

<p>County Court, Adams County, Colorado Justice Center 1100 Judicial Center Drive Brighton, CO 80601</p> <p><b>THE PEOPLE OF THE STATE OF COLORADO,</b></p> <p>v. Efrain GARCIA-LOZA, Urbano MARQUEZ, Julio ALBA-GUZMAN, FNU LNU a/k/a JUANITO, Sergio CHAVEZ-FRANCO, FNU LNU a/k/a EDDIE, Cesar BARRIOS-VILLEGAS, Michelle SANDOVAL MARQUEZ, Ronnie GARCIA, Francisco SANCHEZ, Luciano RAMIREZ-GARCIA, Ismael VILLEGAS-ESPINOZA, Isidro VARGAS, FNU LNU a/k/a DEPO Juan GALLEGOS, Gustavo MENA-FLORES a/k/a UM7580, Javier VASQUEZ, Defendants.</p>	<p style="text-align: center;"><b>▲ COURT USE ONLY ▲</b></p>
<p>Brian S. Mason Seventeenth Judicial District District Attorney, # 38008 1000 Judicial Center Drive Brighton, CO 80601 Phone Number: 303-659-7720</p>	<p>GJ Case No.: 22CV100</p> <p>Ctrm: 305</p>
<p><b>SEVENTEENTH JUDICIAL DISTRICT GRAND JURY INDICTMENT</b></p>	

Of the 2022-2023 term of the Seventeenth Judicial District Grand Jury in the year 2022; 2022-2023 Seventeenth Judicial District Grand Jurors, chosen, selected, and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

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

Efrain GARCIA-LOZA,  
Urbano MARQUEZ,  
Julio ALBA-GUZMAN,

FNU LNU a/k/a JUANITO,  
Sergio CHAVEZ-FRANCO,  
FNU LNU a/k/a EDDIE,  
Cesar BARRIOS-VILLEGAS,  
Michelle SANDOVAL MARQUEZ,  
Ronnie GARCIA  
Javier VASQUEZ

COUNT 2:  
37284

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

Efrain GARCIA-LOZA,  
Urbano MARQUEZ,  
Julio ALBA-GUZMAN,  
FNU LNU a/k/a JUANITO,  
Sergio CHAVEZ-FRANCO,  
FNU LNU a/k/a EDDIE,  
Cesar BARRIOS-VILLEGAS,  
Michelle SANDOVAL MARQUEZ,  
Ronnie GARCIA  
Javier VASQUEZ

COUNT 3:  
8102C

Distribution of a Controlled Substance—Schedule II—Between 14  
and 225 Grams; § 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)

Efrain GARCIA-LOZA

COUNT 4:  
8105L

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

Urbano MARQUEZ, Efrain GARCIA-LOZA

COUNT 5:  
12213C

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

Urbano MARQUEZ, Efrain GARCIA-LOZA

COUNT 6:  
8102D

Distribution of a Controlled Substance—Schedule II—More than  
225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Urbano MARQUEZ

- COUNT 7:  
81048 Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams;  
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Efrain GARCIA-LOZA
- COUNT 8:  
12213 Money Laundering;  
§ 18-5-309(1)(b)(I),(II) C.R.S., (F3)
- Urbano MARQUEZ, Efrain GARCIA-LOZA
- COUNT 9:  
8105L Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Urbano MARQUEZ, Efrain GARCIA-LOZA
- COUNT 10:  
12213C Conspiracy to Commit Money Laundering;  
§ 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)
- Urbano MARQUEZ, Efrain GARCIA-LOZA
- COUNT 11:  
8105L Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Julio ALBA-GUZMAN, FNU LNU a/k/a JUANITO,  
Sergio CHAVEZ-FRANCO, Francisco SANCHEZ
- COUNT 12:  
12213C Conspiracy to Commit Money Laundering;  
§ 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)
- Julio ALBA-GUZMAN, FNU LNU a/k/a JUANITO,  
Sergio CHAVEZ-FRANCO, Francisco SANCHEZ
- COUNT 13:  
8102D Distribution of a Controlled Substance—Schedule II—More than  
225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Julio ALBA-GUZMAN, Francisco SANCHEZ
- COUNT 14:  
81048 Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams;  
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Sergio CHAVEZ-FRANCO

- COUNT 15: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)
- Sergio CHAVEZ-FRANCO, Francisco SANCHEZ
- COUNT 16: Possession with Intent to Distribute a Controlled Substance—  
81047 Schedule II—Between 14 and 225 Grams;  
§ 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)
- Luciano RAMIREZ-GARCIA
- COUNT 17: Conspiracy to Distribute a Controlled Substance—Schedule II—  
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Julio ALBA-GUZMAN, FNU LNU a/k/a JUANITO,  
Sergio CHAVEZ-FRANCO
- COUNT 18: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Sergio CHAVEZ-FRANCO
- COUNT 19: Conspiracy to Distribute a Controlled Substance—Schedule II—  
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Urbano MARQUEZ, FNU LNU a/k/a EDDIE,  
Ismael VILLEGAS-ESPINOZA, Cesar BARRIOS-VILLEGAS
- COUNT 20: Distribution of a Controlled Substance—Schedule II—More than  
8102D 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- FNU LNU a/k/a EDDIE, Ismael VILLEGAS-ESPINOZA
- COUNT 21: Special Offender – Controlled Substance – School/Housing  
33A49 Development; § 18-18-407(1)(g), C.R.S., (DF1)
- FNU LNU a/k/a EDDIE, Ismael VILLEGAS-ESPINOZA
- COUNT 22: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Urbano MARQUEZ

- COUNT 23: Special Offender – Controlled Substance – School/Housing  
33A49 Development; § 18-18-407(1)(g), C.R.S., (DF1)  
  
Urbano MARQUEZ
- COUNT 24: Distribution of a Controlled Substance—Schedule II—More than  
8102D 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)  
  
FNU LNU a/k/a EDDIE, Cesar BARRIOS-VILLEGAS
- COUNT 25: Special Offender – Controlled Substance – School/Housing  
33A49 Development; § 18-18-407(1)(g), C.R.S., (DF1)  
  
FNU LNU a/k/a EDDIE, Cesar BARRIOS-VILLEGAS
- COUNT 26: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)  
  
Urbano MARQUEZ; Michelle SANDOVAL MARQUEZ
- COUNT 27: Special Offender – Controlled Substance – School/Housing  
33A49 Development; § 18-18-407(1)(g), C.R.S., (DF1)  
  
Urbano MARQUEZ; Michelle SANDOVAL MARQUEZ
- COUNT 28: Conspiracy to Distribute a Controlled Substance—Schedule II—  
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)  
  
Urbano MARQUEZ, Michelle SANDOVAL MARQUEZ,  
Efrain GARCIA-LOZA
- COUNT 29: Conspiracy to Distribute a Controlled Substance—Schedule II—  
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)  
  
Urbano MARQUEZ, FNU LNU a/k/a EDDIE,  
Cesar BARRIOS-VILLEGAS
- COUNT 30: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)  
  
Urbano MARQUEZ, Cesar BARRIOS-VILLEGAS

COUNT 31: Conspiracy to Distribute a Controlled Substance—Schedule II—  
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Efrain GARCIA-LOZA, Isidro VARGAS

COUNT 32: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Isidro VARGAS

COUNT 33: Possession with Intent to Distribute a Controlled Substance—  
8104A Heroin—Between 7 and 114 Grams;  
§ 18-18-405(1),(2)(b)(I)(B), C.R.S., (DF2)

Isidro VARGAS

COUNT 34: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)

Isidro VARGAS

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

Urbano MARQUEZ, FNU LNU a/k/a EDDIE,  
Cesar BARRIOS-VILLEGAS, Michelle SANDOVAL MARQUEZ

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

Urbano MARQUEZ, Cesar BARRIOS-VILLEGAS,  
Michelle SANDOVAL MARQUEZ

COUNT 37: Conspiracy to Commit Money Laundering;  
12213C § 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)

