

<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>[REDACTED]</p> <p>JOSUE CASTENADA JOSHUA COOKE</p> <p>[REDACTED]</p> <p>RODOLZO LEWIS MARIO MUNOZ MARK NOLF GUSTAVO RAMIREZ JESUS PATRICIA SALAS-LUCERO HARLAND SCHUG ANA ROSA VARGAS-HERNANDEZ JOSE ANTONIO VARGAS-GONZALEZ</p> <p>[REDACTED]</p> <p>JOSE MANUAL CANTANO-ACOSTA</p> <p>Defendants.</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>JOHN W. SUTHERS, Attorney General ANNEMARIE L. BRAUN* Senior Assistant Attorney General 1300 Broadway, 9th Floor Denver, CO 80203 720-508-6701 Registration Number: 39877 *Counsel of Record</p>	<p>Case No:</p> <p>GJ Case No.: 13CR01</p> <p>Ctrm: 209</p>
<p>COLORADO STATE GRAND JURY INDICTMENT</p>	

Of the 2013-2014 term of the Denver District Court in the year 2013; the 2013-2014 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 ONE:
37284

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

[REDACTED]; Josue Castenada; Joshua Cooke;
[REDACTED];
Rodolfo Lewis; Mario Munoz; Mark Nolf; Gustavo Ramirez;
Jesus Patricia Salas-Lucero; Harland Schug;
Ana Rosa Vargas-Hernandez;
Jose Antonio Vargas-Gonzalez; [REDACTED]

COUNT TWO:
37284

COCCA – Conspiracy, § 18-17-104(4), C.R.S., (F2)

[REDACTED]; Josue Castenada; Joshua Cooke;
[REDACTED];
Rodolfo Lewis; Mario Munoz; Mark Nolf; Gustavo Ramirez;
Jesus Patricia Salas-Lucero; Harland Schug;
Ana Rosa Vargas-Hernandez;
Jose Antonio Vargas-Gonzalez; [REDACTED]

COUNT THREE:
8205G

Conspiracy to Distribute a Schedule II Controlled Substance, § 18-18-405(1),(2)(a)(I)(A), C.R.S., (F3)

Ana Rosa Vargas-Hernandez; Mark Nolf

COUNT FOUR:
8205G

Conspiracy to Distribute a Schedule II Controlled Substance, § 18-18-405(1),(2)(a)(I)(A), C.R.S., (F3)

Ana Rosa Vargas-Hernandez;
Jose Antonio Vargas-Gonzalez; [REDACTED];
Joshua Cooke; [REDACTED]

COUNT FIVE:
82021

Distribution of a Schedule II Controlled Substance, § 18-18-405(1), (2)(a)(I)(A), C.R.S., (F3)

Joshua Cooke

COUNT SIX:
82041

Possession with Intent to Distribute a Schedule II Controlled Substance, § 18-18-405(1), (2)(a)(I)(A), C.R.S., (F3)

Ana Rosa Vargas-Hernandez;
Jose Antonio Vargas-Gonzalez

COUNT FIFTEEN: 8205G	Conspiracy to Distribute a Schedule II Controlled Substance, § 18-18-405(1),(2)(a)(I)(A), C.R.S., (F3) Gustavo Ramirez; Jesus Patricia Salas-Lucero
COUNT SIXTEEN: 8205G	Conspiracy to Distribute a Schedule II Controlled Substance, § 18-18-405(1),(2)(a)(I)(A), C.R.S., (F3) Gustavo Ramirez; Rodolfo Lewis
COUNT SEVENTEEN: 8205G	Conspiracy to Distribute a Schedule II Controlled Substance, § 18-18-405(1),(2)(a)(I)(A), C.R.S., (F3) Gustavo Ramirez; Rodolfo Lewis
COUNT EIGHTEEN: 82022	Distribution of a Schedule II Controlled Substance— 25 to 450 Grams, § 18-18-405(1), (2)(a)(I)(A), (3)(a)(I), C.R.S., (F3) Gustavo Ramirez
COUNT NINETEEN: 82042	Possession with Intent to Distribute a Schedule II Controlled Substance—25 to 450 Grams, § 18-18-405(1), (2)(a)(I)(A), (3)(a)(I), C.R.S., (F3) Rodolfo Lewis
COUNT TWENTY: 8205G	Conspiracy to Distribute a Schedule II Controlled Substance, § 18-18-405(1),(2)(a)(I)(A), C.R.S., (F3) Gustavo Ramirez; Jesus Patricia Salas-Lucero
COUNT TWENTY-ONE: 82044	Possession with Intent to Distribute a Schedule II Controlled Substance – Over 1000 Grams, § 18-18-405(1), (2)(a)(I)(A),(3)(a)(III) C.R.S., (F3) Jesus Patricia Salas-Lucero
COUNT TWENTY-TWO: 8205G	Conspiracy to Distribute a Schedule II Controlled Substance, § 18-18-405(1),(2)(a)(I)(A), C.R.S., (F3) Gustavo Ramirez; [REDACTED]

