

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO</p> <p>1437 Bannock Street Denver, CO 80202</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO,</p> <p>v.</p> <p>Fabian Ruiz-Morales Jesus Zepeda-Fuentes Alejandro Ceja-Balderas Daniel Olivas-Salgado Ricardo Lopez Oscar Valdez-Vargas Amanda Anderson George Trevino Maryann Gonzales Victoria Taylor James Salazar Cosme Favela-Garcia Jesus Martinez Jr. – AKA Junior Martinez Miguel Covarrubias-Yunez Amado Martinez Heidi Hixon Armando Rodriguez Rene Valdez-Gonzalez Valentine Marquez</p> <p>Defendants.</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>PHILIP J. WEISER, Attorney General JOHN STOCKLEY, Reg. No. 52496* Assistant Attorney General 1300 Broadway, 9<sup>th</sup> Floor Denver, CO 80203 720-508-6000 *Counsel of Record</p>	<p>Case No.:</p> <p>Grand Jury Case No.:</p> <p>22CR0001</p> <p>Ctrm: 259</p>
<p><b>COLORADO STATE GRAND JURY AMENDED INDICTMENT</b></p>	

Of the 2022-2023 term of the Denver District Court in the year 2023; the 2022-2023 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: 37284	COCCA-Pattern of Racketeering – Participation in an Enterprise, §§18-17-104(3) and 18-17-105, C.R.S. (F2)
COUNT 2: 37285	COCCA-Conspiracy/Endeavoring, §18-17-104(4), C.R.S. (F2)
COUNT 3: 8105N	Conspiracy to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 4: 8104A	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 5: 8202H	Distribution of a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 6: 8104A	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 7: 8202H	Distribution of a Controlled Substance – Methamphetamine – between and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 8: 81046	Possession with Intent to Distribute – Schedule I/II (Cocaine), §18-18-405(1),(2)(c)(I), C.R.S. (DF3)
COUNT 9: 8102B	Distribution of a Controlled Substance – Schedule I/II (Cocaine), §18-18-405(1),(2)(c)(I), C.R.S. (DF3)
COUNT 10: 87133	Possession with Intent to Distribute a Controlled Substance grams Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 11: 87131	Distribution of a Controlled Substance– Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 12: 8104B	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – over 112 grams, §18-18-405(1),(2)(a)(I)(B), C.R.S. (DF1)
COUNT 13: 8202J	Distribution a Controlled Substance – Methamphetamine – over 112 grams, §18-18-405(1),(2)(a)(I)(B), C.R.S. (DF1)
COUNT 14: 8104A	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 15: 8202H	Distribution of a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 16: 8104A	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 17: 8202H	Distribution of a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)

COUNT 18: 8104A	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 19: 8202H	Distribution of a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 20: 87133	Possession with Intent to Distribute a Controlled Substance – Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 21: 87131	Distribution of a Controlled Substance – Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 22: 8105N	Conspiracy to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 23: 8104A	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
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COUNT 25: 8104A	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 26: 8202H	Distribution of a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 27: 87133	Possession with Intent to Distribute a Controlled Substance – Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 28: 87131	Distribution of a Controlled Substance – Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 29: 8104A	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 30: 8202H	Distribution of a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 31: 87133	Possession with Intent to Distribute a Controlled Substance – Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 32: 87131	Distribution of a Controlled Substance – Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 33: 8104B	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – over 112 grams, §18-18-405(1),(2)(a)(I)(B), C.R.S. (DF1)

COUNT 34: 8202J	Distribution of a Controlled Substance – Methamphetamine – over 112 grams, §18-18-405(1),(2)(a)(I)(B), C.R.S. (DF1)
COUNT 35: 8104A	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 36: 8202H	Distribution of a Controlled Substance – Methamphetamine – between and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 37: 87133	Possession with Intent to Distribute – Schedule I/II, Fentanyl – between 4 and 50 grams, § 18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 38: 87131	Distribution of a Controlled Substance – Schedule I/II Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 39: 8104A	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 40: 8202H	Distribution of a Controlled Substance – Methamphetamine – between and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 41: 87133	Possession with Intent to Distribute – Schedule I/II, Fentanyl – between 4 and 50 grams, § 18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 42: 87131	Distribution of a Controlled Substance – Schedule I/II Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 43: 87133	Possession with Intent to Distribute – Schedule I/II, Fentanyl – between 4 and 50 grams, § 18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 44: 87131	Distribution of a Controlled Substance – Schedule I/II Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 45: 8105P	Conspiracy to Distribute – Methamphetamine – over 112 grams, §18-18-405(1),(2)(a)(I)(B), C.R.S. (DF1)
COUNT 46: 8104B	Possession with Intent to Distribute – Methamphetamine – over 112 grams, §18-18-405(1),(2)(a)(I)(B), C.R.S. (DF1)
COUNT 47: 8202J	Distribution of a Controlled Substance – Methamphetamine – over 112 grams, §18-18-405(1),(2)(a)(I)(B), C.R.S. (DF1)
COUNT 48: 8104B	Possession with Intent to Distribute – Methamphetamine – over 112 grams, §18-18-405(1),(2)(a)(I)(B), C.R.S. (DF1)
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COUNT 51: 87131	Distribution of a Controlled Substance – Schedule I/II Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 52: 8104A	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
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COUNT 61: 8104B	Possession with Intent to Distribute – Methamphetamine – over 112 grams, §18-18-405(1),(2)(a)(I)(B), C.R.S. (DF1)
COUNT 62: 8202J	Distribution of a Controlled Substance – Methamphetamine – over 112 grams, §18-18-405(1),(2)(a)(I)(B), C.R.S. (DF1)
COUNT 63: 87134	Conspiracy to Distribute a Controlled Substance – Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
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COUNT 68: 87134	Conspiracy to Distribute a Controlled Substance – Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 69: 8104A	Possession with Intent to Distribute a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 70: 8202H	Distribution of a Controlled Substance – Methamphetamine – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 71: 8105P	Conspiracy to Distribute – Methamphetamine – over 112 grams, §18-18-405(1),(2)(a)(I)(B), C.R.S. (DF1)
COUNT 72: 8105N	Conspiracy to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
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COUNT 75: 87124	Conspiracy to Distribute a Controlled Substance – Schedule I/II Fentanyl – More than 50 grams, §18-18-405(1),(2)(a)(I)(D), C.R.S. (DF1)
COUNT 76: 8105N	Conspiracy to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
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COUNT 82: 8105L	Conspiracy to Distribute a Controlled Substance – Schedule I/II (Cocaine) – over 225 grams, §18-18-405(1),(2)(a)(I)(A), C.R.S. (DF1).
COUNT 83: 8105M	Conspiracy to Distribute a Controlled Substance – Heroin, §18-18-405(1),(2)(C)(II), C.R.S. (DF3).
COUNT 84: 81049	Possession with Intent to Distribute a Controlled Substance – Heroin, §18-18-405(1),(2)(C)(II), C.R.S. (DF3).

