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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY \_\_\_\_\_

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2016 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ESMERALDA GOMEZ,  
aka "Esmeralda Jimenez  
Miranda,"  
aka "Guera,"  
RAYMUNDO LUGO MARTINEZ,  
aka "Musico,"  
JAVIER HERNANDEZ,  
aka "Francisco Javier  
Iniguez,"  
aka "Demetrio Peralta  
Gonzalez,"  
aka "Pancho," and  
HENRY QUIJADA,

Defendants.

CR No. 17-

**CR17-0064**

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to Possess With Intent to Distribute Methamphetamine; 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii): Possession With Intent to Distribute Methamphetamine; 18 U.S.C. § 982(a)(1)(A): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 846]

A. OBJECT OF THE CONSPIRACY

Beginning on an unknown date, and continuing until on or about October 16, 2015, in Los Angeles County, within the Central District of California, and elsewhere, defendants ESMERALDA GOMEZ, also known as ("aka") "Esmeralda Jimenez Miranda," aka "Guera" ("GOMEZ"), RAYMUNDO LUGO MARTINEZ, aka "Musico" ("LUGO"), JAVIER HERNANDEZ, aka "Francisco Javier Iniguez," aka "Demetrio Peralta Gonzalez," aka "Pancho" ("HERNANDEZ"), and HENRY QUIJADA, and others known and unknown to the Grand Jury, conspired and agreed with one another to knowingly and intentionally possess with intent to distribute at least 50 grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

1. Defendant GOMEZ would recruit and hire drivers to travel to Mexico, pick up vehicles loaded with controlled substances, and drive the vehicles to the United States.

2. Defendants LUGO and HERNANDEZ would retrieve the drugs from hidden compartments in the vehicles that were brought into the United States from Mexico.

3. Defendant QUIJADA would maintain a location for the off-loading of drugs from load vehicles.

1 C. OVERT ACTS

2 In furtherance of the conspiracy and to accomplish the object  
3 thereof, defendants GOMEZ, LUGO, HERNANDEZ, and QUIJADA, and others  
4 known and unknown to the Grand Jury, committed various overt acts  
5 within the Central District of California, and elsewhere, on or about  
6 the following dates, including but not limited to the following:

7 1. On October 7, 2015, at the direction of defendant GOMEZ, an  
8 individual defendant GOMEZ believed to be a drug trafficker, but who  
9 was, in fact, a law enforcement confidential informant ("CI"),  
10 recruited an unindicted co-conspirator to drive a 2007 Audi A4  
11 outfitted with a false compartment that contained approximately six  
12 kilograms of methamphetamine from Mexico to the United States.

13 2. On October 11, 2015, defendant GOMEZ instructed the CI to  
14 take possession of the Audi A4 for delivery to defendants LUGO and  
15 HERNANDEZ.

16 3. On October 11, 2015, defendant GOMEZ instructed the CI by  
17 telephone to contact defendant LUGO for the purpose of arranging the  
18 delivery of the methamphetamine.

19 4. On October 11, 2015, defendant LUGO instructed the CI by  
20 telephone to meet him at a gas station near Citrus Avenue and  
21 Interstate 210 in Fontana, California.

22 5. On October 11, 2015, defendants LUGO and HERNANDEZ met the  
23 CI at this location and instructed the CI to follow them to 15552  
24 Elaine Drive, Fontana, California.

25 6. On October 11, 2015, defendants LUGO and HERNANDEZ  
26 instructed the CI to drive the Audi A4 into the garage of the  
27 residence at 15552 Elaine Drive, Fontana, California.

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1           7.    On October 11, 2015, defendant GOMEZ instructed the CI by  
2 telephone to give the keys to the Audi A4 to defendant LUGO.

3           8.    On October 11, 2015, defendant LUGO instructed the CI to  
4 enter the residence at 15552 Elaine Drive, Fontana, California, while  
5 defendants LUGO and HERNANDEZ worked on the inside of the Audi A4.

6           9.    On October 11, 2015, defendant QUIJADA, who was the owner  
7 of the residence at 15552 Elaine Drive, Fontana, California, met the  
8 CI inside the residence and stated that he and defendants LUGO and  
9 HERNANDEZ had been expecting the load of methamphetamine since the  
10 previous day.

11          10.   On October 11, 2015, defendants LUGO and HERNANDEZ worked  
12 on opening a compartment inside the center console of the Audi A4  
13 while QUIJADA watched from the doorway between the house and the  
14 garage.

15          11.   On October 11, 2015, defendants LUGO and HERNANDEZ left the  
16 residence at 15552 Elaine Drive, Fontana, California.

17          12.   On October 11, 2015, defendant QUIJADA waited inside the  
18 garage beside the Audi A4 for defendants LUGO and HERNANDEZ to  
19 return.

