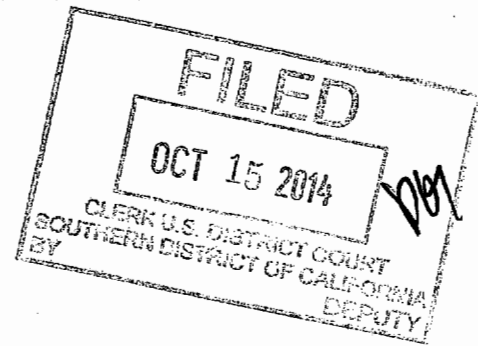


SEALED



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

June 2014 Grand Jury

UNITED STATES OF AMERICA,

Case No. 14CR3008 LAB

Plaintiff,

I N D I C T M E N T

v.

RAPHAEL VILLASENOR (1),  
aka Rafa,  
CESAR ADRIAN GOMEZ (2),  
aka Potro,  
ERIBERTO GONZALEZ-RUIZ (3),  
LUIS FERNANDO CALDERON NAVA (4),  
ORLANDO QUINTERO (5),  
aka Chino,  
MONIQUE VANIA CAMARGO (6),  
aka Mo Tweak,  
SHANDRA DECOYE CAMARGO (7),

Title 21, U.S.C., Secs. 841(a)(1)  
and 846 - Conspiracy to Distribute  
Heroin and Methamphetamine;  
Title 21, U.S.C., Sec. 841(a)(1) -  
Possession of Heroin and  
Methamphetamine with Intent to  
Distribute; Title 18, U.S.C.,  
Sec. 2 - Aiding and Abetting;  
Title 21, U.S.C., Sec. 853 -  
Criminal Forfeiture

Defendants.

The grand jury charges:

Count 1

(Conspiracy to Distribute Heroin)

Beginning at a date unknown to the grand jury and continuing up  
to and including October 15, 2014, within the Southern District of  
California, and elsewhere, defendants RAPHAEL VILLASENOR, aka Rafa;  
CESAR ADRIAN GOMEZ, aka Potro; and LUIS FERNANDO CALDERON NAVA; did  
knowingly and intentionally conspire with other persons known and  
unknown to the grand jury to distribute heroin, a Schedule I

1 Controlled Substance; in violation of Title 21, United States Code,  
2 Sections 841(a)(1) and 846.

3 With respect to defendant RAPHAEL VILLASENOR, aka Rafa, the  
4 distribution of one kilogram and more of heroin, a Schedule I  
5 Controlled Substance, was within the scope of the agreement with  
6 coconspirators and reasonably foreseeable to the defendant.

7 Count 2

8 (Conspiracy to Distribute Methamphetamine)

9 Beginning at a date unknown to the grand jury and continuing up  
10 to and including October 15, 2014, within the Southern District of  
11 California, and elsewhere, defendants RAPHAEL VILLASENOR, aka Rafa;  
12 ERIBERTO GONZALEZ-RUIZ; and ORLANDO QUINTERO, aka Chino; did knowingly  
13 and intentionally conspire with other persons known and unknown to the  
14 grand jury to distribute methamphetamine, a Schedule II Controlled  
15 Substance; in violation of Title 21, United States Code,  
16 Sections 841(a)(1) and 846.

17 With respect to defendants RAPHAEL VILLASENOR, aka Rafa, and  
18 ORLANDO QUINTERO, aka Chino, the distribution of 50 grams and more of  
19 methamphetamine (actual), a Schedule II Controlled Substance, was  
20 within the scope of the agreement with coconspirators and reasonably  
21 foreseeable to the defendants.

22 Count 3

23 (PWID 2,998 grams of Heroin)

24 On or about May 8, 2014, within the Southern District of  
25 California, defendants RAPHAEL VILLASENOR aka Rafa; CESAR ADRIAN  
26 GOMEZ, aka Potro; and LUIS FERNANDO CALDERON NAVA; did knowingly and  
27 intentionally possess, with intent to distribute, heroin, a Schedule I  
28

1 Controlled Substance; in violation of Title 21, United States Code,  
2 Section 841(a)(1), and Title 18, United States Code, Section 2.