COUNT 85: 87134	Conspiracy to Distribute a Controlled Substance – Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
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COUNT 87: 87123	Possession with Intent to Distribute a Controlled Substance – Schedule I/II Fentanyl – More than 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF1)
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COUNT 97: 8104A	Possession with Intent to Distribute a Controlled Substance – Heroin – between 7 and 112 grams, §18-18-405(1),(2)(b)(I)(B), C.R.S. (DF2)
COUNT 98: 87133	Possession with Intent to Distribute a Controlled Substance – Fentanyl – between 4 and 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF2)
COUNT 99: 81046	Possession with Intent to Distribute – Schedule I/II (Cocaine), §18-18-405(1),(2)(c)(I), C.R.S. (DF3)
COUNT 100: 87123	Possession with Intent to Distribute a Controlled Substance – Schedule I/II Fentanyl – More than 50 grams, §18-18-405(1),(2)(b)(I)(D), C.R.S. (DF1)
COUNT 101: 8104B	Possession with Intent to Distribute – Heroin – over 112 grams, §18-18-405(1),(2)(a)(I)(B), C.R.S. (DF1)

COUNT 102: 81048	Possession with Intent to Distribute a Controlled Substance – Schedule I/II (Cocaine) – over 225 grams, §18-18-405(1),(2)(a)(I)(A), C.R.S. (DF1)
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**COUNT 1**  
**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT –  
PATTERN OF RACKETEERING – PARTICIPATION IN AN ENTERPRISE, C.R.S.  
§18-17-104(3) and §18-17-105, (F2)**  
**37284**

Between the dates of October 28, 2022 and August 24, 2023, in the state of Colorado, **Fabian Ruiz-Morales, Jesus Zepeda-Fuentes, Alejandro Ceja-Balderas, and Daniel Olivas-Salgado** while employed by or associated with an enterprise, namely a group of individuals associated in fact, although not a legal entity, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity; in violation of C.R.S. §18-17-104(3) and §18-17-105.

**COUNT 2**  
**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT –  
CONSPIRACY, C.R.S. §18-17-104(4) (F2)**  
**37285**

Between the dates of October 28, 2022 and August 24, 2023, in the state of Colorado, **Fabian Ruiz-Morales, Jesus Zepeda-Fuentes, Alejandro Ceja-Balderas, Daniel Olivas-Salgado**, and others both known and unknown to the Grand Jury, did unlawfully, knowingly, and feloniously conspire or endeavor to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity; in violation of C.R.S. §18-17-104(4) and §18-17-104(3).

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

**The Enterprise**

The enterprise alleged in Counts One and Two consisted of a groups of individuals, associated in fact, although not a legal entity. The enterprise included, the following associated in fact individuals and/or legal or other entities: **Fabian Ruiz-Morales, Jesus Zepeda-Fuentes, Alejandro Ceja-Balderas, Oscar Valdez-Vargas, George Trevino, Amanda Anderson, Maryann Gonzales, Victoria Taylor, Jesus Martinez Jr. – AKA Junior Martinez, Giovanni Rodriguez-Bonilla, Armando Rodriguez, Cosme Favela-Garcia, Ricardo Lopez, Daniel Olivas-Salgado, Miguel Covarrubias-Yunez, Amado Martinez, Heidi Hixon, Rene Valdez-Gonzalez, James Salazar, Lance Esquibel, Valentine Marquez**, and others known and unknown to the Grand Jury, who were associated from time to time in the racketeering activity related to the conduct of the enterprise.

The individuals (and any entities) associated with the enterprise have a primary objective and common purpose to distribute illegal controlled substances to various customers and persons throughout Colorado. A secondary and related objective to the common purpose was to acquire, collect and transport proceeds generated from the sale of these illegal controlled substances to sources of supply for the illegal controlled substances in a manner that concealed the illegal nature of the proceeds.

### **Pattern of Racketeering Activity**

For purposes of Counts One and Two, **Fabian Ruiz-Morales, Jesus Zepeda-Fuentes, Alejandro Ceja-Balderas, Daniel Olivas-Salgado**, 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, and any lesser included offenses as permitted in C.R.S. §18-17-103, related to the conduct of the enterprise, with at least one of which taking 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:

Distribution of a Schedule I/II Controlled Substance; Distribution of Fentanyl; Distribution of Methamphetamine; Distribution of Heroin; Conspiracy to Distribute a Schedule I/II Controlled Substance; Conspiracy to Distribute Fentanyl; Conspiracy to Distribute Methamphetamine; Conspiracy to Distribute Heroin; Possession with Intent to Distribute a Schedule I/II Controlled Substance; Possession with Intent to Distribute Fentanyl; Possession with Intent to Distribute Methamphetamine; and Possession with Intent to Distribute Heroin.

### **RACKETEERING ACTIVITY**

The acts of racketeering activity that the above-named persons and/or entities 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 permitted to be used as predicates under this statute as well as the charged counts listed below:

**NOTE: Counts 3-26, 29-30, 33-34, 39-42, 45-58, 66-77, 81, and 85-90, set forth the essential relevant acts of racketeering activity and are incorporated in these Counts One and Two by this reference. The relevant acts of racketeering activity include any lesser-included offenses of those listed Counts.**

#### **COUNT 3**

**Conspiracy to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams,  
C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8105N**

On or about October 28, 2022, in the state of Colorado, **Fabian Ruiz-Morales, Ricardo Lopez**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute methamphetamine.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven grams, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 4**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8104A**

On or about October 28, 2022, in the state of Colorado, **Fabian Ruiz-Morales and Ricardo Lopez**, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 5**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8202H**

On or about October 28, 2022, in the state of Colorado, **Fabian Ruiz-Morales and Ricardo Lopez**, feloniously, and knowingly sold or distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The Offenses alleged in Counts 3 - 5 were committed in the following manner:

On October 28, 2022, a Weld County Drug Taskforce (WCDF) undercover officer (UC) contacted Fabian Ruiz-Morales to purchase methamphetamine. During this time period, and prior, Ruiz-Morales was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Later that same day, Ruiz-Morales directed the UC to meet with a drug courier, later identified as Ricardo Lopez, in Milliken, CO. Upon meeting Ruiz-Morales's courier, Lopez, at 1760 S Broad Street, Milliken, the UC was provided with 83.0 grams of methamphetamine. Lopez was paid \$560 dollars for the methamphetamine.

**COUNT 6**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)**

**8104A**

On or about November 9, 2022, in the state of Colorado, **Fabian Ruiz-Morales**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than seven grams but not more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 7**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)**

**8202H**

On or about November 9, 2022, in the state of Colorado, **Fabian Ruiz-Morales**, unlawfully, feloniously, and knowingly distributed methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than seven grams but not more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

The Offenses alleged in Counts 6 & 7 were committed in the following manner:

On November 9, 2022, a WCDTF UC contacted Fabian Ruiz-Morales to purchase methamphetamine. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Ruiz-Morales agreed to meet with the UC. Later that day, the UC met with Ruiz-Morales at 3103 23<sup>rd</sup> Ave., Greeley, CO. Ruiz-Morales gave the UC approximately 114.5 grams of methamphetamine. Ruiz-Morales was paid \$660 dollars for the methamphetamine.

**COUNT 8**

**Possession with Intent to Distribute – Schedule I/II, C.R.S. §18-18-405(1),(2)(c)(I) (DF3)**

**81046**

On or about December 7, 2022, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute cocaine, a schedule I or II controlled substance, in violation of section §18-18-405(1),(2)(c), C.R.S.

