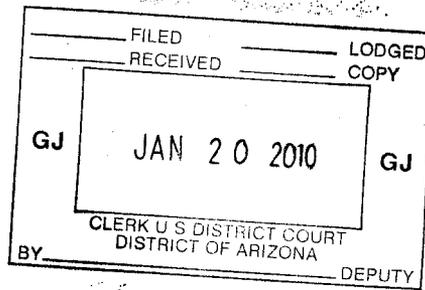


1 DENNIS K. BURKE
United States Attorney
2 District of Arizona
PATRICK T. BARRY
3 CHRISTOPHER A. BROWN
Assistant United States Attorneys
4 Evo A. Deconcini U.S. Courthouse
405 West Congress, Suite 4800
5 Tucson, Arizona 85701-5040
Telephone: (520) 620-7300
6 Patrick.Barry2@usdoj.gov
Christopher.Brown7@usdoj.gov
7 Attorneys for Plaintiff



8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10 United States of America,

11 Plaintiff,

12 v.

13 Ronaldo Acuna Urcadez;
Hector David Romo-Morales;
14 Luis Marcial Luna-Alamillo;
Ignacio Alfredo Erives-Martinez;
15 Arnulfo Beltran Sosa;
Emmanuel Jesus Castro;
16 Jorge Adalberto Campos;
Magda Leticia Morales;
17 James Angelo Lull;
Maria Angelica Rodriguez;
18 Pedro Ballesteros, Jr.;
Linda Ann Urcadez;

19 Defendants.
20

CR10-0150TUC Jme
BPV

INDICTMENT

Violations: 21 USC §846
21 USC §841(a)(1)
21 USC §841(b)(1)(A)(vii)
21 USC §841(b)(1)(B)(vii)
21 USC §841(b)(1)(C)
18 USC §2
21 USC §853

(Conspiracy to Possess with Intent to Distribute Marijuana; Possession with Intent to Distribute Marijuana; Aiding and Abetting; Forfeiture)

21 THE GRAND JURY CHARGES:

22 COUNT 1

23 From approximately November 4, 2008 to approximately October 3, 2009, in
24 or near Cochise County and Pima County, in the District of Arizona, RONALDO ACUNA
25 URCADEZ; HECTOR DAVID ROMO-MORALES; LUIS MARCIAL LUNA-
26 ALAMILLO; ARNULFO BELTRAN SOSA; EMMANUEL JESUS CASTRO; MAGDA

1 LETICIA MORALES; JAMES ANGELO LULL; and LINDA ANN URCADEZ, named
2 herein as defendants and co-conspirators, did knowingly and intentionally combine,
3 conspire, confederate and agree together and with other persons known and unknown to the
4 grand jury, to possess with intent to distribute 1,000 kilograms or more of marijuana, that
5 is, approximately 1,996.5 kilograms of marijuana, a Schedule I controlled substance; in
6 violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vii).

7 All in violation of Title 21, United States Code, Section 846.

8 **COUNT 2**

9 From approximately October 17, 2008 to approximately May 19, 2009, in or
10 near Cochise County, in the District of Arizona, IGNACIO ALFREDO ERIVES-
11 MARTINEZ, named herein as defendant and co-conspirator, did knowingly and
12 intentionally combine, conspire, confederate and agree with other persons known and
13 unknown to the grand jury, to possess with intent to distribute 1,000 kilograms or more of
14 marijuana, that is, approximately 4,863 kilograms of marijuana, a Schedule I controlled
15 substance; in violation of Title 21, United States Code, Sections 841(a)(1) and
16 841(b)(1)(A)(vii).

17 All in violation of Title 21, United States Code, Section 846.

18 **COUNT 3**

19 On or about November 18, 2008, at or near Palominas, in the District of Arizona,
20 IGNACIO ALFREDO ERIVES-MARTINEZ, did knowingly and intentionally possess with
21 intent to distribute 100 kilograms or more, but less than 1,000 kilograms of marijuana, that
22 is, approximately 350 kilograms of marijuana, a Schedule I controlled substance, and did
23 aid, abet, counsel, command, induce, procure, and cause the same; in violation of Title 21,
24 United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States
25 Code, Section 2.

COUNT 4

1
2 On or about January 4, 2009, at or near Benson, in the District of Arizona,
3 PEDRO BALLESTEROS JR., did knowingly and intentionally possess with intent to
4 distribute 50 kilograms or more, but less than 100 kilograms of marijuana, that is,
5 approximately 62 kilograms of marijuana, a Schedule I controlled substance, and did aid,
6 abet, counsel, command, induce, procure, and cause the same; in violation of Title 21,
7 United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code,
8 Section 2.

9
COUNT 5

10 On or about May 2, 2009, at or near Benson, in the District of Arizona,
11 HECTOR DAVID ROMO-MORALES, did knowingly and intentionally possess with intent
12 to distribute 100 kilograms or more, but less than 1,000 kilograms of marijuana, that is,
13 approximately 478 kilograms of marijuana, a Schedule I controlled substance, and did aid,
14 abet, counsel, command, induce, procure, and cause the same; in violation of Title 21,
15 United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States
16 Code, Section 2.

