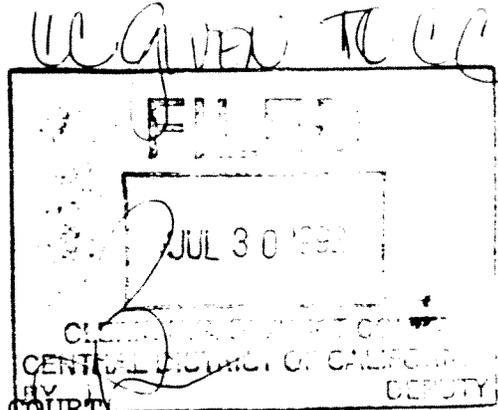


I hereby attest and certify on 10-17-81
that the foregoing document is a full, true
and correct copy of the original on file in
my office, and in my legal custody.

CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
[Signature]
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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

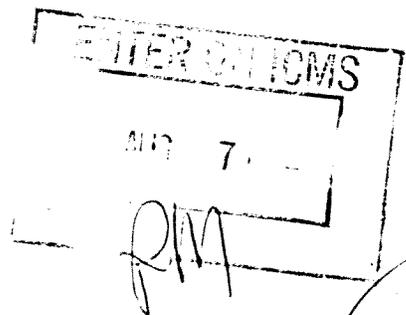
February 1991 Grand Jury

UNITED STATES OF AMERICA,)
)
) Plaintiff,)
)
) v.)
)
) RAFAEL CARO-QUINTERO, ✓)
) aka "Rafael",)
) aka "Rafa", ✓)
) ERNESTO FONSECA-CARRILLO, ✓)
) aka "Don Neto", ✓)
) MIGUEL ANGEL FELIX-GALLARDO,)
) MANUEL IBARRA-HERRERA, ✓)
) MIGUEL ALDANA-IBARRA, ✓)
) RUBEN ZUNO-ARCE, ✓)
) JAVIER BARBA-HERNANDEZ, ✓)
) ARMANDO PAVON-REYES, ✓)
) JUAN GILBERTO HERNANDEZ-PARRA,)
) SERGIO ESPINO-VERDIN, -)
) HUMBERTO ALVAREZ-MACHAIN, -)
) ANTONIO VASQUEZ-VELASCO, -)
) ANTONIO VASQUEZ-OCHOA, -)
) EZEQUIEL GODINEZ-CERVANTES, -)
) INES CALDERON-QUINTERO,)
) aka "Rolando Cervantes",)
) ALBINO BAZAN-PADILLA,)
)
) Defendants.)

No. CR 87-422(G)-ER
SEVENTH SUPERSEDING
INDICTMENT

[18 U.S.C. § 1959(a)(1):
Violent Crimes in Aid of
Racketeering;
18 U.S.C. § 1959(a)(5):
Conspiracy to Commit Violent
Crimes in Aid of Racketeering;
18 U.S.C. § 1201(c):
Conspiracy to Kidnap a Federal
Agent; 18 U.S.C. § 1201(a)(5):
Kidnapping of a Federal Agent;
18 U.S.C. §§ 1111, 1114:
Felony Murder of a Federal
Agent; 18 U.S.C. § 2: Aiding
and Abetting; 18 U.S.C. § 3:
Accessory After the Fact]

JLC:jlc



16414

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2 The Grand Jury charges:

3 General Allegations

4 1. At all times referred to in this Seventh Superseding
5 Indictment, defendant RAFAEL CARO-QUINTERO, aka "Rafael", aka
6 "Rafa", ERNESTO FONSECA-CARRILLO, aka "Don Neto", MIGUEL ANGEL
7 FELIX-GALLARDO, MANUEL IBARRA-HERRERA, MIGUEL ALDANA-IBARRA,
8 RUBEN ZUNO-ARCE, JAVIER BARBA-HERNANDEZ, ARMANDO PAVON-REYES,
9 JUAN GILBERTO HERNANDEZ-PARRA, SERGIO ESPINO-VERDIN, HUMBERTO
10 ALVAREZ-MACHAIN, ANTONIO VASQUEZ-VELASCO, ANTONIO VASQUEZ-OCHOA,
11 EZEQUIEL GODINEZ-CERVANTES, INES CALDERON-QUINTERO, aka "Rolando
12 Cervantes", ALBINO BAZAN-PADILLA, and unindicted co-conspirators
13 Juan Ramon Matta-Ballesteros, Rene Martin Verdugo-Urquidez, Raul
14 Lopez-Alvarez, Juan Jose Bernabe-Ramirez, Javier Vasquez-Velasco
15 and Jesus Felix-Guiterrez, were members of an international
16 narcotics enterprise based in Guadalajara, Jalisco, Mexico
(hereinafter referred to as the "Guadalajara Narcotics Cartel").

17 2. At all times referred to in this Seventh Superseding
18 Indictment, the Guadalajara Narcotics Cartel engaged in
19 racketeering activity, including, but not limited to, the
20 cultivation, importation and distribution of multi-ton quantities
21 of marijuana in Mexico, the Central District of California, and
22 elsewhere.

