

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>14-652</u>
v.	:	DATE FILED: _____
ANTONIO LAREDO,	:	VIOLATIONS:
a/k/a "Antonio Rodriguez,"	:	21 U.S.C. § 848 (continuing criminal
a/k/a "Job Laredo Donjuan,"	:	enterprise – 1 count)
a/k/a "Gordo,"	:	21 U.S.C. § 846 (conspiracy to distribute 1
ISMAEL LAREDO,	:	kilogram or more of heroin – 1 count)
a/k/a "Ismael Laredo Don Juan,"	:	21 U.S.C. § 963 (conspiracy to import 1
OSMAR FLORES	:	kilogram or more of heroin – 1 count)
ANTONIO MARCELO BARRAGAN,	:	21 U.S.C. § 841(a)(1) (possession
a/k/a "El Raton,"	:	with intent to distribute 1 kilogram or
ALEJANDRO SOTELO,	:	more of heroin - 16 counts)
a/k/a "Alex,"	:	21 U.S.C. § 841(a)(1) (distribution of 1
LUIS DEHEZA LAREDO,	:	kilogram or more of heroin – 20 counts)
a/k/a "Guicho,"	:	21 U.S.C. § 846 (attempt to distribute 1
VICTOR JAIMES LAREDO,	:	kilogram or more of heroin – 2 counts)
a/k/a "Marshmallow,"	:	21 U.S.C. § 846 (attempt to possess with
ENOC LAREDO-BARRIOS,	:	intent to distribute 1 kilogram or more of
a/k/a "Jose Rosales,"	:	heroin – 2 counts)
FRANCISCO GONZALEZ JOSE,	:	21 U.S.C. § 856(a)(2) (maintaining a drug
a/k/a "Franci,"	:	house – 1 count)
a/k/a "Francisco Morales,"	:	18 U.S.C. § 1956(h) (conspiracy to commit
DARBIN VARGAS,	:	money laundering – 1 count)
a/k/a "Darbi,"	:	18 U.S.C. § 1956(a)(1)(B)(i) (money
GABRIEL VARGAS	:	laundering – 62 counts)
CONFESOR MONTALVO	:	18 U.S.C. § 2 (aiding and abetting)
MIGUEL IRIZARRY,	:	Notice of forfeiture
a/k/a "Chisito,"	:	
JOSE RUIZ,	:	
a/k/a "Drama,"	:	
EDWIN VIDAL	:	
LUIS VASQUEZ,	:	
a/k/a "Chupe,"	:	

FRANK CHRISTIAN PERALTA, :
a/k/a "Cojo,"
ARIEL RODRIGUEZ, :
a/k/a "El Puro,"
JOEL PERALTA-REYES :
JHONNY MENA-MARIANO
SAMUEL PEREZ :
MELVIN PAGAN
ROBERT DELORBE :
JOHANA LASALS
JOSE LUIS ROJAS-HERNANDEZ :
JACQUELINE DELGADO
IVET MANRIQUE BANDA :
EDGAR R. CHAVELAS-MANRIQUE
MERCEDES BARRIOS HERNANDEZ, :
a/k/a "La Meche,"
ORTENCIA HERRERA :
CARMELINA SOTELO
DANIELA GOMEZ-VELASQUEZ, :
MAURICIO CALDERON
ANGEL P. MASCORRO :
YANDELIZ RENTERIA
JUAN GONZALEZ :
PRISCILLA BUSTAMANTE,
a/k/a "Priscilla Laredo" :

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about 2008 to on or about November 19, 2014, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan,"
ANTONIO MARCELO BARRAGAN,
a/k/a "El Raton,"
ALEJANDRO SOTELO,
a/k/a "Alex,"
LUIS DEHEZA LAREDO,
a/k/a "Guicho,"
VICTOR JAIMES LAREDO,
a/k/a "Marshmallow,"
ENOC LAREDO-BARRIOS,
a/k/a "Jose Rosales,"
OSMAR FLORES,
FRANCISCO GONZALEZ JOSE,
a/k/a "Franci,"
a/k/a "Francisco Morales,"
DARBIN VARGAS,
a/k/a "Darbi,"
GABRIEL VARGAS,
CONFESOR MONTALVO,
MIGUEL IRIZARRY,
a/k/a "Chisito,"
JOSE RUIZ,
a/k/a "Drama,"
FRANK CHRISTIAN PERALTA,
a/k/a "Cojo,"
ARIEL RODRIGUEZ,
a/k/a "El Puro,"
JOEL PERALTA REYES,
EDWIN VIDAL,
JHONNY MENA-MARIANO,
JACQUELINE DELGADO, and
IVET MANRIQUE BANDA

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 1 kilogram or more, that is, approximately 1,000 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants ANTONIO LAREDO and ISMAEL LAREDO, leaders of the Mexico based Laredo Drug Trafficking Organization ("DTO"), were engaged in the manufacture in Mexico, and the smuggling and unlawful importation into the United States for distribution and sale of, approximately 1,000 kilograms of heroin; the heroin was smuggled into the United States in multi-kilogram quantities using various concealment and smuggling techniques, including the concealment of shipments of multiple kilograms of heroin in car batteries, car bumpers, concealed vehicle traps, and sealed fruit and vegetable cans.

3. Defendants ANTONIO LAREDO and ISMAEL LAREDO recruited and hired couriers in the United States to transport and deliver multi-kilogram shipments of heroin originating in Mexico to heroin distributors affiliated with the Laredo DTO located in Chicago, Illinois, Philadelphia, Pennsylvania, Camden, New Jersey and New York, New York.

4. Defendant ANTONIO MARCELO BARRAGAN, a/k/a "El Raton," served as a broker of raw opium in Mexico which he supplied to defendant ANTONIO LAREDO, for use in the manufacture of heroin by members of the Laredo DTO in Mexico.

5. Defendant ALEJANDRO SOTELO, a/k/a "Alex," who was based in Chicago, Illinois, served as a recipient of monthly shipments of 35 to 50 kilograms of heroin which were smuggled and imported from Mexico into the United States at the direction of

defendants ANTONIO LAREDO and ISMAEL LAREDO. Defendant SOTELO concealed and stored bulk shipments of the DTO's heroin in Chicago, Illinois, until defendants ANTONIO LAREDO and ISMAEL LAREDO directed that defendant SOTELO transport, or have hired couriers transport, multi-kilogram quantities of heroin to Philadelphia, for storage in Laredo DTO stash houses, and ultimately for delivery to heroin distributors based in the Philadelphia, Pennsylvania area.

6. Joseph Torres, charged elsewhere, coordinated and supervised the transportation and delivery of heroin, manufactured in Mexico, under the supervision of defendants ANTONIO LAREDO and ISMAEL LAREDO, into the United States. Torres oversaw in Philadelphia, Pennsylvania the distribution of kilogram quantities of heroin by, at times, defendants LUIS DEHEZA LAREDO, VICTOR JAIMES LAREDO and Bertin Sanchez, charged elsewhere, each of whom, at various times, also collected and supervised the storage, transportation and laundering of drug proceeds for the organization; accounted to the leaders of the organization; and ensured that drug proceeds were laundered, transmitted, and transported, using various money laundering techniques, to the organization's leadership in Mexico.

7. Euddy Izquierdo, charged elsewhere, Joseph Torres, defendants LUIS DEHEZA LAREDO, VICTOR JAIMES LAREDO and, later, Bertin Sanchez, received, arranged, and supervised the storage and distribution of, kilogram to multi-kilogram quantities of heroin distributed by the Laredo DTO's Philadelphia distributors.

8. At various times, defendants FRANCISCO GONZALEZ JOSE, DARBIN VARGAS, GABRIEL VARGAS, LUIS DEHEZA-LAREDO, FRANK CHRISTIAN PERALTA, ARIEL RODRIGUEZ, JOEL PERALTA REYES, CONFESOR MONTALVO, MIGUEL IRIZARRY, JOSE RUIZ, EDWIN VIDAL, and Euddy Izquierdo, Frank Felix-

Herrera, Jeudy Mena, and Leandro Rodriguez-Urena, each charged elsewhere, served as Philadelphia based distributors for defendants ANTONIO LAREDO and ISMAEL LAREDO, and were responsible for the distribution and sale of multi-kilogram quantities of heroin in the Philadelphia, Pennsylvania area, and in Camden, New Jersey. During the course of the conspiracy, the Laredo DTO was responsible for supplying its Philadelphia area distributors with multi-kilogram quantities of heroin ranging from 12 to 50 kilograms per month, at a cost of approximately \$60,000 to \$63,000 per kilogram.

9. Euddy Izquierdo also served defendants ANTONIO LAREDO and ISMAEL LAREDO and the Laredo DTO as a heroin transporter and courier who coordinated the transfer of bulk shipments of multiple kilograms of heroin from Mexico, Texas, and Chicago, Illinois to the Philadelphia, Pennsylvania area, using vehicles, purchased by the Laredo DTO from defendant OSMAR FLORES, equipped with concealed compartments, and false-bottom car batteries, intended for carrying drugs and drug proceeds. At the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, on multiple occasions, Izquierdo traveled to Mount Pleasant, Texas and met with defendant IVET MANRIQUE-BANDA, a Laredo DTO heroin stash house operator, courier and money launderer, to pick up car batteries in which kilograms of heroin were concealed, for transportation and delivery to Philadelphia heroin distributors for the Laredo DTO.

10. Frank Felix-Herrera served as a heroin kilogram distributor for defendants ANTONIO LAREDO and ISMAEL LAREDO, and was responsible for the distribution of kilogram to multi-kilogram quantities of heroin in the Philadelphia area.

11. Jeudy Mena served as a heroin distributor for defendants ANTONIO LAREDO and ISMAEL LAREDO and regularly received kilogram to multi-kilogram quantities

of heroin in the Philadelphia, Pennsylvania area, which deliveries were arranged by and through Joseph Torres. Mena supervised a heroin cutting, bagging and packaging operation located at 1510 Stoney Lane, in Philadelphia, which was comprised of five workers who regularly received bulk heroin obtained by Mena from the Laredo DTO, broke it down, and cut, bagged and packaged the heroin into 13 packet bundles of heroin intended for sale and distribution to heroin users and distributors on the streets of Philadelphia. Defendant ISMAEL LAREDO supplied the 1510 Stony Lane heroin mill with multi-kilogram quantities of heroin on multiple occasions in April and May of 2012.

12. At the direction of defendant ANTONIO LAREDO, defendant JACQUELINE DELGADO served as a courier of multi-kilogram shipments of heroin from Chicago, Illinois to Philadelphia based distributors for the Laredo DTO, including Euddy Izquierdo, and further served as a courier transporting in concealed vehicle compartments bulk sums of U.S. currency representing proceeds of sales of heroin by Philadelphia based distributors for the Laredo DTO back to defendant ANTONIO LAREDO and the members of the Laredo DTO in the Chicago, Illinois area.

13. Defendants ANTONIO LAREDO and ISMAEL LAREDO and members of the Laredo DTO used violence, such as assaults and kidnapping; threats of violence, including murder and arson; and brandished, used, and threatened to use, firearms -- all to protect the DTO's product and proceeds and to prevent members from withdrawing from the organization.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, the defendants and others known and unknown to the grand jury, committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere:

1. In or about 2008, defendant ANTONIO LAREDO, after an introduction to Euddy Izquierdo, charged elsewhere, by defendant DARBIN VARGAS, recruited Izquierdo to become a driver for the Laredo DTO and to transport from Lockport, Illinois, to Philadelphia, Pennsylvania, in vehicles with concealed compartments, kilograms of heroin which Izquierdo, at the direction of defendant ANTONIO LAREDO, delivered to defendant DARBIN VARGAS, for distribution and sale in the Philadelphia, Pennsylvania area.