20          13.   On October 11, 2015, defendants LUGO, HERNANDEZ, and  
21 QUIJADA possessed approximately six kilograms of methamphetamine  
22 inside the garage of the residence.

23          14.   On October 16, 2015, during a recorded telephone call,  
24 defendant GOMEZ informed the CI that defendant GOMEZ was being  
25 charged \$63,000 for the loss of the six kilograms of methamphetamine.

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COUNT TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

On or about October 11, 2015, in Los Angeles County, within the Central District of California, defendants ESMERALDA GOMEZ, also known as ("aka") "Esmeralda Jimenez Miranda," aka "Guera," RAYMUNDO LUGO MARTINEZ, aka "Musico," JAVIER HERNANDEZ, aka "Francisco Javier Iniguez," aka "Demetrio Peralta Gonzalez," aka "Pancho," and HENRY QUIJADA knowingly and intentionally possessed with intent to distribute at least 50 grams, that is, approximately 6,169 grams, of methamphetamine, a Schedule II controlled substance.

FORFEITURE ALLEGATION

[18 U.S.C. § 982(a)(1)(A)]

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3 1. The allegations contained in Counts One and Two of this  
4 Indictment are hereby realleged and incorporated by reference for the  
5 purpose of alleging forfeitures pursuant to Title 18, United States  
6 Code, Section 982(a)(1)(A).

7 2. Count One of this Indictment alleges that defendants  
8 ESMERALDA GOMEZ, also known as ("aka") Esmeralda Jimenez Miranda, aka  
9 "Guera" ("GOMEZ"), RAYMUNDO LUGO MARTINEZ, aka "Musico" ("LUGO"),  
10 JAVIER HERNANDEZ, aka "Francisco Javier Iniguez," aka "Demetrio  
11 Peralta Gonzalez," aka "Pancho" ("HERNANDEZ"), and HENRY QUIJADA  
12 ("QUIJADA") engaged in a conspiracy to possess with intent to  
13 distribute controlled substances, in violation of Title 21, United  
14 States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(viii). Count  
15 Two of this Indictment alleges that defendants GOMEZ, LUGO,  
16 HERNANDEZ, and QUIJADA possessed with intent to distribute a  
17 controlled substance in violation of Title 21, United States Code,  
18 Sections 841(a)(1) and (b)(1)(A)(viii). Pursuant to Rule 32.2 of the  
19 Federal Rules of Criminal Procedure, notice is hereby given to  
20 defendants GOMEZ, LUGO, HERNANDEZ, and QUIJADA that the United States  
21 will seek forfeiture as part of any sentence in accordance with Title  
22 18, United States Code, Section 982, in the event of any such  
23 defendant's conviction under Counts One and Two of this Indictment.  
24 Upon such conviction, each defendant that is convicted of this  
25 offense shall forfeit to the United States any right, title, and  
26 interest in any property, real or personal, involved in such offense,  
27 or any property traceable to such property, including, but not  
28 limited to, following:

1 a. The sum of money equal to the total amount of property  
2 involved in, or traceable to property involved in, the charged  
3 violations; and

4 b. All assets, including, without limitation, vehicles,  
5 bank accounts, and real property of defendants GOMEZ, LUGO,  
6 HERNANDEZ, and QUIJADA involved in such violations.

7 3. If more than one defendant is convicted of an offense, the  
8 defendants so convicted are jointly and severally liable for the  
9 amount involved in such offense. By virtue of the commission of the  
10 felony offenses charged in Counts One and Two of this Indictment, any  
11 and all interest that a defendant has in the property involved in, or  
12 traceable to property involved in, the offense is vested in the  
13 United States and hereby forfeited to the United States pursuant to  
14 Title 18, United States Code, Section 982(a)(1).

15 4. If any of the property described above, as a result of any  
16 act or omission of the defendants:

- 17 a. cannot be located upon the exercise of due diligence;  
18 b. has been transferred or sold to, or deposited with, a  
19 third party;  
20 c. has been placed beyond the jurisdiction of the court;  
21 d. has been substantially diminished in value; or  
22 e. has been commingled with other property that cannot be  
23 divided without difficulty;

24 the United States of America shall be entitled to forfeiture of  
25 substitute property pursuant to Title 21, United States Code,  
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1 Section 853(p), as incorporated by Title 18, United States Code,  
2 Section 982(b)(1).

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5 A TRUE BILL

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8 Foreperson

9 EILEEN M. DECKER  
10 United States Attorney

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12 LAWRENCE S. MIDDLETON  
13 Assistant United States Attorney  
14 Chief, Criminal Division

15 KEVIN M. LALLY  
16 Assistant United States Attorney  
17 Chief, Organized Crime Drug  
18 Enforcement Task Force Section

19 JULIE J. SHEMITZ  
20 Assistant United States Attorney  
21 Organized Crime Drug Enforcement  
22 Task Force Section  
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