17
COUNT 6

18 On or about May 19, 2009, at or near Sierra Vista, in the District of Arizona,
19 HECTOR DAVID ROMO-MORALES; IGNACIO ALFREDO ERIVES-MARTINEZ; and
20 ARNULFO BELTRAN SOSA, did knowingly and intentionally possess with intent to
21 distribute 100 kilograms or more, but less than 1,000 kilograms of marijuana, that is,
22 approximately 457 kilograms of marijuana, a Schedule I controlled substance, and did aid,
23 abet, counsel, command, induce, procure, and cause the same; in violation of Title 21,
24 United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States
25 Code, Section 2.

1 COUNT 7

2 On or about September 29, 2009, at or near Huachuca City, in the District of
3 Arizona, HECTOR DAVID ROMO-MORALES; EMMANUEL JESUS CASTRO; and
4 JORGE ADALBERTO CAMPOS, did knowingly and intentionally possess with intent to
5 distribute 100 kilograms or more, but less than 1,000 kilograms of marijuana, that is,
6 approximately 157.7 kilograms of marijuana, a Schedule I controlled substance, and did aid,
7 abet, counsel, command, induce, procure, and cause the same; in violation of Title 21,
8 United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States
9 Code, Section 2.

10 COUNT 8

11 On or about October 3, 2009, in or near Cochise County and Pima County, in
12 the District of Arizona, HECTOR DAVID ROMO-MORALES; LUIS MARCIAL LUNA-
13 ALAMILLO; ARNULFO BELTRAN SOSA; EMMANUEL JESUS CASTRO; MAGDA
14 LETICIA MORALES; JAMES ANGELO LULL; and MARIA ANGELICA
15 RODRIGUEZ, did knowingly and intentionally possess with intent to distribute 100
16 kilograms or more, but less than 1,000 kilograms of marijuana, that is, approximately 476.1
17 kilograms of marijuana, a Schedule I controlled substance, and did aid, abet, counsel,
18 command, induce, procure, and cause the same; in violation of Title 21, United States Code,
19 Sections 841(a)(1) and 841(b)(1)(B)(vii) and Title 18, United States Code, Section 2.

20 FORFEITURE ALLEGATION

21 Upon conviction of one or more of the controlled substance offenses alleged in
22 Counts One through Eight of this Indictment, defendants RONALDO ACUNA URCADEZ;
23 HECTOR DAVID ROMO-MORALES; LUIS MARCIAL LUNA-ALAMILLO; IGNACIO
24 ALFREDO ERIVES-MARTINEZ; ARNULFO BELTRAN SOSA; EMMANUEL JESUS
25 CASTRO; JORGE ADALBERTO CAMPOS; MAGDA LETICIA MORALES; JAMES
26 ANGELO LULL; MARIA ANGELICA RODRIGUEZ;

1 PEDRO BALLESTEROS, JR.; and LINDA ANN URCADEZ, shall forfeit to the United
2 States pursuant to Title 21, United States Code, Section 853,

3 (a) All right, title, and interest in (1) any property, real or personal constituting,
4 or derived from, any proceeds the defendants obtained, directly or indirectly, as the result
5 of the said violations and (2) any property used, or intended to be used, in any manner or
6 part, to commit, or to facilitate, the commission of the said violations;

7 (b) A sum of money equal to the amount of proceeds obtained as a result of the
8 offenses, for which the defendants are jointly and severally liable.

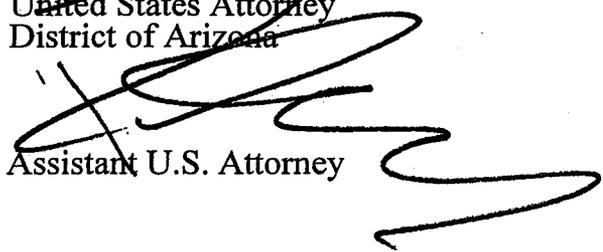
9 If any of the forfeitable property, as a result of any act or omission of the
10 defendants: (1) cannot be located upon the exercise of due diligence; (2) has been
11 transferred or sold to, or deposited with, a third party; (3) has been placed beyond the
12 jurisdiction of the court; (4) has been substantially diminished in value; or (5) has been
13 commingled with other property which cannot be divided without difficulty; it is the intent
14 of the United States to seek forfeiture of any other property of said defendant(s) up to the
15 value of the forfeitable property.

16 All pursuant to Title 21, United States Code, Section 853 and Rule 32.2.(a),
17 Federal Rules of Criminal Procedure.

18
19 A TRUE BILL

20
21 
22 Presiding Juror

23 DENNIS K. BURKE
24 United States Attorney
25 District of Arizona

26 
Assistant U.S. Attorney

JAN 20 2010

REDACTED FOR
PUBLIC DISCLOSURE