**COUNT 9**

**Distribution of a Controlled Substance – Schedule I/II, C.R.S. §18-18-405(1),(2)(c)(I) (DF3)  
8102B**

On or about December 7, 2022, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly sold or distributed cocaine, a schedule I or II controlled substance; in violation of section 18-18-405(1),(2)(c)(I), C.R.S.

**COUNT 10**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S.  
§18-18-405(1),(2)(b)(I)(D)(DF2)  
87133**

On or about December 7, 2022, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 11**

**Distribution of a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams,  
C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87131**

On or about December 7, 2022, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged in Counts 8 - 11 were committed in the following manner:

On December 7, 2022, a WCDTF UC contacted Jesus Zepeda-Fuentes to purchase cocaine and fentanyl. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Zepeda-Fuentes directed the UC to meet him at 2297 Greeley Mall, Greeley, Colorado. The UC met with Zepeda-Fuentes at his chosen location, at 2297 Greeley Mall, Greeley, Colorado. Upon meeting with Zepeda-Fuentes, the UC was provided with approximately 11.1 grams of fentanyl pills and 5.0 grams of cocaine. Zepeda-Fuentes was paid \$260 dollars for the cocaine and fentanyl.

**COUNT 12**

**Possession with Intent to Distribute – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8104B**

On or about December 13, 2022, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 13**

**Distribution a Controlled Substance – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8202J**

On or about December 13, 2022, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly distributed methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

The Offenses alleged in Counts 12 - 13 were committed in the following manner:

On December 13, 2022, a WCDTF UC contacted Jesus Zepeda-Fuentes to purchase methamphetamine. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Zepeda-Fuentes directed the UC to meet at 1005 54<sup>th</sup> Ave, Greeley, CO. Later that day, the UC met with Zepeda-Fuentes at his chosen location. Zepeda-Fuentes gave the UC approximately 231.0 grams of methamphetamine. Zepeda-Fuentes was paid \$800 dollars for the methamphetamine.

**COUNT 14**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)**

**8104A**

On or about December 30, 2022, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 15**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)**

**8202H**

On or about December 30, 2022, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The Offenses alleged in Counts 14 - 15 were committed in the following manner:

On December 30, 2022, a WCDTF UC contacted Jesus Zepeda-Fuentes to purchase methamphetamine. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Zepeda-Fuentes directed the UC to meet at 905 Railroad Street, Gilcrest, CO. Later that day, the UC met with Zepeda-Fuentes at his chosen location. Zepeda-Fuentes gave the UC approximately 57.7 grams of methamphetamine. Zepeda-Fuentes was paid \$250 dollars for the methamphetamine.

**COUNT 16**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8104A**

On or about January 5, 2023, in the state of Colorado, **Alejandro Ceja-Balderas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 17**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8202H**

On or about January 5, 2023, in the state of Colorado, **Alejandro Ceja-Balderas**, unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The Offenses alleged in Counts 16 & 17 were committed in the following manner:

On January 5, 2023, a Confidential Informant (CI) contacted Alejandro Ceja-Balderas to purchase methamphetamine. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Ceja-Balderas agreed to meet with the CI and UC. Later that day, the CI along with a WCDTF UC met with Ceja-Balderas at 310 8<sup>th</sup> Street, Greeley, CO. Ceja-Balderas gave the UC approximately 63.5 grams of methamphetamine. Ceja-Balderas was paid \$460 dollars for the methamphetamine.

**COUNT 18**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8104A**

On or about January 17, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 19**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8202H**

On or about January 17, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 20**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)**

**87133**

On or about January 17, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 21**

**Distribution of a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams,  
C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87131**

On or about January 17, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged in Predicate Acts P - S and Counts 18 - 21 were committed in the following manner:

On January 17, 2023, a WCDTF UC contacted Jesus Zepeda-Fuentes to purchase methamphetamine and fentanyl. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Zepeda-Fuentes agreed to meet with the UC. Later that day, the UC met with Zepeda-Fuentes at 3103 South 23<sup>rd</sup> Ave., Greeley, CO. Zepeda-Fuentes gave the UC approximately 57.7 grams of methamphetamine and 10.0 grams of fentanyl. Zepeda-Fuentes was paid \$300 dollars for the methamphetamine and fentanyl.

**COUNT 22**

**Conspiracy to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams,  
C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8105N**

On or about January 19, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, Alejandro Ceja-Balderas**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute methamphetamine.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven grams, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 23**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8104A**

On or about January 19, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes and Alejandro Ceja-Balderas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 24**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8202H**

On or about January 19, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes and Alejandro Ceja-Balderas**, unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The Offenses alleged in Counts 22 - 24 were committed in the following manner:

On January 19, 2023, a WCDTF UC contacted Alejandro Ceja-Balderas to purchase methamphetamine. Ceja-Balderas told the UC that he needed to go get the methamphetamine to complete the order. Ceja-Balderas contacted Jesus Zepeda-Fuentes to secure the requested methamphetamine. Law enforcement surveillance observed Ceja-Balderas and Zepeda-Fuentes meet at 109 E 22<sup>nd</sup> Street, Greeley, CO. Law enforcement followed Ceja-Balderas to 310 8<sup>th</sup> Street, Greeley, CO where Ceja-Balderas met with the WCDTF UC. Ceja-Balderas provided the UC with 56.5 grams of methamphetamine. Ceja-Balderas was paid \$230 for the methamphetamine.

**COUNT 25**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8104A**

On or about January 27, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 26**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8202H**

On or about January 27, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The Offenses alleged in Counts 25 & 26 were committed in the following manner:

On January 27, 2023, a WCDTF UC contacted Jesus Zepeda-Fuentes to purchase methamphetamine. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Zepeda-Fuentes agreed to meet with the UC. Later that day, the UC met with Zepeda-Fuentes at 3103 South 23<sup>rd</sup> Ave., Greeley, CO. Zepeda-Fuentes gave the UC approximately 58.1 grams of methamphetamine. Zepeda-Fuentes was paid \$250 dollars for the methamphetamine and to pay off a debt owed by the UC to Zepeda-Fuentes for prior UC buy deals.

**COUNT 27**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87133**

On or about February 10, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 28**

**Distribution of a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87131**

On or about February 10, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged in Counts 27 & 28 were committed in the following manner:

On February 10, 2023, a CI contacted Oscar Valdez-Vargas to purchase fentanyl. Valdez-Vargas agreed to meet with the CI. Later that day, the CI and a WCDTF UC met with Valdez-Vargas at 105 S 2<sup>nd</sup> Street, LaSalle, CO. Valdez-Vargas gave the UC approximately 5.0 grams of fentanyl. Valdez-Vargas was paid \$550 dollars for the fentanyl and to pay off a preexisting drug debt.

**COUNT 29**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8104A**

On or about February 14, 2023, in the state of Colorado, **Alejandro Ceja-Balderas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 30**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8202H**

On or about February 14, 2023, in the state of Colorado, **Alejandro Ceja-Balderas**, unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The Offenses alleged in Counts 29 & 30 were committed in the following manner:

On February 14, 2023, a WCDTF UC contacted Alejandro Ceja-Balderas to purchase methamphetamine. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Ceja-Balderas agreed to meet with the UC. Later that day, the UC met with Ceja-Balderas at 310 8<sup>th</sup> Street, Greeley, CO. Ceja-Balderas gave the UC approximately 88.2 grams of methamphetamine. Ceja-Balderas was paid \$800 dollars for the methamphetamine and for additional uncharged marijuana.