23 3. At all times referred to in this Seventh Superseding
24 Indictment, the Guadalajara Narcotics cartel also engaged in the
25 importation and distribution of multi-kilogram quantities of
26 cocaine in Mexico, Colombia, Costa Rica, the Central District of
27 California, and elsewhere.

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2 4. At all times referred to in this Seventh Superseding
3 Indictment, defendants RAFAEL CARO-QUINTERO, ERNESTO FONSECA-
4 CARRILLO, MIGUEL ANGEL FELIX-GALLARDO and co-conspirator Juan
5 Ramon Matta-Ballesteros supervised and managed the Guadalajara
6 Narcotics Cartel, and co-conspirator Rene Martin Verdugo-Urquidez
7 was a high level lieutenant of defendant RAFAEL CARO-QUINTERO in
8 said enterprise.

9 5. At all times referred to in this Seventh Superseding
10 Indictment, defendants RUBEN ZUNO-ARCE, HUMBERTO ALVAREZ-MACHAIN,
11 ANTONIO VASQUEZ-VELASCO, ANTONIO VASQUEZ-OCHOA and EZEQUIEL
12 GODINEZ-CERVANTES and co-conspirators Juan Jose Bernabe-Ramirez
13 and Javier Vasquez-Velasco assisted, aided and abetted the
14 Guadalajara Narcotics Cartel.

15 6. At all times referred to in this Seventh Superseding
16 Indictment, Enrique Camarena-Salazar was a Special Agent employed
17 by the Drug Enforcement Administration (hereinafter "DEA") and
18 assigned to the DEA office in Guadalajara, Jalisco, Mexico.

19 7. At all times referred to in this Seventh Superseding
20 Indictment, Special Agent Enrique Camarena-Salazar was
21 responsible for investigating the Guadalajara Narcotics Cartel.

22 8. At all times referred to in this Seventh Superseding
23 Indictment, Alfredo Zavala-Avelar was a pilot who assisted the
24 DEA and Special Agent Enrique Camarena-Salazar in locating
25 marijuana fields in Mexico.

26 9. At all times referred to in this Seventh Superseding
27 Indictment, John Walker was a United States citizen temporarily
28 residing in Guadalajara, Jalisco, Mexico.

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2 10. At all times referred to in this Seventh Superseding
3 Indictment, Alberto Radelat was a United States permanent
4 resident alien temporarily residing in Guadalajara, Jalisco,
5 Mexico.

6 11. At all times referred to in this Seventh Superseding
7 Indictment, defendant MANUEL IBARRA-HERRERA was the Director of
8 the Mexican Federal Judicial Police.

9 12. At all times referred to in this Seventh Superseding
10 Indictment, defendant MIGUEL ALDANA-IBARRA was the Director of
11 Interpol in Mexico.

12 13. At all times referred to in this Seventh Superseding
13 Indictment, defendant ARMANDO PAVON-RYES was a Comandante with
14 the Mexican Federal Judicial Police and assigned by the Mexican
15 government to head the investigation into the kidnapping and
16 murder of Special Agent Enrique Camarena-Salazar.

17 14. At all times referred to in this Seventh Superseding
18 Indictment, defendant SERGIO ESPINO-VERDIN, a Comandante with the
19 Directorate of Federal Security in Mexico, worked for the
20 Guadalajara Narcotics Cartel.

21 15. At all times referred to in this Seventh Superseding
22 Indictment, co-conspirator Raul Lopez-Alvarez, a State Judicial
23 Police Officer assigned to the homicide investigation squad in
24 Guadalajara, worked for the Guadalajara Narcotics Cartel.

25 16. At all times referred to in this Seventh Superseding
26 Indictment, defendant JUAN GILBERTO HERNANDEZ-PARRA, an agent
27 with the Mexican Federal Judicial Police assigned to Guadalajara,
28 Jalisco, Mexico, worked for the Guadalajara Narcotics Cartel.

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2 17. Commencing in 1984, members of the Guadalajara
3 Narcotics Cartel engaged in a series of actions the purpose and
4 intent of which was to retaliate against the DEA, its agents and
5 informants, in Mexico, and to learn the nature and extent of the
6 DEA's knowledge of the membership and operations of the cartel.
7 Such actions included, but were not limited to, the following:

8 a. On or about September 30, 1984, a confidential
9 informant working for the DEA was shot in Guadalajara, Jalisco,
10 Mexico, by members of the Guadalajara Narcotics Cartel.

11 b. On or about October 10, 1984, in Guadalajara,
12 Jalisco, Mexico, members of the Guadalajara Narcotics Cartel
13 machine-gunned a DEA automobile assigned to a DEA agent.

14 c. On or about January 30, 1985, John Walker and
15 Alberto Radelat were murdered by members of the Guadalajara
16 Narcotics Cartel.

17 d. On or about February 7, 1985, Special Agent
18 Enrique Camarena-Salazar and Alberto Zavala-Avelar were kidnapped
19 by members of the Guadalajara Narcotics Cartel.

20 e. On or about February 7, 1985, Special Agent
21 Enrique Camarena-Salazar was taken to defendant RAFAEL CARO-
22 QUINTERO'S residence at 881 Lope de Vega in Guadalajara, Jalisco,
23 Mexico.