2. From 2008 through 2009, at the direction of defendant ANTONIO LAREDO, Euddy Izquierdo made multiple trips to Lockport, Illinois and back to Philadelphia, Pennsylvania in order to deliver multiple kilograms of heroin to defendant DARBIN VARGAS, and members of the Philadelphia based Vargas DTO, including defendant GABRIEL VARGAS and John Vargas and Wilmer Vargas, each charged elsewhere.

3. From in or about 2009, to on or about December 19, 2011, defendants ANTONIO LAREDO and ISMAEL LAREDO directed transporters and couriers of Laredo DTO heroin shipments, including at times, Joseph Torres, Victoriano Avalos and Euddy Izquierdo, to deliver to Brandon Williams, charged elsewhere, approximately 7 to 10 kilograms of Laredo DTO heroin every month in Philadelphia, Pennsylvania. Within the stated time period, Williams met almost daily with Torres and regularly delivered up to \$300,000 in cash per week, representing proceeds of sale of Laredo DTO heroin in Philadelphia, Pennsylvania, to be laundered, transmitted, and transported, using various money laundering techniques, to defendants ANTONIO LAREDO and ISMAEL LAREDO in Mexico.

4. In or about August 2009, at the direction of defendant ANTONIO LAREDO, Joseph Torres transported, from Chicago, Illinois, and delivered one kilogram of heroin to defendant DARBIN VARGAS at a residence in Philadelphia, Pennsylvania.

5. In or about Spring 2010:

a. At the direction of defendant ANTONIO LAREDO, Giovanni Delgado, charged elsewhere, and defendant JACQUELINE DELGADO traveled by car from Chicago, Illinois to a Philadelphia, Pennsylvania residence, and delivered multiple kilograms of heroin to Euddy Izquierdo, for distribution and sale to Philadelphia based heroin distributors, including defendants DARBIN VARGAS and GABRIEL VARGAS.

b. At the direction of defendant ANTONIO LAREDO, Giovanni Delgado and defendant JACQUELINE DELGADO remained in Philadelphia, Pennsylvania to collect proceeds from the sale of the multiple kilograms of heroin they had delivered to Euddy Izquierdo.

c. Giovanni Delgado and defendant JACQUELINE DELGADO returned to Chicago, Illinois with \$60,000, representing proceeds of heroin sales, concealed in a vehicle, for delivery to defendant ANTONIO LAREDO.

6. In or about the Fall of 2010, at the direction of defendant ANTONIO LAREDO, Giovanni Delgado and defendant JACQUELINE DELGADO made a second trip by car from Chicago, Illinois to Philadelphia, Pennsylvania to deliver multiple kilograms of heroin concealed within a load vehicle to Euddy Izquierdo, for delivery to Philadelphia heroin

distributors for the Laredo DTO, including defendants DARBIN VARGAS and GABRIEL VARGAS.

7. From in or about October 2010 to in or about February 2011, defendant ISMAEL LAREDO sent four separate shipments of heroin, each containing between 2.5 and 7 kilograms of heroin produced by the Laredo DTO, in Mexico to Gregorio Lantigua-Reyes, charged elsewhere, a Philadelphia based heroin distributor for the Laredo DTO, to Philadelphia, Pennsylvania.

8. On or about November 17, 2010, defendants ANTONIO LAREDO and ISMAEL LAREDO aided and abetted the possession with intent to distribute of approximately 5 kilograms of heroin which had been supplied to Philadelphia heroin traffickers by defendants ANTONIO LAREDO and ISMAEL LAREDO and which was seized by law enforcement personnel during a warrant authorized search of the premises at 6060 Crescentville Road, Philadelphia, Pennsylvania.

9. On or about November 29, 2010, at the direction of defendant ANTONIO LAREDO, two female couriers recruited by defendant ANTONIO LAREDO possessed approximately 4 kilograms of heroin concealed inside a motor vehicle in Jones County, Mississippi; this shipment of heroin was intended for delivery in Philadelphia, Pennsylvania, to Gregorio Lantigua-Reyes, charged elsewhere, a Philadelphia based distributor of heroin for defendants ANTONIO LAREDO and ISMAEL LAREDO and the Laredo DTO.

10. On or about April 5, 2011, acting at the direction of defendant ANTONIO LAREDO, Joseph Torres possessed approximately \$68,950, representing proceeds of sales of heroin supplied by the Laredo DTO which Torres had collected, in Astoria, New York.

11. On or about April 8, 2011, acting at the direction of defendant ANTONIO LAREDO, Joseph Torres possessed approximately \$52,990, representing proceeds of sales of Laredo DTO heroin, in New York, New York.

12. From in or about the Fall of 2010 to in or about the summer of 2011, acting at the direction of defendant ANTONIO LAREDO, Giovanni Delgado made approximately eight round trip bus trips from Chicago, Illinois to Philadelphia, Pennsylvania in order to pick up bulk cash in the tens of thousands of dollars, representing proceeds of sales of Laredo DTO heroin in Philadelphia, Pennsylvania, and deliver it to defendant ANTONIO LAREDO and representatives of the Laredo DTO in Chicago, Illinois.

13. In or about Summer 2011, acting under the direction of defendant ANTONIO LAREDO, Joseph Torres and Victoriano Avalos, charged elsewhere, opened and caused the opening of, a Bank of America bank account in Joliet, Illinois, for the purpose of wiring proceeds from the sale of Laredo DTO heroin in Philadelphia, Pennsylvania back to defendants ANTONIO LAREDO and ISMAEL LAREDO in Mexico.

14. In or about July 2011, defendant ANTONIO LAREDO directed Frank Felix-Herrera and Euddy Izquierdo to supply members of the street corner heroin trafficking organization of Christian Serrano, charged elsewhere, in Philadelphia, Pennsylvania with multiple kilograms of heroin.

15. On or about July 21, 2011, members of the Christian Serrano street corner heroin trafficking organization in Philadelphia possessed multiple kilograms of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO and the Laredo DTO in the Serrano organization's heroin cutting and bagging house and in a stash location, both located in Philadelphia, Pennsylvania.

16. On or about July 28, 2011, defendant GABRIEL VARGAS and Wilmer Vargas, charged elsewhere, who were driver and passenger, respectively, in a 2005 Chevrolet Impala vehicle which was stopped by law enforcement agents in Philadelphia, Pennsylvania, possessed approximately \$314,820 in U.S. currency, representing proceeds of heroin sales owed by the Vargas DTO, including defendants DARBIN VARGAS and GABRIEL VARGAS, and other Philadelphia based heroin distributors, including defendant FRANCISCO GONZALEZ JOSE, to the Laredo DTO, which was intended to be transferred to representatives of the Laredo DTO in Philadelphia, Pennsylvania, for transportation and delivery to defendants ANTONIO LAREDO and ISMAEL LAREDO in Mexico.

17. From on or about July 28, 2011, to in or about March 2012, defendants ANTONIO LAREDO and ISMAEL LAREDO directed Victoriano Avalos and Euddy Izquierdo, couriers and transporters of bulk heroin for the Laredo DTO, to travel to Atlanta, Georgia, on multiple occasions, to pick up, transport and deliver to Philadelphia, Pennsylvania, approximately 40-50 kilograms of heroin, for delivery to Philadelphia area heroin distributors for the Laredo DTO, including defendants FRANCISCO GONZALEZ JOSE, CONFESOR MONTALVO, MIGUEL IRIZARRY, JOSE RUIZ, FRANK CHRISTIAN PERALTA, ARIEL RODRIGUEZ, JOEL PERALTA REYES, and Frank Felix-Herrera and Izquierdo.

18. From on or about July 28, 2011, to in or about March 2012, defendants ANTONIO LAREDO and ISMAEL LAREDO supplied defendant FRANCISCO GONZALEZ JOSE in Philadelphia with approximately 15 to 18 kilograms of Laredo DTO heroin per month, which were delivered, at various times, by Victoriano Avalos and Euddy Izquierdo.

19. From in or about August 2011, to on or about July 19, 2013, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, Euddy Izquierdo delivered approximately 3 to 4 kilograms of Laredo DTO heroin every three to four weeks to defendants CONFESOR MONTALVO, MIGUEL IRIZARRY and JOSE RUIZ, in Camden, New Jersey, for a total quantity distributed of more than 100 kilograms of heroin.

20. On or about September 2, 2011, acting at the direction of defendant ANTONIO LAREDO, Giovanni Delgado possessed approximately 3 kilograms of heroin supplied by the Laredo DTO and concealed in the battery of a motor vehicle in Texarkana, Texas; Giovanni Delgado was enroute to deliver the heroin to distributors for the Laredo DTO in Philadelphia, Pennsylvania.

21. In or about November 2011, Victoriano Avalos travelled from Chicago, Illinois to Philadelphia, Pennsylvania to collect proceeds from the sale of kilogram quantities of heroin for the Laredo DTO, which had been delivered to Philadelphia based heroin distributors for the Laredo DTO, at the direction of defendant ANTONIO LAREDO.

22. On or about March 9, 2012:

a. Joseph Torres possessed approximately \$88,000 in bulk U.S. currency, representing proceeds of the sale of kilogram quantities of heroin Torres had collected, in Queens, New York, intended for delivery to the Laredo DTO in Mexico.

b. Joseph Torres, at 4320 Chippendale Street, Philadelphia, Pennsylvania, possessed approximately \$54, 000 in bulk U.S. currency, representing proceeds of sale of kilograms of heroin, intended for delivery to defendant ANTONIO LAREDO, and members of the Laredo DTO in Mexico, in addition to an electronic money counter and a laptop containing records relating to the Laredo DTO heroin trafficking and money laundering operations.

c. Victoriano Avalos possessed approximately 7 kilograms of heroin concealed in luggage aboard an Amtrak train in New Orleans, Louisiana, representing a shipment of Laredo DTO heroin intended for delivery to Laredo DTO heroin distributors based in Philadelphia, Pennsylvania.

23. In or about mid-March 2012, following the search of his residence at 4320 Chippendale Street, Philadelphia, Pennsylvania, Joseph Torres and his family moved from the Philadelphia residence to Plainfield, Illinois, in an effort to evade law enforcement.

24. In or about April 2012, under the direction and supervision of defendant ISMAEL LAREDO:

a. Joseph Torres moved from the area of Chicago, Illinois to 301 # D Byberry Road, Philadelphia, Pennsylvania, in order to begin distributing kilogram quantities of heroin supplied by defendant ISMAEL LAREDO and the Laredo DTO to Philadelphia based distributors for the organization, including Jeudy Mena.

b. Joseph Torres delivered a shipment of approximately 3 kilograms of heroin to Jeudy Mena, in Philadelphia, Pennsylvania; the heroin was concealed inside a car battery and transported from Mexico to Philadelphia, under the direction of defendant ISMAEL LAREDO and the Laredo DTO in Mexico.

25. On or about April 19, 2012, acting under the direction of defendant ANTONIO LAREDO, at 210 West 251st Street, Bronx, New York, defendant ISMAEL REYNA-FELIX possessed approximately \$196,020, representing proceeds of sale of multiple kilograms of heroin supplied by the Laredo DTO, collected by defendant ISMAEL REYNA-FELIX, and intended for delivery to members of the Laredo DTO in Mexico.

