRA-ALVAREZ a/k/a IBARRA; Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS;** and others both known and unknown to the Grand Jury.

The individuals associated with the enterprise had a primary objective and a common purpose to import illegal controlled substances, including heroin, methamphetamine, counterfeit Oxycodone, and cocaine into the state of Colorado, and to further distribute these illegal controlled substances to various customers throughout the Denver Metro area. In order to support and facilitate this drug trafficking activity,

members and associates of the criminal enterprise utilized motor vehicles to transport quantities of the illicit controlled substances.

Each of the members of the criminal enterprise relied upon and utilized a complex system of cellular telephones and electronic communication devices to arrange and execute the importation, transportation, and distribution of these illegal controlled substances and to facilitate the collection and transfer of the related criminal proceeds. Because the members of the criminal enterprise used telecommunication devices so extensively to conduct the operations of the enterprise, the members often utilized coded terminology when speaking to each other over the telephone in order to conceal their criminal activities.

### **Pattern of Racketeering Activity**

**Jose Roberto MORENO-OLIVAS a/k/a PAUL; Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI; Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO; Baltazar IBARRA-ALVAREZ a/k/a IBARRA; Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS;** and others both known and unknown to the Grand Jury directly and in concert engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, including any lesser offenses, related to the conduct of the enterprise, with at least one of which took place in the state of Colorado after July 1, 1981, and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

- Conspiracy to Distribute a Controlled Substance (Colorado Revised Statutes)
- Possession with Intent to Distribute a Controlled Substance  
(Colorado Revised Statutes)
- Conspiracy to Commit Money Laundering (Colorado Revised Statutes)
- Money Laundering (Colorado Revised Statutes)
- Unlawful Use of a Telecommunications Facility (United States Code)

Pursuant to C.R.S. § 18-17-103(5)(a), “**Racketeering Activity**” includes any conduct defined as “racketeering activity” under 18 U.S.C. 1961 (1)(A), (1)(B), (1)(C), and (1)(D), including the act of Unlawful Use of a Telecommunications Facility, in violation of 21 U.S.C. § 843.

### **Racketeering Activity**

The acts of racketeering activity that the above named persons committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated another person to commit, consist of the following predicate acts, including any lesser included offenses:

**Predicate Act 1**  
**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

Between and including the dates of June 17, 2020, and June 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL, Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI**, Miriam RIVERA, and Tawnia WHITE unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 2**  
**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams, (DF1)**

Between and including the dates of June 17, 2020, and June 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL, Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI**, Miriam RIVERA, and Tawnia WHITE unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 3**  
**Conspiracy to Commit Money Laundering, (F4)**

Between and including the dates of June 17, 2020, and June 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL, Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI**, Miriam RIVERA, and Tawnia WHITE, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**Predicate Act 4**  
**Money Laundering, (F3)**

Between and including the dates of June 17, 2020, and June 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL, Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI**, Miriam RIVERA, and Tawnia WHITE unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**Predicate Act 5**  
**Unlawful Use of a Communication Facility**

Between and including the dates of June 17, 2020, and June 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and **Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI**, did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*The offenses alleged in Predicate Acts 1-5 were committed in the manner described in Counts 3-6.*

**Predicate Act 6**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

Between and including the dates of August 1, 2020, and August 11, 2020, in the state of Colorado, **Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO; Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS**; and Denise RIVERA-REYES, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, fentanyl and/or methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 7**  
**Unlawful Use of a Communication Facility**

Between and including the dates of August 1, 2020, and August 11, 2020, in the state of Colorado, **Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO; Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS;** and Denise RIVERA-REYES, did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*The offenses alleged in Predicate Acts 6-7 were committed in the manner described in Count 7.*

**Predicate Act 8**  
**Possession with Intent to Distribute a Controlled Substance—  
Heroin—More than 112 Grams (DF1)**

Between and including the dates of August 6, 2020, and August 12, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ a/k/a IBARRA** and **Dolores IBARRA-ESPINOZA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 9**  
**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

Between and including the dates of August 6, 2020, and August 12, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ a/k/a IBARRA** and **Dolores IBARRA-ESPINOZA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 10**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—Between 14 and 225 Grams (DF2)**

Between and including the dates of August 6, 2020, and August 12, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ a/k/a IBARRA** and Dolores IBARRA-ESPINOZA unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, fentanyl and/or methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of §18-18-405(1),(2)(b)(I)(A), C.R.S.

*The offenses alleged in Predicate Acts 8-10 were committed in the manner described in Counts 8-10.*

**Predicate Act 11**  
**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

Between and including the dates of August 23, 2020, and August 29, 2020, in the state of Colorado, **Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS; Jose Roberto MORENO-OLIVAS a/k/a PAUL; Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO;** Jose Ignacio VALDEZ-SOLIS a/k/a Jesus URIAS-LOPEZ a/k/a PELON; and Anakaren PEREZ unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 12**  
**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

On or about August 27, 2020, in the state of Colorado, **Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO** and Jose Ignacio VALDEZ-SOLIS a/k/a Jesus URIAS-LOPEZ a/k/a PELON unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 13**  
**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

Between and including the dates of August 27, 2020, and August 29, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL**; and Anakaren PEREZ unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 14**  
**Unlawful Use of a Communication Facility**

Between and including the dates of August 23, 2020, and August 29, 2020, in the state of Colorado, **Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS**; **Jose Roberto MORENO-OLIVAS a/k/a PAUL**; and **Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO**; did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*The offenses alleged in Predicate Acts 11-14 were committed in the manner described in Counts 11-13.*

**Predicate Act 15**  
**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

Between and including the dates of July 19, 2020, and July 23, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL**; Janett SANCHEZ-RUIZ; Adiel ACOSTA-LEYVA; Karla VILLA-CEBALLOS; and Tawnia WHITE unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 15**  
**Distribution of a Controlled Substance—**  
**Methamphetamine—More than 112 Grams (DF1)**

On or about July 23, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 16**  
**Conspiracy to Commit Money Laundering, (F4)**

Between and including the dates of July 19, 2020, and July 23, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL; Janett SANCHEZ-RUIZ; Adiel ACOSTA-LEYVA; Karla VILLA-CEBALLOS; and Tawnia WHITE**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**Predicate Act 17**  
**Money Laundering, (F3)**

Between and including the dates of July 19, 2020, and July 23, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL; Janett SANCHEZ-RUIZ; Adiel ACOSTA-LEYVA; Karla VILLA-CEBALLOS; and Tawnia WHITE** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**Predicate Act 18**  
**Unlawful Use of a Communication Facility**

Between and including the dates of July 19, 2020, and July 23, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*The offenses alleged in Predicate Acts 15-18 were committed in the manner described in Counts 14-18.*

**Predicate Act 19**  
**Conspiracy to Distribute a Controlled Substance—Heroin—  
More than 112 Grams, (DF1)**

On or about October 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and Maximilliano ACOSTA unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 20**  
**Possession with Intent to Distribute a Controlled Substance—  
Heroin—More than 112 Grams (DF1)**

On or about October 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and Maximilliano ACOSTA unlawfully, feloniously, and knowingly possessed with intent to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 21**  
**Unlawful Use of a Communication Facility**

On or about October 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and

846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*The offenses alleged in Predicate Acts 19-21 were committed in the manner described in Counts 19-20.*

**Predicate Act 22**  
**Conspiracy to Distribute a Controlled Substance—Heroin—  
More than 112 Grams, (DF1)**

On or about August 22, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and Samuel QUINONEZ-HERRERA unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 23**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about August 22, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and Samuel QUINONEZ-HERRERA unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, fentanyl and/or methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 24**  
**Unlawful Use of a Communication Facility**

On or about August 22, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*The offenses alleged in Predicate Acts 22-24 were committed in the manner described in Counts 21-24.*