24 f. Between on or about February 7, 1985, and February
25 9, 1985, Special Agent Enrique Camarena-Salazar and Alfredo
26 Zavala-Avelar were tortured, interrogated and murdered.
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2 18. On or about February 7, 1985, co-conspirator Juan Jose
3 Bernabe-Ramirez and other named defendants and co-conspirators,
4 were present at 881 Lope de Vega in Guadalajara, Jalisco, Mexico.

5 19. On or about February 9, 1985, defendant RAFAEL CARO-
6 QUINTERO and co-conspirator Rene Martin Verdugo-Urquidez fled
7 Guadalajara, Jalisco, Mexico.

8 20. On or about March 5, 1985, the bodies of Special Agent
9 Enrique Camarena-Salazar and Alfredo Zavala-Avelar were found
10 together in Zamora, Michoacan, Mexico.

11 21. On or about March 17, 1985, defendant RAFAEL CARO-
12 QUINTERO fled Mexico to Costa Rica.

13 22. On or about June 17, 1985, the bodies of John Walker
14 and Alberto Radelat were found together in Guadalajara, Jalisco,
15 Mexico.

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COUNT ONE

[18 U.S.C. §§ 1959(a)(1), 2]

The general allegations of this Seventh Superseding Indictment are realleged in this count and incorporated herein by reference.

On or about January 30, 1985, in Guadalajara, Jalisco, Mexico, defendants RAFAEL CARO-QUINTERO, ERNESTO FONSECA-CARRILLO, JAVIER BARBA-HERNANDEZ, JUAN GILBERTO HERNANDEZ-PARRA, ANTONIO VASQUEZ-VELASCO, ANTONIO VASQUEZ-OCHOA, EZEQUIEL GODINEZ-CERVANTES and co-conspirator Javier Vasquez-Velasco, and others known and unknown to the Grand Jury, did aid, abet, counsel, induce, procure, cause and otherwise willfully participate in the murder of John Walker, which offense was committed for the purpose of maintaining and increasing the positions of the aforesaid defendants in an enterprise that engaged in racketeering activity, to wit: individuals associated for the purpose of trafficking in marijuana and cocaine, whose activities affected interstate and foreign commerce. The racketeering activity included, but is not limited to, the following substantive narcotics offenses:

1. From in or about November, 1983, through in or about June, 1984, defendant RAFAEL CARO-QUINTERO, and other members of the Guadalajara Narcotics Cartel, possessed with intent to distribute multi-ton quantities of marijuana which were being cultivated in marijuana fields in Zacatecas, Mexico.

2. In or about June, 1984, defendant RAFAEL CARO-QUINTERO, and other members of the Guadalajara Narcotics Cartel, possessed

1 with intent to distribute approximately ten (10) tons of
2 harvested marijuana in Zacatecas, Mexico.

3 3. In or about April, 1984, co-conspirator Rene Martin
4 Verdugo-Urquidez, and other members of the Guadalajara Narcotics
5 Cartel, in the Central District of California and elsewhere,
6 possessed with intent to distribute approximately two (2) tons of
7 marijuana.

8 4. In or about April, 1984, co-conspirator Rene Martin
9 Verdugo-Urquidez, and other members of the Guadalajara Narcotics
10 Cartel, in the Central District of California and elsewhere,
11 possessed with intent to distribute approximately two (2) tons of
12 marijuana.

13 5. In or about November, 1984, defendant RAFAEL CARO-
14 QUINTERO, and other members of the Guadalajara Narcotics Cartel,
15 possessed with intent to distribute approximately 10,000 tons of
16 marijuana which were being cultivated in marijuana fields in
17 Chihuahua, Mexico.

18 6. On or about February 5, 1985, con-conspirator Rene
19 Martin Verdugo-Urquidez, and other members of the Guadalajara
20 Narcotics Cartel, possessed two (2) tons of marijuana with intent
21 to distribute.

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COUNT TWO

[18 U.S.C. §§ 1959(a)(1), 2]

The general allegations of this Seventh Superseding Indictment are realleged in this count and incorporated herein by reference.

On or about January 30, 1985, in Guadalajara, Jalisco, Mexico, defendants RAFAEL CARO-QUINTERO, ERNESTO FONSECA-CARRILLO, JAVIER BARBA-HERNANDEZ, JUAN GILBERTO HERNANDEZ-PARRA, ANTONIO VASQUEZ-VELASCO, ANTONIO VASQUEZ-OCHOA, EZEQUIEL GODINEZ-CERVANTES and co-conspirator Javier Vasquez-Velasco and others known and unknown to the Grand Jury, did aid, abet, counsel, induce, procure, cause and otherwise willfully participate in the murder of Alberto Radelat, which offense was committed for the purpose of maintaining and increasing the positions of the aforesaid defendants in an enterprise that engaged in racketeering activity, to wit: individuals associated for the purpose of trafficking in marijuana and cocaine, whose activities affected interstate and foreign commerce. The racketeering activity included, but is not limited to, the following substantive narcotics offenses:

1. From in or about November, 1983, through in or about June, 1984, defendant RAFAEL CARO-QUINTERO, and other members of the Guadalajara Narcotics Cartel, possessed with intent to distribute multi-ton quantities of marijuana which were being cultivated in marijuana fields in Zacatecas, Mexico.