26. In or about late April 2012, acting under the direction and supervision of defendant ISMAEL LAREDO, Joseph Torres delivered a shipment of approximately 4 kilograms of heroin to Jeudy Mena in Philadelphia, Pennsylvania; the heroin was concealed inside a vehicle speaker box and transported by car from Mexico to Philadelphia.

27. In or about mid-May 2012, acting under the direction and supervision of defendant ISMAEL LAREDO, Joseph Torres delivered a shipment of approximately 3 kilograms of heroin to Jeudy Mena in Philadelphia, Pennsylvania; the heroin was concealed inside a car battery and transported by a courier from Chicago, Illinois to Philadelphia, Pennsylvania.

28. In or about the third week of May 2012, Jeudy Mena gave Joseph Torres a tour of a heroin cutting, packaging and bagging operation Mena controlled and supplied, located at 1510 Stoney Lane, Philadelphia, Pennsylvania, which was comprised of multiple workers, including defendants SAMUEL PEREZ, MELVIN PAGAN, ROBERT DELORBE, JOHANA LASALS, and JOSE LUIS ROJAS-HERNANDEZ, and was supervised by defendant JHONNY MENA-MARIANO, all of whom were engaged in grinding, cutting and bagging the heroin for street sale in bundle quantities in Philadelphia, Pennsylvania.

29. On or about May 31, 2012, defendants ISMAEL LAREDO, JHONNY MENA-MARIANO, SAMUEL PEREZ, MELVIN PAGAN, ROBERT DELORBE, JOHANA LASALS, and JOSE LUIS ROJAS-HERNANDEZ and Jeudy Mena used and maintained, and

aided and abetted the use and maintaining of, the premises at 1510 Stoney Lane, Philadelphia, Pennsylvania as a location to store, manufacture, grind, cut, bag, package and distribute heroin intended for sale on the streets of Philadelphia, and possessed approximately 1 kilogram of heroin, together with significant quantities of heroin processing and packaging materials.

30. On or about July 5, 2012, Person #1, known to the grand jury, acting under the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO and the Laredo DTO, possessed approximately \$549,680 in U.S. currency, representing proceeds of sale of numerous kilograms of heroin supplied by the Laredo DTO, which was intended for delivery to members of the Laredo DTO in Mexico, at 3216 Disston Street, Philadelphia, Pennsylvania.

31. On or about September 1, 2012, defendant LUIS DEHEZA-LAREDO, acting at the direction of defendant ANTONIO LAREDO, moved from Lombard, Illinois to Apartment #1023 A, Presidential Apartments, 3901 City Line Avenue, Philadelphia, Pennsylvania, and established a multi-kilogram heroin "stash" location for the Laredo DTO, to be used as a location to store, and from which to distribute, multi-kilogram quantities of heroin to Philadelphia based distributors for the Laredo DTO.

32. On or about September 18, 2012, acting at the direction of defendant ANTONIO LAREDO, and on behalf of the Laredo DTO, Jose Estrada, charged elsewhere, supplied three couriers, charged elsewhere, with approximately 7.6 kilograms of heroin concealed in sealed fruit and vegetable cans in Texas, and directed the couriers to transport the heroin to Philadelphia, Pennsylvania for delivery to defendants DARBIN VARGAS and GABRIEL VARGAS, and the members of the Vargas DTO, including Wilmer Vargas and John Carlos Vargas, each charged elsewhere.

33. On or about September 19, 2012, on behalf of defendants DARBIN VARGAS and GABRIEL VARGAS, John Vargas and Wilmer Vargas attempted to accept delivery of approximately 7.6 kilograms of heroin concealed in sealed fruit and vegetable cans from couriers sent by the Laredo DTO at 6634 Sylvester Street, Philadelphia, Pennsylvania.

34. In or about June 2013, Joseph Torres, using the alias "Ramon Laboy," established utilities service at 3901 City Line Avenue, Apartment #1023 A, Philadelphia, Pennsylvania, to establish the DTO's Philadelphia heroin stash location.

35. On or about June 5, 2013, at the direction of defendant ANTONIO LAREDO, Bertin Sanchez distributed approximately 2 kilograms of heroin to Frank Felix-Herrera at a location in Philadelphia, Pennsylvania, on short term credit, with the understanding that Felix-Herrera would complete payment of approximately \$60,000 to \$62,000 per kilogram sold within the approximately two week period following the delivery of the heroin to Felix-Herrera.

36. From on or about June 3, 2013, to on or about July 19, 2013, Bertin Sanchez distributed approximately 21 kilograms of heroin to Euddy Izquierdo in Philadelphia, Pennsylvania, on short term credit, with the understanding that Izquierdo would complete payment of approximately \$60,000 to \$62,000 per kilogram sold to the Laredo DTO within the approximately two week period following the delivery of the heroin to Izquierdo.

37. On or about July 2, 2013, Bertin Sanchez entered the Laredo DTO's Philadelphia heroin stash location at 3901 City Line Avenue, Apartment #1023 A, Philadelphia, Pennsylvania and exited carrying a shopping bag containing kilogram quantities of heroin which he then placed in the trunk of a gray 2005 Volkswagen Jetta, bearing PA registration plate JGP 2724.

38. On or about July 18, 2013, Bertin Sanchez, after observing law enforcement surveillance in the vicinity of the organization's Philadelphia heroin stash location at 3901 City Line Avenue, Apartment #1023 A, Philadelphia, Pennsylvania, engaged in erratic "counter-surveillance" driving techniques, and eventually abandoned his vehicle, a gray 2005 Volkswagen Jetta, bearing PA registration plate JGP 2724, in the vicinity of 100 E. Mentor Street, Philadelphia, Pennsylvania.

39. In or about June or July 2013, Frank Felix-Herrera, charged elsewhere, received approximately two kilograms of heroin from Bertin Sanchez, charged elsewhere, in Philadelphia, Pennsylvania, on behalf of the Laredo DTO.

40. From in or about June to on or about July 19, 2013, acting at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, Bertin Sanchez distributed approximately 39 kilograms of heroin for the Laredo DTO for which he was awaiting receipt of, or in the process of receiving, bulk cash payments from the organization's Philadelphia area heroin distributors, to be laundered, transmitted, and transported, using various money laundering techniques, to defendants ANTONIO LAREDO and ISMAEL LAREDO in Mexico.

41. On or about July 19, 2013, acting at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO:

a. Joseph Torres and Bertin Sanchez possessed approximately 12 kilograms of heroin supplied by the Laredo DTO at Apartment #1023 A, 3901 City Line Avenue, Philadelphia, Pennsylvania, and further possessed, and attempted to take possession of, in Philadelphia, Pennsylvania, approximately \$220,000 in U.S. currency, representing proceeds of sale of kilograms of heroin supplied by the Laredo DTO to Philadelphia based distributors for

the organization, and intended for delivery to defendants ANTONIO LAREDO and ISMAEL LAREDO and members of the Laredo DTO in Mexico.

b. Bertin Sanchez, driven by Euddy Izaquierdo, in a white 2009 Acura TL sedan, bearing Pennsylvania registration K09-779K, returned to the vicinity of 100 E. Mentor Street, in Philadelphia, where Sanchez had left the 2005 Volkswagen Jetta on the previous day.

c. At the time Euddy Izquierdo dropped off Bertin Sanchez at the location where he had left his 2005 Volkswagen Jetta, Izquierdo possessed approximately \$105,118.56, representing heroin trafficking proceeds from defendants CONFESOR MONTALVO, MIGUEL IRIZARRY, and JOSE RUIZ , which were intended to partly defray the balance owed by Izquierdo to defendant ANTONIO LAREDO and the Laredo DTO for kilogram quantities of heroin he had received on credit.

d. Joseph Torres was present at 7801 Roosevelt Boulevard, Apartment #36, Philadelphia, Pennsylvania, an apartment used by the Laredo DTO to collect and store bulk sums of U. S. currency representing proceeds of the organization's Philadelphia heroin trafficking activities, and possessed approximately \$19,319 in U. S. currency, representing drug proceeds, as well as a smashed electronic money counter and a heat sealer used in the packaging of drug proceeds.

e. Joseph Torres possessed and controlled a black Saturn automobile, bearing Pennsylvania registration JHY-4650, which contained a hidden, electronically controlled compartment that contained approximately \$89,920 in United States currency representing proceeds of heroin sales intended for delivery to defendants ANTONIO LAREDO and ISMAEL LAREDO and the Laredo DTO in Mexico.

42. In or about August 2013, following the arrests of Joseph Torres and Bertin Sanchez, defendant ANTONIO LAREDO recruited Leandro Rodriguez-Urena, charged elsewhere, to become, and Rodriguez-Urena undertook the role of, the primary coordinator for the distribution of multi-kilogram quantities of heroin for the Laredo DTO in the Philadelphia, Pennsylvania area.

43. On or about October 15, 2013, Jeudy Mena possessed approximately one kilogram of packaged heroin supplied by defendant ISMAEL LAREDO and members of the Laredo DTO at a heroin mill Mena maintained at 8846 Swamp Road, Plumstead, Pennsylvania.

44. On or about November 24, 2013, in Veracruz, Mexico, defendant ISMAEL LAREDO possessed with intent to import into the United States and to distribute to Laredo DTO heroin distributors based in the Philadelphia, Pennsylvania area, approximately 12 kilograms of heroin.

45. On or about March 13, 2014, at the direction of defendant ANTONIO LAREDO, Ronny Espinal, charged elsewhere, possessed with intent to distribute to Leandro Rodriguez-Urena and defendants EDWIN VIDAL and LUIS VASQUEZ, approximately 17 kilograms of heroin supplied by the Laredo DTO, and intended for distribution and sale in the Philadelphia, Pennsylvania area.

46. On or about June 18, 2014, at 8846 Blue Grass Road, Philadelphia, Pennsylvania, defendant FRANCISCO GONZALEZ JOSE possessed approximately \$26,000 in U.S. currency representing proceeds of heroin supplied by the Laredo DTO, in addition to heroin trafficking and packaging material, an iPad and three ledger books containing records of

defendant GONZALEZ-JOSE's heroin sale, distribution and payment transactions with the Laredo DTO from 2011, 2012 and 2013.

47. On or about November 19, 2014, in Philadelphia, Pennsylvania, defendant GABRIEL VARGAS possessed approximately \$21,000 in U.S. currency, representing proceeds of a heroin shipment received and sold by Vargas DTO members in Philadelphia, Pennsylvania, and intended to be tendered for payment to defendants ANTONIO LAREDO and ISMAEL LAREDO.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 2 through 13 of Count One are incorporated here.
2. From in or about 2008 to on or about November 19, 2014, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"
ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan,"
ALEJANDRO SOTELO,
a/k/a "Alex,"
LUIS DEHEZA LAREDO,
a/k/a "Guicho,"
OSMAR FLORES,
FRANCISCO GONZALEZ JOSE,
a/k/a "Franci,"
a/k/a "Francisco Morales,"
DARBIN VARGAS,
a/k/a "Darbi,"
GABRIEL VARGAS,
CONFESOR MONTALVO,
MIGUEL IRIZARRY,
a/k/a "Chisito,"
JOSE RUIZ,
a/k/a "Drama,"
EDWIN VIDAL,
LUIS VASQUEZ,
a/k/a "Chuppee,"
FRANK CHRISTIAN PERALTA,
a/k/a "Cojo,"
ARIEL RODRIGUEZ,
a/k/a "El Puro,"
JOEL PERALTA-REYES, and
IVET MANRIQUE BANDA**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally import 1 kilogram or more, that is, approximately 1,000 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, into the United States from a place outside thereof, that is, Mexico, in violation of Title 21, United States Code, Section 963 and 960 (b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

3. The defendants named in this count of the superseding indictment participated and joined in an agreement to import multi-kilogram quantities of heroin, manufactured in Mexico, into the United States through the use of various concealment and smuggling techniques, including the concealment of shipments of multiple kilograms of heroin in car batteries, car bumpers, concealed vehicle traps, and in sealed fruit and vegetable cans.