**Predicate Act 25**  
**Conspiracy to Distribute a Controlled Substance—Heroin—  
More than 112 Grams, (DF1)**

Between and including the dates of May 16, 2020, and May 19, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL, Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS, FNU LNU a/k/a NARICLES, Omar BAUTISTA-CUEVAS, and Alfredo NUNEZ-TARANGO** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 26**  
**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

Between and including the dates of May 16, 2020, and May 19, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL, Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS, FNU LNU a/k/a NARICLES, Omar BAUTISTA-CUEVAS, and Alfredo NUNEZ-TARANGO** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 27**  
**Unlawful Use of a Communication Facility**

Between and including the dates of May 16, 2020, and May 19, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL and Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*The offenses alleged in Predicate Acts 25-27 were committed in the manner described in Counts 25-28.*

**Predicate Act 28**  
**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

On or about September 15, 2020, in the state of Colorado, **Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO** and Ivan ABOYTE-VALDEZ unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 29**  
**Distribution of a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

On or about September 15, 2020, in the state of Colorado, **Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO** unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 30**  
**Unlawful Use of a Communication Facility**

On or about September 15, 2020, in the state of Colorado, **Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*The offenses alleged in Predicate Acts 28-30 were committed in the manner described in Counts 29-30.*

**Predicate Act 31**  
**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

Between and including the dates of April 28, 2020, and April 30, 2020, in the state of Colorado, **Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI**, FNU LNU a/k/a Unidentified Male #1207, Jesus Alberto LOPEZ-MEDINA, and Ossler MARQUEZ-GUZMAN a/k/a OLDER unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 32**  
**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams, (DF1)**

On or about April 30, 2020, in the state of Colorado, **Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI** and Jesus Alberto LOPEZ-MEDINA unlawfully, feloniously, and knowingly possessed with intent to sell or distribute distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of §18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 33**  
**Unlawful Use of a Communication Facility**

On or about April 30, 2020, in the state of Colorado, **Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*The offenses alleged in Predicate Acts 31-33 were committed in the manner described in Counts 31-32.*

**Predicate Act 34**  
**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

Between and including the dates of September 4, 2020, and September 9, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ**, Erubiel IBARRA-ALVAREZ a/k/a HUACHE, Dolores IBARRA-ESPINOZA a/k/a SUPE, and FNU LNU a/k/a Unidentified Male #5123 unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 35**  
**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams, (DF1)**

On or about September 9, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ**, Erubiel IBARRA-ALVAREZ a/k/a HUACHE, and Dolores IBARRA-ESPINOZA a/k/a SUPE unlawfully, feloniously, and knowingly possessed with intent to sell or distribute distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of §18-18-405(1),(2)(a)(I)(B), C.R.S.

**Predicate Act 36**  
**Unlawful Use of a Communication Facility**

On or about September 9, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ**, did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*The offenses alleged in Predicate Acts 34-36 were committed in the manner described in Counts 33-34.*

**Predicate Act 37**  
**Conspiracy to Commit Money Laundering, (F4)**

On or about November 6, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ**, FNU LNU a/k/a Unidentified Male #5123, and Jesus BARBA-OCHOA, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**Predicate Act 38**  
**Money Laundering, (F3)**

On or about November 6, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ**, FNU LNU a/k/a Unidentified Male #5123, and Jesus BARBA-OCHOA unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*The offenses alleged in Predicate Acts 37-38 were committed in the manner described in Counts 35-36.*

**Predicate Act 39**  
**Money Laundering, (F3)**

Between and including the dates of **April 27, 2020**, and **November 11, 2020**, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL**, and Anakaren PEREZ unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**Predicate Act 40**  
**Conspiracy to Commit Money Laundering, (F4)**

Between and including the dates of **April 27, 2020**, and **November 11, 2020**, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL**, and Anakaren PEREZ with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

*The offenses alleged in Predicate Acts 39-40 were committed in the manner described in Counts 66-67.*

**Predicate Act 41**  
**Money Laundering, (F3)**

Between and including the dates of **March 27, 2020**, and **October 27, 2020**, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and Maximilliano ACOSTA unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**Predicate Act 42**  
**Conspiracy to Commit Money Laundering, (F4)**

Between and including the dates of **March 27, 2020**, and **October 27, 2020**, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and Maximilliano ACOSTA with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

*The offenses alleged in Predicate Acts 41-42 were committed in the manner described in Counts 68-69.*

**Predicate Act 43**  
**Money Laundering, (F3)**

Between and including the dates of March 19, 2020, and June 19, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL and Janett SANCHEZ-RUIZ** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**Predicate Act 44**  
**Conspiracy to Commit Money Laundering, (F4)**

Between and including the dates of March 19, 2020, and June 19, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL and Janett SANCHEZ-RUIZ** with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

*The offenses alleged in Predicate Acts 43-44 were committed in the manner described in Counts 70-71.*

**COUNT 3**  
**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

Between and including the dates of June 17, 2020, and June 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL, Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI, Miriam RIVERA, and Tawnia WHITE** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 4**  
**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

Between and including the dates of June 17, 2020, and June 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL, Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI, Miriam RIVERA, and Tawnia WHITE** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 5**  
**Conspiracy to Commit Money Laundering, (F4)**

Between and including the dates of June 17, 2020, and June 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL, Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI, Miriam RIVERA, and Tawnia WHITE,** with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**COUNT 6**  
**Money Laundering, (F3)**

Between and including the dates of June 17, 2020, and June 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL, Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI, Miriam RIVERA, and Tawnia WHITE** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*The offenses alleged in Counts 3-6 were committed in the following manner:*

Beginning on or about June 17, 2020, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Jose Roberto MORENO-OLIVAS a/k/a PAUL, Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI, Miriam RIVERA, and Tawnia WHITE, made a series of agreements with each other and others to sell and/or purchase a quantity of illegal controlled substances, specifically methamphetamine, in the Denver Metro area. As a part of this series of agreements, the parties agreed that BAUTISTA-CERVANTES would broker a transaction for approximately nine (9) pounds of methamphetamine between MORENO-OLIVAS and RIVERA. MORENO-OLIVAS made a series of concurrent agreements with WHITE to sell her nine pounds of methamphetamine after the purchase from RIVERA was completed.

As a part of this series of agreements, the parties agreed that MORENO-OLIVAS would provide an amount of US currency to BAUTISTA-CERVANTES, which BAUTISTA-CERVANTES would in turn deliver to RIVERA in exchange for approximately nine (9) pounds of methamphetamine. BAUTISTA-CERVANTES agreed to take custody of and maintain the purchased nine (9) pounds of methamphetamine on behalf of MORENO-OLIVAS until he could deliver the methamphetamine to MORENO-OLIVAS.

In addition to these agreements, MORENO-OLIVAS agreed that WHITE would provide an amount of US currency to MORENO-OLIVAS in exchange for approximately nine (9) pounds of methamphetamine.

On June 20, 2020, MORENO-OLIVAS a provided approximately \$48,000 in US currency to BAUTISTA-CERVANTES. BAUTISTA-CERVANTES transported the \$48,000 in US currency to RIVERA and purchased nine pounds of methamphetamine from RIVERA. BAUTISTA-CERVANTES subsequently transported the nine pounds

of methamphetamine to MORENO-OLIVAS at the Comfort Inn Hotel, 4830 Peoria Street, Denver, Colorado. This purchase and transport was at the direction of MORENO-OLIVAS.

Also on June 20, 2020, after receiving the nine (9) pounds of methamphetamine from BAUTISTA-CERVANTES, MORENO-OLIVAS made a series of agreements with WHITE to sell her nine (9) pounds of methamphetamine for approximately \$54,000 in US currency. WHITE transported approximately \$54,000 in US currency to the room designated by MORENO-OLIVAS at the Comfort Inn Hotel, 4830 Peoria Street, Denver, Colorado, purchased nine (9) pounds of methamphetamine, and loaded the methamphetamine into her vehicle.