2. In or about June, 1984, defendant RAFAEL CARO-QUINTERO, and other members of the Guadalajara Narcotics Cartel, possessed

1 with intent to distribute approximately ten (10) tons of
2 harvested marijuana in Zacatecas, Mexico.

3 3. In or about April, 1984, co-conspirator Rene Martin
4 Verdugo-Urquidez, and other members of the Guadalajara Narcotics
5 Cartel, in the Central District of California and elsewhere,
6 possessed with intent to distribute approximately two (2) tons of
7 marijuana.

8 4. In or about April, 1984, co-conspirator Rene Martin
9 Verdugo-Urquidez, and other members of the Guadalajara Narcotics
10 Cartel, in the Central District of California and elsewhere,
11 possessed with intent to distribute approximately two (2) tons of
12 marijuana.

13 5. In or about November, 1984, defendant RAFAEL CARO-
14 QUINTERO, and other members of the Guadalajara Narcotics Cartel,
15 possessed with intent to distribute approximately 10,000 tons of
16 marijuana which were being cultivated in marijuana fields in
17 Chihuahua, Mexico.

18 6. On or about February 5, 1985, co-conspirator Rene
19 Martin Verdugo-Urquidez, and other members of the Guadalajara
20 Narcotics Cartel, possessed two (2) tons of marijuana with intent
21 to distribute.

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COUNT THREE

[18 U.S.C. §§ 1959(a)(5), 2]

The general allegations of this Seventh Superseding Indictment are realleged in this count and incorporated herein by reference.

A. Objects of the Conspiracy

Beginning on a date unknown and continuing to on or about February 9, 1985, within Guadalajara, Jalisco, Mexico, defendants RAFAEL CARO-QUINTERO, ERNESTO FONSECA-CARRILLO, MIGUEL ANGEL FELIX GALLARDO, MANUEL IBARRA-HERRERA, MIGUEL ALDANA-IBARRA, RUBEN ZUNO-ARCE, JAVIER BARBA-HERNANDEZ, ARMANDO PAVON-REYES, JUAN GILBERTO HERNANDEZ-PARRA, SERGIO ESPINO-VERDIN, HUMBERTO ALVAREZ-MACHAIN, and co-conspirators Juan Ramon Matta-Ballesteros, Rene Martin Verdugo-Urquidez, Juan Jose Bernabe-Ramirez, Raul Lopez-Alvarez, and others known and unknown to the Grand Jury, unlawfully and knowingly combined, conspired, confederated and agreed to commit an offense against the United States, namely:

To knowingly and intentionally kidnap, torture, interrogate and murder Special Agent Enrique Camarena-Salazar, in violation of Title 18, United States Code, Section 1959(a)(5).

B. Means of the Conspiracy

1. Defendants RAFAEL CARO-QUINTERO, ERNESTO FONSECA-CARRILLO, MIGUEL ANGEL FELIX-GALLARDO, MANUEL IBARRA-HERRERA, MIGUEL ALDANA-IBARRA, RUBEN ZUNO-ARCE, JAVIER

1 BARBA-HERNANDEZ, JUAN GILBERTO HERNANDEZ-PARRA, ARMANDO
2 PAVON-REYES, co-conspirator Juan Ramon Matta-
3 Ballesteros, and others both known and unknown,
4 organized and put into operation a scheme to kidnap and
5 murder Enrique Camarena-Salazar, a Special Agent with
6 the United States Drug Enforcement Administration.

7 2. Defendants RAFAEL CARO-QUINTERO, ERNESTO
8 FONSECA-CARRILLO, SERGIO ESPINO-VERDIN and
9 HUMBERTO ALVAREZ-MACHAIN, and co-conspirators
10 Rene Martin Verdugo-Urquidez, Juan Jose
11 Bernabe-Ramirez and Raul Lopez-Alvarez, and
12 other members of the Guadalajara Narcotics
13 Cartel, caused Special Agent Enrique
14 Camarena-Salazar to be kidnapped, held
15 against his will, tortured, interrogated and
16 murdered.

17 C. Overt Acts

18 The following overt acts, among others, were committed by
19 the defendants and by their co-conspirators in furtherance of the
20 foregoing conspiracy in Guadalajara, Jalisco, Mexico:

21 1. In or about October, 1984, defendants RAFAEL
22 CARO-QUINTERO, ERNESTO FONSECA-CARRILLO,
23 MANUEL IBARRA-HERRERA, MIGUEL ALDANA-IBARRA,
24 RUBEN ZUNO-ARCE, JAVIER BARBA-HERNANDEZ,
25 ARMANDO PAVON-REYES, co-conspirator Juan
26 Ramon Matta-Ballesteros, and others, met at a
27 residence of defendant JAVIER BARBA-HERNANDEZ

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2 in Guadalajara, Jalisco, Mexico, and
3 discussed the kidnapping of Special Agent
4 Enrique Camarena-Salazar.