4. Defendants ANTONIO LAREDO and ISMAEL LAREDO manufactured, processed and caused the manufacture and process of multi-kilogram quantities of heroin at production facilities in Mexico.

5. Defendants ANTONIO LAREDO and ISMAEL LAREDO hired couriers, including Euddy Izquierdo, charged elsewhere, and others, to transport, in concealed vehicle compartments, car batteries, and in sealed fruit and vegetable cans, multi-kilogram quantities of heroin from Mexico to Chicago, Illinois, Atlanta, Georgia, Philadelphia, Pennsylvania, and New York, New York, for distribution to heroin distributors located in those cities and regions.

6. Defendants ANTONIO LAREDO and ISMAEL LAREDO, using proceeds of heroin sales from the heroin they smuggled and imported into the United States from

Mexico, purchased multiple vehicles from defendant OSMAR FLORES, which they equipped with hidden compartments to facilitate the importation into the United States of multi-kilogram quantities of heroin, and which were also used to smuggle and export from the United States to Mexico large amounts of U.S currency, representing proceeds of Laredo DTO heroin sales in metropolitan areas of the United States.

7. Defendants ANTONIO LAREDO and ISMAEL LAREDO arranged for the manufacture and production of car batteries in Mexico containing concealed compartments to hold multiple kilograms of heroin and which were then used to surreptitiously import heroin into the United States.

8. Defendants ANTONIO LAREDO and ISMAEL LAREDO arranged for the production at a cannery in Mexico of metal fruit and vegetable cans which were filled with cylindrical shaped quantities of heroin and then sealed, to be used to surreptitiously import heroin into the United States by couriers hired and paid by defendants ANTONIO LAREDO and ISMAEL LAREDO.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, the defendants and others known and unknown to the grand jury, committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere:

1. Overt Acts 1 through 47 of Count One are incorporated here.

All in violation of Title 21, United States Code, Section 963.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

In or about mid-November, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo," and
ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1 kilogram or more, that is, approximately 5 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

In or about May 2011, in Philadelphia, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1
kilogram or more, that is, approximately 4 kilograms, of a mixture and substance containing a
detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and
Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 19, 2012, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo." and
ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan,"**

knowingly and intentionally attempted to distribute, and aided and abetted and caused the attempted distribution of, 1 kilogram or more, that is, approximately 7.6 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 19, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**DARBIN VARGAS,
a/k/a "Darbi," and
GABRIEL VARGAS**

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute of, 1 kilogram or more, that is, approximately 7.6 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

In or around mid-May 2012, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1 kilogram or more, that is, approximately 3 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

In or around May 2012, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan," and
JHONNY MENA-MARIANO,**

and Jeudy Mena, charged elsewhere, knowingly used and maintained, and aided and abetted the use and maintaining of, a place, that is, 1510 Stoney Lane, Philadelphia, Pennsylvania, for the purpose of manufacturing and distributing a controlled substance, that is, heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 856(a)(1), and Title 18,
United States Code, Section 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 31, 2012, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan,"
JHONNY MENA-MARIANO,
SAMUEL PEREZ,
MELVIN PAGAN,
ROBERT DELORBE,
JOHANA LASALS, and
JOSE LUIS ROJAS-HERNANDEZ**

and Jeudy Mena, charged elsewhere, possessed with intent to distribute, and aided and abetted and caused the possession with intent to distribute of, 1 kilogram or more, that is, approximately 3 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 2, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1
kilogram or more, that is, approximately 20 kilograms, of a mixture and substance containing a
detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and
Title 18, United States Code, Section 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 3, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**FRANK CHRISTIAN PERALTA,
a/k/a "Cojo,"
ARIEL RODRIGUEZ,
a/k/a "El Puro," and
JOEL PERALTA-REYES**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 2 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 3, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1
kilogram or more, that is, approximately 5 kilograms, of a mixture and substance containing a
detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and
Title 18, United States Code, Section 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 3, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**FRANCISCO GONZALEZ JOSE,
a/k/a "Franci,"
a/k/a "Francisco Morales,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 5 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 4, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
and elsewhere, defendants

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo," and
ALEJANDRO SOTELO,
a/k/a "Alex,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1
kilogram or more, that is, approximately 14 kilograms, of a mixture and substance containing a
detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and
Title 18, United States Code, Section 2.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 5, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1
kilogram or more, that is, approximately 2 kilograms, of a mixture and substance containing a
detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and
Title 18, United States Code, Section 2.

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 5, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**FRANK CHRISTIAN PERALTA,
a/k/a "Cojo,"
ARIEL RODRIGUEZ,
a/k/a "El Puro," and
JOEL PERALTA-REYES,**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 2 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 5, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1
kilogram or more, that is, approximately 3 kilograms, of a mixture and substance containing a
detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and
Title 18, United States Code, Section 2.

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 5, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**LUIS DEHEZA LAREDO,
a/k/a "Guicho,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 3 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 5, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1
kilogram or more, that is, approximately 2 kilograms, of a mixture and substance containing a
detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and
Title 18, United States Code, Section 2.

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 7, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
and elsewhere, defendants

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo," and
ALEJANDRO SOTELO,
a/k/a "Alex,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1
kilogram or more, that is, approximately 14 kilograms, of a mixture and substance containing a
detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and
Title 18, United States Code, Section 2.

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 11, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1 kilogram or more, that is, approximately 2 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 11, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**FRANK CHRISTIAN PERALTA,
a/k/a "Cojo,"
ARIEL RODRIGUEZ,
a/k/a "El Puro," and
JOEL PERALTA-REYES,**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 2 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 12, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1 kilogram or more, that is, approximately 2 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 12, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**FRANK CHRISTIAN PERALTA,
a/k/a "Cojo,"
ARIEL RODRIGUEZ,
a/k/a "El Puro," and
JOEL PERALTA-REYES**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 2 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 15, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1 kilogram or more, that is, approximately 3 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 15, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**LUIS DEHEZA LAREDO,
a/k/a "Guicho,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 3 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 22, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1 kilogram or more, that is, approximately 3 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 22, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**LUIS DEHEZA LAREDO,
a/k/a "Guicho,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 3 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 23, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1 kilogram or more, that is, approximately 2 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 23, 2013, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**FRANK CHRISTIAN PERALTA,
a/k/a "Cojo,"
ARIEL RODRIGUEZ,
a/k/a "El Puro," and
JOEL PERALTA-REYES,**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the
possession with intent to distribute of, 1 kilogram or more, that is, approximately 2 kilograms, of
a mixture and substance containing a detectable amount of heroin, a Schedule I controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and
Title 18, United States Code, Section 2.

COUNT THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 30, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1 kilogram or more, that is, approximately 2 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 30, 2013, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**LUIS DEHEZA LAREDO,
a/k/a "Guicho,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the
possession with intent to distribute of, 1 kilogram or more, that is, approximately 2 kilograms, of
a mixture and substance containing a detectable amount of heroin, a Schedule I controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and
Title 18, United States Code, Section 2.

COUNT THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 3, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1
kilogram or more, that is, approximately 4 kilograms, of a mixture and substance containing a
detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and
Title 18, United States Code, Section 2.

COUNT THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 3, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**FRANK CHRISTIAN PERALTA,
a/k/a "Cojo,"
ARIEL RODRIGUEZ,
a/k/a "El Puro," and
JOEL PERALTA-REYES,**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 4 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 4, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1
kilogram or more, that is, approximately 5 kilograms, of a mixture and substance containing a
detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and
Title 18, United States Code, Section 2.

COUNT THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 4, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**FRANCISCO GONZALEZ JOSE,
a/k/a "Franci,"
a/k/a "Francisco Morales,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 5 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 4, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1 kilogram or more, that is, approximately 2 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 4, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**LUIS DEHEZA LAREDO,
a/k/a "Guicho,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 2 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THIRTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 15, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally distributed, and aided and abetted and caused the distribution of, 1 kilogram or more, that is, approximately 3 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 15, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**LUIS DEHEZA LAREDO,
a/k/a "Guicho,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 3 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FORTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 19, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
"Gordo,"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted and caused the possession with intent to distribute of, 1 kilogram or more, that is, approximately 12 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FORTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 13, 2014, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly and intentionally attempted to distribute, and aided and abetted and caused the attempted distribution of, 1 kilogram or more, that is, approximately 17 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 13, 2014, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**EDWIN VIDAL and
LUIS VASQUEZ,
a/k/a "Chupee,"**

and Leandro Rodriguez-Urena, charged elsewhere, knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute of, 1 kilogram or more, that is, approximately 17 kilograms, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT FORTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 2 through 13 of Count One are re-alleged in incorporated herein by reference.

2. From in or about summer 2009 to on or about November 19, 2014, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"
ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan,"
ALEJANDRO SOTELO,
a/k/a "Alex,"
CARMELINA SOTELO
LUIS DEHEZA LAREDO,
a/k/a "Guicho,"
VICTOR JAIMES LAREDO,
a/k/a "Marshmallow,"
ENOC LAREDO,
a/k/a "Jose Rosales,"
PRISCILLA BUSTAMANTE,
a/k/a "Priscilla Laredo,"
OSMAR FLORES,
FRANCISCO GONZALEZ JOSE,
a/k/a "Franci,"
a/k/a "Francisco Morales,"
DARBIN VARGAS,
a/k/a "Darbi,"
GABRIEL VARGAS,
EDWIN VIDAL,
JACQUELINE DELGADO,
IVET MANRIQUE BANDA,
EDGAR R. CHAVELAS-MANRIQUE,
MERCEDES BARRIOS HERNANDEZ,
a/k/a "La Meche,"

**ORTENCIA HERRERA,
ANGEL P. MASCORRO,
DANIELA GOMEZ-VELASQUEZ,
MAURICIO CALDERON,
YANDELIZ RENTERIA, and
JUAN GONZALEZ**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly conduct, and attempt to conduct, and aid, abet, and willfully cause, financial transactions affecting interstate commerce involving the proceeds of a specified unlawful activity, that is, conspiracy to distribute 1 kilogram or more of heroin, and the sale and distribution of 1 kilogram or more of heroin, a Schedule I narcotic controlled substance, which property and transactions the defendants knew to involve the proceeds of unlawful drug trafficking activity, and as to which the defendants acted with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

MANNER AND MEANS

3. It was part of the conspiracy that defendants ANTONIO LAREDO and ISMAEL LAREDO manufactured, in Mexico and unlawfully transported, imported and smuggled into the United States multi-kilogram quantities of heroin intended for distribution and sale in the Philadelphia, Pennsylvania, New York, New York, Camden, New Jersey and elsewhere.