FNU LNU a/k/a EDDIE, Cesar BARRIOS-VILLEGAS,  
Urbano MARQUEZ, Michelle SANDOVAL MARQUEZ

- COUNT 38: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)
- Cesar BARRIOS-VILLEGAS, Michelle SANDOVAL MARQUEZ
- COUNT 39: Conspiracy to Commit Money Laundering;  
12213C § 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)
- Cesar BARRIOS-VILLEGAS, FNU LNU a/k/a DEPO,  
Ronnie GARCIA
- COUNT 40: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)
- Cesar BARRIOS-VILLEGAS, Ronnie GARCIA
- COUNT 41: Conspiracy to Distribute a Controlled Substance—Schedule II—  
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Cesar BARRIOS-VILLEGAS, Ronnie GARCIA, Juan GALLEGOS,  
FNU LNU a/k/a DEPO
- COUNT 42: Distribution of a Controlled Substance—Schedule II—More than  
8102D 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Juan GALLEGOS
- COUNT 43: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Cesar BARRIOS-VILLEGAS, Ronnie GARCIA
- COUNT 44: Conspiracy to Commit Money Laundering;  
12213C § 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)
- Cesar BARRIOS-VILLEGAS, Ronnie GARCIA, Juan GALLEGOS,  
FNU LNU a/k/a DEPO
- COUNT 45: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)
- Cesar BARRIOS-VILLEGAS, Ronnie GARCIA

COUNT 46: Conspiracy to Distribute a Controlled Substance—Schedule II—  
8105L More than 225 Grams;  
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)  
Julio ALBA GUZMAN, Gustavo MENA-FLORES a/k/a UM7580,  
Javier VASQUEZ a/k/a Unidentified Male #6328

COUNT 47: Distribution of a Controlled Substance—Schedule II— More than  
8102D 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)  
  
Javier VASQUEZ a/k/a Unidentified Male #6328

COUNT 48: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Julio ALBA GUZMAN

COUNT 49: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Juan GALLEGOS

**SUPERSEDING INDICTMENT:**

COUNT 50: Distribution of a Controlled Substance—Schedule II;  
8102B § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)

Javier VASQUEZ a/k/a Unidentified Male #6328

COUNT 51: Conspiracy to Distribute a Controlled Substance—Schedule II—  
8105L More than 225 Grams;

§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Julio ALBA GUZMAN, Gustavo MENA-FLORES a/k/a UM7580,  
Javier VASQUEZ a/k/a Unidentified Male #6328

COUNT 52: Distribution of a Controlled Substance—Schedule II— More than  
8102D 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Javier VASQUEZ a/k/a Unidentified Male #6328



- COUNT 53: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Julio ALBA GUZMAN
- COUNT 54: Conspiracy to Distribute a Controlled Substance—Schedule II—  
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Julio ALBA GUZMAN, Gustavo MENA-FLORES a/k/a UM7580,  
Javier VASQUEZ a/k/a Unidentified Male #6328
- COUNT 55: Distribution of a Controlled Substance—Schedule II— More than  
8102D 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Javier VASQUEZ a/k/a Unidentified Male #6328
- COUNT 56: Possession with Intent to Distribute a Controlled Substance—  
81048 Schedule II—More than 225 Grams;  
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Julio ALBA GUZMAN
- COUNT 57: Possession with Intent to Distribute a Controlled Substance—  
81047 Schedule II—Between 14 and 225 Grams;  
§ 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)
- Efrain GARCIA-LOZA
- COUNT 58: Possession with Intent to Distribute a Controlled Substance—  
81047 Schedule II—Between 14 and 225 Grams;  
§ 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)
- Efrain GARCIA-LOZA
- COUNT 59: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)
- Efrain GARCIA-LOZA
- COUNT 60: Special Offender – Controlled Substance – Source of Income;  
33A42 § 18-18-407(1)(a), C.R.S., (DF1)
- Efrain GARCIA-LOZA

COUNT 61: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)

Julio ALBA-GUZMAN

COUNT 62: Tampering with Physical Evidence of a Felony Crime –  
26066 Destruction; § 18-8-610(1)(a),(3)(a), C.R.S., (F6)

Julio ALBA-GUZMAN

COUNT 63: Possession with Intent to Distribute a Controlled Substance—  
81047 Schedule II—Between 14 and 225 Grams;  
§ 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)

Javier VASQUEZ

COUNT 64: Money Laundering;  
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)

Javier VASQUEZ

Defendant:	Charges:
Efrain GARCIA-LOZA	1, 2, 3, 4, 5, 7, 8, 9, 10, 28, 31, 57, 58, 59, 60
Urbano MARQUEZ	1, 2, 4, 5, 6, 8, 9, 10, 19, 22, 23, 26, 27, 28, 29, 30, 35, 36, 37
Julio ALBA-GUZMAN	1, 2, 11, 12, 13, 17, 46, 48, 51, 53, 54, 56, 61, 62
FNU LNU a/k/a JUANITO	1, 2, 11, 12, 17
Sergio CHAVEZ-FRANCO	1, 2, 11, 12, 14, 15, 17, 18
FNU LNU a/k/a EDDIE	1, 2, 19, 20, 21, 24, 25, 29, 35, 37
Cesar BARRIOS-VILLEGAS	1, 2, 19, 24, 25, 29, 30, 35, 36, 37, 38, 39, 40, 41, 43, 44, 45
Michelle SANDOVAL MARQUEZ	1, 2, 26, 27, 28, 35, 36, 37, 38
Ronnie GARCIA	1, 2, 39, 40, 41, 43, 44, 45
Francisco SANCHEZ	11, 12, 13, 15
Luciano RAMIREZ-GARCIA	16
Ismael VILLEGAS-ESPINOZA	19, 20, 21
Isidro VARGAS	31, 32, 33, 34
FNU LNU a/k/a DEPO	39, 41, 44
Juan GALLEGOS	41, 42, 44, 49
Gustavo MENA-FLORES	46, 51, 54
Javier VASQUEZ	1, 2, 46, 47, 50, 51, 52, 54, 55, 63, 64

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

Between the dates of October 1, 2021, and September 20, 2022, in the state of Colorado, **Efrain GARCIA-LOZA, Urbano MARQUEZ, Julio ALBA-GUZMAN, First Name Unknown, Last Name Unknown (“FNU LNU”) a/k/a JUANITO, Sergio CHAVEZ-FRANCO, First Name Unknown, Last Name Unknown (“FNU LNU”) a/k/a EDDIE, Cesar BARRIOS-VILLEGAS, Michelle SANDOVAL MARQUEZ, Ronnie GARCIA, and Javier VASQUEZ**, and others both known and unknown to the Grand Jury, while employed by or associated with an enterprise, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity; in violation of § 18-17-104(3) and § 18-17-105, C.R.S.

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

Between the dates of October 1, 2021, and September 20, 2022, in the state of Colorado, **Efrain GARCIA-LOZA, Urbano MARQUEZ, Julio ALBA-GUZMAN, First Name Unknown, Last Name Unknown (“FNU LNU”) a/k/a JUANITO, Sergio CHAVEZ-FRANCO, First Name Unknown, Last Name Unknown (“FNU LNU”) a/k/a EDDIE, Cesar BARRIOS-VILLEGAS, Michelle SANDOVAL MARQUEZ, Ronnie GARCIA, and Javier VASQUEZ**, and others both known and unknown to the Grand Jury, unlawfully, knowingly, and feloniously conspired to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity; in violation of § 18-17-104(4) and § 18-17-105, C.R.S.

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

**The Enterprise**

The criminal enterprise alleged in Counts One and Two was primarily a group of individuals, associated in fact, although not a legal entity. The enterprise included, but was not limited to, the following associated in fact individuals and/or legal entities: **Efrain GARCIA-LOZA, Urbano MARQUEZ, Julio ALBA-GUZMAN, First Name Unknown, Last Name Unknown (“FNU LNU”) a/k/a JUANITO, Sergio CHAVEZ-FRANCO, First Name Unknown, Last Name Unknown (“FNU LNU”) a/k/a EDDIE, Cesar BARRIOS-VILLEGAS, Michelle SANDOVAL MARQUEZ, and Ronnie GARCIA**, and others both known and unknown to the Grand Jury.