5 2. In or about December, 1984, defendants
6 RAFAEL CARO-QUINTERO, ERNESTO FONSECA-
7 CARRILLO, JAVIER BARBA-HERNANDEZ, and others,
8 met at a residence of defendant ERNESTO
9 FONSECA-CARRILLO in Guadalajara, Jalisco,
10 Mexico, and had a discussion concerning
11 Special Agent Enrique Camarena-Salazar.

12 3. In or about December, 1984, defendant JUAN
13 GILBERTO HERNANDEZ-PARRA, an agent with the
14 Mexican Federal Judicial Police, was present
15 at this meeting at the residence of defendant
16 ERNESTO FONSECA-CARRILLO in Guadalajara,
17 Jalisco, Mexico.

18 4. In or about the first week of February, 1985,
19 defendants RAFAEL CARO-QUINTERO, ERNESTO FONSECA-
20 CARRILLO, RUBEN ZUNO-ARCE and JAVIER BARBA-HERNANDEZ
21 met at a residence of defendant JAVIER BARBA-HERNANDEZ
22 in Guadalajara, Jalisco, Mexico, and discussed the
23 kidnapping and interrogation of Special Agent Enrique
24 Camarena-Salazar.

25 5. On or about February 7, 1985, Special Agent
26 Enrique Camarena-Salazar was abducted by
27 members of the Guadalajara Narcotics Cartel.
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6. From on or about February 7, 1985, to February 9, 1985, defendant RAFAEL CARO-QUINTERO, and others, interrogated Special Agent Enrique Camarena-Salazar at 881 Lope de Vega in Guadalajara, Jalisco, Mexico.
7. From on or about February 7, 1985, to February 9, 1985, defendant SERGIO ESPINO-VERDIN, a Comandante with the Directorate of Federal Security, and others, interrogated Special Agent Enrique Camarena-Salazar at 881 Lope de Vega in Guadalajara, Jalisco, Mexico.
8. On or about February 8, 1985, defendant ERNESTO FONSECA-CARRILLO was present at 881 Lope de Vega in Guadalajara, Jalisco, Mexico.
9. On or about February 8, 1985, co-conspirator Juan Jose Bernabe-Ramirez was present at 881 Lope de Vega in Guadalajara, Jalisco, Mexico.
10. On or about February 8, 1985, defendant HUMBERTO ALVAREZ-MACHAIN was present at 881 Lope de Vega, Guadalajara, Jalisco, Mexico.
11. On or about February 8, 1985, co-conspirator Raul Lopez-Alvarez, a State Judicial Police Officer, was present at 881 Lope de Vega in Guadalajara, Jalisco, Mexico.
12. On or about February 8, 1985, co-conspirator Rene Martin Verdugo-Urquidez was present at

1 881 Lope de Vega in Guadalajara, Jalisco,
2 Mexico.

3 13. On or about February 10, 1985, defendant
4 MIGUEL ANGEL FELIX-GALLARDO possessed at his
5 residence in Guadalajara, Jalisco, Mexico, a
6 photograph of Special Agent Enrique Camarena-
7 Salazar.
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COUNT FOUR

[18 U.S.C. §§ 1959(a)(1), 2]

The general allegations of this Seventh Superseding Indictment are realleged in this count and incorporated herein by reference.

On or about February 7, 1985, in Guadalajara, Jalisco, Mexico, defendants RAFAEL CARO-QUINTERO, ERNESTO FONSECA-CARRILLO, MIGUEL ANGEL FELIX-GALLARDO, MANUEL IBARRA-HERRERA, MIGUEL ALDANA-IBARRA, RUBEN ZUNO-ARCE, JAVIER BARBA-HERNANDEZ, ARMANDO PAVON-REYES, JUAN GILBERTO HERNANDEZ-PARRA, SERGIO ESPINO-VERDIN, HUMBERTO ALVAREZ-MACHAIN, and co-conspirators Juan Ramon Matta-Ballesteros, Rene Martin Verdugo-Urquidez, Juan Jose Bernabe-Ramirez, Raul Lopez-Alvarez, and others known and unknown to the Grand Jury, did aid, abet, counsel, induce, procure, cause and otherwise willfully participate in the kidnapping and murder of Special Agent Enrique Camarena-Salazar, which offenses were committed for the purpose of maintaining and increasing the positions of the aforesaid defendants in an enterprise that engaged in racketeering activity, to wit: individuals associated for the purpose of trafficking in marijuana and cocaine, whose activities affected interstate and foreign commerce. The racketeering activity included, but is not limited to, the following substantive narcotics offenses:

1. From in or about November, 1983, through in or about June, 1984, defendant RAFAEL CARO-QUINTERO, and other members of the Guadalajara Narcotics Cartel, possessed with intent to

1 distributed multi-ton quantities of marijuana which were being
2 cultivated in marijuana fields in Zacatecas, Mexico.

3 2. In or about June, 1984, defendant RAFAEL CARO-QUINTERO,
4 and other members of the Guadalajara Narcotics Cartel, possessed
5 with intent to distribute approximately ten (10) tons of
6 harvested marijuana in Zacatecas, Mexico.

7 3. In or about April, 1984, co-conspirator Rene Martin
8 Verdugo-Urquidez, and other members of the Guadalajara Narcotics
9 Cartel, in the Central District of California and elsewhere,
10 possessed with intent to distribute approximately two (2) tons of
11 marijuana.