4. It was part of the conspiracy that defendants ANTONIO LAREDO and ISMAEL LAREDO enlisted the assistance of their associates and heroin customers in the United States, as well as other associates, relatives and family members located in both Mexico and the

United States, including defendants ALEJANDRO SOTELO, CARMELINA SOTELO, LUIS DEHEZA LAREDO, VICTOR JAIMES LAREDO, ENOC LAREDO, PRISCILLA BUSTAMANTE, OSMAR FLORES, FRANCISCO GONZALEZ JOSE, DARBIN VARGAS, GABRIEL VARGAS, EDWIN VIDAL, JACQUELINE DELGADO, IVET MANRIQUE BANDA, EDGAR R. CHAVELAS-MANRIQUE, MERCEDES BARRIOS HERNANDEZ, ORTENCIA HERRERA, ANGEL P. MASCORRO, DANIELA GOMEZ-VELASQUEZ, MAURICIO CALDERON, YANDELIZ RENTERIA, JUAN GONZALEZ, and Joseph Torres, charged elsewhere, to transport cash proceeds and engage in various money laundering activities to enable defendants ANTONIO LAREDO and ISMAEL LAREDO to receive in Mexico the proceeds of the sale of heroin that was distributed and sold in the United States.

5. It was part of the conspiracy that defendants ANTONIO LAREDO and ISMAEL LAREDO, employed and paid relatives and family members, including defendants ENOC LAREDO, ORTENCIA HERRERA, and Joseph Torres to transport bulk amounts of cash proceeds of heroin sales in luggage and on their persons from points in the United States to Mexico, for delivery to defendants ANTONIO LAREDO and ISMAEL LAREDO in Mexico.

6. It was further a part of the conspiracy that defendants ANTONIO LAREDO and ISMAEL LAREDO recruited, employed and paid relatives, associates and family members, including defendants ALEJANDRO SOTELO, CARMELINA SOTELO, LUIS DEHEZA LAREDO, VICTOR JAIMES LAREDO, ENOC LAREDO, PRISCILLA BUSTAMANTE, OSMAR FLORES, ANGEL P. MASCORRO, JACQUELINE DELGADO, IVET MANRIQUE BANDA, EDGAR R. CHAVELAS-MANRIQUE, MERCEDES BARRIOS HERNANDEZ, ORTENCIA HERRERA, DANIELA GOMEZ-VELASQUEZ, MAURICIO CALDERON, YANDELIZ RENTERIA, JUAN GONZALEZ, and Joseph Torres, to open and

maintain "funnel accounts" at various banks in the United States; "funnel accounts" are bank accounts used to deposit and collect cash proceeds of the Laredo DTO's heroin sales in the United States, and were further used for cash withdrawals in, and wire transfer to, Mexico, and elsewhere, for the benefit of defendants ANTONIO LAREDO and ISMAEL LAREDO.

7. It was further a part of the conspiracy that defendants ANTONIO LAREDO and ISMAEL LAREDO recruited, as "funnel account" holders, defendants ANGEL P. MASCORRO, JACQUELINE DELGADO, LUIS DEHEZA LAREDO, VICTOR JAIMES LAREDO, ENOC LAREDO, PRISCILLA LAREDO, IVET MANRIQUE BANDA, EDGAR R. CHAVELAS-MANRIQUE, JUAN GONZALEZ, ALEJANDRO SOTELO, CARMELINA SOTELO, OSMAR FLORES, MAURICIO CALDERON, ORTENCIA HERRERA, YANDELIZ RENTERIA, and Joseph Torres, a/k/a "Ramon Laboy," Giovanni Delgado and Victoriano Avalos, each charged elsewhere, all of whom, on the basis of "funnel accounts" opened and maintained at the behest of defendants ANTONIO LAREDO and ISMAEL LAREDO, collected cash proceeds of the Laredo DTO's heroin distribution activities in Philadelphia, Pennsylvania, and in other parts of the United States, for the purpose of ensuring the laundering of the proceeds of the sale of heroin to defendants ANTONIO LAREDO and ISMAEL LAREDO in Mexico.

8. It was further a part of the conspiracy that defendants ANTONIO LAREDO and ISMAEL LAREDO instructed the "funnel account" holders to permit defendants ANTONIO LAREDO and ISMAEL LAREDO to withdraw sums of money representing proceeds of the sale of heroin ranging from thousands to hundreds of thousands of dollars from the "funnel accounts" in the United States, or in Mexico, or to send to defendants ANTONIO LAREDO and ISMAEL LAREDO, or their designees in Mexico, wire transfers of funds ranging

from tens of thousands to hundreds of thousands of dollars, representing heroin proceeds from the "funnel accounts."

9. It was further a part of the conspiracy that defendants ANTONIO LAREDO and ISMAEL LAREDO directed defendant OSMAR FLORES, doing business as Tri-Country Auto Sales, Inc., to collect, in Philadelphia, and elsewhere, from Laredo DTO members, including Joseph Torres and Bertin Sanchez, and deposit large sums of cash representing proceeds of the Laredo DTO's heroin trafficking sales in the United States to the business bank account of defendant OSMAR FLORES' business, Tri Country Auto Sales, Inc., and to use portions of the funds collected to purchase multiple vehicles used to transport in concealed hidden compartments, kilogram quantities of heroin from Mexico into the United States, and bulk sums of U.S. currency from the United States to defendants ANTONIO LAREDO and ISMAEL LAREDO in Mexico.

10. It was further a part of the conspiracy that defendants ANTONIO LAREDO and ISMAEL LAREDO also directed various heroin distributors they supplied, in Philadelphia, and elsewhere, including defendants FRANCISCO GONZALEZ JOSE, DARBIN VARGAS, GABRIEL VARGAS, LUIS DEHEZA LAREDO, and Euddy Izquierdo, Frank Felix-Herrera, Jeudy Mena and Leandro Rodriguez-Urena, each charged elsewhere, to complete "structured" wire transfers of proceeds of heroin sales, using Western Union wire facilities, in amounts of less than \$1,000, to avoid providing personal identification required by Western Union for transfers over \$1,000, to defendants ANTONIO LAREDO and ISMAEL LAREDO in Mexico, or to recipients in Mexico designated by defendants ANTONIO LAREDO and ISMAEL LAREDO, including defendants DANIELA GOMEZ-VELASQUEZ and MERCEDES BARRIOS HERNANDEZ.

11. It was further a part of the conspiracy that defendants ANTONIO LAREDO and ISMAEL LAREDO at times, directed "funnel account" holders, including defendants ANGEL P. MASCORRO, JACQUELINE DELGADO, VICTOR JAIMES LAREDO, ENOC LAREDO, PRISCILA LAREDO, IVET MANRIQUE BANDA, EDGAR R. CHAVELAS-MANRIQUE, JUAN GONZALEZ, ALEJANDRO SOTELO, CARMELINA SOTELO, OSMAR FLORES, MAURICIO CALDERON, ORTENCIA HERRERA, LUIS DEHEZA LAREDO, and YANDELIZ RENTERIA, and Giovanni Delgado and Victoriano Avalos, each charged elsewhere, to withdraw funds accumulated in "funnel accounts" for the benefit of defendants ANTONIO LAREDO and ISMAEL LAREDO and to wire transfer the funds to defendants ANTONIO LAREDO and ISMAEL LAREDO in Mexico, or to wire funds to accounts held and controlled by other persons handling money laundering activity for the Laredo DTO, including Joseph Torres, charged elsewhere, for wire transfer to defendants ANTONIO LAREDO and ISMAEL LAREDO in Mexico.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the below named defendants and others, charged elsewhere, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

2. In or about December 2011, at the direction of defendant ANTONIO LAREDO, Giovanni Delgado deposited approximately \$29,000 in U.S. currency, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO in the United States, into Delgado's Bank of America account #XXXX XXXX 8657.

2. In or about December 2011, at the direction of defendant ANTONIO LAREDO, Giovanni Delgado withdrew in Illinois \$26,300 in funds from Bank of America

account #XXXX XXXX 8657.

3. From on or about August 27, 2009 to on or about October 28, 2010, Philadelphia based heroin distributors supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO deposited \$54,700 in U.S. currency, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, to Bank of America Account No. XXXX XXXX 0517 in the name of defendant YANDELIZ RENTERIA.

4. From on or about June 22, 2012 to on or about October 15, 2012, Philadelphia based heroin distributors supplied by defendants ANTONIO LAREDO and ISMAEL Laredo deposited \$22,840 in U.S. currency, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, to Wells Fargo Account No. XXXX XX8 731 in the name of defendant YANDELIZ RENTERIA.

5. On or about October 28, 2010, at the direction of defendant ANTONIO LAREDO, defendant YANDELIZ RENTERIA wire transferred approximately \$20,000 in U.S. currency, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, from defendant RENTERIA's Bank of America Account No. XXXX XXXX 0517, Dade City, Florida to defendant ISMAEL LAREDO at: Ismael Don Juan Laredo, Banco Nacional de Mexico, Account No. XXXXXXXXXXXXXXXX1118, in Mexico.

6. From in or about 2010 to in or about 2012, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant LUIS DEHEZA opened and maintained six "funnel accounts" with Bank of America used for the purpose of laundering drug proceeds for the Laredo Drug Trafficking Organization; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, into the

six accounts over the stated period totaled \$234,237; deposits were made in Pennsylvania, New York, North Carolina and Illinois.

7. On or about January 31, 2011, defendant LUIS DEHEZA wire transferred approximately \$38,000, from his Bank of America Account No. XXXXXXXXX0426, at the direction of defendant ISMAEL LAREDO, to defendant ISMAEL DON JUAN LAREDO, Banco Nacional de Mexico, Account No. XXXXXXXXXXXXXXXX1118, in Mexico.

8. On or about February 28, 2011, defendant LUIS DEHEZA LAREDO wire transferred approximately \$19,000, from his Bank of America Account No. XXXXXXXXX0426, at the direction of defendant ISMAEL LAREDO, to defendant ISMAEL LAREDO, Banco Nacional de Mexico, Account No. XXXXXXXXXXXXXXXX1118, in Mexico.

9. On or about April 1, 2011, defendant LUIS DEHEZA LAREDO wire transferred approximately \$15,000, from his Bank of America Account No. XXXXXXXXX6223, at the direction of Joseph Torres, to Joseph Torres' J. P. Morgan Chase account No. XXXXXXX2860.

10. From on or about July 12, 2010, to on or about March 23, 2011, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant LUIS DEHEZA LAREDO withdrew from Bank of America, Account Nos. XXXXXXXXX0426 and XXXXXXXXX5788, in Illinois, approximately \$138,803 in U.S. currency, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO in the United States.

11. From on or about November 6, 2010, to on or about November 27, 2010, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant LUIS DEHEZA LAREDO, through use of ATM cards assigned to defendant DEHEZA LAREDO's

Bank of America, Accounts Nos. XXXXXXXXX0426 and XXXXXXXXX5788, and 40 ATM withdrawals in Mexico, facilitated defendants ANTONIO LAREDO and ISMAEL LAREDO in the withdrawal of approximately \$19,371 in U.S. currency representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO in the United States.

12. From on or about March 23, 2011, to on or about June 3, 2011, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant LUIS DEHEZALAREDO deposited approximately \$66,320 in U.S. currency, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO in the United States, into Bank of America, Accounts Nos. XXXXXXXXX0746 and XXXXXXXXX6223, in Philadelphia, Pennsylvania, New York, and Illinois; withdrawals of approximately \$62,429 in U.S. currency were made from these accounts during the stated period in Illinois, and Texas.