The individuals associated with the enterprise had a primary objective and a common purpose to import illegal controlled substances, including cocaine, into the state of Colorado, and to further distribute these illegal controlled substances to various customers throughout the Denver Metro area. In order to support and facilitate this drug trafficking activity, members and associates of the criminal enterprise utilized motor vehicles to transport quantities of the illicit controlled substances.

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

### **Pattern of Racketeering Activity**

**Efrain GARCIA-LOZA, Urbano MARQUEZ, Julio ALBA-GUZMAN, First Name Unknown, Last Name Unknown (“FNU LNU”) a/k/a JUANITO, Sergio CHAVEZ-FRANCO, First Name Unknown, Last Name Unknown (“FNU LNU”) a/k/a EDDIE, Cesar BARRIOS-VILLEGAS, Michelle SANDOVAL MARQUEZ, Ronnie GARCIA, and Javier VASQUEZ, and others both known and unknown to the Grand Jury directly and in concert engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, including any lesser offenses, related to the conduct of the enterprise, with at least one of which took place in the state of Colorado after July 1, 1981, and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:**

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

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

## **Racketeering Activity**

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

### **Predicate Act 1** **Distribution of a Controlled Substance— Schedule II—Between 14 and 225 Grams (DF2)**

On or about November 9, 2021, in the state of Colorado, **Efrain GARCIA-LOZA** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

### **Predicate Act 2** **Unlawful Use of a Communication Facility**

On or about November 9, 2021, in the state of Colorado, **Efrain GARCIA-LOZA** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 1-2 were committed in the manner described in Count 3.*

### **Predicate Act 3** **Conspiracy to Distribute a Controlled Substance—Schedule II— More than 225 Grams, (DF1)**

Between and including the dates of February 4, 2022, and February 5, 2022, in the state of Colorado, **Urbano MARQUEZ** and **Efrain GARCIA-LOZA** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 4**  
**Conspiracy to Commit Money Laundering, (F4)**

Between and including the dates of February 4, 2022, and February 5, 2022, in the state of Colorado, **Urbano MARQUEZ** and **Efrain GARCIA-LOZA**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**Predicate Act 5**  
**Distribution of a Controlled Substance—**  
**Schedule II—More than 225 Grams (DF1)**

On or about February 5, 2022, in the state of Colorado, **Urbano MARQUEZ** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 6**  
**Possession with Intent to Distribute a Controlled Substance—**  
**Schedule II—More than 225 Grams (DF1)**

On or about February 5, 2022, in the state of Colorado, **Efrain GARCIA-LOZA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 7**  
**Money Laundering, (F3)**

On or about February 5, 2022, in the state of Colorado, **Urbano MARQUEZ** and **Efrain GARCIA-LOZA** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**Predicate Act 8**  
**Unlawful Use of a Communication Facility**

Between and including the dates of February 4, 2022, and February 5, 2022, in the state of Colorado, **Urbano MARQUEZ** and **Efrain GARCIA-LOZA** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 3-8 were committed in the manner described in Counts 4-8.*

**Predicate Act 9**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about February 8, 2022, in the state of Colorado, **Urbano MARQUEZ** and **Efrain GARCIA-LOZA** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 10**  
**Conspiracy to Commit Money Laundering, (F4)**

On or about February 8, 2022, in the state of Colorado, **Urbano MARQUEZ** and **Efrain GARCIA-LOZA**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

*Predicate Acts 9-10 were committed in the manner described in Counts 9-10.*

**Predicate Act 11**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about February 17, 2022, in the state of Colorado, **Julio ALBA-GUZMAN**, **FNU LNU a/k/a JUANITO**, **Sergio CHAVEZ-FRANCO**, and Francisco SANCHEZ unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 12**  
**Conspiracy to Commit Money Laundering, (F4)**

On or about February 17, 2022, in the state of Colorado, **Julio ALBA-GUZMAN**, **FNU LNU a/k/a JUANITO**, **Sergio CHAVEZ-FRANCO**, and Francisco SANCHEZ, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.



**Predicate Act 13**  
**Distribution of a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about February 17, 2022, in the state of Colorado, **Julio ALBA-GUZMAN** and Francisco SANCHEZ unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 14**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about February 17, 2022, in the state of Colorado, **Sergio CHAVEZ-FRANCO** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 15**  
**Money Laundering, (F3)**

On or about February 17, 2022, in the state of Colorado, **Sergio CHAVEZ-FRANCO** and Francisco SANCHEZ unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**Predicate Act 16**  
**Unlawful Use of a Communication Facility**

On or about February 17, 2022, in the state of Colorado, **Julio ALBA-GUZMAN**, **FNU LNU a/k/a JUANITO**, and **Sergio CHAVEZ-FRANCO** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 11-16 were committed in the manner described in Counts 11-15.*

**Predicate Act 17**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

Between and including the dates April 14, 2022, and April 15, 2022, in the state of Colorado, **Julio ALBA-GUZMAN, FNU LNU a/k/a JUANITO**, and **Sergio CHAVEZ-FRANCO** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 18**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

Between and including the dates April 14, 2022, and April 15, 2022, in the state of Colorado, **Sergio CHAVEZ-FRANCO** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 19**  
**Unlawful Use of a Communication Facility**

Between and including the dates April 14, 2022, and April 15, 2022, in the state of Colorado, **Julio ALBA-GUZMAN, FNU LNU a/k/a JUANITO**, and **Sergio CHAVEZ-FRANCO** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 17-19 were committed in the manner described in Counts 17-18.*

**Predicate Act 20**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about April 27, 2022, in the state of Colorado, **Urbano MARQUEZ, FNU LNU a/k/a EDDIE**, Ismael VILLEGAS-ESPINOZA, and **Cesar BARRIOS-VILLEGAS** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 21**  
**Distribution of a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about April 27, 2022, in the state of Colorado, **FNU LNU a/k/a EDDIE** and Ismael VILLEGAS-ESPINOZA unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 22**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about April 27, 2022, in the state of Colorado, **Urbano MARQUEZ** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 23**  
**Distribution of a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about April 27, 2022, in the state of Colorado, **FNU LNU a/k/a EDDIE** and **Cesar BARRIOS-VILLEGAS** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

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

On or about April 27, 2022, in the state of Colorado, **Michelle SANDOVAL MARQUEZ** and **Urbano MARQUEZ** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 25**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about April 27, 2022, in the state of Colorado, **Urbano MARQUEZ, Michelle SANDOVAL MARQUEZ, and Efrain GARCIA-LOZA** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 26**  
**Unlawful Use of a Communication Facility**

On or about April 27, 2022, in the state of Colorado, **Urbano MARQUEZ, FNU LNU a/k/a EDDIE, Cesar BARRIOS-VILLEGAS, and Efrain GARCIA-LOZA** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 20-26 were committed in the manner described in Counts 19-28.*

**Predicate Act 27**  
**Conspiracy to Commit Money Laundering, (F4)**

On or about April 28, 2022, in the state of Colorado, **Urbano MARQUEZ, FNU LNU a/k/a EDDIE**, and **Cesar BARRIOS-VILLEGAS**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**Predicate Act 28**  
**Money Laundering, (F3)**

On or about April 28, 2022, in the state of Colorado, **Urbano MARQUEZ** and **Cesar BARRIOS-VILLEGAS** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*Predicate Acts 27-28 were committed in the manner described in Counts 29-30.*

**Predicate Act 29**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about May 2, 2022, in the state of Colorado, **Efrain GARCIA-LOZA** and **Isidro VARGAS** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