**COUNT 31**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87133**

On or about February 16, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 32**

**Distribution of a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87131**

On or about February 16, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged in Counts 31 & 32 were committed in the following manner:

On February 16, 2023, a WCDTF UC contacted Oscar Valdez-Vargas to purchase fentanyl. Valdez-Vargas agreed to meet with the UC. Later that day, the UC met with Valdez-Vargas at 105 South 2<sup>nd</sup> Street, LaSalle, CO. Valdez-Vargas gave the UC approximately 10 grams of fentanyl. Valdez-Vargas was paid \$500 dollars for the fentanyl.

**COUNT 33**

**Possession with Intent to Distribute – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8104B**

On or about February 21, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 34**

**Distribution a Controlled Substance – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8202J**

On or about February 21, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly distributed methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

The Offenses alleged Counts 33 & 34 were committed in the following manner:

On February 21, 2023, a WCDTF UC contacted Jesus Zepeda-Fuentes to purchase methamphetamine. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Zepeda-Fuentes agreed to meet with the UC. Later that day, the UC met with Zepeda-Fuentes at 3103 S. 23<sup>rd</sup> Ave., Greeley, CO. Zepeda-Fuentes gave the UC approximately 229.0 grams of methamphetamine. Zepeda-Fuentes was paid \$700 dollars for the methamphetamine.

**COUNT 35**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8104A**

On or about February 24, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 36**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8202H**

On or about February 24, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 37**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87133**

On or about February 24, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 38**

**Distribution of a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams,  
C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87131**

On or about February 24, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged in Counts 35 - 38 were committed in the following manner:

On February 24, 2023, a WCDTF UC contacted Oscar Valdez-Vargas to purchase methamphetamine and fentanyl. Valdez-Vargas agreed to meet with the UC. Later that day, the UC met with Valdez-Vargas at 16420 Washington Street, Thornton, CO. Valdez-Vargas gave the UC approximately 30.5 grams of methamphetamine and 12.2 grams of fentanyl. Valdez-Vargas was paid \$800 dollars for the methamphetamine and fentanyl.

**COUNT 39**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8104A**

On or about March 7, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 40**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8202H**

On or about March 7, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 41**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87133**

On or about March 7, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 42**

**Distribution of a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87131**

On or about March 7, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged in Counts 39 - 42 were committed in the following manner:

On March 7, 2023, a WCDTF UC contacted Jesus Zepeda-Fuentes to purchase methamphetamine and fentanyl. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Zepeda-Fuentes agreed to meet with the UC. Later that day, the UC met with Zepeda-Fuentes at 607 Railroad St., Gilcrest, CO. Zepeda Fuentes gave the UC approximately 114.5 grams of methamphetamine and 32.8 grams of fentanyl. Zepeda-Fuentes was paid \$700 dollars for the methamphetamine and fentanyl.

**COUNT 43**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87133**

On or about March 9, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 44**

**Distribution of a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87131**

On or about March 9, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged in Counts 43 & 44 were committed in the following manner:

On March 9, 2023, a WCDTF UC contacted Oscar Valdez-Vargas to purchase fentanyl. Oscar Valdez-Vargas agreed to meet with the UC. Later that day, the UC met with Valdez-Vargas at 16420 Washington Street, Thornton, CO. Valdez-Vargas gave the UC approximately 10.9 grams of fentanyl. Valdez-Vargas was paid \$500 dollars for the fentanyl.

**COUNT 45**

**Conspiracy to Distribute a Controlled Substance – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8105P**

On or about and including March 17, 2023 to March 17, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, George Trevino, MaryAnn Gonzalez, Victoria Taylor**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 46**

**Possession with Intent to Distribute – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8104B**

On or about and including March 1, 2023 to March 17, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, George Trevino, MaryAnn Gonzalez, and Victoria Taylor**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 47**

**Distribution a Controlled Substance – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8202J**

On or about and including March 1, 2023 to March 17, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, George Trevino, MaryAnn Gonzalez, and Victoria Taylor**, unlawfully, feloniously, and knowingly distributed methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

The Offenses alleged in Predicate Acts GG - II and Counts 45 - 47 were committed in the following manner:

Beginning on March 1, 2023, through a series of recorded jail telephone communications George Trevino, Victoria Taylor, MaryAnn Gonzalez, and Jesus Zepeda Fuentes coordinated the sale of approximately 7 pounds of methamphetamine from Zepeda-Fuentes through the intermediary of Gonzalez, and ultimately to Taylor for further distribution in the State of Texas.

On March 1, 2023, in a recorded conversation, Trevino and Taylor confirmed that Taylor owed Trevino money from a previous drug transaction which law enforcement believed to have occurred in February of 2023. On March 4, 2023, in a recorded conversation, Trevino told Gonzalez that Taylor would bring money for this prior debt and was to receive additional methamphetamine for future distribution in Texas. Trevino instructed Gonzalez to notify their source of supply, Zepeda-Fuentes of this arrangement.

On March 5, 2023, in a recorded, multi-person phone conversation, Trevino, Zepeda-Fuentes, and Gonzalez agreed to a fee arrangement that would pay each party for their role in the transaction from the money that Taylor was bringing from Texas. Trevino directed Gonzalez to notify Taylor to make her way to Weld County, Colorado from Texas to receive the methamphetamine.

On March 8<sup>th</sup>, 2023, in a recorded conversation, Trevino told Taylor that he was ready for her to come pick up the narcotics. Taylor confirmed she would soon be heading to Colorado to complete the transaction.

On March 15, 2023, using GPS data, Law enforcement observed Taylor arrive in Weld County.

On March 16, 2023, law enforcement observed Gonzalez meet with Zepeda-Fuentes to receive the methamphetamine and then observed Taylor meet with Gonzalez to complete the transaction and give Taylor the methamphetamine.

On March 17, 2023, law enforcement conducted a traffic stop on Taylor who was traveling south on I-25 near Colorado Springs, Colorado and recovered 3,250 grams (approximately 7.17 pounds) of methamphetamine from the trunk of her vehicle.

On March 18, 2023, in a recorded conversation, Gonzalez told Trevino that Taylor was pulled over by law enforcement and that the methamphetamine was seized by law enforcement.

**COUNT 48**

**Possession with Intent to Distribute – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8104B**

On or about March 24, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 49**

**Distribution a Controlled Substance – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8202J**

On or about March 24, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 50**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87133**

On or about March 24, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 51**

**Distribution of a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87131**

On or about March 24, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

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

On March 24, 2023, a WCDTF UC contacted Jesus Zepeda-Fuentes to purchase methamphetamine and fentanyl. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Zepeda-Fuentes agreed to meet with the UC. Later that day, the UC met with Zepeda-Fuentes at 2918 11<sup>th</sup> Ave., Evans, CO. Zepeda-Fuentes arrived to the meeting location driving the known vehicle of Alejandro Ceja-Balderas. Zepeda Fuentes gave the UC approximately 225.9 grams of methamphetamine and 23.5 grams of fentanyl. Zepeda-Fuentes was paid \$1,000 dollars for the methamphetamine and fentanyl.