13. From on or about July 9, 2012, to on or about September 13, 2012, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant LUIS DEHEZA deposited, and caused the deposit of, in Philadelphia, Pennsylvania and Aurora, Illinois, approximately \$5,280 in U.S. currency, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO in the United States, into Bank of America, Accounts Nos. XXXXXXXXX5855 and XXXXXXXXX3404; withdrawals of funds in these accounts during the stated period totaled \$2,635, and were made in Mexico, Missouri and in Mexico, through the use of ATM machines.

14. From on or about August 4, 2011, to on or about February 3, 2012, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant VICTOR JAIMES LAREDO, a resident of North Carolina, opened and maintained two "funnel accounts,"

one with Bank of America, Account No. XXXXXXXXXX3334, and one with Wells Fargo Bank, Account No. XXXXXXXXXX6900, used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, into the two accounts, and made in Philadelphia, Pennsylvania, totaled \$55,000; cash withdrawals from the two accounts totaled \$52,600 and were made in North Carolina within the stated time period.

15. From on or about October 21, 2011, to on or about November 30, 2011, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant JUAN GONZALEZ, a resident of Aurora, Illinois, opened and maintained one "funnel account," with Bank of America, Account No. XXXXXXXXXX8629, used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, into the two accounts, and made in the Philadelphia, Pennsylvania area, totaled \$32,000; withdrawals from the account totaled \$31,880, and were made in Illinois within the stated time period. Defendant JUAN GONZALEZ further drew a \$2,000 check payable to defendant ALEJANDRO SOTELO that was funded by a \$2,000 deposit to defendant GONZALEZ's account made in Philadelphia, Pennsylvania, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO to Philadelphia based heroin distributors for the Laredo DTO.

16. From on or about February 28, 2011, to on or about November 29, 2011, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant EDGAR R. CHAVELAS-MANRIQUE, a resident of Mount Pleasant, Texas, opened and maintained three "funnel accounts," with Bank of America; only one account was active, Account No.

XXXXXXXXXX8852, used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of the sale of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO into the two accounts, and made in the Philadelphia, Pennsylvania area, in Illinois and in North Carolina, totaled \$19,000; withdrawals from the account totaled \$19,000 and were all made in Mount Pleasant, Texas within the stated time period.

17. From on or about June 1, 2009, to on or about June 5, 2011, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant ORTENCIA HERRERA, a resident of Mexico, Missouri, opened and maintained one "funnel account," with Bank of America, Account No. XXXXXXXXXX4792, used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, into the two accounts, and made in the Philadelphia, Pennsylvania area, and in Illinois, totaled \$54,851, including cash deposits and three wire transfers; withdrawals from the account totaled \$51,680, and were all made in Mexico, Missouri within the stated time period.

18. From on or about December 12, 2010, to on or about February 29, 2012, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant IVET MANRIQUE BANDA, a resident of Mount Pleasant, Texas, opened and maintained one "funnel account," with Bank of America, a checking account, Account No. XXXXXXXXXX7497, used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO into the account, and made in the Philadelphia, Pennsylvania area, Illinois, Florida, Massachusetts and Texas, totaled \$212,086.00; cash withdrawals from the account totaled

\$126,350.00, and were made by defendant IVET MANRIQUE BANDA in Mount Pleasant, Texas within the stated time period.

19. From on or about July 26, 2011, to on or about February 5, 2013, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant ALEJANDRO SOTELO, a resident of West Chicago, Illinois, opened and maintained an individual "funnel account," with Bank of America, an e-banking checking account, Account No. XXXXXXXXX5464, used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, into the account, and made in the Philadelphia, Pennsylvania, and Illinois, totaled \$66,600.00; cash withdrawals from the account totaled \$32,105.00, and were made by defendant ALEJANDRO SOTELO in Illinois within the stated time period; \$16,923.00 in cash was withdrawn from the account via ATM withdrawals, at various locations in Mexico, including Cuernavaca, Temixco, Acapulco, and Inverlat.

20. From on or about April 1, 2011, to on or about February 9, 2013, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant CARMELINA SOTELO, a resident of West Chicago, Illinois, opened and maintained two individual "funnel accounts," with Bank of America, an e-banking checking account, Account No. XXXXXXXXX5681, and a savings account, Account No. XXXXXXXXX4192, used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, into the checking account, and made in Philadelphia, Pennsylvania, Illinois and Brooklyn, New York, totaled \$78,390.00 (Account No. XXXXXXXXX5681); cash withdrawals from the account totaled \$29,805.00, and were made by defendant CARMELINA SOTELO in Illinois within the stated

time period; \$18,393.00 in cash was withdrawn from the account via ATM withdrawals, at various locations in Mexico, including Guadalupe, Tepotzotlan, Hidalgo, Cuernavaca, Temixco, and Acapulco; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO into the savings account, and made in Brooklyn, New York, totaled \$5,000 (Account No. XXXXXXXXX4192); cash withdrawals from the account totaled \$1,900, and were made by defendant CARMELINA SOTELO in Illinois within the stated time period; defendant CARMELINA SOTELO further made a \$3,000 bank transfer of funds to defendant IVET MANRIQUE BANDA's Bank of America checking account, Account No. XXXXXXXXX7497, in Mount Pleasant, Texas.

21. From on or about October 26, 2009, to on or about July 13, 2011, defendant ANTONIO LAREDO and defendant ANGEL P. MASCORRO, both, at times, residents of Aurora, Illinois, opened and maintained a joint checking and savings account at Bank of America, Account Nos. XXXXXXXXX4443 (checking) and XXXXXXXXX3345 (savings), which constituted "funnel accounts," used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO into both accounts, and made in Philadelphia, Pennsylvania, Illinois, and Mexico, Missouri, totaled \$224,230.00; at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, eight wire transfers from the above stated checking account totaled \$125,000.00, and were made by defendant ANGEL P. MASCORRO in Illinois, and seven wire transfers totaling \$110,500.00 were directed to defendant ISMAEL LAREDO in Mexico; defendant ANGEL MASCORRO made an additional wire transfer of \$15,000 from the above-stated checking account to Napoleon Estin Palacio, in Mexico, within the stated time period. On January 18, 2011, defendant ANGEL MASCORRO

bank transferred \$30,000 to the Bank of America account of defendant ENOC LAREDO, Account No. XXXXXXXXXX5640; on the next day, January 19, 2011, defendant ENOC LAREDO, wire transferred \$30,000 from his Bank of America account to defendant ISMAEL LAREDO in Mexico.

22. From on or about August 20, 2010, to on or about March 30, 2011, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant ENOC LAREDO, a/k/a "Jose Rosales," a resident of Illinois, opened and maintained a checking account and a savings account at Bank of America, Account Nos. XXXXXXXXXX5640 (checking) and XXXXXXXXXX4599 (savings), which constituted "funnel accounts," used for the purpose of laundering drug proceeds for the Laredo Drug Trafficking Organization; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO into both accounts, and made predominantly in Philadelphia, Pennsylvania, and also New York, totaled \$216,280.00; at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant ENOC LAREDO, a/k/a "Jose Rosales," withdrew \$96,540.00 from this account in Illinois, and further made three wire transfers of funds from the above stated checking account totaling \$100,800, two of which, totaling \$58,800, were made to defendant ISAMEL LAREDO, a/k/a "Ismael Laredo Don Juan," and one of which in the amount of \$42,000.00 was made to N. R. A., an associate of defendant ISMAEL LAREDO, a/k/a "Ismael Laredo Don Juan," in Mexico.

23. From on or about January 27, 2011 to on or about February 23, 2011, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant ENOC LAREDO, a/k/a "Jose Rosales," bank transferred \$11,500.00 from his Bank of America account, Account No. XXXXXXXXXX5640, to defendant LUIS DEHEZA LAREDO, at his Bank of

America Account No. XXXXXXXXX0426; that wire transfer partially funded a \$38,000 wire transfer from defendant LUIS DEHEZA LAREDO to defendant ISMAEL LAREDO, a/k/a "Ismael Laredo Don Juan," in Mexico.

24. On February 23, 2011, defendant ENOC LAREDO, a/k/a "Jose Rosales," at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, bank transferred \$6,000 from his Bank of America account, Account No. XXXXXXXXX5640, to defendant LUIS DEHEZA LAREDO's Bank of America account, Account No. XXXXXXXXX5788; that wire transfer partially funded a \$19,000 wire transfer from the Bank of America account of defendant LUIS DEHEZA LAREDO to defendant ISMAEL LAREDO, a/k/a "Ismael Laredo Don Juan," in Mexico.

25. From on or about June 16, 2011, to on or about June 6, 2012, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant ENOC LAREDO, a/k/a "Jose Rosales," a resident of Illinois, opened and maintained a checking account at PNC Bank, Account No. XXXXXXXX6014, which constituted a "funnel account," used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, and made predominantly in Philadelphia, Pennsylvania, and also in Illinois, totaled \$59,390, of which \$56,700 was deposited in cash in Philadelphia, Pennsylvania; at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant ENOC LAREDO, a/k/a "Jose Rosales," withdrew \$35,940.00 from his account in Illinois; the cash deposits, which were made in Philadelphia, Pennsylvania, also funded a \$22,000.00 check drawn on November 25, 2011, on defendant ENOC LAREDO's account, and, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, was made payable to L.A., the mother of Victoriano Avalos,

charged elsewhere; that \$22,000 check partially funded a wire transfer from L.A.'s Bank of America account, Account No. XXXXXXXXX6581, to defendant ISMAEL LAREDO, a/k/a "Ismael Laredo Don Juan," in Mexico.

26. From on or about October 25, 2012, to on or about January 31, 2013, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendants ENOC LAREDO, a/k/a "Jose Rosales," and PRISCILLA BUSTAMANTE, a/k/a "Priscilla Laredo," husband and wife, residents of Illinois, opened and maintained joint checking and savings accounts at Bank of America, Account Nos. XXXXXXXXX6791 (checking) and XXXXXXXXX2125 (savings), which constituted "funnel accounts," used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, and made predominantly in Philadelphia, Pennsylvania, and also in Illinois, totaled \$88,160.00, of which \$27,000.00 was deposited in cash in Philadelphia, Pennsylvania; at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendants ENOC LAREDO, a/k/a "Jose Rosales," and PRISCILLA BUSTAMANTE, a/k/a "Priscilla Laredo," wire transferred \$53,000 from the checking account, which was used to purchase a residential property at 1838 Festival Court, Joliet, Illinois, in the name of "Priscilla Laredo."

27. From on or about October 25, 2012, to on or about January 31, 2013, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant PRISCILLA BUSTAMANTE, a/k/a "Priscilla Laredo," a resident of Illinois, opened and maintained a checking account at PNC Bank, Account No. XXXXXX6502, which constituted a "funnel account," used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO

and ISMAEL LAREDO, and made predominantly in Philadelphia, Pennsylvania, totaled \$14,000, of which \$13,000 was deposited in Philadelphia, Pennsylvania; at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant PRISCILLA BUSTAMANTE, a/k/a "Priscilla Laredo," completed three cash withdrawals totaling \$5,500 in Illinois and drew a check on the account in the amount of \$4,500 payable to R. L., the sister of defendants ANTONIO LAREDO and ISMAEL LAREDO.