COUNT
TWENTY-THREE:
82044

Possession with Intent to Distribute a Schedule II Controlled Substance – Over 1000 Grams, § 18-18-405(1), (2)(a)(I)(A),(3)(a)(III) C.R.S., (F3)

Gustavo Ramirez; Jose Manuel Cantano-Acosta

COUNT
TWENTY-FOUR:
82042

Possession with Intent to Distribute a Schedule II Controlled Substance—25 to 450 Grams, § 18-18-405(1), (2)(a)(I)(A), (3)(a)(I), C.R.S., (F3)

Harland Schug

COUNT
TWENTY-FIVE:

Possession of a Schedule I Controlled Substance – Four Grams or Less, § 18-18-403.5(1),(2)(a)(I), C.R.S. (F6)

Harland Schug

COUNT ONE
**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)**

Between the dates of May 1, 2012, and August 15, 2013, in the State of Colorado, [REDACTED]; **Josue Castenada; Joshua Cooke; [REDACTED]; [REDACTED]; Rodolzo Lewis; Mario Munoz; Mark Nolf; Gustavo Ramirez; Jesus Patricia Salas-Lucero; Harland Schug; Ana Rosa Vargas-Hernandez; Jose Antonio Vargas-Gonzalez; [REDACTED]** and others both known and unknown, while employed by or associated with an enterprise, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity: in violation of sections 18-17-104(3) and 18-17-105, C.R.S.

COUNT TWO
**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT —
CONSPIRACY/ENDEAVORING, C.R.S. 18-17-104(4) (F2)**

Between the dates of May 1, 2012, and August 15, 2013, in the State of Colorado, [REDACTED]; **Josue Castenada; Joshua Cooke; [REDACTED]; [REDACTED]; Rodolzo Lewis; Mario Munoz; Mark Nolf; Gustavo Ramirez; Jesus Patricia Salas-Lucero; Harland Schug; Ana Rosa Vargas-Hernandez; Jose Antonio Vargas-Gonzalez; [REDACTED]** and others both known and unknown, did unlawfully, knowingly, and feloniously conspire and 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), C.R.S.

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

The Enterprise

The enterprise alleged in counts one and two was primarily a group of individuals, associated in fact, although not a legal entity. The enterprise included, but was not limited to, the following associated in fact individuals and/or legal entities: [REDACTED]; **Josue Castenada; Joshua Cooke; [REDACTED]; [REDACTED]; Rodolzo Lewis; Mario Munoz; Mark Nolf; Gustavo Ramirez; Jesus Patricia Salas-Lucero; Harland Schug; Ana Rosa Vargas-Hernandez; Jose Antonio Vargas-Gonzalez; [REDACTED]** and others both known and unknown to the Grand Jury. The individuals associated with the enterprise had a primary objective and a common purpose to distribute large quantities of illegal controlled substances, including methamphetamine and cocaine, both Schedule II controlled substances, to various customers throughout the Denver Metro, Colorado area.

The members of this enterprise included the sources of supply, based primarily in Mexico, the main-level distributors, based predominately in Colorado, and the lower-level dealers and associates, based largely in the Denver Metro area. The enterprise also included couriers who trafficked illegal controlled substances into Colorado from Mexico.

The sources of supply, including but not limited to [REDACTED], [REDACTED], and [REDACTED], resided primarily in Mexico and provided members of the criminal enterprise based in Colorado with illegal controlled substances. These sources frequently supplied the illegal controlled substance methamphetamine in a pure, liquid form. The liquid methamphetamine was then trafficked via couriers who traveled from Mexico into the state of Colorado carrying the pure liquid methamphetamine in sealed water bottles or in the windshield washer reservoirs of motor vehicles.

The members of the criminal enterprise based in Colorado, including Ana Rosa Vargas-Hernandez, Jose Antonio Vargas-Gonzalez, Mario Munoz, Gustavo Ramirez, Jesus Patricia Salas-Lucero, and Josue Castenada received the illegal controlled substances, including methamphetamine and cocaine, from the couriers. On occasion, these members also transported the illegal controlled substances from Mexico, across the border, into the United States and into Colorado. These couriers included, amongst others, Mark Nolf and [REDACTED].