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

On or about May 2, 2022, in the state of Colorado, **Efrain GARCIA-LOZA** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute

a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 29-30 were committed in the manner described in Counts 31-34.*

**Predicate Act 31**  
**Conspiracy to Commit Money Laundering, (F4)**

On or about May 19, 2022, in the state of Colorado, **Urbano MARQUEZ, FNU LNU a/k/a EDDIE, Cesar BARRIOS-VILLEGAS, and Michelle SANDOVAL MARQUEZ**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**Predicate Act 32**  
**Money Laundering, (F3)**

On or about May 19, 2022, in the state of Colorado, **Urbano MARQUEZ, Cesar BARRIOS-VILLEGAS, and Michelle SANDOVAL MARQUEZ**, unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*Predicate Acts 31-32 were committed in the manner described in Counts 35-36.*

**Predicate Act 33**  
**Conspiracy to Commit Money Laundering, (F4)**

On or about June 20, 2022, in the state of Colorado, **FNU LNU a/k/a EDDIE, Cesar BARRIOS-VILLEGAS, Urbano MARQUEZ, and Michelle SANDOVAL MARQUEZ**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**Predicate Act 34**  
**Money Laundering, (F3)**

On or about June 20, 2022, in the state of Colorado, **Cesar BARRIOS-VILLEGAS and Michelle SANDOVAL MARQUEZ** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*Predicate Acts 33-34 were committed in the manner described in Counts 37-38.*

**Predicate Act 35**  
**Conspiracy to Commit Money Laundering, (F4)**

On or about June 20, 2022, in the state of Colorado, **Cesar BARRIOS-VILLEGAS, FNU LNU a/k/a DEPO, and Ronnie GARCIA**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**Predicate Act 36**  
**Money Laundering, (F3)**

On or about June 20, 2022, in the state of Colorado, **Cesar BARRIOS-VILLEGAS**, and **Ronnie GARCIA** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*Predicate Acts 35-36 were committed in the manner described in Counts 39-40.*

**Predicate Act 37**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about July 20, 2022, in the state of Colorado, **Cesar BARRIOS-VILLEGAS**, **Ronnie GARCIA**, Juan GALLEGOS, and FNU LNU a/k/a DEPO unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 38**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about July 20, 2022, in the state of Colorado, **Cesar BARRIOS-VILLEGAS** and **Ronnie GARCIA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.



**Predicate Act 39**  
**Conspiracy to Commit Money Laundering, (F4)**

On or about July 20, 2022, in the state of Colorado, **Cesar BARRIOS-VILLEGAS, Ronnie GARCIA**, Juan GALLEGOS, and FNU LNU a/k/a DEPO with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**Predicate Act 40**  
**Money Laundering, (F3)**

On or about July 20, 2022, in the state of Colorado, **Cesar BARRIOS-VILLEGAS and Ronnie GARCIA** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**Predicate Act 41**  
**Unlawful Use of a Communication Facility**

On or about July 20, 2022, in the state of Colorado, **Cesar BARRIOS-VILLEGAS and Ronnie GARCIA** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 37-41 were committed in the manner described in Counts 41-45.*

**Predicate Act 42**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
Between 14 and 225 Grams, (DF2)**

Between and including the dates of July 27, 2022, and August 1, 2022, in the state of Colorado, **Julio ALBA GUZMAN, Javier VASQUEZ a/k/a UM6328**, and Gustavo MENA-FLORES a/k/a UM7580 unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

**Predicate Act 43**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about August 1, 2022, in the state of Colorado, **Julio ALBA-GUZMAN** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 44**  
**Unlawful Use of a Communication Facility**

On or about August 1, 2022, in the state of Colorado, **Julio ALBA-GUZMAN** and **Javier VASQUEZ a/k/a UM6328** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

**Predicate Act 45**  
**Distribution of a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about August 1, 2022, in the state of Colorado, **Javier VASQUEZ a/k/a UM6328** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

*Predicate Acts 42-45 were committed in the manner described in Counts 46-48.*

**SUPERSEDING PREDICATE ACTS:**

**Predicate Act 46  
Distribution of a Controlled Substance—  
Schedule II (DF3)**

On or about August 29, 2022, in the state of Colorado, **Javier VASQUEZ a/k/a UM6328** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

*Predicate Act 46 was committed in the manner described in Count 50.*

**Predicate Act 47  
Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about September 8, 2022, in the state of Colorado, **Julio ALBA-GUZMAN**, Gustavo MENA-FLORES a/k/a UM7580, and **Javier VASQUEZ a/k/a UM6328** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 48  
Distribution of a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about September 8, 2022, in the state of Colorado, **Javier VASQUEZ a/k/a UM6328** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 49  
Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about September 8, 2022, **Julio ALBA-GUZMAN** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 50**  
**Unlawful Use of a Communication Facility**

On or about September 8, 2022, in the state of Colorado, **Julio ALBA-GUZMAN** and **Javier VASQUEZ a/k/a UM6328** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 47-50 were committed in the manner described in Counts 51-53.*

**Predicate Act 51**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about September 19, 2022, in the state of Colorado, **Julio ALBA-GUZMAN**, **Gustavo MENA-FLORES a/k/a UM7580**, and **Javier VASQUEZ a/k/a UM6328** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 52**  
**Distribution of a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about September 19, 2022, in the state of Colorado, **Javier VASQUEZ a/k/a UM6328** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 53**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about September 19, 2022, **Julio ALBA-GUZMAN** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**Predicate Act 54**  
**Unlawful Use of a Communication Facility**

On or about September 19, 2022, in the state of Colorado, **Julio ALBA-GUZMAN** and **Javier VASQUEZ a/k/a UM6328** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

*Predicate Acts 51-54 were committed in the manner described in Counts 54-56.*

**Predicate Act 55**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—Between 14 Grams and 225 Grams (DF2)**

On or about September 20, 2022, **Efrain GARCIA-LOZA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

**Predicate Act 56**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—Between 14 Grams and 225 Grams (DF2)**

On or about September 20, 2022, **Efrain GARCIA-LOZA** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

**Predicate Act 57**  
**Money Laundering, (F3)**

On or about September 20, 2022, in the state of Colorado, **Efrain GARCIA-LOZA** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*Predicate Acts 55-57 were committed in the manner described in Counts 57-60.*

**Predicate Act 58**  
**Money Laundering, (F3)**

On or about September 20, 2022, in the state of Colorado, **Julio ALBA-GUZMAN** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*Predicate Act 58 was committed in the manner described in Counts 61-62.*

**Predicate Act 59**  
**Possession with Intent to Distribute a Controlled Substance—**  
**Schedule II—Between 14 Grams and 225 Grams (DF2)**

On or about September 20, 2022, **Javier VASQUEZ** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

**Predicate Act 60**  
**Money Laundering, (F3)**

On or about September 20, 2022, in the state of Colorado, **Javier VASQUEZ** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*Predicate Acts 59-60 were committed in the manner described in Counts 63-64.*

**COUNT 3**  
**Distribution of a Controlled Substance—  
Schedule II—Between 14 and 225 Grams (DF2)**

On or about November 9, 2021, in the state of Colorado, Efrain GARCIA-LOZA unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

*The offense alleged in Count 3 was committed in the following manner:*

On November 9, 2021, Efrain GARCIA-LOZA sold one ounce (28 grams) of cocaine to a third party for the price of \$1,000 in 3052 Vaughn Street, Adams County, CO.