Shortly after that, WHITE was contacted in her vehicle by law enforcement officers who located 9.73 pounds of methamphetamine in her vehicle. WHITE confirmed that she had just purchased the methamphetamine from MORENO-OLIVAS at the Comfort Inn Hotel, 4830 Peoria Street, Denver, Colorado, right before law enforcement officers contacted her on that date.

#### **COUNT 7**

#### **Conspiracy to Distribute a Controlled Substance—Schedule II— More than 225 Grams, (DF1)**

Between and including the dates of August 1, 2020, and August 11, 2020, in the state of Colorado, **Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO; Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS; and Denise RIVERA-REYES**, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, fentanyl and/or methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

*The offense alleged in Count 7 was committed in the following manner:*

Between the dates of August 1, 2020, and August 11, 2020, in a series of in-person and/or telephone conversations and electronic communications utilizing cellular telephone devices, Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO; Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS, and Denise RIVERA-REYES made a series of agreements with each other to distribute a large quantity of counterfeit Oxycodone pills containing fentanyl and/or methamphetamine. In furtherance of this series of agreements, VALDEZ-CRUZ arranged to send packages through the United States Postal Service to VALDEZ-LEON in Colorado Springs, Colorado, via a third party.

As part of and in furtherance of this series of agreements, on or about August 6, 2020, RIVERA-REYES prepared two packages containing a total of approximately 21,800

counterfeit Oxycodone pills containing fentanyl and/or methamphetamine and weighing approximately 2.18 kilograms (2180 grams). RIVERA-REYES delivered these two packages to the United States Postal Service in Glendale, Arizona, and paid for these packages to be delivered to two addresses in Colorado Springs that are associated with VALDEZ-LEON. On or about August 11, 2020, United States Postal Service inspectors intercepted the two packages sent by RIVERA-REYES. After obtaining a search warrant, investigators opened the two packages and recovered approximately 21,800 counterfeit Oxycodone pills containing fentanyl and/or methamphetamine and weighing approximately 2.18 kilograms (2180 grams).

#### **COUNT 8**

#### **Possession with Intent to Distribute a Controlled Substance— Heroin—More than 112 Grams (DF1)**

Between and including the dates of August 6, 2020, and August 12, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ a/k/a IBARRA** and **Dolores IBARRA-ESPINOZA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

#### **COUNT 9**

#### **Possession with Intent to Distribute a Controlled Substance— Methamphetamine—More than 112 Grams (DF1)**

Between and including the dates of August 6, 2020, and August 12, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ a/k/a IBARRA** and **Dolores IBARRA-ESPINOZA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

#### **COUNT 10**

#### **Possession with Intent to Distribute a Controlled Substance— Schedule II—Between 14 and 225 Grams (DF2)**

Between and including the dates of August 6, 2020, and August 12, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ a/k/a IBARRA** and **Dolores IBARRA-ESPINOZA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, fentanyl and/or methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of §18-18-405(1),(2)(b)(I)(A), C.R.S.

*The offenses alleged in Counts 8-10 were committed in the following manner:*

On August 12, 2020, Colorado State Patrol troopers initiated a traffic stop in the vicinity of Pueblo, Colorado, of a red Nissan Sentra, bearing CO license plate #CHU-300. The troopers identified the driver of the vehicle as Baltazar IBARRA-ALVAREZ and the passenger as Dolores IBARRA-ESPINOZA. During this contact, both IBARRA-ALVAREZ and IBARRA-ESPINOZA fled the area on foot. Shortly thereafter, the troopers conducted a search of the vehicle and recovered approximately 2.69 pounds (or approximately 1220.1 grams) of heroin; 12.5 pounds (or approximately 5669.9 grams) of methamphetamine; and approximately 1,800 counterfeit Oxycodone pills containing fentanyl and/or methamphetamine and weighing approximately 188.8 grams.

**COUNT 11**

**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

Between and including the dates of August 23, 2020, and August 29, 2020, in the state of Colorado, **Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS; Jose Roberto MORENO-OLIVAS a/k/a PAUL; Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO; Jose Ignacio VALDEZ-SOLIS a/k/a Jesus URIAS-LOPEZ a/k/a PELON;** and **Anakaren PEREZ** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 12**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

On or about August 27, 2020, in the state of Colorado, **Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO;** and **Jose Ignacio VALDEZ-SOLIS a/k/a Jesus URIAS-LOPEZ a/k/a PELON;** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

### COUNT 13

#### **Possession with Intent to Distribute a Controlled Substance— Methamphetamine—More than 112 Grams (DF1)**

Between and including the dates of August 27, 2020, and August 29, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL**; and **Anakaren PEREZ** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

*The offenses alleged in Counts 11-13 were committed in the following manner:*

Between the dates of August 27, 2020, and August 29, 2020, in a series of telephone conversations and electronic communications utilizing cellular telephone devices, Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS, Jose Roberto MORENO-OLIVAS a/k/a PAUL, Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO; Jose Ignacio VALDEZ-SOLIS a/k/a Jesus URIAS-LOPEZ a/k/a PELON [hereafter referred to as “PELON”]; and Anakaren PEREZ made a series of agreements with each other to distribute a large quantity of methamphetamine. As a part of this series of agreements, VALDEZ-CRUZ, from his location in the Republic of Mexico, agreed to send a shipment of methamphetamine to MORENO-OLIVAS and VALDEZ-LEON at their locations within the state of Colorado.

As part of and in furtherance of this series of agreements, on or about August 27, 2020, VALDEZ-LEON and PELON, driving a Chevrolet Cobalt sedan, met with a third party courier who was driving a black Ford Escape SUV in the trailer park at 26900 East Colfax Avenue, Aurora, CO. This courier had been sent by MORENO-OLIVAS. During this meeting, VALDEZ-LEON and PELON received from the courier a large box containing illegal controlled substances, namely about 69 pounds of methamphetamine, and loaded this box into their vehicle, the Chevrolet Cobalt sedan. Shortly after the third party courier departed the area, Colorado State Patrol troopers conducted a traffic stop of the Chevrolet Cobalt sedan. The troopers identified VALDEZ-LEON and PELON via Mexican identification cards. Next, VALDEZ-LEON provided both written and verbal consent to the troopers to search the vehicle. The troopers then located a large box in the trunk. Within the box, troopers recovered approximately 25 individually wrapped packages of methamphetamine from the box, weighing approximately 69 pounds.

Also as part of and in furtherance of this series of agreements, on or about August 27, 2020, Anakaren PEREZ sent several text messages to third parties, including Tawnia WHITE and offered to supply WHITE with illegal controlled substances, namely methamphetamine.

On August 28, 2020, investigators met with MORENO-OLIVAS in Room #216 at the Hyatt Place hotel located at 16250 East 40<sup>th</sup> Avenue, Aurora, CO. At the time, investigators determined that both MORENO-OLIVAS and PEREZ had been staying in Room #216. MORENO-OLIVAS admitted to investigators that he had received a large shipment of methamphetamine from LAGRIMAS, [Gildardo VALDEZ-CRUZ] that he had distributed and supplied to Hispanic males (whom investigators determined to be Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO and Jose Ignacio VALDEZ-SOLIS a/k/a Jesus URIAS-LOPEZ a/k/a PELON) with approximately 50-60 pounds of methamphetamine and had distributed and supplied another associate, identified only as PRIETO, with another 50-60 pounds. At that time, MORENO-OLIVAS gave investigators consent to search his hotel room, Room #216, and investigators located an additional 21 pounds of methamphetamine.