**COUNT 52**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8104A**

On or about March 29, 2023, in the state of Colorado, **Alejandro Ceja-Balderas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 53**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8202H**

On or about March 29, 2023, in the state of Colorado, **Alejandro Ceja-Balderas**, unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The Offenses alleged in Counts 52 & 53 were committed in the following manner:

On March 29, 2023, a WCDTF UC contacted Alejandro Ceja-Balderas to purchase methamphetamine. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Ceja-Balderas agreed to meet with the UC. Later that day, the UC met with Ceja-Balderas at 101 E. 22<sup>nd</sup> Street, Greeley, CO. Ceja-Balderas gave the UC approximately 59.7 grams of methamphetamine. Ceja-Balderas was paid \$460 dollars for the methamphetamine.

**COUNT 54**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)**

**8104A**

On or about March 30, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 55**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)**

**8202H**

On or about March 30, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 56**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – More than 50 grams, C.R.S. §18-18-405(1),(2)(a)(I)(D)(DF1)**

**87123**

On or about March 30, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than fifty grams, in violation of section §18-18-405(1),(2)(a)(I)(D), C.R.S.

**COUNT 57**

**Distribution of a Controlled Substance – – Schedule I/II Fentanyl – More than 50 grams,  
C.R.S. §18-18-405(1),(2)(a)(I)(D)(DF1)**

**87121**

On or about March 30, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than fifty grams, in violation of section §18-18-405(1),(2)(a)(I)(D), C.R.S.

The Offenses alleged in Counts 54 - 57 were committed in the following manner:

On March 30, 2023, a WCDTF UC contacted Jesus Zepeda-Fuentes to purchase methamphetamine and fentanyl. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Zepeda-Fuentes agreed to meet with the UC. Later that day, the UC met with Zepeda-Fuentes at 905 Railroad Street, Gilcrest, CO. Zepeda-Fuentes gave the UC approximately 112.3 grams of methamphetamine and 55.4 grams of fentanyl. Zepeda-Fuentes was paid \$1,500 dollars for the methamphetamine and fentanyl.

**COUNT 58**

**Money Laundering, C.R.S. § 18-5-309(1)(b)(II)**

**12214 (F3)**

On or about March 31, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with knowledge or a belief that the monetary instrument or moneys represented the proceeds of a criminal offense and that the transportation, transmission, or transfer was 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 section §18-5-309(1)(b)(II), C.R.S.

The Offense alleged in Count 58 was committed in the following manner:

On March 31, 2023, Jesus Zepeda-Fuentes contacted a DEA UC agent to coordinate the laundering of money on behalf of the DTO. During this time period, and prior, he was coordinating with other members of the DTO and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Zepeda-Fuentes met with the DEA UC at 501 Railroad Street, Gilcrest, CO. Zepeda-Fuentes gave the DEA UC \$48,141 in narcotics proceeds with the intent that an intermediary wire the proceeds back to sources of supply in Mexico. Law enforcement confirmed based on serial numbers that part of the money recovered included previously recorded funds used by WCDTF UCs to purchase narcotics from Zepeda-Fuentes on February 21, 2023, which represent Counts 34 and 35 of this indictment.

**COUNT 59**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87133**

On or about March 31, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 60**

**Distribution of a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87131**

On or about March 31, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged Counts 59 & 60 were committed in the following manner:

On March 31, 2023, a WCDTF UC contacted Oscar Valdez-Vargas to purchase fentanyl. Oscar Valdez-Vargas agreed to meet with the UC. Later that day, the UC met with Valdez-Vargas at 70 West Bridge Street, Brighton, CO. Valdez-Vargas gave the UC approximately 11.0 grams of fentanyl. Valdez-Vargas was paid \$500 dollars for the fentanyl.

**COUNT 61**

**Possession with Intent to Distribute – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8104B**

On or about March 31, 2023, in the state of Colorado, **Amanda Anderson**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 62**

**Distribution a Controlled Substance – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8202J**

On or about March 31, 2023, in the state of Colorado, **Amanda Anderson**, unlawfully, feloniously, and knowingly distributed methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

The Offenses alleged in Counts 61 & 62 were committed in the following manner:

On March 31, 2023, a WCDTF UC contacted Lance Esquibel to purchase a quarter pound of methamphetamine. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Esquibel agreed to meet with the UC at 835 31<sup>st</sup> Street, Evans, CO. During the controlled buy, Esquibel told the UC he needed to go get “it” and walked over to meet with Amanda Anderson. Esquibel returned and provided a bag of methamphetamine to the UC. Esquibel gave the UC approximately 116.6 grams of methamphetamine. Esquibel was paid \$800 dollars for the methamphetamine.

**COUNT 63**

**Conspiracy to Distribute a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87134**

On or about April 19, 2023, in the state of Colorado, **Oscar Valdez-Vargas, Cosme Favela-Garcia**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute fentanyl.

Further, the violation involved any material, compound, mixture or preparation that weighed more than four grams, but not more than fifty grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 64**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87133**

On or about April 19, 2023, in the state of Colorado, **Oscar Valdez-Vargas and Cosme Favela Garcia**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 65**

**Distribution of a Controlled Substance – Fentanyl – 4 to 50 grams, C.R.S. §18-18-405(1),(2)(B)(I)(D) (DF2)  
87131**

On or about April 19, 2023, in the state of Colorado, **Oscar Valdez-Vargas and Cosme Favela Garcia**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged in Counts 63 – 65 were committed in the following manner:

On April 19, 2023, a WCDTF UC contacted Oscar Valdez-Vargas to purchase fentanyl. Valdez-Vargas directed the UC to meet with a courier, later identified as Cosme Favela-Garcia. Later that day, the UC met with Favela-Garcia at 70 West Bridge Street, Brighton, CO. Favela-Garcia gave the UC approximately 5.7 grams (50 pills) of fentanyl. Favela-Garcia was paid \$250 dollars for the fentanyl.

**COUNT 66**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8104A**

On or about April 20, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 67**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8202H**

On or about April 20, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The Offenses alleged in Counts 66 & 67 were committed in the following manner:

On April 20, 2023, a WCDTF UC contacted Jesus Zepeda-Fuentes to purchase methamphetamine. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Zepeda-Fuentes agreed to meet with the UC. Later that day, the UC met with Zepeda-Fuentes at 101 E. 22<sup>nd</sup> Street, Greeley, CO. Zepeda-Fuentes gave the UC approximately 114.0 grams of methamphetamine. Zepeda-Fuentes was paid \$500 dollars for the methamphetamine.

**COUNT 68**

**Conspiracy to Distribute a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87134**

On or about May 1, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, Daniel Olivas-Salgado**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute fentanyl.

Further, the violation involved any material, compound, mixture or preparation that weighed more than four, but not more than fifty grams; in violation of section 18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offense alleged in Count 68 was committed in the following manner:

Beginning on or about May 1, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones, Jesus Zepeda-Fuentes and Daniel Olivas-Salgado coordinated the distribution of fentanyl to Olivas-Salgado for subsequent distribution. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. On that day, Zepeda-Fuentes arranged the delivery to Olivas-Salgado of 400 pills of fentanyl for \$1,000. Law enforcement surveillance observed Zepeda-

Fuentes and Olivas-Salgado meet at 1100 42<sup>nd</sup> Street, Evans, CO. The approximate weight of the 400 fentanyl pills is 40 grams.