28. From on or about January 9, 2010, to on or about October 26, 2012, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant PRISCILLA BUSTAMANTE, a/k/a "Priscilla Laredo," a resident of Illinois, opened and maintained a checking account at J. P. Morgan Chase Bank, Account No. XXXXX8957, which constituted a "funnel account," used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, totaled \$52,778, of which \$8,000 was deposited in New Jersey, and the remainder in Illinois; at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant PRISCILLA BUSTAMANTE, a/k/a "Priscilla Laredo," completed cash withdrawals totaling \$13,482 and wire transferred \$16,000 to G.R.A, an associate of defendants ANTONIO LAREDO and ISMAEL LAREDO, in Mexico.

29. From on or about May 20, 2010, to on or about May 25, 2012, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant JACQUELINE DELGADO, a resident of Chicago, Illinois, opened and maintained a joint checking account, in the names of Jacqueline Delgado and S. D., at Bank of America, Account No. XXXXXXXXX9422, which constituted a "funnel account," used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of

heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, totaled \$58,840, of which funds were deposited in cash predominantly in the Philadelphia, Pennsylvania area, and also in Illinois and New York; at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant JACQUELINE DELGADO completed withdrawals totaling \$19,000, in Illinois, and wire transferred \$8,500, representing proceeds of the sale of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, to an attorney in Texas, who represented defendant DELGADO's son, Giovanni Delgado, charged elsewhere.

30. From on or about February 16, 2010, to on or about March 31, 2011, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant MAURICIO CALDERON, a resident of Aurora, Illinois, opened and maintained a checking account at Bank of America, Account No. XXXXXXXXX0554, which constituted a "funnel account," used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, totaled \$54,145, of which the majority of funds were deposited in cash in Philadelphia, Pennsylvania; at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant MAURICIO CALDERON completed cash withdrawals totaling \$51,330 in Illinois; on or about January 18, 2011, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant MAURICIO CALDERON, completed a bank transfer of funds in the amount of \$18,000 to the Bank of America joint checking account of defendants ANTONIO LAREDO a/k/a "Antonio Rodriguez," and ANGEL P. MASCORRO at Bank of America, Account No. XXXXXXXXX4443; that transaction funded a wire transfer of \$11,000 on January 19, 2011 from the joint checking account of defendants ANTONIO LAREDO a/k/a "Antonio Rodriguez," and

ANGEL P. MASCORRO at Bank of America, Account No. XXXXXXXXX4443 to defendant ISMAEL LAREDO, in Mexico.

31. On or about March 31, 2011, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, defendant MAURICIO CALDERON, transferred \$9,000, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, from his checking account at Bank of America, Account No. XXXXXXXXX0554, which constituted a "funnel account," used for the purpose of laundering drug proceeds for the Laredo DTO, to defendant LUIS DEHEZA LAREDO, and his Bank of America checking account, Account No. XXXXXXXXX0746 ; that transaction partially funded a \$15,000 wire transfer by defendant LUIS DEHEZA LAREDO on April 1, 2011 to the J.P. Morgan Chase account of Joseph Torres, charged elsewhere, the principal money launderer for defendants ANTONIO LAREDO and ISMAEL LAREDO.

32. From on or about February 6, 2009, to on or about February 6, 2012, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, Joseph Torres, a resident of Crest Hill, Illinois, opened and maintained a checking account at J.P. Morgan Chase Bank, Account No. XXXXX2860, which constituted a "funnel account," used for the purpose of laundering drug proceeds for the Laredo Drug Trafficking Organization; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, totaled \$150,581, of which the majority of funds were deposited in cash in Illinois; at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, Joseph Torres completed cash withdrawals totaling \$43,828 in Illinois, and made two wire transfers to Mexico totaling \$65,000, both to N. R. A., a designee of defendant ISMAEL LAREDO in Mexico.

33. From on or about December 4, 2010, to on or about January 31, 2013, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, Joseph Torres, at times, a resident of Philadelphia, Pennsylvania, opened and maintained a checking account and a savings account at Bank of America, Account Nos. XXXXXXXXX2825 (checking) and XXXXXXXXX8195 (savings), which constituted "funnel accounts," used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, totaled \$562,546, of which the majority of funds were deposited in cash in the Philadelphia, Pennsylvania area; at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, Joseph Torres completed cash withdrawals and bank transfers totaling \$197,126, predominantly in Illinois, and further made eleven wire transfers of funds totaling \$345,700, to various designees of defendants ANTONIO LAREDO and ISMAEL LAREDO located in Mexico.

34. From on or about June 15, 2011, to on or about July 27, 2012, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, Joseph Torres, at times, a resident of Philadelphia, Pennsylvania, opened and maintained a checking account and a money market account at Wells Fargo Bank, Account Nos. XXXXXXXX9005 (checking) and XXXXXXXX4331 (money market), which constituted "funnel accounts," used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of the sale of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, totaled \$149,180, deposited in the Philadelphia, Pennsylvania area; at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, Joseph Torres completed cash withdrawals totaling \$13,061, predominantly in the Philadelphia, Pennsylvania area, and further made two wire transfers of

funds totaling \$70,000, to designees of defendants ANTONIO LAREDO and ISMAEL LAREDO located in Mexico.

35. From on or about May 11, 2012, to on or about August 20, 2012, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, Joseph Torres, at times, a resident of Philadelphia, Pennsylvania, using the alias "Ramon Laboy," opened and maintained a checking account and a savings account at Wells Fargo Bank, Account Nos. XXXXXX4074 (checking) and XXXXXX1482 (savings), which constituted "funnel accounts," used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits and online bank transfers, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, totaled \$37,803, of which all funds were deposited in the Philadelphia, Pennsylvania area; at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, Joseph Torres authorized the completion of ATM withdrawals and drew checks made payable to Joseph Torres totaling \$14,492, in both Illinois and Mexico, and further made one wire transfer of funds totaling \$11,000, to defendant ISMAEL LAREDO in Mexico.

36. From on or about October 31, 2012, to on or about May 21, 2013, at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, Joseph Torres, at times, a resident of Philadelphia, Pennsylvania, using the alias "Ramon Laboy," opened and maintained a checking account and a savings account at Bank of America, Account Nos. XXXXXXXXX7079 (checking) and XXXXXXXXX3276 (savings), which constituted "funnel accounts," used for the purpose of laundering drug proceeds for the Laredo DTO; cash deposits, representing proceeds of sales of heroin supplied by defendants ANTONIO LAREDO and ISMAEL LAREDO, totaled \$243,364, made in the Philadelphia, Pennsylvania area, New York and Illinois; at the direction of defendants ANTONIO LAREDO and ISMAEL LAREDO, Joseph Torres completed online bank

transfers totaling \$16,580 to designees of defendants ANTONIO LAREDO and ISMAEL LAREDO in Mexico, and further made eight wire transfers of funds totaling \$238,000, to designees of defendants ANTONIO LAREDO and ISMAEL LAREDO in Mexico.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS FORTY-FIVE TO FIFTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs Three through Eleven of Count Forty-Four are re-alleged and incorporated herein by reference.

At all times material to this indictment:

2. On or about the dates set forth below, based upon cash deposits of funds representing proceeds of heroin sales by Laredo DTO heroin distributors in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANTONIO LAREDO
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"
ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan" and
ANGEL P. MASCORRO**

knowingly conducted, and attempted to conduct, and aided, abetted, and willfully caused, the following financial transactions affecting interstate commerce:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
45	7/21/10	\$15,000 wire transfer Bank of America, #XXXX XXXX 4443, Antonio Rodriguez Angel Mascorro to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID #XXXXXXXXXXXXXXXX1118.
46	8/20/10	\$15,000 wire transfer Bank of America, # XXXX XXXX 4443, Antonio Rodriguez Angel Mascorro to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID #XXXXXXXXXXXXXXXX1118.
47	11/5/10	\$30,000 wire transfer Bank of America,

		# XXXX XXXX 4443, Antonio Rodriguez Angel Mascorro to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID # XXXXXXXXXXXXXXXXXXXX1118.
48	3/24/11	\$21,750 wire transfer Bank of America, # XXXX XXXX 4443, Antonio Rodriguez Angel Mascorro to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID # XXXXXXXXXXXXXXXXXXXX1118.
49	1/19/11	\$11,000 wire transfer Bank of America, # XXXX XXXX 4443, Antonio Rodriguez Angel Mascorro to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID # XXXXXXXXXXXXXXXXXXXX1118.
50	1/31/11	\$11,500 wire transfer Bank of America, # XXXX XXXX 4443, Antonio Rodriguez Angel Mascorro to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID # XXXXXXXXXXXXXXXXXXXX1118.
51	5/17/11	\$6,250 wire transfer Bank of America, # XXXX XXXX 4443, Antonio Rodriguez Angel Mascorro to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID # XXXXXXXXXXXXXXXXXXXX1118.

3. When conducting, aiding, abetting, and willfully causing, the financial transactions described in paragraph 2 above, defendants **ANTONIO LAREDO, ISMAEL LAREDO** and **ANGEL P. MASCORRO** knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

4. The financial transactions described in paragraph 2 above involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute 1 kilogram or more of heroin and the distribution of hundreds of kilograms of heroin, in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A), and defendants **ANTONIO LAREDO, ISMAEL LAREDO** and

ANGEL P. MASCORRO acted with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS FIFTY-TWO TO FIFTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs Three through Eleven of Count Forty-Four are re-alleged and incorporated herein by reference.

At all times material to this indictment:

2. On or about the dates set forth below, based upon cash deposits of funds representing proceeds of heroin sales by Laredo DTO heroin distributors in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan," and
LUIS DEHEZA LAREDO**

knowingly conducted, and attempted to conduct, and aided, abetted, and willfully caused, the following financial transactions affecting interstate commerce:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
52	1/31/11	\$38,000 wire transfer Bank of America, #XXXX XXXX 0426, Luis M. Deheza to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID # XXXXXXXXXXXXXXXX1118.
53	2/28/11	\$19,000 wire transfer Bank of America, # XXXX XXXX 0426, Luis M. Deheza to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID # XXXXXXXXXXXXXXXX1118.

3. When conducting, aiding, abetting, and willfully causing, the financial transactions described in paragraph 2 above, defendants **ISMAEL LAREDO** and **LUIS DEHEZA LAREDO** knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

4. The financial transactions described in paragraph 2 above involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute 1 kilogram or more of heroin and the distribution of 1 kilogram or more of heroin, in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A), and defendants **ISMAEL LAREDO** and **LUIS DEHEZA LAREDO** acted with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS FIFTY-FOUR TO FIFTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs Three through Eleven of Count Forty-Four are re-alleged and incorporated herein by reference.

At all times material to this indictment:

2. On or about the dates set forth below, based upon cash deposits of funds representing proceeds of heroin sales by Laredo DTO heroin distributors in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan," and
ENOC LAREDO,
a/k/a "Jose Rosales,"**

knowingly conducted, and attempted to conduct, and aided, abetted, and willfully caused, the following financial transactions affecting interstate commerce:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
54	12/16/10	\$28,800 wire transfer Bank of America, #XXXX XXXX 5640, Jose Rosales to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID # XXXXXXXXXXXXXXXX1118.
55	1/19/11	\$30,000 wire transfer Bank of America, #XXXX XXXX 0426, Jose Rosales to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID # XXXXXXXXXXXXXXXX1118.