**COUNT 4**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

Between and including the dates of February 4, 2022, and February 5, 2022, in the state of Colorado, Urbano MARQUEZ and Efrain GARCIA-LOZA unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

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

Between and including the dates of February 4, 2022, and February 5, 2022, in the state of Colorado, Urbano MARQUEZ and Efrain GARCIA-LOZA, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**COUNT 6**  
**Distribution of a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about February 5, 2022, in the state of Colorado, Urbano MARQUEZ unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 7**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about February 5, 2022, in the state of Colorado, Efrain GARCIA-LOZA unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 8**  
**Money Laundering, (F3)**

On or about February 5, 2022, in the state of Colorado, Urbano MARQUEZ and Efrain GARCIA-LOZA unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*The offenses alleged in Counts 4-8 were committed in the following manner:*

Between and including the dates of February 4, 2022, and February 5, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Urbano MARQUEZ and Efrain GARCIA-LOZA made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that MARQUEZ would deliver a kilogram of cocaine to GARCIA-LOZA and GARCIA-LOZA would pay MARQUEZ approximately \$23,400. In furtherance of this agreement, on February 5, 2022, MARQUEZ transported a kilogram of cocaine from his residence to GARCIA-LOZA at 14032 E. Iowa Drive, Aurora, CO. In exchange, GARCIA-LOZA paid MARQUEZ approximately \$22,400 in US currency.



**COUNT 9**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about February 8, 2022, in the state of Colorado, Urbano MARQUEZ and Efrain GARCIA-LOZA unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 10**  
**Conspiracy to Commit Money Laundering, (F4)**

On or about February 8, 2022, in the state of Colorado, Urbano MARQUEZ and Efrain GARCIA-LOZA, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

*The offenses alleged in Counts 9-10 were committed in the following manner:*

On or about February 8, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Urbano MARQUEZ and Efrain GARCIA-LOZA made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that MARQUEZ would deliver a kilogram of cocaine to GARCIA-LOZA and GARCIA-LOZA would pay MARQUEZ a quantity of bulk US currency generated from the sale of illegal controlled substances. In furtherance of this agreement, on February 8, 2022, GARCIA-LOZA traveled to MARQUEZ's residence at 1058 Dearborn Street, Aurora, CO, in order to deliver the bulk US currency to MARQUEZ.

**COUNT 11**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about February 17, 2022, in the state of Colorado, Julio ALBA-GUZMAN, FNU LNU a/k/a JUANITO, Sergio CHAVEZ-FRANCO, and Francisco SANCHEZ unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 12**  
**Conspiracy to Commit Money Laundering, (F4)**

On or about February 17, 2022, in the state of Colorado, Julio ALBA-GUZMAN, FNU LNU a/k/a JUANITO, Sergio CHAVEZ-FRANCO, and Francisco SANCHEZ, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**COUNT 13**  
**Distribution of a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about February 17, 2022, in the state of Colorado, Julio ALBA-GUZMAN and Francisco SANCHEZ unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 14**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about February 17, 2022, in the state of Colorado, Sergio CHAVEZ-FRANCO, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 15**  
**Money Laundering, (F3)**

On or about February 17, 2022, in the state of Colorado, Sergio CHAVEZ-FRANCO and Francisco SANCHEZ unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*The offenses alleged in Counts 11-15 were committed in the following manner:*

On or about February 17, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Julio ALBA-GUZMAN, FNU LNU a/k/a JUANITO, and Sergio CHAVEZ-FRANCO, made a series of agreements with each other and others to sell and distribute cocaine and to collect the proceeds from the sale of this cocaine. The first part of these agreements arranged for ALBA-GUZMAN to purchase a large quantity of cocaine and to distribute some of that cocaine to CHAVEZ-FRANCO, for JUANITO. The second part of these agreements arranged for JUANITO, through his assistant, CHAVEZ-FRANCO, to pay US currency for the purchase of a quantity of cocaine to ALBA-GUZMAN. The final part of these agreements established that SANCHEZ would transport the bulk quantity of cocaine to ALBA-GUZMAN in the Denver metro area and then SANCHEZ would receive the bulk US currency from ALBA-GUZMAN and ultimately transport the currency back to the original source of supply of the cocaine.

On February 17, 2022, in furtherance of these agreements and at the express direction of JUANITO, CHAVEZ-FRANCO collected and transported approximately \$8,000 in bulk US currency to the meeting location at 4099 Upham Street, Wheat Ridge, Colorado. At that location, CHAVEZ-FRANCO transferred the bulk US currency to ALBA-GUZMAN. Later, at that same location, ALBA-GUZMAN met with SANCHEZ. During this meeting, ALBA-GUZMAN received from SANCHEZ approximately five (5) kilograms of cocaine and transferred bulk US currency to

SANCHEZ as payment for the purchased cocaine. SANCHEZ then left the area, transporting the bulk US currency. Later that afternoon, Castle Rock Police officers contacted SANCHEZ in Castle Rock, CO and secured and seized the vehicle that SANCHEZ was operating. After obtaining a search warrant, officers ultimately recovered approximately \$48,000 in bulk US currency from the vehicle.

**COUNT 16**

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

On or about April 14, 2022, in the state of Colorado, Luciano RAMIREZ-GARCIA unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

*The offense alleged in Count 16 was committed in the following manner:*

On April 14, 2022, Adams County Sheriff's deputies conducted a traffic stop of Luciano RAMIREZ-GARCIA who was driving a black Toyota Scion (CO #ARQM90), in the vicinity of I-25 northbound at Santa Fe Drive, Denver, CO. The deputies subsequently searched the vehicle and recovered from RAMIREZ-GARCIA's backpack 20 individual bundles of cocaine, with a total net weight of 29.9 grams.

**COUNT 17**

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

Between and including the dates April 14, 2022, and April 15, 2022, in the state of Colorado, Julio ALBA-GUZMAN, FNU LNU a/k/a JUANITO, and Sergio CHAVEZ-FRANCO unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 18**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

Between and including the dates April 14, 2022, and April 15, 2022, in the state of Colorado, Sergio CHAVEZ-FRANCO unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

*The offenses alleged in Counts 17-18 were committed in the following manner:*

Beginning on April 14, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Julio ALBA-GUZMAN and FNU LNU a/k/a JUANITO made an agreement with each other for JUANITO to distribute a half-kilogram quantity of cocaine to ALBA-GUZMAN. As part of this agreement, and in furtherance of this agreement, ALBA-GUZMAN directed JUANITO to have their associate, CHAVEZ-FRANCO remove the illegal controlled substances and related paraphernalia from their current storage location at 9999 Yale Ave, Denver, CO. Also in furtherance of this agreement, CHAVEZ-FRANCO removed a large quantity of illegal controlled substances from that location and placed the items in his vehicle, a black Honda Civic (CO # ARM H11), transporting those items to a nearby apartment complex.

Later that afternoon, law enforcement investigators seized the Honda Civic that CHAVEZ-FRANCO had parked in the apartment complex parking lot. Investigators ultimately recovered approximately 1,422.90 grams of cocaine and bulk US currency from the vehicle.

**COUNT 19**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about April 27, 2022, in the state of Colorado, Urbano MARQUEZ, FNU LNU a/k/a EDDIE, Ismael VILLEGAS-ESPINOZA, and Cesar BARRIOS-VILLEGAS unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 20**  
**Distribution of a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about April 27, 2022, in the state of Colorado, FNU LNU a/k/a EDDIE and Ismael VILLEGAS-ESPINOZA unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 21**  
**Special Offender – Controlled Substance – School/Housing Development  
(DF1)**

On or about April 27, 2022, in the state of Colorado, FNU LNU a/k/a EDDIE and Ismael VILLEGAS-ESPINOZA committed the felony offense[s] charged in **COUNT 13** within or upon the grounds of a public or private elementary school, middle school, junior high school, high school, vocational school or public housing development, or within one thousand feet of the perimeter of the school or public housing development grounds on a street, alley, parkway, sidewalk, public park, playground or other area or premises which was accessible to the public, or within a private dwelling which was accessible to the public for the purpose of the sale, distribution, use, exchange, manufacture, or attempted manufacture of controlled substance in violation of section 18-18-407(1)(g), C.R.S.