12 4. In or about April, 1984, co-conspirator Rene Martin
13 Verdugo-Urquidez, and other members of the Guadalajara Narcotics
14 Cartel, in the Central District of California and elsewhere,
15 possessed with intent to distribute approximately two (2) tons of
16 marijuana.

17 5. In or about November, 1984, defendant RAFAEL CARO-
18 QUINTERO, and other members of the Guadalajara Narcotics Cartel,
19 possessed with intent to distribute approximately 10,000 tons of
20 marijuana which were being cultivated in marijuana fields in
21 Chihuahua, Mexico.

22 6. On or about February 5, 1985, co-conspirator Rene
23 Martin Verdugo-Urquidez, and other members of the Guadalajara
24 Narcotics Cartel, possessed two (2) tons of marijuana with intent
25 to distribute.

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COUNT FIVE

[18 U.S.C. §§ 1959(a)(1), 2]

The general allegations of this Seventh Superseding Indictment are realleged in this count and incorporated herein by reference.

On or about February 7, 1985, in Guadalajara, Jalisco, Mexico, defendants RAFAEL CARO-QUINTERO, ERNESTO FONSECA-CARRILLO, SERGIO ESPINO-VERDIN, and co-conspirators Rene Martin Verdugo-Urquidez, Juan Jose Bernabe-Ramirez, Raul Lopez-Alvarez, and others known and unknown to the Grand Jury, did aid, abet, counsel, induce, procure, cause and otherwise willfully participate in the kidnapping and murder of Alfredo Zavala-Avelar, which offenses were committed for the purpose of maintaining and increasing the positions of the aforesaid defendants in an enterprise that engaged in racketeering activity, to wit: individuals associated for the purpose of trafficking in marijuana and cocaine, whose activities affected interstate and foreign commerce. The racketeering activity included, but is not limited to, the following substantive narcotics offenses:

1. From in or about November, 1983, through in or about June, 1984, defendant RAFAEL CARO-QUINTERO, and other members of the Guadalajara Narcotics Cartel, possessed with intent to distribute multi-ton quantities of marijuana which were being cultivated in marijuana fields in Zacatecas, Mexico.

2. In or about June, 1984, defendant RAFAEL CARO-QUINTERO, and other members of the Guadalajara Narcotics Cartel, possessed

1 with intent to distribute approximately ten (10) tons of
2 harvested marijuana in Zacatecas, Mexico.

3 3. In or about April, 1984, co-conspirator Rene Martin
4 Verdugo-Urquidez, and other members of the Guadalajara Narcotics
5 Cartel, in the Central District of California and elsewhere,
6 possessed with intent to distribute approximately two (2) tons of
7 marijuana.

8 4. In or about April, 1984, co-conspirator Rene Martin
9 Verdugo-Urquidez, and other members of the Guadalajara Narcotics
10 cartel, in the Central District of California and elsewhere,
11 possessed with intent to distribute approximately two (2) tons of
12 marijuana.

13 5. In or about November, 1984, defendant RAFAEL CARO-
14 QUINTERO, and other members of the Guadalajara Narcotics Cartel,
15 possessed with intent to distribute approximately 10,000 tons of
16 marijuana which were being cultivated in marijuana fields in
17 Chihuahua, Mexico.

18 6. On or about February 5, 1985, co-conspirator Rene
19 Martin Verdugo-Urquidez, and other members of the Guadalajara
20 Narcotics Cartel, possessed two (2) tons of marijuana with intent
21 to distribute.
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COUNT SIX

[18 U.S.C. § 1201(c)]

The general allegations of this Seventh Superseding Indictment are realleged in this count and incorporated herein by reference.

A. Objects of the Conspiracy

Beginning on a date unknown and continuing to on or about February 9, 1985, within Guadalajara, Jalisco, Mexico, defendants RAFAEL CARO-QUINTERO, ERNESTO FONSECA-CARRILLO, MIGUEL ANGEL FELIX-GALLARDO, MANUEL IBARRA-HERRERA, MIGUEL ALDANA-IBARRA, RUBEN ZUNO-ARCE, JAVIER BARBA-HERNANDEZ, ARMANDO PAVON-REYES, JUAN GILBERTO HERNANDEZ-PARA, SERGIO ESPINO-VERDIN, HUMBERTO ALVAREZ-MACHAIN, and co-conspirators Juan Ramon Matta-Ballesteros, Rene Martin Verdugo-Urquidez, Juan Jose Bernabe-Ramirez, Raul Lopez-Alvarez, and others known and unknown to the Grand Jury, unlawfully and knowingly combined, conspired, confederated and agreed to commit an offense against the United States, namely:

To knowingly and intentionally kidnap and hold for the purpose of interrogation, a Special Agent of the United States Drug Enforcement Administration, on account of the performance of his official duties, in violation of Title 18, United States Code, Sections 1201(a)(5) and 1201(c).