Once the illegal controlled substances were transported into Colorado, the Colorado-based members of the enterprise supplied their respective dealers and associates with the illegal controlled substances. These dealers or associates included Harland Schug, Joshua Cooke, and Rodolzo Lewis.

All the members of the enterprise relied upon and utilized a system of cellular telephones and other telecommunications facilities to arrange and execute both the importation and the distribution of these illegal controlled substances throughout the Denver Metro, Colorado, area. Because the members of the criminal enterprise used cellular telephones so extensively to conduct the business and operations of the enterprise, the members often utilized coded terminology when speaking to each other on the telephone in order to conceal their criminal activities.

Pattern of Racketeering Activity

[REDACTED]; Josue Castenada; Joshua Cooke; [REDACTED]; [REDACTED]; Rodolzo Lewis; Mario Munoz; Mark Nolf; Gustavo Ramirez; Jesus Patricia Salas-Lucero; Harland Schug; Ana Rosa Vargas-Hernandez; Jose Antonio Vargas-Gonzalez; and [REDACTED] directly and in concert, engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, including any lesser offenses, related to the conduct of the enterprise, with at least one of which took place in the State of

Colorado after July 1, 1981 and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

Distribution of a Controlled Substance – Schedule II
Possession with Intent to Distribute a Controlled Substance – Schedule II
Conspiracy to Distribute a Controlled Substance – Schedule II
Unlawful Use of a Telecommunications Facility

Racketeering Activity

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

PREDICATE ACT ONE

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of February 6, 2013, and February 7, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez** and **Mark Nolf** unlawfully, feloniously, and knowingly conspired with each other and others to distribute methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

PREDICATE ACT TWO

Possession with Intent to Distribute a Schedule II Controlled Substance

On February 7, 2013, in the State of Texas, **Mark Nolf** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained methamphetamine, a schedule II controlled substance, listed in Penalty Group 2 of Section 481.103 of the Texas Health and Safety Code, in violation of Section 481.113 (a),(d), Texas Health and Safety Code.

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

On or about February 6, 2013, Ana Rosa Vargas-Hernandez directed Mark Nolf to travel to Ciudad Juarez, Mexico, in order to pick up a quantity of liquid methamphetamine on her behalf and transport it to Denver, Colorado, for her to possess. On or about that same date, Mark Nolf traveled from Colorado to Ciudad Juarez, Mexico. After Nolf arrived in Ciudad Juarez, Vargas-Hernandez arranged for a quantity of liquid methamphetamine to be delivered to Nolf. On February 7, 2013, Nolf transported the liquid methamphetamine to the El Paso, Texas, Port of Entry. At the location, Nolf was found to be in possession of 1.5 liters of liquid methamphetamine.

PREDICATE ACT THREE

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

On or about May 6, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez, Jose Antonio Vargas-Gonzalez, [REDACTED], Joshua Cooke, [REDACTED]** and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

PREDICATE ACT FOUR

Unlawful Use of a Communication Facility

On or about May 6, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez, Jose Antonio Vargas-Gonzalez, [REDACTED], Joshua Cooke, [REDACTED]** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT FIVE

Distribution of a Schedule II Controlled Substance, (F3)

On or about May 6, 2013, in the State of Colorado, **Joshua Cooke** unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

PREDICATE ACT SIX

Possession with Intent to Distribute a Schedule II Controlled Substance, (F3)

On or about May 6, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez and Jose Antonio Vargas-Gonzalez** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained methamphetamine, a schedule II controlled substance, in violation of section 18-18-405(1),(2)(a)(I)(A),(3), C.R.S.

The offenses alleged in Predicate Acts Three through Six were committed in the following manner:

On or about May 6, 2013, in a series of phone conversations utilizing cellular telephones, **Ana Rosa Vargas-Hernandez, Jose Antonio Vargas-Gonzalez, [REDACTED], [REDACTED], Joshua Cooke, and [REDACTED]** agreed that Joshua Cooke, acting at the direction of and on behalf of **[REDACTED]**, would deliver a quantity of methamphetamine to Ana Rosa Vargas-Hernandez and Jose Antonio Vargas-Gonzalez, who were both acting at the direction of and on behalf of **[REDACTED]**. After this series of phone conversations, Ana Rosa Vargas-Hernandez and Jose Antonio Vargas-Gonzalez met with Joshua Cooke at a location in

Denver, Colorado. On that date, in a parking lot in the vicinity of Mississippi and Tejon streets, Denver, CO, Cooke delivered a quantity of methamphetamine to Vargas-Gonzalez and Vargas-Hernandez. Vargas-Hernandez and Vargas-Gonzalez then transported the methamphetamine to their stash location for further processing and distribution.