**COUNT 22**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about April 27, 2022, in the state of Colorado, Urbano MARQUEZ unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 23**

**Special Offender – Controlled Substance – School/Housing Development  
(DF1)**

On or about April 27, 2022, in the state of Colorado, Urbano MARQUEZ committed the felony offense[s] charged in **COUNT 15** within or upon the grounds of a public or private elementary school, middle school, junior high school, high school, vocational school or public housing development, or within one thousand feet of the perimeter of the school or public housing development grounds on a street, alley, parkway, sidewalk, public park, playground or other area or premises which was accessible to the public, or within a private dwelling which was accessible to the public for the purpose of the sale, distribution, use, exchange, manufacture, or attempted manufacture of controlled substance in violation of section 18-18-407(1)(g), C.R.S.

**COUNT 24**

**Distribution of a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about April 27, 2022, in the state of Colorado, FNU LNU a/k/a EDDIE and Cesar BARRIOS-VILLEGAS unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 25**

**Special Offender – Controlled Substance – School/Housing Development  
(DF1)**

On or about April 27, 2022, in the state of Colorado, FNU LNU a/k/a EDDIE and Cesar BARRIOS-VILLEGAS committed the felony offense[s] charged in **COUNT 17** within or upon the grounds of a public or private elementary school, middle school, junior high school, high school, vocational school or public housing development, or within one thousand feet of the perimeter of the school or public housing development grounds on a street, alley, parkway, sidewalk, public park, playground or other area or premises which was accessible to the public, or within a private dwelling which was accessible to the public for the purpose of the sale, distribution, use, exchange, manufacture, or attempted manufacture of controlled substance in violation of section 18-18-407(1)(g), C.R.S.

**COUNT 26**

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

On or about April 27, 2022, in the state of Colorado, Michelle SANDOVAL MARQUEZ and Urbano MARQUEZ unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 27**

**Special Offender – Controlled Substance – School/Housing Development  
(DF1)**

On or about April 27, 2022, in the state of Colorado, Michelle SANDOVAL MARQUEZ and Urbano MARQUEZ committed the felony offense[s] charged in **COUNT 26** within or upon the grounds of a public or private elementary school, middle school, junior high school, high school, vocational school or public housing development, or within one thousand feet of the perimeter of the school or public housing development grounds on a street, alley, parkway, sidewalk, public park, playground or other area or premises which was accessible to the public, or within a private dwelling which was accessible to the public for the purpose of the sale, distribution, use, exchange, manufacture, or attempted manufacture of controlled substance in violation of section 18-18-407(1)(g), C.R.S.

**COUNT 28**

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

On or about April 27, 2022, in the state of Colorado, Urbano MARQUEZ, Michelle SANDOVAL MARQUEZ, and Efrain GARCIA-LOZA unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

*The offenses alleged in Counts 19-28 were committed in the following manner:*

On or about April 27, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Urbano MARQUEZ, FNU LNU a/k/a EDDIE, Cesar BARRIOS-VILLEGAS, Ismael VILLEGAS-ESPINOZA, Efrain GARCIA-LOZA, and Michelle SANDOVAL MARQUEZ made a series of agreements with each other and others to sell and distribute cocaine.



The first part of these agreements established that MARQUEZ would purchase two kilograms of cocaine from EDDIE. As part of this first series of agreements, EDDIE arranged for his associate, VILLEGAS-ESPINOZA to deliver a kilogram of cocaine to MARQUEZ. Later that day, in furtherance of this first series of agreements, VILLEGAS-ESPINOZA transported a kilogram of cocaine to MARQUEZ's residence at 1058 Dearborn Street, Aurora, CO, and while there, VILLEGAS-ESPINOZA delivered to MARQUEZ the kilogram of cocaine. MARQUEZ's residence at 1058 Dearborn Street, Aurora, CO is located approximately 244 feet from Elkhart Elementary School, 1020 Eagle Street, Aurora, CO.

The second part of these agreements established that EDDIE would coordinate the delivery of a second kilogram of cocaine to MARQUEZ. As part of this second series of agreements, EDDIE arranged for his associate, BARRIOS VILLEGAS to deliver the second kilogram of cocaine to MARQUEZ. In furtherance of this second series of the agreements, BARRIOS VILLEGAS transported a second kilogram of cocaine to MARQUEZ's residence at 1058 Dearborn Street. At that location, SANDOVAL MARQUEZ, at the expression direction of MARQUEZ, took custody of the kilogram of cocaine from BARRIOS VILLEGAS and transported it into the residence.

The third part of these agreements established that MARQUEZ, along with SANDOVAL MARQUEZ, would deliver a kilogram of cocaine to GARCIA-LOZA. As part of this third series of agreements, MARQUEZ and GARCIA-LOZA agreed that MARQUEZ would deliver the kilogram to GARCIA-LOZA at GARCIA-LOZA's stash location at 1376 S. Galena Street, #A101, Aurora, Arapahoe County, CO. In furtherance of this third series of agreements, MARQUEZ and SANDOVAL MARQUEZ, in a black Volkswagen Jetta (CO #OBL579) transported a kilogram of cocaine from their residence, towards the meeting location with GARCIA-LOZA. Aurora Police officers conducted a traffic stop of the Volkswagen Jetta and ultimately recovered one kilogram of cocaine from SANDOVAL MARQUEZ's purse. MARQUEZ later admitted to law enforcement investigators that the kilogram of cocaine belonged to him.

**COUNT 29**  
**Conspiracy to Commit Money Laundering, (F4)**

On or about April 28, 2022, in the state of Colorado, Urbano MARQUEZ, FNU LNU a/k/a EDDIE, and Cesar BARRIOS-VILLEGAS, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**COUNT 30**  
**Money Laundering, (F3)**

On or about April 28, 2022, in the state of Colorado, Urbano MARQUEZ and Cesar BARRIOS-VILLEGAS unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

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

On or about April 28, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Urbano MARQUEZ, FNU LNU a/k/a EDDIE, and Cesar BARRIOS-VILLEGAS made a series of agreements with each other and others to collect criminal proceeds in the form of bulk US currency generated from the sale and distribution of illegal controlled substances. As part of this agreement, EDDIE directed MARQUEZ to deliver the drug proceeds to EDDIE's associate, BARRIOS-VILLEGAS.

In furtherance of this agreement, on April 28, 2022, MARQUEZ, at the expression direction of EDDIE, transported drug proceeds in the form of bulk US currency from 1058 Dearborn Street, Aurora, CO, to 4806 Chambers Street, Aurora, CO, and placed the drug proceeds in a blue Toyota truck associated with BARRIOS-VILLEGAS.

**COUNT 31**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—  
More than 225 Grams, (DF1)**

On or about May 2, 2022, in the state of Colorado, Efrain GARCIA-LOZA and Isidro VARGAS unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 32**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about May 2, 2022, in the state of Colorado, Isidro VARGAS unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 33**  
**Possession with Intent to Distribute a Controlled Substance—  
Heroin—Between 7 and 114 Grams (DF2)**

On or about May 2, 2022, in the state of Colorado, Isidro VARGAS unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a heroin, Schedule II controlled substance. Further, the violation involved a material compound, mixture, or preparation that weighed more than seven grams but not more than one hundred fourteen grams; in violation of § 18-18-405(1),(2)(b)(I)(B), C.R.S.

**COUNT 34**  
**Money Laundering, (F3)**

On or about May 2, 2022, in the state of Colorado, Isidro VARGAS unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*The offenses alleged in Counts 31-34 were committed in the following manner:*

On or about May 2, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Efrain GARCIA-LOZA and Isidro VARGAS made an agreement with each other and others to sell and distribute cocaine and to collect the proceeds from the sale of this cocaine. As part of this agreement, VARGAS agreed to meet with GARCIA-LOZA on that date. In furtherance of this agreement, GARCIA-LOZA directed VARGAS to bring the cocaine to GARCIA-LOZA's stash location at 1376 Galena Street, #A101, Aurora, CO. On that same date, as part of the conspiracy, VARGAS left his residence at 4706 E. 168<sup>th</sup> Avenue, Thornton, CO, transporting the cocaine intended for GARCIA-LOZA. Shortly thereafter, Westminster Police officers conducted a traffic stop of VARGAS in the green Chevrolet Cruz (CO # APW H48). The officers subsequently conducted a search of the vehicle and recovered 552 grams of cocaine, 33 grams of heroin, and \$4,000 bulk US currency.