**COUNT 69**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8104A**

On or about May 2, 2023, in the state of Colorado, **Alejandro Ceja-Balderas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 70**

**Distribution of a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8202H**

On or about May 2, 2023, in the state of Colorado, **Alejandro Ceja-Balderas**, unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

The Offenses alleged in Counts 69 & 70 were committed in the following manner:

On May 2, 2023, a WCDTF UC contacted Alejandro Ceja-Balderas to purchase methamphetamine. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Ceja-Balderas agreed to meet with the UC. Later that day, the UC met with Ceja-Balderas at 310 8<sup>th</sup> Street, Greeley, CO. Ceja-Balderas gave the UC approximately 58.0 grams of methamphetamine. Ceja-Balderas was paid \$460 dollars for the methamphetamine.

**COUNT 71**

**Conspiracy to Distribute a Controlled Substance – Methamphetamine – over 112 grams,  
C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8105P**

On or about May 5, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, Valentine Marquez,** and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

The Offense alleged in Count 71 was committed in the following manner:

Beginning on or about May 5, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones, Jesus Zepeda-Fuentes and Marquez coordinated the distribution of methamphetamine to Marquez for subsequent distribution. During this time period, and prior, Zepeda-Fuentes was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. On that day, Zepeda-Fuentes arranged the delivery to Marquez 4 ounces of methamphetamine for \$180 per ounce. Law enforcement surveillance observed Zepeda-Fuentes and Marquez meet at 2856 17<sup>th</sup> Ave, Greeley, CO to make the exchange. Immediately prior to the exchange, Zepeda-Fuentes contacted Marquez and confirmed he was at the meeting location.

**COUNT 72**

**Conspiracy to Distribute a Controlled Substance – Methamphetamine – 7 grams to 112  
grams, C.R.S. §18-18-405(1),(2)(b)(I)(B)(DF2)  
8105N**

On or about May 9, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, Valentine Marquez,** and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute Methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 73**

**Conspiracy to Distribute a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)**

**87134**

On or about May 9, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes and Valentine Marquez**, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute fentanyl.

Further, the violation involved any material, compound, mixture or preparation that weighed more than four, but not more than fifty grams; in violation of section 18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged in Counts 72 & 73 were committed in the following manner:

Beginning on or about May 9, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones, Jesus Zepeda-Fuentes and Valentine Marquez coordinated the distribution of fentanyl to Marquez for subsequent distribution. During this time period, and prior, Zepeda-Fuentes was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. On that day, Zepeda-Fuentes arranged the delivery to Marquez of a half-ounce (approximately 14.17 grams) of methamphetamine and 50 pills of fentanyl for \$90. Law enforcement surveillance observed Zepeda-Fuentes and Marquez meet at 2921 17<sup>th</sup> Ave, Greeley, CO. The approximate weight of the 50 fentanyl pills is 5 grams.

**COUNT 74**

**Conspiracy to Distribute a Controlled Substance – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)**

**8105P**

On or about May 10, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, James Salazar**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 75**

**Conspiracy to Distribute a Controlled Substance – Schedule I/II Fentanyl – Over 50 grams, C.R.S. §18-18-405(1),(2)(a)(I)(D)(DF1)  
87124**

On or about May 10, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, James Salazar**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute fentanyl.

Further, the violation involved any material, compound, mixture or preparation that weighed more than fifty grams; in violation of section 18-18-405(1),(2)(a)(I)(D), C.R.S.

The Offenses alleged in Counts 74 & 75 were committed in the following manner:

Beginning on or about May 10, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones, Jesus Zepeda-Fuentes and James Salazar coordinated the distribution of fentanyl to Salazar for subsequent distribution. During this time period, and prior, Zepeda-Fuentes was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. On that day, Zepeda-Fuentes arranged the delivery to Salazar of one pound of methamphetamine and 700 pills of fentanyl. Law enforcement surveillance observed Zepeda-Fuentes arrive at Salazar's house at 1324 6<sup>th</sup> Street, Greeley, CO. The approximate weight of the 700 fentanyl pills is 70 grams.

**COUNT 76**

**Conspiracy to Distribute a Controlled Substance – Methamphetamine – 7 grams to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B)(DF2)  
8105N**

On or about May 13, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, Valentine Marquez**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 77**

**Conspiracy to Distribute a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)**

**87134**

On or about May 13, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, Valentine Marquez**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute fentanyl.

Further, the violation involved any material, compound, mixture or preparation that weighed more than four, but not more than fifty grams; in violation of section 18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged in Counts 76 & 77 were committed in the following manner:

Beginning on or about May 13, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones, Jesus Zepeda-Fuentes and Valentine Marquez coordinated the distribution of fentanyl to Marquez for subsequent distribution. During this time period, and prior, Zepeda-Fuentes was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. On that day, Zepeda-Fuentes arranged the delivery to Marquez of one ounce (28.35 grams) of methamphetamine and 100 pills of fentanyl. Law enforcement surveillance observed Zepeda-Fuentes and Marquez meet at 2931 17<sup>th</sup> Ave, Greeley, CO. After the transaction, law enforcement intercepted a communication between Marquez and Zepeda-Fuentes where Marquez complained he was missing 5 pills from his 100-pill order. The approximate weight of the 95 fentanyl pills that Marquez received from his 100 pill order is 9.5 grams.

**COUNT 78**

**Conspiracy to Distribute a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)**

**87134**

On or about May 17, 2023, in the state of Colorado, **Oscar Valdez-Vargas, Cosme Favela-Garcia**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute fentanyl.

Further, the violation involved any material, compound, mixture or preparation that weighed more than four, but not more than fifty grams; in violation of section 18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 79**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87133**

On or about May 17, 2023, in the state of Colorado, **Oscar Valdez-Vargas and Cosme Favela Garcia**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 80**

**Distribution of a Controlled Substance – Fentanyl – 4 to 50 grams, C.R.S. §18-18-405(1),(2)(B)(I)(D) (DF2)  
87131**

On or about May 17, 2023, in the state of Colorado, **Oscar Valdez-Vargas and Cosme Favela Garcia**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged in Counts 78 – 80 were committed in the following manner:

On May 17, 2023, a WCDTF UC contacted Oscar Valdez-Vargas to purchase fentanyl. Oscar Valdez-Vargas directed the UC to meet with a courier, later identified as Cosme Favela-Garcia. Later that day, the UC met with Favela-Garcia at 402 Vasquez Blvd., Platteville, CO. Favela-Garcia gave the UC approximately 11.0 grams of fentanyl. Favela-Garcia was paid \$400 dollars for the fentanyl.

**COUNT 81**

**Conspiracy to Distribute a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87134**

On or about May 22, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, Daniel Olivas-Salgado, and Jesus Martinez Jr. -AKA Junior Martinez**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute fentanyl.