PREDICATE ACT SEVEN

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of May 4 through May 7, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez** and **Harland Schug** and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

PREDICATE ACT EIGHT

Unlawful Use of a Communication Facility

Between the dates of May 4 through May 7, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez** and **Harland Schug** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

The offenses alleged in Predicate Acts Seven and Eight were committed in the following manner:

Between the dates of May 4 through May 7, 2013, in a series of phone conversations utilizing cellular telephones, Ana Rosa Vargas-Hernandez and Harland Schug agreed that Vargas-Hernandez would deliver a quantity of methamphetamine to Schug. After this series of phone conversations, Ana Rosa Vargas-Hernandez traveled to Schug's residence at 1480 W. Nevada Place, Denver, Colorado. At that location, Vargas-Hernandez delivered a quantity of methamphetamine to Schug.

PREDICATE ACT NINE

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of [REDACTED], in the State of Colorado, **Ana Rosa Vargas-Hernandez**, [REDACTED], and [REDACTED] and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

PREDICATE ACT TEN
Unlawful Use of a Communication Facility

Between the dates of [REDACTED], in the State of Colorado, **Ana Rosa Vargas-Hernandez** and [REDACTED] did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT ELEVEN
**Possession with Intent to Distribute a Schedule II Controlled Substance –
Over 1000 Grams, (F3)**

On or about [REDACTED], in the State of Colorado, [REDACTED] unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained methamphetamine, a schedule II controlled substance.

Further, the amount was or had been represented to be one thousand grams or one kilogram or more of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(III), C.R.S.

The offenses alleged in Predicate Acts 9-11 were committed in the following manner:

On or about [REDACTED], in a series of phone conversations utilizing cellular telephones, Ana Rosa Vargas-Hernandez and [REDACTED] agreed that [REDACTED], acting at the direction of and on behalf of [REDACTED], would deliver a quantity of methamphetamine to Ana Rosa Vargas-Hernandez in the state of Colorado, who was also acting at the direction of and on behalf of [REDACTED]. After this series of phone conversations, [REDACTED], [REDACTED] was stopped by law enforcement officers in the vicinity of [REDACTED], Colorado, while he was operating a [REDACTED] truck. Officers seized the vehicle and subsequently recovered six liters of liquid methamphetamine from the windshield washer reservoir of the vehicle.

PREDICATE ACT TWELVE
Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of May 7, 2013, and May 30, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez**, [REDACTED], and **Mario Munoz** and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine and cocaine, both schedule II controlled substances; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

PREDICATE ACT THIRTEEN
Unlawful Use of a Communication Facility

Between the dates of May 7, 2013, and May 30, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez** and **Mario Munoz** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT FOURTEEN
**Possession with Intent to Distribute a Schedule II Controlled Substance –
Over 1000 Grams, (F3)**

On or about May 30, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez** and **Mario Munoz** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained methamphetamine, a schedule II controlled substance.

Further, the amount was or had been represented to be one thousand grams or one kilogram or more of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(III), C.R.S.

PREDICATE ACT FIFTEEN
**Possession with Intent to Distribute a Schedule II Controlled Substance –
Over 1000 Grams, (F3)**

On or about May 30, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez** and **Mario Munoz** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained cocaine, a schedule II controlled substance.

Further, the amount was or had been represented to be one thousand grams or one kilogram or more of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(III), C.R.S.

The offenses alleged in Predicate Acts 12-15 were committed in the following manner:

Between the dates of May 7, 2013, and May 30, 2013, in a series of phone conversations utilizing cellular telephones, Ana Rosa Vargas-Hernandez and Mario Munoz agreed that Vargas-Hernandez, acting at the direction of and on behalf of [REDACTED], would provide quantities of methamphetamine and cocaine to Mario Munoz, who was also acting at the direction of and on behalf of [REDACTED]. Vargas-Hernandez and Munoz also agreed that the methamphetamine and cocaine would be stored for further distribution at their "office" at 1725 W. Mosier Place, Denver, CO. After this series of phone conversations, on May 31, 2013, law

enforcement officers executed a search warrant at 1725 W. Mosier Place, Denver, CO. At that location, officers located and seized approximately 10 pounds (approx. 4480 grams) of methamphetamine and 1.5 kilograms of cocaine.