**December 3, 2020 - SUPERSEDING CHARGES:**

**COUNT 14**

**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

Between and including the dates of July 19, 2020, and July 23, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL; Janett SANCHEZ-RUIZ; Adiel ACOSTA-LEYVA; Karla VILLA-CEBALLOS; and Tawnia WHITE** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 15**

**Distribution of a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

On or about July 23, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 16**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

On or about July 23, 2020, in the state of Colorado, **Adiel ACOSTA-LEYVA and Karla VILLA-CEBALLOS** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 17**

**Conspiracy to Commit Money Laundering, (F4)**

Between and including the dates of July 19, 2020, and July 23, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL; Janett SANCHEZ-RUIZ; Adiel ACOSTA-LEYVA; Karla VILLA-CEBALLOS; and Tawnia WHITE**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**COUNT 18**

**Money Laundering, (F3)**

Between and including the dates of July 19, 2020, and July 23, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL; Janett SANCHEZ-RUIZ; Adiel ACOSTA-LEYVA; Karla VILLA-CEBALLOS; and Tawnia WHITE** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*The offenses alleged in Counts 14-18 were committed in the following manner:*

Beginning on or about July 19, 2020, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Jose Roberto MORENO-OLIVAS a/k/a PAUL, Janett SANCHEZ-RUIZ; Adiel

ACOSTA-LEYVA; Karla VILLA-CEBALLOS; and Tawnia WHITE made a series of agreements with each other and others to sell and/or purchase a quantity of illegal controlled substances, specifically methamphetamine, in the Denver Metro area. As a part of this series of agreements, the parties agreed that SANCHEZ-RUIZ would broker a transaction for approximately 14 or 15 pounds of methamphetamine between MORENO-OLIVAS and ACOSTA-LEYVA. MORENO-OLIVAS made a series of concurrent agreements with Tawnia WHITE to sell her a quantity of methamphetamine, approximately four or five pounds, after the purchase from ACOSTA-LEYVA was completed. In exchange, WHITE agreed to provide MORENO-OLIVAS with a quantity of US currency as payment for the methamphetamine.

As a part of this series of agreements, the parties agreed that MORENO-OLIVAS would provide an amount of US currency to SANCHEZ-RUIZ, which SANCHEZ-RUIZ would in turn deliver to ACOSTA-LEYVA so that he may purchase additional controlled substances from unidentified suppliers in California.

On July 23, 2020, WHITE provided a quantity of US currency to MORENO-OLIVAS, which MORENO-OLIVAS subsequently transferred to ACOSTA-LEYVA. MORENO-OLIVAS also transferred a quantity of methamphetamine to ACOSTA-LEYVA and VILLA-CEBALLOS. Later that day, law enforcement officers contacted ACOSTA-LEYVA and VILLA-CEBALLOS in their black Nissan Maxima and recovered 9.73 pounds (or approximately 4.4 kilograms) of methamphetamine and \$13,420 in US currency from within the vehicle. VILLA-CEBALLOS later admitted to investigators that she was assisting ACOSTA-LEYVA in his drug trafficking activities by driving him around in her vehicle.

**COUNT 19**  
**Conspiracy to Distribute a Controlled Substance—Heroin—  
More than 112 Grams, (DF1)**

On or about October 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and **Maximiliano ACOSTA** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(D)(B), C.R.S.

**COUNT 20**

**Possession with Intent to Distribute a Controlled Substance—  
Heroin—More than 112 Grams (DF1)**

On or about October 20, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and **Maximilliano ACOSTA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

*The offenses alleged in Counts 19-20 were committed in the following manner:*

On or about October 20, 2020, in a series of in-person and/or telephone conversations and electronic communications utilizing cellular telephone devices, Jose Roberto MORENO-OLIVAS a/k/a PAUL and Maximilliano ACOSTA made an agreement with each other to distribute a large quantity of heroin. In furtherance of this agreement, MORENO-OLIVAS and ACOSTA agreed to meet in the vicinity of 410 Orchard Street, Golden, CO. That evening, ACOSTA traveled to the meeting location in a black Jeep Grand Cherokee. Law enforcement officers subsequently conducted a traffic stop of this vehicle while ACOSTA was driving and recovered approximately 684.5 grams of heroin.

**COUNT 21**

**Conspiracy to Distribute a Controlled Substance—Heroin—  
More than 112 Grams, (DF1)**

On or about August 22, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and **Samuel QUINONEZ-HERRERA** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 22**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about August 22, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and **Samuel QUINONEZ-HERRERA** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, fentanyl and/or methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 23**  
**Possession with Intent to Distribute a Controlled Substance—  
Heroin—More than 112 Grams (DF1)**

On or about August 22, 2020, in the state of Colorado, **Samuel QUINONEZ-HERRERA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 24**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams, (DF1)**

On or about August 22, 2020, in the state of Colorado, **Samuel QUINONEZ-HERRERA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, fentanyl and/or methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of §18-18-405(1),(2)(a)(I)(A), C.R.S.

*The offenses alleged in Counts 21-24 were committed in the following manner:*

On or about the date of August 22, 2020, in a series of in-person and/or telephone conversations and electronic communications utilizing cellular telephone devices, Jose Roberto MORENO-OLIVAS a/k/a PAUL and Samuel QUINONEZ-HERRERA made a series of agreements with each other to distribute a large quantity of counterfeit Oxycodone pills containing fentanyl and/or methamphetamine, and a large quantity of heroin.

As part of and in furtherance of this series of agreements, on or about August 22, 2020, the parties agreed that QUINONEZ-HERRERA would deliver a large quantity

of counterfeit Oxycodone pills containing fentanyl and/or methamphetamine, and a large quantity of heroin, to a designated location where MORENO-OLIVAS was located. MORENO-OLIVAS would then provide an amount of US currency to QUINONEZ-HERRERA in exchange for these controlled substances. MORENO-OLIVAS sent a series of text messages to QUINONEZ-HERRERA in the evening of August 22, 2020 indicating MORENO-OLIVAS was located at a Holiday Inn at 14200 E. Colfax Ave, Aurora, Colorado, 80011. Investigators subsequently observed QUINONEZ-HERRERA at this location. Approximately thirty minutes after the text messages were sent, QUINONEZ-HERRERA arrived in a black GMC SUV, bearing Arizona license plate #U107229. Shortly thereafter, investigators conducted a search of the vehicle and recovered approximately 11,700 counterfeit Oxycodone pills containing fentanyl and/or methamphetamine weighing approximately 1.17 kilograms, and 0.76 pounds (or approximately 344.8 grams) of heroin. QUINONEZ-HERRERA subsequently admitted to transporting the controlled substances from Arizona to Colorado in exchange for US currency.

#### **COUNT 25**

#### **Conspiracy to Distribute a Controlled Substance—Heroin— More than 112 Grams, (DF1)**

Between and including the dates of May 16, 2020, and May 19, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL, Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS, FNU LNU a/k/a NARICLES, Omar BAUTISTA-CUEVAS, and Alfredo NUNEZ-TARANGO** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

#### **COUNT 26**

#### **Conspiracy to Distribute a Controlled Substance—Methamphetamine— More than 112 Grams, (DF1)**

Between and including the dates of May 16, 2020, and May 19, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL, Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS, FNU LNU a/k/a NARICLES, Omar BAUTISTA-CUEVAS, and Alfredo NUNEZ-TARANGO** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 27**

**Possession with Intent to Distribute a Controlled Substance—  
Heroin—More than 112 Grams (DF1)**

Between and including the dates of May 16, 2020, and May 19, 2020, in the state of Colorado, **Omar BAUTISTA-CUEVAS** and **Alfredo NUNEZ-TARANGO** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 28**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams, (DF1)**

Between and including the dates of May 16, 2020, and May 19, 2020, in the state of Colorado, **Omar BAUTISTA-CUEVAS** and **Alfredo NUNEZ-TARANGO** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of §18-18-405(1),(2)(a)(I)(B), C.R.S.