B. Means of the Conspiracy

1 The foregoing objects of the conspiracy were accomplished as
2 follows:

3 1. Defendants RAFAEL CARO-QUINTERO, ERNESTO
4 FONSECA-CARRILLO, MIGUEL ANGEL FELIX-
5 GALLARDO, MANUEL IBARRA-HERRERA, MIGUEL
6 ALDANA-IBARRA, RUBEN ZUNO-ARCE, JAVIER BARBA-
7 HERNANDEZ, JUAN GILBERTO HERNANDEZ-PARRA,
8 ARMANDO PAVON-REYES, co-conspirator Juan
9 Ramon Matta-Ballesteros, and other members of
10 the Guadalajara Narcotics Cartel, developed a
11 scheme and plan to kidnap torture and
12 interrogate Enrique Camarena-Salazar, a
13 Special Agent with the United States Drug
14 Enforcement Administration.

15 2. Defendants RAFAEL CARO-QUINTERO, ERNESTO
16 FONSECA-CARRILLO, SERGIO ESPINO-VERDIN,
17 HUMBERTO ALVAREZ-MACHAIN, and co-conspirators
18 Rene Martin Verdugo-Urquidez, Juan Jose
19 Bernabe-Ramirez and Raul Lopez-Alvarez and
20 other members of the Guadalajara Narcotics
21 Cartel, caused Special Agent Enrique
22 Camarena-Salazar to be held against his will
23 at 881 Lope de Vega in Guadalajara, Jalisco,
24 Mexico.

25 C. Overt Acts
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2 The following overt acts, among others, were committed by
3 the defendants and by their co-conspirators in furtherance of the
4 foregoing conspiracy in Guadalajara, Jalisco, Mexico:

5 1. In or about October, 1984, in a meeting at a
6 residence of defendant JAVIER BARBA-
7 HERNANDEZ, in Guadalajara, Jalisco, Mexico,
8 defendants RAFAEL CARO-QUINTERO, ERNESTO
9 FONSECA-CARRILLO, MANUEL IBARRA-HERRERA,
10 MIGUEL ALDANA-IBARRA, RUBEN ZUNO-ARCE, JAVIER
11 BARBA-HERNANDEZ, ARMANDO PAVON-REYES, co-
12 conspirator Juan Ramon Matta-Ballesteros, and
13 others, discussed the kidnapping of Special
14 Agent Enrique Camarena-Salazar.

15 2. In or about December, 1984, in a meeting at
16 the residence of defendant ERNESTO FONSECA-
17 CARRILLO in Guadalajara, Jalisco, Mexico,
18 defendants RAFAEL CARO-QUINTERO, ERNESTO
19 FONSECA-CARRILLO, JAVIER BARBA-HERNANDEZ, and
20 others, had a discussion concerning Special
21 Agent Enrique Camarena-Salazar.

22 3. In or about December, 1984, defendant JUAN
23 GILBERTO HERNANDEZ-PARRA, an agent with the
24 Mexican Federal Judicial Police, was present
25 at this meeting at defendant ERNESTO FONSECA-
26 CARRILLO's residence in Guadalajara, Jalisco,
27 Mexico.
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4. In or about the first week of February, 1985, defendants RAFAEL CARO-QUINTERO, ERNESTO FONSECA-CARRILLO, RUBEN ZUNO-ARCE and JAVIER BARBA-HERNANDEZ met at a residence of defendant JAVIER BARBA-HERNANDEZ in Guadalajara, Jalisco, Mexico, and discussed the kidnaping and interrogation of Special Agent Enrique Camarena-Salazar.
 5. On or about February 7, 1985, members of the Guadalajara Narcotics Cartel abducted Special Agent Enrique Camarena-Salazar.
 6. Between on or about February 7, 1985, and February 9, 1985, defendant RAFAEL CARO-QUINTERO, and others, interrogated Special Agent Enrique Camarena-Salazar.
 7. Between on or about February 7, 1985, and February 9, 1985, defendant SERGIO ESPINO-VERDIN, a Comandante with the Directorate of Federal Security, and others, interrogated Special Agent Enrique Camarena-Salazar.
 8. On or about February 8, 1985, defendant ERNESTO FONSECA-CARRILLO went to 881 Lope de Vega in Guadalajara, Jalisco, Mexico.
 9. On or about February 8, 1985, co-conspirator Juan Jose Bernabe-Ramirez went to 881 Lope de Vega in Guadalajara, Jalisco, Mexico.

10. On or about February 8, 1985, defendant HUMBERTO ALVAREZ-MACHAIN went to 881 Lope de Vega in Guadalajara, Jalisco, Mexico.
11. On or about February 8, 1985, co-conspirator Rene Martin Verdugo-Urquidez went to 881 Lope de Vega in Guadalajara, Jalisco, Mexico.
12. On or about February 8, 1985, co-conspirator Raul Lopez-Alvarez, a State Judicial Police Officer, went to 881 Lope de Vega in Guadalajara, Jalisco, Mexico.
13. On or about February 10, 1985, defendant MIGUEL ANGEL FELIX-GALLARDO possessed at his residence in Guadalajara, Jalisco, Mexico, a photograph of Special Agent Enrique Camarena-Salazar.

COUNT SEVEN

[18 U.S.C. §§ 1201(a)(5), 2]

The general allegations of this Seventh Superseding Indictment are realleged in this count and incorporated herein by reference.