PREDICATE ACT SIXTEEN

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of June 28, 2013, and July 2, 2013, in the State of Colorado, **Joshua Cooke** and **Josue Castenada**, [REDACTED] and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

PREDICATE ACT SEVENTEEN

Unlawful Use of a Communication Facility

Between the dates of June 28, 2013, and July 2, 2013, in the State of Colorado, **Joshua Cooke** and **Josue Castenada** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT EIGHTEEN

**Possession with Intent to Distribute a Schedule II Controlled Substance –
Over 1000 Grams, (F3)**

On or about July 2, 2013, in the State of Colorado, **Joshua Cooke** and **Josue Castenada** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained methamphetamine, a schedule II controlled substance.

Further, the amount was or had been represented to be one thousand grams or one kilogram or more of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(III), C.R.S.

The offenses alleged in Predicate Acts 16-18 were committed in the following manner:

Between the dates of June 28, 2013, and July 2, 2013, in a series of phone conversations utilizing cellular telephones, Joshua Cooke and Josue Castenada agreed that Cooke would provide Castenada with access to Cooke's residence at 4722 Josephine Street, Denver, CO, so that Castenada could process a quantity of liquid methamphetamine that he would receive from [REDACTED] at that location. Cooke and Castenada further agreed that Cooke would assist Castenada with the processing of the liquid methamphetamine in exchange for US currency. After this series of phone conversations, Castenada brought a quantity of liquid methamphetamine that he had

received from [REDACTED] to Cooke's residence to process for further distribution. On July 2, 2013, law enforcement officers searched the residence at 4722 Josephine Street, Denver, CO. At that location, officers located and seized approximately 1 pound of crystallized methamphetamine and another five pounds of liquid methamphetamine. Officers also recovered a .357 revolver belonging to Castenada.

PREDICATE ACT NINETEEN

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of June 28, 2013, and July 2, 2013, in the State of Colorado, **Gustavo Ramirez** and **Jesus Patricia Salas-Lucero** and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine and cocaine, both schedule II controlled substances; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

PREDICATE ACT TWENTY

Unlawful Use of a Communication Facility

Between the dates of June 28, 2013, and July 2, 2013, in the State of Colorado, **Gustavo Ramirez** and **Jesus Patricia Salas-Lucero** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

The offenses alleged in Predicate Acts 19-20 were committed in the following manner:

Between the dates of June 28, 2013, and July 2, 2013, in a series of phone conversations utilizing cellular telephones, Gustavo Ramirez and Jesus Patricia Salas-Lucero agreed that Salas-Lucero would provide Ramirez with a quantity of illegal controlled substances, methamphetamine and/or cocaine, at Ramirez' residence at 130 Perry Street, Denver, CO. After this series of phone conversations, on July 2, 2013, Salas-Lucero arrived at Ramirez' residence at 130 Perry Street, Denver, CO, and delivered to him a quantity of illegal controlled substances.

PREDICATE ACT TWENTY-ONE

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of July 15, 2013, and July 25, 2013, in the State of Colorado, **Gustavo Ramirez** and **Rodolzo Lewis** unlawfully, feloniously, and knowingly conspired with each other to distribute cocaine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

PREDICATE ACT TWENTY-TWO
Unlawful Use of a Communication Facility

Between the dates of July 15, 2013, and July 25, 2013, in the State of Colorado, **Gustavo Ramirez** and **Rodolzo Lewis** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

The offenses alleged in Predicate Acts 21-22 were committed in the following manner:

Between the dates of July 15, 2013, and July 25, 2013, in a series of phone conversations utilizing cellular telephones, Gustavo Ramirez and Rodolzo Lewis agreed that Ramirez would provide Lewis with a quantity of cocaine. After this series of phone conversations, on July 25, 2013, Ramirez and Lewis met in the vicinity of 5th Avenue and Osceola Street, Denver, CO. At that location, Ramirez delivered a quantity of cocaine to Lewis in exchange for US currency.