### **COUNT 35**

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

On or about May 19, 2022, in the state of Colorado, Urbano MARQUEZ, FNU LNU a/k/a EDDIE, Cesar BARRIOS-VILLEGAS, and Michelle SANDOVAL MARQUEZ, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

### **COUNT 36**

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

On or about May 19, 2022, in the state of Colorado, Urbano MARQUEZ, Cesar BARRIOS-VILLEGAS, and Michelle SANDOVAL MARQUEZ, unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

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

On or about May 19, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Urbano MARQUEZ, FNU LNU a/k/a EDDIE, Cesar BARRIOS-VILLEGAS, and Michelle

SANDOVAL MARQUEZ made a series of agreements with each other and others to collect criminal proceeds in the form of bulk US currency generated from the sale and distribution of illegal controlled substances. As part of this agreement, EDDIE directed MARQUEZ to deliver the drug proceeds to EDDIE's associate, BARRIOS-VILLEGAS.

In furtherance of this agreement, on that date, MARQUEZ, at the expression direction of EDDIE, transported drug proceeds in the form of bulk US currency from 1058 Dearborn Street, Aurora, CO, to 4500 Washington Street, Denver, CO, and handed the proceeds to BARRIOS-VILLEGAS.

**COUNT 37**  
**Conspiracy to Commit Money Laundering, (F4)**

On or about June 20, 2022, in the state of Colorado, FNU LNU a/k/a EDDIE, Cesar BARRIOS-VILLEGAS, Urbano MARQUEZ, and Michelle SANDOVAL MARQUEZ, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**COUNT 38**  
**Money Laundering, (F3)**

On or about June 20, 2022, in the state of Colorado, Cesar BARRIOS-VILLEGAS and Michelle SANDOVAL MARQUEZ unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

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

On or about June 20, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, FNU LNU a/k/a EDDIE, Cesar BARRIOS-VILLEGAS, Urbano MARQUEZ, and Michelle SANDOVAL MARQUEZ made a series of agreements with each other and others to collect criminal proceeds in the form of bulk US currency generated from the sale and distribution of illegal controlled substances. As part of this agreement, EDDIE directed MARQUEZ to deliver the drug proceeds to EDDIE's associate, BARRIOS-

VILLEGAS. Also as part of this series of agreements, MARQUEZ directed SANDOVAL MARQUEZ to deliver bulk US currency to BARRIOS-VILLEGAS.

In furtherance of this agreement, on that date, BARRIOS-VILLEGAS, at the expression direction of EDDIE, traveled to the residence of MARQUEZ and SANDOVAL MARQUEZ at 1058 Dearborn Street, Aurora, CO. At that location, SANDOVAL MARQUEZ exited the residence and handed BARRIOS-VILLEGAS a package of bulk US crurrency that had been generated from the sale of illegal controlled substances. BARRIOS-VILLEGAS then transported the currency away from the location.

**COUNT 39**

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

On or about June 20, 2022, in the state of Colorado, Cesar BARRIOS-VILLEGAS, FNU LNU a/k/a DEPO, and Ronnie GARCIA, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**COUNT 40**

**Money Laundering, (F3)**

On or about June 20, 2022, in the state of Colorado, Cesar BARRIOS-VILLEGAS, and Ronnie GARCIA unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*The offenses alleged in Counts 39-40 were committed in the following manner:*

On or about June 20, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, FNU LNU a/k/a DEPO, Cesar BARRIOS-VILLEGAS, and Ronnie GARCIA made a series of agreements with each other and others to collect criminal proceeds in the form of bulk US currency generated from the sale and distribution of illegal controlled substances. As part of this agreement, DEPO directed his associate, BARRIOS-VILLEGAS, to collect drug proceeds in the form of bulk US currency from GARCIA.

In furtherance of this agreement, on that date, BARRIOS-VILLEGAS, at the expression direction of DEPO, traveled to the residence of GARCIA at 4419 Grant Street, Denver, CO. At that location, GARCIA met with BARRIOS-VILLEGAS and handed BARRIOS-VILLEGAS a package of bulk US currency that had been generated from the sale of illegal controlled substances. BARRIOS-VILLEGAS then transported the currency away from the location.

**COUNT 41**

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

On or about July 20, 2022, in the state of Colorado, Cesar BARRIOS-VILLEGAS, Ronnie GARCIA, Juan GALLEGOS, and FNU LNU a/k/a DEPO unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 42**

**Distribution of a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about July 20, 2022, in the state of Colorado, Juan GALLEGOS unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 43**

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

On or about July 20, 2022, in the state of Colorado, Cesar BARRIOS-VILLEGAS and Ronnie GARCIA unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 44**  
**Conspiracy to Commit Money Laundering, (F4)**

On or about July 20, 2022, in the state of Colorado, Cesar BARRIOS-VILLEGAS, Ronnie GARCIA, Juan GALLEGOS, and FNU LNU a/k/a DEPO with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

**COUNT 45**  
**Money Laundering, (F3)**

On or about July 20, 2022, in the state of Colorado, Cesar BARRIOS-VILLEGAS and Ronnie GARCIA unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*The offenses alleged in Counts 41-45 were committed in the following manner:*

On or about July 20, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Cesar BARRIOS-VILLEGAS, Ronnie GARCIA, Juan GALLEGOS, and FNU LNU a/k/a DEPO made a series of agreements with each other and others to sell and distribute cocaine and to collect the proceeds from the sale of this cocaine. As part of this series of agreements, FNU LNU a/k/a PARREL facilitated the delivery of cocaine that was being transported by GALLEGOS to BARRIOS-VILLEGAS and GARCIA. Also as part of this series of agreements, FNU LNU a/k/a DEPO facilitated the communication between BARRIOS-VILLEGAS and GARCIA. In anticipation of the pending load of cocaine, GARCIA collected drug proceeds in the form of bulk US currency.

Also on July 20, 2022, in furtherance of these agreements, BARRIOS-VILLEGAS met with GARCIA in preparation for receiving the impending load of cocaine. Then, BARRIOS-VILLEGAS met with GALLEGOS who was transporting the load of cocaine and directed GALLEGOS to GARCIA's location (1410 W. 41<sup>st</sup> Avenue, Denver, CO) where GARCIA was preparing to assist in receiving the load of cocaine. Shortly thereafter, BARRIOS-VILLEGAS and GARCIA received the load of cocaine



from GALLEGOS at 1410 W. 41<sup>st</sup> Avenue, Denver, CO, Later that evening, officers executed a search warrant at 1410 W. 41<sup>st</sup> Avenue, Denver, CO, and recovered 1,109 grams of cocaine and approximately \$44, 200 in US currency.

**COUNT 46**

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

Between and including the dates of July 27, 2022, and August 1, 2022, in the state of Colorado, Julio ALBA-GUZMAN, Gustavo MENA-FLORES a/k/a UM7580 and Javier VASQUEZ a/k/a UM6328 unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 47**

**Distribution of a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about August 1, 2022, in the state of Colorado, Javier VASQUEZ a/k/a UM6328 unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 48**

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

On or about August 1, 2022, in the state of Colorado, Julio ALBA-GUZMAN unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

*The offenses alleged in Counts 46-48 were committed in the following manner:*

Between and including the dates of July 27, 2022, and August 1, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Julio ALBA GUZMAN, Gustavo MENA-FLORES a/k/a UM7580 and Javier VASQUEZ a/k/a UM6328 made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that ALBA-GUZMAN would pay VASQUEZ approximately \$6,500 for a quarter-kilogram quantity of cocaine. In furtherance of this agreement, on August 1, 2022,

VASQUEZ transported a quarter-kilogram of cocaine and delivered the cocaine to ALBA-GUZMAN in the vicinity of 130<sup>th</sup> Avenue and Fox Street, Thornton, CO.