*The offenses alleged in Counts 25-28 were committed in the following manner:*

Between the dates of May 16, 2020, and May 20, 2020, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Jose Roberto MORENO-OLIVAS a/k/a PAUL, Gildardo VALDEZ-CRUZ a/k/a LAGRIMAS, FNU LNU a/k/a NARICLES [hereafter referred to as “NARICLES”], Alfredo NUNEZ-TARANGO, and Omar BAUTISTA-CUEVAS, made a series of agreements with each other and others to sell and/or purchase a quantity of illegal controlled substances, specifically methamphetamine and heroin, for transport from California to the Denver metro area. As a part of this series of agreements, the parties agreed that BAUTISTA-CUEVAS and NUNEZ-TARANGO would obtain illegal controlled substances from VALDEZ-CRUZ and NARICLES in California in exchange for an amount of US currency for delivery to MORENO-OLIVAS in Colorado.

As part of and in furtherance of this series of agreements, on or about May 16, 2020, MORENO-OLIVAS called VALDEZ-CRUZ to discuss how much illegal controlled substances VALDEZ-CRUZ and NARICLES had available for purchase. NARICLES subsequently called MORENO-OLIVAS to confirm there were illegal controlled substances for purchase, and MORENO-OLIVAS indicated that NUNEZ-TARANGO was going to transport an amount of US currency to VALDEZ-CRUZ and NARICLES in exchange for illegal controlled substances.

As part of and in furtherance of this series of agreements, NUNEZ-TARANGO communicated with MORENO-OLIVAS on May 17, 2020, and May 18, 2020, to coordinate a purchase of methamphetamine and heroin from VALDEZ-CRUZ and NARICLES in California in exchange for an amount of US currency for delivery to MORENO-OLIVAS in Colorado.

In part of and in furtherance of these agreements, NUNEZ-TARANGO and BAUTISTA-CUEVAS began traveling from California to Colorado with illegal controlled substances to deliver to MORENO-OLIVAS. On May 19, 2020, Colorado State Patrol troopers in the vicinity of Evergreen, Colorado, initiated a traffic stop of a white Mini Cooper, bearing California license plate #8PHY924, being driven by NUNEZ-TARANGO, and a gray Ford 500, bearing Colorado license plate #BBA-I84, being driven by BAUTISTA-CUEVAS. On May 21, 2020, investigators conducted a search of both vehicles and recovered approximately 17.72 pounds (or approximately 8040 grams) of methamphetamine, and approximately 2.64 pounds (or approximately 1120 grams) of heroin from the vehicles.

#### **COUNT 29**

#### **Conspiracy to Distribute a Controlled Substance—Methamphetamine— More than 112 Grams, (DF1)**

On or about September 15, 2020, in the state of Colorado, **Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO** and **Ivan ABOYTE-VALDEZ** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of §18-18-405(1),(2)(a)(I)(B), C.R.S.

#### **COUNT 30**

#### **Distribution of a Controlled Substance— Methamphetamine—More than 112 Grams (DF1)**

On or about September 15, 2020, in the state of Colorado, **Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO** unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

*The offenses alleged in Counts 29-30 were committed in the following manner:*

On or about the date of September 15, 2020, in a series of in-person and/or telephone conversations and electronic communications utilizing cellular telephone devices, Jesus Alfredo VALDEZ-LEON a/k/a ALFREDO and Ivan ABOYTE-VALDEZ made a

series of agreements with each other to distribute a large quantity of methamphetamine. As a part of this series of agreements, the parties agreed that VALDEZ-LEON would transport the methamphetamine to the meeting location in order to distribute approximately one pound of methamphetamine to a third party (an undercover law enforcement officer posing as a drug distributor).

On September 15, 2020, the undercover law enforcement officer contacted VALDEZ-LEON to arrange a meeting location near Colorado Springs, Colorado. The undercover law enforcement officer provided VALDEZ-LEON with approximately \$5000 in US currency, and VALDEZ-LEON then transferred approximately one pound of methamphetamine to the undercover law enforcement officer.

**December 17, 2020 - SUPERSEDING CHARGES:**

**COUNT 31**

**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

Between and including the dates of April 28, 2020, and April 30, 2020, in the state of Colorado, **Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI, FNU LNU a/k/a Unidentified Male #1207, Jesus Alberto LOPEZ-MEDINA, and Ossler MARQUEZ-GUZMAN a/k/a OLDER** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 32**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams, (DF1)**

On or about April 30, 2020, in the state of Colorado, **Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI** and **Jesus Alberto LOPEZ-MEDINA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of §18-18-405(1),(2)(a)(I)(B), C.R.S.

*The offenses alleged in Counts 31-32 were committed in the following manner:*

Between and including the dates of April 28, 2020, and April 30, 2020, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Victor Antonio BAUTISTA-CERVANTES a/k/a NEGRI, FNU LNU a/k/a Unidentified Male #1207 [hereafter UM #1207], Jesus Alberto LOPEZ-MEDINA, and Ossler MARQUEZ-GUZMAN a/k/a OLDER made a series of agreements with each other and others to sell and/or purchase a quantity of illegal controlled substances, specifically methamphetamine, in the Denver metro area. As a part of this series of agreements, the parties agreed that UM #1207, from his location in the Republic of Mexico, would arrange for a third-party courier to transport multiple pounds of methamphetamine to BAUTISTA-CERVANTES in the Denver Metro, Colorado, area. The parties also agreed that upon BAUTISTA-CERVANTES' receipt of this bulk shipment of methamphetamine, BAUTISTA-CERVANTES and LOPEZ-MEDINA would conduct numerous drug transactions throughout the Denver Metro area in order to further sell and distribute the bulk quantity of methamphetamine that UM #1207 had sent. MARQUEZ-GUZMAN agreed to purchase a large amount of this bulk shipment of methamphetamine.

As part of and in furtherance of this series of agreements, on or about April 30, 2020, BAUTISTA-CERVANTES agreed to sell a quantity of methamphetamine to MARQUEZ-GUZMAN at a price of \$2,600 per pound and MARQUEZ-GUZMAN agreed to purchase three (3) pounds of methamphetamine at that price.

On that same date, LOPEZ-MEDINA transported a quantity of methamphetamine to a meeting with BAUTISTA-CERVANTES at the Hyatt Place Denver hotel located at 4150 E. Mississippi Avenue, Denver, CO 80246. From that location, BAUTISTA-CERVANTES and LOPEZ-MEDINA, in their respective vehicles, traveled to 4255 Kittredge Street, Denver, CO 80239, the location that MARQUEZ-GUZMAN referred to as Benji's place, a location which investigators had previously identified as MARQUEZ-GUZMAN's primary stash location.

Later that evening, law enforcement officers conducted a traffic stop and contacted LOPEZ-MEDINA in the vicinity of East Mississippi Avenue and South Blackhawk Street, Aurora, CO. The officers secured the Chevrolet Cruze sedan, in which LOPEZ-MEDINA was driving, and towed the vehicle to the Aurora Police secured impound lot. After obtaining a search warrant, investigators conducted a search of the vehicle and recovered approximately 21.65 pounds (or approximately 9820.27 grams) of methamphetamine.

**COUNT 33**

**Conspiracy to Distribute a Controlled Substance—Methamphetamine—  
More than 112 Grams, (DF1)**

Between and including the dates of September 4, 2020, and September 9, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ, Erubiel IBARRA-ALVAREZ a/k/a HUACHE, Dolores IBARRA-ESPINOZA a/k/a SUPE, and FNU LNU a/k/a Unidentified Male #5123** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 34**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams, (DF1)**

On or about September 9, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ, Erubiel IBARRA-ALVAREZ a/k/a HUACHE, and Dolores IBARRA-ESPINOZA a/k/a SUPE** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of §18-18-405(1),(2)(a)(I)(B), C.R.S.