3 With respect to defendant RAPHAEL VILLASENOR, aka Rafa, the  
4 amount defendant knowingly and intentionally possessed with intent to  
5 distribute was one kilogram and more of heroin, to wit: approximately  
6 2.99 kilograms of heroin, a Schedule I Controlled Substance.

7 Count 4

8 (PWID 90 grams of Methamphetamine (actual))

9 On or about September 6, 2014, within the Southern District of  
10 California, defendants ORLANDO QUINTERO, aka Chino, MONIQUE VANIA  
11 CAMARGO, aka Mo Tweak, and SHANDRA DECOYE CAMARGO did knowingly and  
12 intentionally possess, with intent to distribute, methamphetamine, a  
13 Schedule II Controlled Substance; in violation of Title 21, United  
14 States Code, Section 841(a)(1), and Title 18, United States Code,  
15 Section 2.

16 With respect to defendants ORLANDO QUINTERO, aka Chino, and  
17 MONIQUE VANIA CAMARGO, aka Mo Tweak, the amount defendants knowingly  
18 and intentionally possessed, with intent to distribute, was 50 grams  
19 and more, to wit: approximately 90 grams of methamphetamine (actual),  
20 a Schedule II Controlled Substance.

21 FORFEITURE ALLEGATION

22 1. The allegations contained in Counts 1 through 4 are  
23 realleged and by their reference fully incorporated herein for the  
24 purpose of alleging forfeiture to the United States of America  
25 pursuant to the provisions of Title 21, United States Code,  
26 Section 853.

27 //

28 //

1        2.    As a result of the commission of the felony offenses alleged  
2 in Counts 1 through 4 of this Indictment, said violations being  
3 punishable by imprisonment for more than one year and pursuant to  
4 Title 21, United States Code, Sections 853(a)(1) and 853(a)(2),  
5 defendants RAPHAEL VILLASENOR, aka Rafa; CESAR ADRIAN GOMEZ,  
6 aka Potro; ERIBERTO GONZALEZ-RUIZ; LUIS FERNANDO CALDERON NAVA;  
7 ORLANDO QUINTERO, aka Chino; MONIQUE VANIA CAMARGO, aka Mo Tweak; and  
8 SHANDRA DECOYE CAMARGO; shall, upon conviction, forfeit to the United  
9 States all their rights, title and interest in any and all property  
10 constituting, or derived from, any proceeds the defendants obtained,  
11 directly or indirectly, as the result of the felony offenses alleged  
12 in this indictment, and any and all property used or intended to be  
13 used in any manner or part to commit and to facilitate the commission  
14 of the violations alleged in this indictment.

15        3.    If any of the above-described forfeitable property, as a  
16 result of any act or omission of the defendants -

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

24 //

25 //

26 //

27 //


28 //

1 it is the intent of the United States, pursuant to Title 21, United  
2 States Code, Section 853(p), to seek forfeiture of any other property  
3 of the defendant up to the value of the said property listed above as  
4 being subject to forfeiture.

5 All in violation of Title 21, United States Code, Section 853.


6 DATED: October 15, 2014.

7 A TRUE BILL:

8  
9   
10 Foreperson

11 LAURA E. DUFFY  
12 United States Attorney

13 By:

14   
MICHAEL F. KAPLAN  
15 Assistant U.S. Attorney

16  
17  
18  
19 I hereby attest and certify on 10/16/14  
20 That the foregoing document is a full, true and correct  
21 copy of the original on file in my office and in my legal  
22 custody.

23 CLERK, U.S. DISTRICT COURT  
24 SOUTHERN DISTRICT OF CALIFORNIA

25 By  Deputy  
26  
27  
28