**COUNT 49**

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

On or about August 18, 2022, in the state of Colorado, Juan GALLEGOS, unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

*The offense alleged in Count 49 was committed in the following manner:*

On or about August 18, 2022, Colorado State Patrol Officers initiated a traffic stop in the vicinity of Walsenburg, CO of a silver Ford F-150 (TX # NGX7699) in which Juan GALLEGOS was the operator and sole occupant. The troopers ultimately recovered approximately five kilograms of packaged cocaine concealed within a tool box attached to the bed of the truck.

**SUPERSEDING INDICTMENT – 12-1-2022**

**COUNT 50**  
**Distribution of a Controlled Substance—**  
**Schedule II (DF3)**

On or about August 29, 2022, in the state of Colorado, Javier VASQUEZ a/k/a UM6328 unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

*The offense alleged in Count 50 was committed in the following manner:*

On or about August 29, 2022, Javier VASQUEZ met with a third party and distributed an amount of cocaine to this third party in the vicinity of the H Mart on 92nd and Sheridan, Westminster, CO.

**COUNT 51**  
**Conspiracy to Distribute a Controlled Substance—Schedule II—**  
**More than 225 Grams, (DF1)**

On or about September 8, 2022, in the state of Colorado, Julio ALBA-GUZMAN, Gustavo MENA-FLORES a/k/a UM7580, and Javier VASQUEZ a/k/a UM6328 unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 52**  
**Distribution of a Controlled Substance—**  
**Schedule II—More than 225 Grams (DF1)**

On or about September 8, 2022, in the state of Colorado, Javier VASQUEZ a/k/a UM6328 unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 53**

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

On or about September 8, 2022, Julio ALBA-GUZMAN unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

*The offenses alleged in Counts 51-53 were committed in the following manner:*

On or about September 8, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Julio ALBA GUZMAN, Gustavo MENA-FLORES a/k/a UM7580 and Javier VASQUEZ a/k/a UM6328 made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that ALBA-GUZMAN would purchase a quarter-kilogram quantity of cocaine. In furtherance of this agreement, on September 8, 2022, VASQUEZ transferred a quarter-kilogram of cocaine to ALBA-GUZMAN in the vicinity of 12841 Galapago Street, Westminster, CO.

**COUNT 54**

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

On or about September 19, 2022, in the state of Colorado, Julio ALBA-GUZMAN, Gustavo MENA-FLORES a/k/a UM7580, and Javier VASQUEZ a/k/a UM6328 unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 55**

**Distribution of a Controlled Substance—  
Schedule II—More than 225 Grams (DF1)**

On or about September 19, 2022, in the state of Colorado, Javier VASQUEZ a/k/a UM6328 unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

**COUNT 56**

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

On or about September 19, 2022, Julio ALBA-GUZMAN unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

*The offenses alleged in Counts 54-56 were committed in the following manner:*

On or about September 19, 2022, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Julio ALBA GUZMAN, Gustavo MENA-FLORES a/k/a UM7580 and Javier VASQUEZ a/k/a UM6328 made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that ALBA-GUZMAN would purchase at least a quarter-kilogram quantity of cocaine. In furtherance of this agreement, on September 19, 2022, VASQUEZ transferred a quarter-kilogram of cocaine to ALBA-GUZMAN in the vicinity of 12841 Galapago Street, Westminster, CO.

**COUNT 57**

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

On or about September 20, 2022, Efrain GARCIA-LOZA unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

**COUNT 58**

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

On or about September 20, 2022, Efrain GARCIA-LOZA unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

**COUNT 59**  
**Money Laundering, (F3)**

On or about September 20, 2022, in the state of Colorado, Efrain GARCIA-LOZA unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**COUNT 60**  
**Special Offender – Source of Income**

Between the dates of October 1, 2021, and September 20, 2022, in the state of Colorado, Efrain GARCIA-LOZA committed the felony offense[s] charged in **COUNTS 3, 4, 7, 9, 28, 31, 57, and 58** as part of a pattern of manufacturing, sale, or distributing controlled substances, which constituted a substantial source of the defendant's income and in which the defendant manifested special skill or expertise; in violation of section 18-18-407(1)(a), C.R.S.

*The offenses alleged in Counts 57-60 were committed in the following manner:*

On or about September 20, 2022, law enforcement investigators executed search warrants at two locations associated with Efrain GARCIA-LOZA. At the residence of GARCIA-LOZA, 17575 E. 16<sup>th</sup> Place, Aurora, Colorado, where he was present at the time of the execution of the search warrant, investigators located 22 grams of cocaine from within GARCIA-LOZA's vehicle, an Acura RL, that was parked in the driveway, and drug proceeds in the amount of approximately \$48,646 United States currency. At GARCIA-LOZA's stash location, 11225 E. Alameda Avenue, #315, Aurora, Colorado, investigators located 58.69 grams of cocaine.

Throughout the course of the investigation, law enforcement investigators observed GARCIA-LOZA engage in drug trafficking activities which generated tens of thousands of dollars in drug proceeds, including the \$48,646 USC recovered from his residence. Investigators did not observe GARCIA-LOZA engage in any other employment or job.

**COUNT 61**  
**Money Laundering, (F3)**

On or about September 20, 2022, in the state of Colorado, Julio ALBA-GUZMAN unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

**COUNT 62**  
**Tampering with Physical Evidence of a Felony Crime - Destruction, (F6)**

On or about September 20, 2022, in the state of Colorado, Julio ALBA-GUZMAN believing that an official proceeding was pending or about to be instituted, and acting without legal right or authority, unlawfully and feloniously destroyed, mutilated, concealed, removed, or altered physical evidence of a felony crime, namely: [Possession with Intent to Distribute], with intent to impair its verity or availability in the pending or prospective official proceeding; in violation of section 18-8-610(1)(a),(3)(a), C.R.S.

*The offenses alleged in Counts 61-62 were committed in the following manner:*

On or about September 20, 2022, law enforcement investigators executed a search warrant at the residence of Julio ALBA-GUZMAN, 1600 Julian Way, Denver, Colorado, where he was present at the time of the execution of the search warrant. During the execution of the search warrant, ALBA-GUZMAN flushed a large amount of cocaine down the toilet while law enforcement officers were attempting to make entry to the residence to execute the search warrant. Subsequently, officers recovered drug proceeds in the amount of \$56,024 USC.

**COUNT 63**  
**Possession with Intent to Distribute a Controlled Substance—  
Schedule II—Between 14 Grams and 225 Grams (DF2)**

On or about September 20, 2022, Javier VASQUEZ unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

**COUNT 64**  
**Money Laundering, (F3)**

On or about September 20, 2022, in the state of Colorado, Javier VASQUEZ unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

*The offenses alleged in Counts 63-64 were committed in the following manner:*

On or about September 20, 2022, law enforcement investigators executed a search warrant at the residence of Javier VASQUEZ, 13432 Falls Drive, Broomfield, Colorado, where he was present at the time of the execution of the search warrant. During the search, investigators located 22.52 grams of cocaine from within the residence, and drug proceeds in the amount of approximately \$21,537 in United States currency along with three (3) gold bars.



Respectfully submitted:

BRIAN S. MASON, #38008  
DISTRICT ATTORNEY

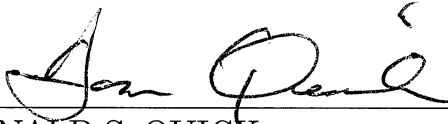


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ANNEMARIE L. BRAUN  
Senior Deputy District Attorney  
Seventeenth Judicial District

The 2022-2023 Seventeenth Judicial District Grand Jury presents the within  
Superseding Indictment, and the same is hereby ORDERED FILED this  
5<sup>th</sup> day of December, 2022.

<sup>not</sup>  
Dated this 5<sup>th</sup> day of December, 2022.



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DONALD S. QUICK  
Chief Judge, Seventeenth Judicial District  
Brighton, Adams County, Colorado