*The offenses alleged in Counts 33-34 were committed in the following manner:*

Between and including the dates of September 4, 2020, and September 9, 2020, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Baltazar IBARRA-ALVAREZ and FNU LNU a/k/a Unidentified Male #5123 [hereafter UM #5123], made a series of agreements with each other and others to sell and/or distribute a quantity of illegal controlled substances, specifically methamphetamine, in the Colorado Springs, Colorado, area. As a part of this series of agreements, the parties agreed that UM #5123, from his location in the Republic of Mexico, would arrange for a third-party courier to transport thirty (30) pounds of methamphetamine to the Colorado Springs, Colorado, area. Also as part of this series of agreements, the parties agreed that after the courier for UM #5123 delivered the shipment of methamphetamine to a location in Colorado Springs, then Erubiel IBARRA-ALVAREZ a/k/a HUACHE and Dolores IBARRA-ESPINOZA a/k/a SUPE would transport the methamphetamine to another location.

In furtherance of this series of agreements, on September 9, 2020, while at the residence at 605 Commanche Drive, Colorado Springs, CO 80905, Erubiel IBARRA-

ALVAREZ a/k/a HUACHE and Dolores IBARRA-ESPINOZA a/k/a SUPE took custody of the methamphetamine in their vehicle, a black Nissan Murano, and transported the methamphetamine away from the residence.

Shortly thereafter, law enforcement officers conducted a traffic stop of the black Nissan Murano in the vicinity of West Cheyenne Road and Alsace Way, Colorado Springs, CO. Before the vehicle came to a complete stop, both Erubiel IBARRA-ALVAREZ a/k/a HUACHE and Dolores IBARRA-ESPINOZA a/k/a SUPE abandoned the vehicle and fled the area on foot. The officers secured the black Nissan Murano, in which Erubiel IBARRA-ALVAREZ a/k/a HUACHE and Dolores IBARRA-ESPINOZA a/k/a SUPE had been driving. The officers then conducted a search of the vehicle and recovered approximately 30 pounds (or approximately 13607.8 grams) of methamphetamine.

#### **COUNT 35**

#### **Conspiracy to Commit Money Laundering, (F4)**

On or about November 6, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ, FNU LNU a/k/a Unidentified Male #5123**, and **Jesus BARBA-OCHOA**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

#### **COUNT 36**

#### **Money Laundering, (F3)**

On or about November 6, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ, FNU LNU a/k/a Unidentified Male #5123**, and **Jesus BARBA-OCHOA** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*The offenses alleged in Counts 35-36 were committed in the following manner:*

On or about November 6, 2020, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Baltazar

IBARRA-ALVAREZ, FNU LNU a/k/a Unidentified Male #5123 [hereafter UM #5123], and Jesus BARBA-OCHOA made a series of agreements with each other that IBARRA-ALVAREZ would provide an amount of US currency to BARBA-OCHOA, for ultimate transfer to UM #5123 as payment for a previous shipment of controlled substances.

That evening, at the Mainstay Suites hotel, located at 5980 Tower Road, Denver, Colorado, IBARRA-ALVAREZ met with BARBA-OCHOA in BARBA-OCHOA's vehicle, a black Ford Ranger truck, in the rear parking lot. Within minutes, BARBA-OCHOA drove IBARRA-ALVAREZ to the front of the hotel and then drove out of the parking lot. Shortly thereafter, BARBA-OCHOA drove to a parking lot at 4701 North Peoria Street, Denver, Colorado, where Denver Police officers contacted him. After receiving consent from BARBA-OCHOA, officers searched the vehicle and recovered \$31,000 in US currency.

#### **COUNT 37**

#### **Conspiracy to Distribute a Controlled Substance—Methamphetamine— More than 112 Grams, (DF1)**

Between and including the dates of September 9, 2020, and September 11, 2020, in the state of Colorado, **Ivan Felix QUINTERO a/k/a CHAYANNE** and **Gerardo MURILLO a/k/a GERA** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

#### **COUNT 38**

#### **Possession with Intent to Distribute a Controlled Substance— Methamphetamine—More than 112 Grams, (DF1)**

On or about September 11, 2020, in the state of Colorado, **Ivan Felix QUINTERO a/k/a CHAYANNE** and **Gerardo MURILLO a/k/a GERA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of §18-18-405(1),(2)(a)(I)(B), C.R.S.

*The offenses alleged in Counts 37-38 were committed in the following manner:*

Between and including the dates of September 9, 2020, and September 11, 2020, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Ivan Felix QUINTERO a/k/a CHAYANNE and Gerardo MURILLO a/k/a GERA made a series of agreements with each other and

others to obtain a quantity of illegal controlled substances, specifically methamphetamine, in California, and then transport the methamphetamine to the Denver metro area for further distribution. As a part of this series of agreements, the parties agreed that QUINTERO and MURILLO would drive to California in order to take custody of the methamphetamine.

In furtherance of this series of agreements, on or about September 9, 2020, QUINTERO and MURILLO took custody of the methamphetamine from unidentified sources in California. On or about September 10, 2020, QUINTERO and MURILLO began transporting the shipment of methamphetamine back to Colorado in their vehicle, a maroon 2015 GMS Sierra truck, CO # 2147504. On September 11, 2020, after locating the vehicle in the vicinity of Frisco, Colorado, Colorado State Patrol troopers initiated a traffic stop of the vehicle along I-70 in Georgetown, Colorado. During this traffic stop, MURILLO admitted to the troopers that he was aware there were controlled substances within the vehicle. The troopers then conducted a search of the vehicle and recovered approximately 14.83 pounds (or approximately 6726.77 grams) of methamphetamine.

### **COUNT 39**

#### **Possession of a Weapon by a Previous Offender (F6)**

On December 2, 2020, in the state of Colorado, **TAWNIA WHITE** unlawfully, feloniously, and knowingly possessed, used, or carried upon her person a firearm or other weapon, namely: black and silver Springfield Armory handgun, .380 caliber, serial #CC090460, and Tawnia WHITE was previously convicted of a felony, namely: Escape from Fugitive Hold as defined by C.R.S. § 18-8-208(8), a level 5 felony, on December 8, 2008; Introduction of Contraband as defined by C.R.S. § 18-8-203(1)(a), a level 4 felony, Possession of a Forgery Device as defined by C.R.S. § 18-5-706, a level 6 felony, and Conspiracy to Distribute a Schedule 2 Controlled Substance, as defined by C.R.S. 18-18-405(1),(2)(a)(I)(A), a level 3 felony, on April 2, 2007; in violation of § 18-12-108(1), C.R.S.

*The offense alleged in Count 39 was committed in the following manner:*

On or about December 2, 2020, law enforcement officers arrested Tawnia WHITE at her residence, 7876 Glasgow Place, Littleton, CO. With WHITE's consent, officers searched her residence and her vehicle, a red Chevrolet Silverado truck, and recovered a black and silver Springfield Armory handgun, .380 caliber, serial #CC090460.

**COUNT 40**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams, (DF1)**

On or about December 2, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of §18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 41**

**Possession with Intent to Distribute a Controlled Substance—  
Heroin—More than 112 Grams (DF1)**

On or about December 2, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 42**

**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams, (DF1)**

On or about December 2, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, fentanyl and/or methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of §18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 43**

**Special Offender – Firearm (DF1)**

On or about December 2, 2020, in the state of Colorado, **Baltazar IBARRA-ALVAREZ** committed the felony offenses charged in Counts 40-42 and the defendant used, displayed, or possessed on his person or within his immediate reach, a deadly weapon, at the time of the commission of the felony offenses; in violation of § 18-18-407(1)(d)(II), C.R.S.

*The offenses alleged in Counts 40-43 were committed in the following manner:*

On or about December 2, 2020, law enforcement officers arrested Baltazar IBARRA-ALVAREZ at his residence, 4202 Pikes Peak Ave, Building 134, Unit #134B, Colorado Springs, CO 80909. With IBARRA-ALVAREZ's consent, officers searched the residence and recovered the following items: 184.9 grams of methamphetamine, 382.8 grams of heroin, 261.6 grams of counterfeit Oxycodone pills containing fentanyl, and a loaded Remington 1911.45 caliber handgun, serial #RH43611A.