Further, the violation involved any material, compound, mixture or preparation that weighed more four grams but less than fifty grams; in violation of section 18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offense alleged in Count 81 was committed in the following manner:

Beginning on or about May 22, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones, Jesus Zepeda-Fuentes, Daniel Olivas-Salgado, and Jesus Martinez Jr. – AKA Junior Martinez coordinated the distribution of fentanyl to Olivas-Salgado for subsequent distribution. During this time period, and prior, Zepeda-Fuentes, Olivas Salgado, and Martinez were coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. On that day, Zepeda-Fuentes arranged for Martinez to deliver to Olivas-Salgado 400 pills of fentanyl. Law enforcement surveillance observed a meeting between Olivas-Salgado and Martinez at 2720 35<sup>th</sup> Ave., Greeley, CO. Later that day, Olivas-Salgado sent a message to Zepeda-Fuentes complaining that he received only 378 fentanyl pills from Martinez. Zepeda-Fuentes confirmed that Martinez would return the next day to complete the 400-pill order. The approximate weight of 378 fentanyl pills is 37.8 grams.

**COUNT 82**

**Conspiracy to Distribute a Controlled Substance – Schedule I/II (Cocaine)– over 225 grams, C.R.S. §18-18-405(1),(2)(a)(I)(A)(DF1)  
8105L**

On or about May 25, 2023, in the state of Colorado, **Amado Martinez and Miguel Covarrubias-Yunez**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute cocaine, a schedule I or II controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than 225 grams; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

The Offense alleged in Count 82 was committed in the following manner:

Beginning on or about May 25, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones, Miguel Covarrubias-Yunez and Amado Martinez coordinated the distribution of cocaine to Martinez for subsequent distribution. On that day, Covarrubias-arranged the delivery to Martinez of 1,000 grams of cocaine. Law enforcement surveillance observed a meeting between Covarrubias-Yunez and Martinez at 940 103<sup>rd</sup> Ave, Northglenn, CO. Surveillance observed Covarrubias-Yunez carrying a weighted down grocery sack as he walked towards Martinez's house. Passing surveillance observed Covarrubias-Yunez and Martinez meet in front of the house at 40 103<sup>rd</sup> Ave., Northglenn, CO.

**COUNT 83**

**Conspiracy to Distribute a Controlled Substance – Heroin, C.R.S. §18-18-405(1),(2)(C)(II)  
(DF3)  
8105M**

On or about May 30, 2023, in the state of Colorado, **Heidi Hixon, Miguel Covarrubias-Yunez**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute heroin, a controlled substance.

**COUNT 84**

**Possession with Intent to Distribute – Heroin, C.R.S. §18-18-405(1),(2)(C)(II) (DF3)  
81049**

On or about May 30, 2023, in the state of Colorado, **Heidi Hixon and Miguel Covarrubias-Yunez**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute heroin, a controlled substance.

The Offenses alleged in Counts 83 – 84 were committed in the following manner:

Beginning on or about May 30, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones, Miguel Covarrubias-Yunez and Heidi Hixon coordinated the distribution of heroin to Hixon. On that day, Covarrubias-arranged the delivery to Hixon of 6.7 grams of heroin. Law enforcement surveillance observed a meeting between Covarrubias-Yunez and Hixon at 16420 Washington Street, Thornton, CO. Later that day, law enforcement conducted a traffic stop on Hixon’s vehicle and recovered the 6.7 grams of heroin.

**COUNT 85**

**Conspiracy to Distribute a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50  
grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87134**

On or about and including May 30, 2023 through May 31, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, Daniel Olivas-Salgado**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute fentanyl.

Further, the violation involved any material, compound, mixture or preparation that weighed more than four grams but less than fifty grams; in violation of section 18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offense alleged in Count 85 was committed in the following manner:

Beginning on or about May 30, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones, Jesus Zepeda-Fuentes and Daniel Olivas-Salgado

coordinated the distribution of fentanyl to Olivas-Salgado for subsequent distribution. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. The next day, on May 31, Zepeda-Fuentes arranged to deliver to Olivas-Salgado 450 pills of fentanyl. Law enforcement surveillance observed a meeting between Zepeda-Fuentes and Olivas-Salgado at 3424 37<sup>th</sup> Street, Evans, CO. Later that day, after surveillance observed the meeting between Zepeda-Fuentes and Olivas-Salgado, law enforcement conducted a traffic stop on Olivas-Salgado. During that stop, officers recovered 44.9 grams of blue fentanyl pills.

**COUNT 86**

**Conspiracy to Distribute a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87134**

On or about and including May 31, 2023, through June 1, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes, Armando Rodriguez**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute fentanyl.

Further, the violation involved any material, compound, mixture or preparation that weighed more than four grams but less than fifty grams; in violation of section 18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offense alleged in Count 86 was committed in the following manner:

Beginning on or about May 31, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones, Jesus Zepeda-Fuentes and Armando Rodriguez coordinated the distribution of 500 fentanyl pills the following day to Rodriguez for subsequent distribution. During this time period, and prior, Zepeda-Fuentes was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. On June 1, 2023, Zepeda-Fuentes arranged to deliver to Rodriguez the 500 pills of fentanyl. Law enforcement surveillance observed a meeting between Zepeda-Fuentes and Rodriguez at Rodriguez's house at 3104 Mariners Landing, Evans, CO. Officers observed a hand to hand transaction between Zepeda-Fuentes and Rodriguez out of the passenger side window of Zepeda-Fuentes' car. The approximate weight of the 500 fentanyl pills is 50 grams.

**COUNT 87**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – More than 50 grams, C.R.S.  
§18-18-405(1),(2)(a)(I)(D)(DF1)  
87123**

On or about June 1, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 88**

**Distribution of a Controlled Substance – – Schedule I/II Fentanyl – More than 50 grams,  
C.R.S. §18-18-405(1),(2)(a)(I)(D)(DF1)  
87121**

On or about June 1, 2023, in the state of Colorado, **Jesus Zepeda-Fuentes**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged in Counts 87 & 88 were committed in the following manner:

On June 1, 2023, a WCDTF UC contacted Jesus Zepeda-Fuentes to purchase fentanyl. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Zepeda-Fuentes agreed to meet with the UC. Later that day, the UC met with Zepeda-Fuentes at 101 E. 22<sup>nd</sup> Street, Greeley, CO. Zepeda-Fuentes gave the UC approximately 59.6 grams of fentanyl. Zepeda-Fuentes was paid \$600 dollars for the fentanyl.

**COUNT 89**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – More than 50 grams, C.R.S.  
§18-18-405(1),(2)(b)(I)(D)(DF1)  
87123**

On or about June 21, 2023, in the state of Colorado, **Alejandro Ceja-Balderas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 90**

**Possession with Intent to Distribute a Controlled Substance – Schedule I/II (Cocaine) – 14 grams to 225 grams, C.R.S. §18-18-405(1),(2)(b)(I)(A) (DF2)  
81047**

On or about June 21, 2023, in the state of Colorado, **Alejandro Ceja-Balderas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute cocaine, a schedule I or II controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than fourteen grams but not more than 224 grams; in violation of section §18-18-405(1),(2)(b)(I)(A), C.R.S.