PREDICATE ACT TWENTY-THREE
Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

On or about July 30, 2013, in the State of Colorado, **Gustavo Ramirez** and **Rodolzo Lewis** unlawfully, feloniously, and knowingly conspired with each other to distribute cocaine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

PREDICATE ACT TWENTY-FOUR
Unlawful Use of a Communication Facility

On or about July 30, 2013, in the State of Colorado, **Gustavo Ramirez** and **Rodolzo Lewis** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT TWENTY-FIVE
**Distribution of a Schedule II Controlled Substance –
25 to 450 Grams, (F3)**

On or about July 30, 2013, in the State of Colorado, **Gustavo Ramirez** unlawfully, feloniously, and knowingly sold or distributed cocaine, a schedule II controlled substance.

Further, the amount was or had been represented to be at least 25 grams but not more than 450 grams of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(I), C.R.S.

PREDICATE ACT TWENTY-SIX

**Possession with Intent to Distribute a Schedule II Controlled Substance –
25 to 450 Grams, (F3)**

On or about July 30, 2013, in the State of Colorado, **Rodolzo Lewis** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained cocaine, a schedule II controlled substance.

Further, the amount was or had been represented to be at least 25 grams but not more than 450 grams of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(I), C.R.S.

The offenses alleged in Predicate Acts 23-26 were committed in the following manner:

On or about July 30, 2013, in a series of phone conversations utilizing cellular telephones, Gustavo Ramirez and Rodolzo Lewis agreed that Ramirez would provide Lewis with a quantity of cocaine. After this series of phone conversations, on that same date, Ramirez and Lewis met in the vicinity of 1st Avenue and Sheridan Blvd., Denver, CO. At that location, Ramirez delivered approx. four ounces (112 grams) of cocaine to Lewis in exchange for \$950 dollars in US currency per ounce of cocaine.

PREDICATE ACT TWENTY-SEVEN

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of July 29, 2013, and August 3, 2013, in the State of Colorado, **Gustavo Ramirez** and **Jesus Patricia Salas-Lucero** and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine and cocaine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

PREDICATE ACT TWENTY-EIGHT

Unlawful Use of a Communication Facility

Between the dates of July 29, 2013, and August 3, 2013, in the State of Colorado, **Gustavo Ramirez** and **Jesus Patricia Salas-Lucero** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT TWENTY-NINE

**Possession with Intent to Distribute a Schedule II Controlled Substance –
Over 1000 Grams, (F3)**

On or about August 3, 2013, in the State of Colorado, **Jesus Patricia Salas-Lucero** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained cocaine, a schedule II controlled substance.

Further, the amount was or had been represented to be one thousand grams or one kilogram or more of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(III), C.R.S.

The offenses alleged in Predicate Acts 27-29 were committed in the following manner:

Between the dates of July 29, 2013, and August 3, 2013, in a series of phone conversations utilizing cellular telephones, Gustavo Ramirez and Jesus Patricia Salas-Lucero agreed that Salas-Lucero would provide Ramirez with a quantity of illegal controlled substances, methamphetamine and/or cocaine, after Salas-Lucero traveled to Mexico and that Salas-Lucero would then transport the illegal controlled substances to Denver, CO. After this series of phone conversations, on or about August 3, 2013, Salas-Lucero received a quantity of cocaine, a schedule II controlled substance, and began transporting it to Denver, CO. Law enforcement officers stopped Salas-Lucero, who was traveling alone in a black Jeep Wrangler, in the vicinity of mile marker 188 on I-25 in Douglas County, CO. Subsequently, officers recovered 2 kilograms of packaged cocaine from the black Jeep Wrangler.

PREDICATE ACT THIRTY

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of July 29, 2013, and August 10, 2013, in the State of Colorado, [REDACTED] and **Gustavo Ramirez** and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

PREDICATE ACT THIRTY-ONE

Unlawful Use of a Communication Facility

Between the dates of July 29, 2013, and August 10, 2013, in the State of Colorado, [REDACTED] and **Gustavo Ramirez** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Distribution of a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

PREDICATE ACT THIRTY-TWO
**Possession with Intent to Distribute a Schedule II Controlled Substance –
Over 1000 Grams, (F3)**

On or about August 10, 2013, in the State of Colorado, **Gustavo Ramirez** and **Jose Manuel Cantano-Acosta** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained methamphetamine, a schedule II controlled substance.

Further, the amount was or had been represented to be one thousand grams or one kilogram or more of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(III), C.R.S.