**COUNT 44**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams, (DF1)**

On or about December 2, 2020, in the state of Colorado, **Jose Luis SALAS-LUGO a/k/a CABIN** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of §18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 45**

**Possession with Intent to Distribute a Controlled Substance—  
Heroin—More than 112 Grams (DF1)**

On or about December 2, 2020, in the state of Colorado, **Jose Luis SALAS-LUGO a/k/a CABIN** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 46**

**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams, (DF1)**

On or about December 2, 2020, in the state of Colorado, **Jose Luis SALAS-LUGO a/k/a CABIN** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, fentanyl and/or methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of §18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 47**  
**Special Offender – Firearm (DF1)**

On or about December 2, 2020, in the state of Colorado, **Jose Luis SALAS-LUGO a/k/a CABIN** committed the felony offenses charged in Counts 44-46 and the defendant used, displayed, or possessed on his person or within his immediate reach, a deadly weapon, at the time of the commission of the felony offenses; in violation of § 18-18-407(1)(d)(II), C.R.S.

*The offenses alleged in Counts 44-47 were committed in the following manner:*

On or about December 2, 2020, law enforcement officers contacted Jose Luis SALAS-LUGO a/k/a CABIN at his residence, 4202 Pikes Peak Ave, Building 134, Unit #134B, Colorado Springs, CO 80909. With SALAS-LUGO's consent, officers searched the residence and recovered the following items: 9690 grams of methamphetamine, 901.5 grams of heroin, 423.3 grams of counterfeit Oxycodone pills containing fentanyl, and a loaded Ruger LCP .380 caliber handgun, serial #372085955.

**February 11, 2021 - SUPERSEDING CHARGES:**

**COUNT 48**  
**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

On or about December 16, 2020, in the state of Colorado, **Adiel ACOSTA-LEYVA** and **Karla VILLA-CEBALLOS** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 49**

**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—Between 14 and 225 Grams (DF2)**

On or about December 16, 2020, in the state of Colorado, **Adiel ACOSTA-LEYVA** and **Karla VILLA-CEBALLOS** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, fentanyl and/or methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of §18-18-405(1),(2)(b)(I)(A), C.R.S.

**COUNT 50**

**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—Between 14 and 225 Grams (DF2)**

On or about December 16, 2020, in the state of Colorado, **Adiel ACOSTA-LEYVA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of §18-18-405(1),(2)(b)(I)(A), C.R.S.

**COUNT 51**

**Money Laundering, (F3)**

On or about December 16, 2020, in the state of Colorado, **Adiel ACOSTA-LEYVA** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*The offenses alleged in Counts 48-51 were committed in the following manner:*

On or about December 15, 2020, law enforcement officers contacted **Adiel ACOSTA-LEYVA** and **Karla VILLA-CEBALLOS** at their residence, 3101 South Federal Boulevard, Unit D-2, in Denver, Colorado. With the consent of both **ACOSTA-LEYVA** and **VILLA-CEBALLOS**, officers searched the residence and recovered the following items: 1354 gross grams (2.98 pounds) of methamphetamine, 74.1 gross grams of counterfeit Oxycodone tablets containing fentanyl, 34.9 gross grams of cocaine, and drug proceeds in the amount of \$4000 United States currency.

**COUNT 52**

**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams, (DF1)**

On or about January 21, 2021, in the state of Colorado, **Eladio MORENO-OLIVAS a/k/a LAYO** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, fentanyl and/or methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of §18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 53**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—Between 7 and 112 Grams (DF2)**

On or about January 21, 2021, in the state of Colorado, **Eladio MORENO-OLIVAS a/k/a LAYO** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but not more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 54**

**Special Offender - Distributing on School Grounds,  
Public Housing, or School Bus, (DF1)**

On or about January 21, 2021, in the state of Colorado, **Eladio MORENO-OLIVAS a/k/a LAYO** committed the felony offenses charged in counts 52-53 within or upon the grounds of a public or private elementary school, middle school, junior high school, high school, vocational school or public housing development, or within one thousand feet of the perimeter of the school or public housing development grounds on a street, alley, parkway, sidewalk, public park, playground or other area or premises which was accessible to the public, or within a private dwelling which was accessible to the public for the purpose of the sale, distribution, use, exchange, manufacture, or attempted manufacture of controlled substance [or in a school vehicle which was engaged in the transportation of persons who were students at a public or private elementary school, middle school, junior high school, or high school]; in violation of section 18-18-407(1)(g), C.R.S.

*The offenses alleged in Counts 52-54 were committed in the following manner:*

On or about January 21, 2021, law enforcement officers contacted Eladio MORENO-OLIVAS a/k/a LAYO in the parking lot near his residence, 1150 South Allison Street, Lakewood, CO 80232. With MORENO-OLIVAS' consent, officers searched his room

within the residence at 1150 South Allison Street, Apartment 3, and recovered the following items: 35.7 gross grams of methamphetamine, and 253 gross grams of counterfeit Oxycodone pills containing fentanyl. Investigators observed that the residence at 1150 South Allison Street, Lakewood, CO, is located approximately 466 feet from Alameda International Junior and Senior High School at 1255 South Wadsworth Boulevard, Lakewood, CO.

**COUNT 55**

**Possession with Intent to Distribute a Controlled Substance—  
Heroin—Between 7 and 112 Grams (DF2)**

On or about January 26, 2021, in the state of Colorado, **Ivan Felix QUINTERO a/k/a CHAYANNE** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but not more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 56**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—Between 7 and 112 Grams (DF2)**

On or about January 26, 2021, in the state of Colorado, **Ivan Felix QUINTERO a/k/a CHAYANNE** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but not more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 57**

**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—Between 14 and 225 Grams (DF2)**

On or about January 26, 2021, in the state of Colorado, **Ivan Felix QUINTERO a/k/a CHAYANNE** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of §18-18-405(1),(2)(b)(I)(A), C.R.S.

**COUNT 58**

**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams, (DF1)**

On or about January 26, 2021, in the state of Colorado, **Ivan Felix QUINTERO a/k/a CHAYANNE** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, fentanyl and/or methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of §18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 59**

**Possession of a Dangerous Weapon, (F5)**

On or about January 26, 2021, in the state of Colorado, **Ivan Felix QUINTERO a/k/a CHAYANNE** unlawfully, feloniously, and knowingly possessed a dangerous weapon, namely: an AR-15 short-barrel rifle; in violation of § 18-12-102(3), C.R.S.

**COUNT 60**

**Special Offender – Firearm (DF1)**

On or about January 26, 2021, in the state of Colorado, **Ivan Felix QUINTERO a/k/a CHAYANNE** committed the felony offenses charged in Counts 55-59 and the defendant used, displayed, or possessed on his person or within his immediate reach, a deadly weapon, at the time of the commission of the felony offenses; in violation of § 18-18-407(1)(d)(II), C.R.S.

**COUNT 61**

**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams, (DF1)**

On or about January 26, 2021, in the state of Colorado, **Jose Luis QUINTERO-SOLANO** and **Jaziel QUINTERO-SOLANO** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, fentanyl and/or methamphetamine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of §18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 62**

**Possession with Intent to Distribute a Controlled Substance—  
Methamphetamine—More than 112 Grams (DF1)**

On or about January 26, 2021, in the state of Colorado, **Jose Luis QUINTERO-SOLANO** and **Jaziel QUINTERO-SOLANO** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 63**

**Possession with Intent to Distribute a Controlled Substance—  
Heroin—Between 7 and 112 Grams (DF2)**

On or about January 26, 2021, in the state of Colorado, **Jose Luis QUINTERO-SOLANO** and **Jaziel QUINTERO-SOLANO** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute heroin, a Schedule I controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but not more than one hundred twelve grams; in violation of § 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 64**

**Possession of a Dangerous Weapon, (F5)**

On or about January 26, 2021, in the state of Colorado, **Jose Luis QUINTERO-SOLANO** and **Jaziel QUINTERO-SOLANO** unlawfully, feloniously, and knowingly possessed a dangerous weapon, namely: an AR-15 short-barrel rifle; in violation of § 18-12-102(3), C.R.S.