The Offenses alleged in Counts 89 & 90 were committed in the following manner:

On June 21, 2023, a WCDTF UC contacted Alejandro Ceja-Balderas to purchase narcotics. During this time period, and prior, he was coordinating with other members of the Drug Trafficking Organization (DTO) and their associates, to distribute narcotics, specifically fentanyl, heroin, cocaine, and methamphetamine. Ceja-Balderas agreed to meet with the UC. Later that day, before Ceja-Balderas met with the UC, law enforcement made a traffic stop on his vehicle and after finding narcotics on his person during the traffic stop, arrested Ceja-Balderas. After his arrest, Ceja-Balderas consented to a search of his house where officers recovered approximately 597.7 grams of fentanyl and 17.4 grams of cocaine.

**COUNT 91**

**Possession with Intent to Distribute – Methamphetamine – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8104B**

On or about June 29, 2023, in the state of Colorado, **Amanda Anderson**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 92**

**Special Offender – Firearm, C.R.S. §18-18-407(1)(d)(II) (DF1)  
33A46**

On or about June 29, 2023, in the state of Colorado, **Amanda Anderson** committed the felony offense charged in Count 91, and the defendant or a confederate of the defendant possessed a firearm to which: the defendant or confederate had access in a manner that posed a risk to others; in violation of §18-18-407(1)(d)(II), C.R.S.

The Offenses alleged in Counts 91 & 92 were committed in the following manner:

On June 29, 2023, investigators executed a search warrant on the home of Amanda Anderson, located at 147 16<sup>th</sup> Avenue Court, Greeley, CO. As a result of this search, investigators seized approximately 398.9 grams of methamphetamine along with Anderson's identification card in her bedroom, and a further 77.3 grams of methamphetamine along with a firearm stored with the controlled substances inside of a backpack belonging to Anderson in her bedroom. The total weight of the methamphetamine was 476.2 grams.

**COUNT 93**

**Conspiracy to Distribute a Controlled Substance – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)**

**87134**

On or about July 26, 2023, in the state of Colorado, **Oscar Valdez-Vargas, Rene Valdez-Gonzalez**, and others, both known and unknown to the Grand Jury, unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to distribute fentanyl.

Further, the violation involved any material, compound, mixture or preparation that weighed more than four, but not more than fifty grams; in violation of section 18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 94**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)**

**87133**

On or about July 26, 2023, in the state of Colorado, **Oscar Valdez-Vargas and Rene Valdez-Gonzalez**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 95**

**Distribution of a Controlled Substance – Fentanyl – 4 to 50 grams, C.R.S. §18-18-405(1),(2)(B)(I)(D) (DF2)**

**87131**

On or about July 26, 2023, in the state of Colorado, **Oscar Valdez-Vargas and Rene Valdez-Gonzalez**, unlawfully, feloniously, and knowingly sold or distributed fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

The Offenses alleged in Counts 93 – 95 were committed in the following manner:

On July 26, 2023, a WCDTF UC contacted Oscar Valdez-Vargas to purchase fentanyl. Oscar Valdez-Vargas directed the UC to meet with a courier, later identified as Rene Valdez-Gonzalez. Later that day, the UC met with Valdez-Gonzalez at 16420 Washington Street, Thornton, CO. Valdez-Gonzalez gave the UC approximately 14.0 grams of fentanyl. Valdez-Gonzalez was paid \$300 dollars for the fentanyl.

**COUNT 96**

**Possession with Intent to Distribute a Controlled Substance – Methamphetamine – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8104A**

On or about August 14, 2023, in the state of Colorado, **Rene Valdez-Gonzalez**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 97**

**Possession with Intent to Distribute a Controlled Substance – Heroin – 7 to 112 grams, C.R.S. §18-18-405(1),(2)(b)(I)(B) (DF2)  
8104A**

On or about August 14, 2023, in the state of Colorado, **Rene Valdez-Gonzalez**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute Heroin, a controlled substance.

Further, the violation involved any material, compound, mixture or preparation that weighed more than seven, but not more than one hundred and twelve grams; in violation of section 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 98**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – 4 grams to 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF2)  
87133**

On or about August 14, 2023, in the state of Colorado, **Rene Valdez-Gonzalez**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than four grams, but not more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 99**

**Possession with Intent to Distribute – Schedule I/II (Cocaine), C.R.S. §18-18-405(1),(2)(c)(I) (DF3)  
81046**

On or about August 14, 2023, in the state of Colorado, **Rene Valdez-Gonzalez**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute cocaine, a schedule I or II controlled substance, in violation of section §18-18-405(1),(2)(c), C.R.S.

The Offenses alleged in Counts 96 – 99 were committed in the following manner:

On August 14, 2023, investigators executed a search warrant at 10065 Dartmouth Ave., Apt. 105, Lakewood, CO. Inside the home, investigators located a grey bag containing the identification card of Rene Valdez-Gonzalez that a WCDTF UC identified as consistent with the bag used by Valdez-Gonzalez during the July 26, 2023, UC purchase charged in this indictment as Counts 95 and 96. Inside that bag, officers located 46.0 grams of fentanyl, 35.6 grams of methamphetamine, 12.8 grams of heroin, and 3.5 grams of cocaine.

**COUNT 100**

**Possession with Intent to Distribute – Schedule I/II Fentanyl – More than 50 grams, C.R.S. §18-18-405(1),(2)(b)(I)(D)(DF1)  
87123**

On or about August 14, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute fentanyl, a controlled substance.

Further, the violation involved a material compound, mixture or preparation that weighed more than fifty grams, in violation of section §18-18-405(1),(2)(b)(I)(D), C.R.S.

**COUNT 101**

**Possession with Intent to Distribute – Heroin – over 112 grams, C.R.S. §18-18-405(1),(2)(a)(I)(B) (DF1)  
8104B**

On or about August 14, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute heroin, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(B), C.R.S.

**COUNT 102**

**Possession with Intent to Distribute – Schedule I/II (Cocaine)– over 225 grams, C.R.S. §18-18-405(1),(2)(a)(I)(A) (DF1)  
81048**

On or about August 14, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

Further the violation involved a material compound mixture or preparation that weighed more than one hundred and twelve grams; in violation of section §18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 103**

**Possession with Intent to Distribute – Methamphetamine, C.R.S. §18-18-405(1),(2)(C)(II)  
(DF3)  
81049**

On or about August 14, 2023, in the state of Colorado, **Oscar Valdez-Vargas**, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute methamphetamine, a controlled substance.

The Offenses alleged in Counts 100 – 103 were committed in the following manner:

On August 14, 2023, investigators executed a search warrant at 10065 Dartmouth Ave., Apt. 105, Lakewood, CO. Inside the home, investigators located a black backpack in a hallway near the bedroom of Oscar Valdez-Vargas. This backpack had several locks on it and was approximately 7 feet from the doorway to Valdez-Vargas' bedroom. Inside this backpack, investigators found 8938.4 grams of fentanyl, 387.2 grams of cocaine, 2649.0 grams of heroin, and 7.7 grams of methamphetamine.

PHILIP J. WEISER  
ATTORNEY GENERAL  
STATE OF COLORADO



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JOHN STOCKLEY. #52496  
Assistant Attorney General  
Special Prosecution Unit  
Criminal Justice Section

The 2022-2023 Colorado Statewide Grand Jury presents the within Indictment, and the same is hereby ORDERED FILED this 29<sup>th</sup> day of August, 2023.

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



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Chief Judge Christopher Baumann  
Presiding Judge, State Grand Jury