The offenses alleged in Predicate Acts 30-32 were committed in the following manner:

Between the dates of July 29, 2013, and August 10, 2013, in a series of phone conversations utilizing cellular telephones, [REDACTED] and Gustavo Ramirez agreed that [REDACTED] would provide Ramirez with a quantity of illegal controlled substances, methamphetamine and/or cocaine, after Ramirez traveled to Mexico and that Ramirez would then transport the illegal controlled substances to Denver, CO. After this series of phone conversations, on or about August 9, 2013, Ramirez received a quantity of methamphetamine, a schedule II controlled substance, from [REDACTED]. Shortly thereafter, Ramirez and Jose Manuel Cantano-Acosta began transporting the quantity of methamphetamine to Denver, CO. At approximately 5 am on August 10, 2013, law enforcement officers stopped Ramirez, who was traveling in a gray GMC Yukon, in the vicinity of mile marker 182 on northbound I-25 in Douglas County, Colorado. Subsequently, officers recovered approximately three gallons of liquid methamphetamine from the windshield washer reservoir of the vehicle.

COUNT THREE

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of February 6, 2013, and February 7, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez** and **Mark Nolf** unlawfully, feloniously, and knowingly conspired with each other and others to distribute methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

The offense alleged in Count Three was committed in the manner described in Predicate Acts One and Two.

COUNT FOUR

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

On or about May 6, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez**, **Jose Antonio Vargas-Gonzalez**, [REDACTED], **Joshua Cooke**, [REDACTED] and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT FIVE

Distribution of a Schedule II Controlled Substance, (F3)

On or about May 6, 2013, in the State of Colorado, **Joshua Cooke** unlawfully, feloniously, and knowingly sold or distributed methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT SIX

Possession with Intent to Distribute a Schedule II Controlled Substance, (F3)

On or about May 6, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez** and **Jose Antonio Vargas-Gonzalez** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained methamphetamine, a schedule II controlled substance, in violation of section 18-18-405(1),(2)(a)(I)(A),(3), C.R.S.

The offenses alleged in Counts Four through Six were committed in the manner described in Predicate Acts Three through Six.

COUNT SEVEN

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of May 4 through May 7, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez** and **Harland Schug** and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

The offense alleged in Count Seven was committed in the manner described in Predicate Acts Seven and Eight.

COUNT EIGHT

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of [REDACTED], in the State of Colorado, **Ana Rosa Vargas-Hernandez**, [REDACTED], and [REDACTED] and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT NINE

Possession with Intent to Distribute a Schedule II Controlled Substance – Over 1000 Grams, (F3)

On or about [REDACTED], in the State of Colorado [REDACTED] unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained methamphetamine, a schedule II controlled substance.

Further, the amount was or had been represented to be one thousand grams or one kilogram or more of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(III), C.R.S.

The offenses alleged in Counts 8-9 were committed in the manner described in Predicate Acts 9-11.

COUNT TEN

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of May 7, 2013, and May 30, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez**, [REDACTED], and **Mario Munoz** and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine and cocaine, both schedule II controlled substances; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT ELEVEN

**Possession with Intent to Distribute a Schedule II Controlled Substance –
Over 1000 Grams, (F3)**

On or about May 30, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez** and **Mario Munoz** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained methamphetamine, a schedule II controlled substance.

Further, the amount was or had been represented to be one thousand grams or one kilogram or more of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(III), C.R.S.

COUNT TWELVE

**Possession with Intent to Distribute a Schedule II Controlled Substance –
Over 1000 Grams, (F3)**

On or about May 30, 2013, in the State of Colorado, **Ana Rosa Vargas-Hernandez** and **Mario Munoz** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained cocaine, a schedule II controlled substance.

Further, the amount was or had been represented to be one thousand grams or one kilogram or more of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(III), C.R.S.

The offenses alleged in Counts 10-12 were committed in the manner described in Predicate Acts 12-15.

COUNT THIRTEEN

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of June 28, 2013, and July 2, 2013, in the State of Colorado, **Joshua Cooke** and **Josue Castenada**, [REDACTED] and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT FOURTEEN

**Possession with Intent to Distribute a Schedule II Controlled Substance –
Over 1000 Grams, (F3)**

On or about July 2, 2013, in the State of Colorado, **Joshua Cooke** and **Josue Castenada** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained methamphetamine, a schedule II controlled substance.

Further, the amount was or had been represented to be one thousand grams or one kilogram or more of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(III), C.R.S.

The offenses alleged in Counts 13-14 were committed in the manner described in Predicate Acts 16-18.

COUNT FIFTEEN

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of June 28, 2013, and July 2, 2013, in the State of Colorado, **Gustavo Ramirez** and **Jesus Patricia Salas-Lucero** and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine and cocaine, both schedule II controlled substances; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

The offense alleged in Count 15 was committed in the manner described in Predicate Acts 19-20.