Beginning on a date unknown and continuing to on or about February 9, 1985, in Guadalajara, Jalisco, Mexico, defendants RAFAEL CARO-QUINTERO, ERNESTO FONSECA-CARRILLO, MIGUEL ANGEL FELIX-GALLARDO, MANUEL IBARRA-HERRERA, RUBEN ZUNO-ARCE, JAVIER BARBA-HERNANDEZ, ARMANDO PAVON-REYES, JUAN GILBERTO HERNANDEZ-PARRA, SERGIO ESPINO-VERDIN, HUMBERTO ALVAREZ-MACHAIN, and co-conspirators Juan Ramon Matta-Ballesteros, Rene Martin Verdugo-Urquidez, Juan Jose Bernabe-Ramirez, Raul Lopez-Alvarez, and others known and unknown to the Grand Jury, did aid, abet, counsel, induce, procure, cause and otherwise willfully participate in the abduction and holding for the purpose of interrogation of Enrique Camarena-Salazar, a Special Agent with the Drug Enforcement Administration, such acts having been done while Special Agent Enrique Camarena-Salazar was engaged in, and on account of, the performance of his official duties, in violation of Title 18, United States Code, Sections 1201(a)(5) and 2.

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COUNT EIGHT

[18 U.S.C. §§ 1111(a), 1114, 2]

The general allegations of this Seventh Superseding Indictment are realleged in this count and incorporated herein by reference.

On or about February 9, 1985, in Guadalajara, Jalisco, Mexico, Enrique Camarena-Salazar, an officer and employee of the Drug Enforcement Administration, was murdered on account of the performance of his official duties as a Special Agent of the Drug Enforcement Administration, said murder having taken place in and during the course of the perpetration of his kidnapping. Defendants RAFAEL CARO-QUINTERO, ERNESTO-FONSECA-CARRILLO, SERGIO ESPINO-VERDIN, HUMBERTO ALVAREZ-MACHAIN, and co-conspirators Juan Ramon Matta-Ballesteros, Rene Martin Verdugo-Urquidez, Juan Jose Bernabe-Ramirez, Raul Lopez-Alvarez, and others known and unknown to the Grand Jury, willfully perpetrated the kidnapping and holding for interrogation of Enrique Camarena-Salazar, on account of the performance of his official duties as a Special Agent of the Drug Enforcement Administration, by aiding, abetting, counseling, inducing, procuring, causing and otherwise willfully participating in said kidnapping, in violation of Title 18, United States Code, Sections 1111, 1114, and 2.

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COUNT NINE

[18 U.S.C. § 3]

The general allegations of this Seventh Superseding Indictment are realleged in this count and incorporated herein by reference.

On or about February 9, 1985, in Guadalajara, Jalisco, Mexico, defendants MANUEL IBARRA-HERRERA and ARMANDO PAVON-REYES, and co-conspirators Juan Jose Bernabe-Ramirez and Raul Lopez-Alvarez, knowing that defendant RAFAEL CARO-QUINTERO aided, abetted, counseled, induced, procured, caused and otherwise willfully participated in the kidnapping and murder of Enrique Camarena-Salazar and Alfred Zavala-Avelar, in violation by defendant RAFAEL CARO-QUINTERO of Title 18, United States Code, Sections 1111, 1114, 1201(a)(5), 1959 and 2, did knowingly and willfully receive, comfort and assist defendant RAFAEL CARO-QUINTERO in order to hinder and prevent his apprehension, trial and punishment, in violation by defendants MANUEL IBARRA-HERRERA and ARMANDO PAVON-REYES and co-conspirators Juan Jose Bernabe-Ramirez and Raul Lopez-Alvarez, of Title 18, United States Code, Section 3.

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COUNT TEN

[18 U.S.C. § 3]

The general allegations of this Seventh Superseding Indictment are realleged in this count and incorporated herein by reference.

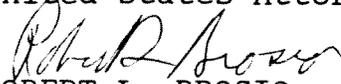
From in or about February, 1985, through April 4, 1985, in Mexico, Costa Rica and elsewhere, defendants INES CALDERON-QUINTERO and ALBINO BAZAN-PADILLA, knowing that defendant RAFAEL CARO-QUINTERO aided, abetted, counseled, induced, procured, caused and otherwise willfully participated in the kidnapping and murder of Special Agent Enrique Camarena-Salazar and Alfred Zavala-Avelar in violation by RAFAEL CARO-QUINTERO of Title 18, United States Code, Sections 1111, 1114, 1201(a)(5), 1959 and 2, did knowingly and willfully receive, comfort and assist defendant RAFAEL CARO-QUINTERO in order to hinder and prevent his apprehension, trial and punishment, in violation by defendants INES CALDERON-QUINTERO and ALBINO BAZAN-PADILLA, of Title 18,

1 United States Code, Section 3.
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4 A TRUE BILL

5 
6 Foreperson

7 LOURDES G. BAIRD
8 United States Attorney

9 
10 ROBERT L. BROSIO
11 Assistant United States Attorney
12 Chief, Criminal Division

13 THOMAS H. BIENERT, Jr.
14 Assistant United States Attorney
15 Chief, Criminal Complaints
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