**COUNT 65**

**Special Offender – Firearm (DF1)**

On or about January 26, 2021, in the state of Colorado, **Jose Luis QUINTERO-SOLANO** and **Jaziel QUINTERO-SOLANO** committed the felony offenses charged in Counts 61-64 and the defendants used, displayed, or possessed on his person or within his immediate reach, a deadly weapon, at the time of the commission of the felony offenses; in violation of § 18-18-407(1)(d)(II), C.R.S.

*The offenses alleged in Counts 55-65 were committed in the following manner:*

On or about January 26, 2021, law enforcement officers contacted Ivan Felix QUINTERO a/k/a CHAYANNE at his residence, 757 Dillon Way, Unit #108, Aurora, CO. After obtaining a search warrant, officers searched the residence and recovered the following items from the northwest bedroom, which QUINTERO identified as his bedroom, and from the common areas of the apartment: 100.4 gross grams of heroin, 55.2 gross grams of methamphetamine, 52.9 gross grams of cocaine, 598.8 gross grams of counterfeit Oxycodone pills containing fentanyl, and an AR-15 short-barrel rifle and an M&P 9 millimeter handgun.

Also at that location, law enforcement officers contacted Jose Luis QUINTERO-SOLANO and Jaziel QUINTERO-SOLANO. During the search of the northeast bedroom, utilized by both Jose QUINTERO-SOLANO and Jaziel QUINTERO-SOLANO, officers recovered the following items from the bedroom: 1815.6 gross grams of counterfeit Oxycodone pills containing fentanyl, 293.2 gross grams of methamphetamine, 83.8 gross grams of heroin, and an AR-15 short-barrel rifle and an H&K VP 9 millimeter handgun.

**COUNT 66**  
**Money Laundering, (F3)**

Between and including the dates of **April 27, 2020**, and **November 11, 2020**, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and **Anakaren PEREZ** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**COUNT 67**  
**Conspiracy to Commit Money Laundering, (F4)**

Between and including the dates of **April 27, 2020**, and **November 11, 2020**, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and **Anakaren PEREZ** with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

*The offenses alleged in Counts 66-67 were committed in the following manner:*

Between and including April 27, 2020, and November 11, 2020, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Jose Roberto MORENO-OLIVAS a/k/a PAUL and Anakaren PEREZ utilized bank accounts, cell phone applications, websites, property purchases, and Money Service Businesses to transfer and conceal proceeds from the purchase and/or sale of illicit substances.

Bank accounts belonging to PEREZ showed frequent large deposits of US currency between and including April 27, 2020, and November 11, 2020, for which she had no legal documented income.

Between and including April 27, 2020, and November 10, 2020, MORENO-OLIVAS a/k/a PAUL directed PEREZ to wire transfer proceeds from the purchase and/or sale of illicit substances utilizing Money Service Businesses around the Denver metro area. Recipients include family members and illicit narcotics sale associates of MORENO-OLIVAS a/k/a PAUL.

Between and including June 8, 2020 and August 31, 2020, MORENO-OLIVAS a/k/a PAUL directed PEREZ to purchase hotel rooms around the Denver metro area for the purpose of conducting illicit narcotics sale transactions, including the purchase and/or sale of illicit substances. Between June 8, 2020, and August 31, 2020, PEREZ made approximately 16 hotel room purchases on behalf of MORENO-OLIVAS a/k/a PAUL.

On July 1, 2020, PEREZ, after a series of deposits of US currency, wrote a check for \$5,000 for the purchase of a mobile home located at 47335 East 72<sup>nd</sup> Avenue, Bennett, Colorado. The US currency deposited and subsequently utilized in the check were proceeds from the purchase and/or sale of illicit substances.

Between and including July 22, 2020, and November 11, 2020, PEREZ received payments on the Cash app for the the purchase and/or sale of illicit substances from Tawnia WHITE on behalf of and at the direction of MORENO-OLIVAS a/k/a PAUL.

**COUNT 68**  
**Money Laundering, (F3)**

Between and including the dates of **March 27, 2020**, and **October 27, 2020**, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and **Maximilliano ACOSTA** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**COUNT 69**  
**Conspiracy to Commit Money Laundering, (F4)**

Between and including the dates of **March 27, 2020**, and **October 27, 2020**, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and **Maximilliano ACOSTA** with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

*The offenses alleged in Counts 68-69 were committed in the following manner:*

Between and including the dates of March 27, 2020, and October 27, 2020, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Jose Roberto MORENO-OLIVAS a/k/a PAUL and Maximilliano ACOSTA utilized Money Service Businesses to transfer and conceal proceeds from the purchase and/or sale of illicit substances.

Between and including the dates of March 27, 2020, and October 27, 2020, MORENO-OLIVAS a/k/a PAUL directed ACOSTA to wire transfer proceeds from the purchase and/or sale of illicit substances utilizing Money Service Businesses around the Denver metro area. Recipients include family members and illicit narcotics sale associates of MORENO-OLIVAS a/k/a PAUL.

**COUNT 70**  
**Money Laundering, (F3)**

Between and including the dates of March 19, 2020, and June 19, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and **Janett SANCHEZ-RUIZ** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**COUNT 71**  
**Conspiracy to Commit Money Laundering, (F4)**

Between and including the dates of March 19, 2020, and June 19, 2020, in the state of Colorado, **Jose Roberto MORENO-OLIVAS a/k/a PAUL** and **Janett SANCHEZ-RUIZ** with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

*The offenses alleged in Counts 70-71 were committed in the following manner:*

Between and including the dates of March 19, 2020, and June 19, 2020, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Jose Roberto MORENO-OLIVAS a/k/a PAUL and Janett SANCHEZ-RUIZ utilized Money Service Businesses to transfer and conceal proceeds from the purchase and/or sale of illicit substances.

Between and including the dates of March 19, 2020, and June 19, 2020, MORENO-OLIVAS a/k/a PAUL directed SANCHEZ-RUIZ to wire transfer proceeds from the purchase and/or sale of illicit substances utilizing Money Service Businesses around the Denver metro area. Recipients include family members and illicit narcotics sale associates of MORENO-OLIVAS a/k/a PAUL.

PHILIP J. WEISER  
Attorney General



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ANNEMARIE L. BRAUN, #39877  
Senior Assistant Attorney General  
Special Prosecutions Unit  
Criminal Justice Section



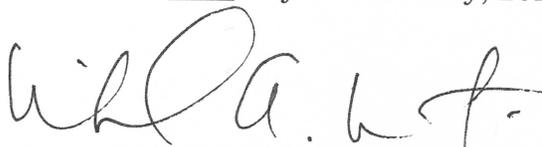
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ALISON CONNAUGHTY, #42548  
Senior Assistant Attorney General  
Special Prosecutions Unit  
Criminal Justice Section

The 2020-2021 Colorado Statewide Grand Jury presents the within  
Indictment, and the same is hereby ORDERED FILED this 12<sup>th</sup> day of  
February, 2021.

Pursuant to § 13-73-107, C.R.S., the Court designates Adams  
County, Colorado as the county of venue for the purposes of trial.

Dated this 12<sup>th</sup> day of February, 2021.



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Michael A. Martinez  
Chief Judge, Second Judicial District  
Denver, Colorado