COUNT SIXTEEN

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of July 15, 2013, and July 25, 2013, in the State of Colorado, **Gustavo Ramirez** and **Rodolzo Lewis** unlawfully, feloniously, and knowingly conspired with each other to distribute cocaine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

The offense alleged in Count 16 was committed in the manner described in Predicate Acts 21-22.

COUNT SEVENTEEN

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

On or about July 30, 2013, in the State of Colorado, **Gustavo Ramirez** and **Rodolzo Lewis** unlawfully, feloniously, and knowingly conspired with each other to distribute cocaine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT EIGHTEEN

**Distribution of a Schedule II Controlled Substance –
25 to 450 Grams, (F3)**

On or about July 30, 2013, in the State of Colorado, **Gustavo Ramirez** unlawfully, feloniously, and knowingly sold or distributed cocaine, a schedule II controlled substance.

Further, the amount was or had been represented to be at least 25 grams but not more than 450 grams of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(I), C.R.S.

COUNT NINETEEN

**Possession with Intent to Distribute a Schedule II Controlled Substance –
25 to 450 Grams, (F3)**

On or about July 30, 2013, in the State of Colorado, **Rodolzo Lewis** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained cocaine, a schedule II controlled substance.

Further, the amount was or had been represented to be at least 25 grams but not more than 450 grams of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(I), C.R.S.

The offenses alleged in Counts 17-19 were committed in the manner described in Predicate Acts 23-26.

COUNT TWENTY

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of July 29, 2013, and August 3, 2013, in the State of Colorado, **Gustavo Ramirez** and **Jesus Patricia Salas-Lucero** and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine and cocaine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT TWENTY-ONE

**Possession with Intent to Distribute a Schedule II Controlled Substance –
Over 1000 Grams, (F3)**

On or about August 3, 2013, in the State of Colorado, **Jesus Patricia Salas-Lucero** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained cocaine, a schedule II controlled substance.

Further, the amount was or had been represented to be one thousand grams or one kilogram or more of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(III), C.R.S.

The offenses alleged in Counts 20-21 were committed in the manner described in Predicate Acts 27-29.

COUNT TWENTY-TWO

Conspiracy to Distribute a Schedule II Controlled Substance, (F3)

Between the dates of July 29, 2013, and August 10, 2013, in the State of Colorado, [REDACTED] and **Gustavo Ramirez** and others unlawfully, feloniously, and knowingly conspired with each other to distribute methamphetamine, a schedule II controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT TWENTY-THREE

**Possession with Intent to Distribute a Schedule II Controlled Substance –
Over 1000 Grams, (F3)**

On or about August 10, 2013, in the State of Colorado, **Gustavo Ramirez** and **Jose Manuel Cantano-Acosta** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained methamphetamine, a schedule II controlled substance.

Further, the amount was or had been represented to be one thousand grams or one kilogram or more of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(III), C.R.S.

The offenses alleged in Counts 22-23 were committed in the manner described in Predicate Acts 30-32.

COUNT TWENTY-FOUR

**Possession with Intent to Distribute a Schedule II Controlled Substance –
25 to 450 Grams, (F3)**

On or about July 17, 2013, in the State of Colorado, **Harland Schug** unlawfully, feloniously, and knowingly possessed with intent to distribute a material, compound, mixture, or preparation that contained methamphetamine, a schedule II controlled substance.

Further, the amount was or had been represented to be at least 25 grams but not more than 450 grams of any material, compound, mixture, or preparation that contained the controlled substance; in violation of section 18-18-405(1),(2)(a)(I)(A),(3)(a)(I), C.R.S.

COUNT TWENTY-FIVE

**Possession of a Schedule I Controlled Substance –
Four Grams or Less, (F6)**

On or about July 17, 2013, in the State of Colorado, **Harland Schug** unlawfully, feloniously, and knowingly possessed less than four grams of a material, compound, mixture, or preparation that contained heroin, a schedule I controlled substance; in violation of section 18-18-403.5(1),(2)(a)(I), C.R.S.

The offenses alleged in Counts 24-25 were committed in the following manner:

On or about July 17, 2013, law enforcement officers conducted a search warrant at Harland Schug's residence at 1480 W. Nevada Place, Denver, CO. In Schug's bedroom, officers located 1.45 ounces (41.229 grams) total of methamphetamine and .323 grams of heroin.