3. When conducting, aiding, abetting, and willfully causing, the financial transactions described in paragraph 2 above, defendants **ISMAEL LAREDO** and **ENOC LAREDO** knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

4. The financial transactions described in paragraph 2 above involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute 1 kilogram or more of heroin and the distribution of hundreds of kilograms of heroin, in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A), and defendants **ISMAEL LAREDO** and **ENOC LAREDO** acted with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS FIFTY-SIX TO SIXTY

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs Three through Eleven of Count Forty-Four are re-alleged and incorporated herein by reference.

At all times material to this indictment:

2. On or about the date set forth below, based upon cash deposits of funds representing proceeds of heroin sales by Laredo DTO heroin distributors in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan,"**

knowingly conducted, and attempted to conduct, and aided, abetted, and willfully caused, the following financial transactions affecting interstate commerce:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
56	12/7/11	\$45,000 wire transfer Bank of America, #XXXX XXXX 6581, Leticia Avalos to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID # XXXXXXXXXXXXXXXX1118.
57	5/22/12	\$39,000 wire transfer Bank of America, #XXXX XXXX 2825, Joseph M. Torres to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID # XXXXXXXXXXXXXXXX1118.
58	6/15/12	\$40,000 wire transfer Wells Fargo Bank, #XXXXXX9005, Joseph M. Torres to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID # XXXXXXXXXXXXXXXX7189.
59	8/20/12	\$11,000 wire transfer Wells Fargo Bank, #XXXXXX1482, Ramon R. Laboy to Banco Nacional De Mexico, BNF: Ismael Laredo Don Juan, MX, ID # XXXXXXXXXXXXXXXX1118.

\$19,500 wire transfer Bank of America,
#XXXX XXXX 7079, Ramon R. Laboy to Banco
Nacional De Mexico, BNF: Ismael Laredo Don
Juan, MX, ID # XXXXXXXXXXXXXXXX1118.

3. When conducting, aiding, abetting, and willfully causing, the financial transactions described in paragraph 2 above, defendant **ISMAEL LAREDO** knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

4. The financial transactions described in paragraph 2 above involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute 1 kilogram or more of heroin and the distribution of hundreds of kilograms of heroin, in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A), and defendant **ISMAEL LAREDO** acted with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS SIXTY-ONE TO EIGHTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs Three through Eleven of Count Forty-Four are re-alleged and incorporated herein by reference.

At all times material to this indictment:

2. On or about the dates set forth below, based upon cash deposits of funds representing proceeds of heroin sales by Laredo DTO heroin distributors in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTONIO LAREDO
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly conducted, and attempted to conduct, and aided, abetted, and willfully caused, the following financial transactions affecting interstate commerce:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
61	8/20/10	\$15,000 wire transfer Bank of America, #XXXX XXXX 4443, Antonio Rodriguez Angel Mascorro to Banco Santander, BNF: N.E.P., MX, ID # XXXXXXXXXXXXXXX9068.
62	1/8/11	\$46,000 wire transfer Bank of America, # XXXX XXXX 2825, Joseph M. Torres to Banco Nacional De Mexico, BNF: A.L.T., Sanmartin Texmelucan Puebla, MX, ID # XXXXXXXXXXXXXXXXX0961.
63	3/17/11	\$42,000 wire transfer Bank of America, # XXXX XXXX 5640, Jose Rosales to Banco Nacional De Mexico, BNF: N.R.A., Cuernavaca, MX, ID # XXXXXXXXXXXXXXX7866.
64	4/15/11	\$30,000 wire transfer J.P. Morgan Chase Bank,

		#XXXXXX2860, Joseph M. Torres to Banco Nacional De Mexico, BNF: N.R.A., MX, ID # XXXXXXXXXXXXXXXX7866.
65	10/20/11	\$35,000 wire transfer J.P. Morgan Chase Bank, #XXXXXX2860, Joseph M. Torres to Banco Nacional De Mexico, BNF: N.R.A., MX, ID # XXXXXXXXXXXXXXXX7866.
66	8/29/11	\$30,000 wire transfer Wells Fargo Bank, #XXXXXX9005, Joseph M. Torres to BBVA Bancomer, S.A., BNF: M.A.O., MX, ID # XXXXXXXXXXXXXXXX1453.
67	10/19/11	\$40,000 wire transfer Bank of America, #XXXXX XXXX 8195, Joseph M. Torres to BBVA Bancomer, S.A., BNF: M.A.O., Paseo De La Colina 3, Xochipec, MX, ID #XXXXXXXXXXXXXXXX1453.
68	3/29/11	\$16,000 wire transfer J.P. Morgan Chase Bank, #XXXXXX8957, Priscilla Bustamante to BBVA Bancomer, S.A., BNF: G.R.A., MX, ID # XXXXXXXXXXXXXXXX6165.
69	11/30/11	\$10,000 wire transfer Bank of America, #XXXXX XXXX 6581, L.A. to BBVA Bancomer, S.A., BNF: A.A., Distrito Fedral, MX, ID # XXXXXXXX1926.
70	9/28/12	\$8,200 wire transfer Bank of America, #XXXXX XXXX 2825, Joseph M. Torres to Banco Mercantile Del Norte Mexico, BNF: S.G.R.C., Laredo Tamaulipa, MX, ID # XXXXXXXXXXXXXXXX3851.
71	12/10/12	\$25,000 wire transfer Bank of America, #XXXXX XXXX 2825, Joseph M. Torres to Banco Nacional De Mexico, BNF: A.A., De Cv, Juarez, MX, ID # XXXXXXXXXXXXXXXX3657.
72	11/20/12	\$50,000 wire transfer Bank of America, #XXXXX XXXX 7079, Ramon R. Laboy to Banco Nacional De Mexico, BNF: Y.M.R., Temixco, MX, ID # XXXXXXXXXXXXXXXX4864.

73	11/27/12	\$22,000 wire transfer Bank of America, #XXXX XXXX 8195, Joseph M. Torres to Banco Nacional De Mexico, BNF: Y.M.R., Temixco, MX, ID # XXXXXXXXXXXXXXXX4864.
74	12/12/12	\$25,000 wire transfer Bank of America, #XXXX XXXX 7079, Ramon R. Laboy to Banco Nacional De Mexico, BNF: Y.M.R., Temixco, Morelos, MX, ID # XXXXXXXXXXXXXXXX4864.
75	12/21/12	\$25,000 wire transfer Bank of America, #XXXX XXXX 7079, Ramon R. Laboy to Banco Nacional De Mexico, BNF: Y.M.R., Temixco, Morelos, MX, ID # XXXXXXXXXXXXXXXX4864.
76	3/7/13	\$30,000 wire transfer Bank of America, #XXXX XXXX 8195, Joseph M. Torres to Banco Nacional De Mexico, BNF: E.B., MX, ID # XXXXXXXXXXXXXXXX4850.
77	4/10/13	\$20,000 wire transfer Bank of America, #XXXX XXXX 2825, Joseph M. Torres to Banco Nacional De Mexico, BNF: E.B., Av. 20 de Noviembre #4 Col., Xaltiaguís, Acapulco, MX, ID # XXXXXXXXXXXXXXXX4850.
78	4/11/13	\$20,000 wire transfer Bank of America, #XXXX XXXX 7079, Ramon R. Laboy to Banco Nacional De Mexico, BNF: E.B., MX, ID # XXXXXXXXXXXXXXXX5827.
79	3/5/13	\$45,000 wire transfer Bank of America, #XXXX XXXX 3276, Ramon R. Laboy to Banco Nacional De Mexico, BNF: D.C.G.A., MX, ID # XXXXXXXXXXXXXXXX6004.
80	5/22/13	\$29,500 wire transfer Bank of America, #XXXX XXXX 8195, Joseph M. Torres to Banco Nacional De Mexico, BNF: A.C.G.A., MX, ID # XXXXXXXXXXXXXXXX6004.
81	5/21/13	\$29,500 wire transfer Bank of America,

#XXXX XXXX 7079, Ramon R. Laboy to Banco
Nacional De Mexico, BNF: L.A.A., MX, ID #
XXXXXXXXXXXXXXXXXXXX5273.

3. When conducting, aiding, abetting, and willfully causing, the financial transactions described in paragraph 2 above, defendant **ANTONIO LAREDO** knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

4. The financial transactions described in paragraph 2 above involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute 1 kilogram or more of heroin and the distribution of hundreds of kilograms of heroin, in violation of 21 U.S.C. § § 846 and 841(a)(1), (b)(1)(A), and defendant **ANTONIO LAREDO** acted with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS EIGHTY-TWO TO EIGHTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs Three through Eleven of Count Forty-Four are re-alleged and incorporated herein by reference.

At all times material to this indictment:

2. On or about the dates set forth below, based upon cash deposits of funds representing proceeds of heroin sales by Laredo DTO heroin distributors in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANTONIO LAREDO
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo," and
MERCEDES BARRIOS HERNANDEZ**

knowingly conducted, and attempted to conduct, and aided, abetted, and willfully caused, the following financial transactions affecting interstate commerce:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
82	3/16/11	\$45,000 wire transfer Bank of America, #XXXX XXXX 2825, Joseph M. Torres to Banco Nacional De Mexico, BNF: Mercedes Barrios Hernandez, MX, ID # XXXXXXXXXXXXXXXX3873.
83	11/29/12	\$24,000 wire transfer Bank of America, #XXXX XXXX 7079, Ramon R. Laboy to Banco Nacional De Mexico, BNF: Mercedes Barrios Hernandez, MX, ID # XXXXXXXXXXXXXXXX3873.

3. When conducting, aiding, abetting, and willfully causing, the financial transactions described in paragraph 2 above, defendants **ANTONIO LAREDO** and

MERCEDES BARRIOS HERNANDEZ knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

4. The financial transactions described in paragraph 2 above involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute 1 kilogram or more of heroin and the distribution of hundreds of kilograms of heroin, in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A), and defendants **ANTONIO LAREDO** and **MERCEDES BARRIOS HERNANDEZ** acted with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS EIGHTY-FOUR TO ONE HUNDRED FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs Three through Eleven of Count Forty-Four are re-alleged and incorporated herein by reference.

At all times material to this indictment:

2. On or about the dates set forth below, based upon cash deposits of funds representing proceeds of heroin sales by Laredo DTO heroin distributors in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ANTONIO LAREDO
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo," and
OSMAR FLORES**

knowingly conducted, and attempted to conduct, and aided, abetted, and willfully caused, the following financial transactions affecting interstate commerce:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
84	10/12/10	\$4,000 cash deposit to PNC Bank, 101 E. Erie Ave. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
85	11/16/10	\$3,000 cash deposit to PNC Bank, 101 E. Erie Ave. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
86	3/8/11	\$10,000 cash deposit to PNC Bank, 2401 Welsh Rd. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
87	8/29/11	\$5,000 cash deposit to PNC Bank, 6855 Frankford Ave. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.

88	8/29/11	\$5,000 cash deposit to PNC Bank, 6855 Frankford Ave. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
89	8/29/11	\$5,000 cash deposit to PNC Bank, 2200 Cottman Ave. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
90	9/19/11	\$5,000 cash deposit to PNC Bank, 2200 Cottman Ave. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
91	9/20/11	\$5,000 cash deposit to PNC Bank 2401 Welsh Rd. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
92	9/28/11	\$5,000 cash deposit to PNC Bank, 2401 Welsh Rd. Philadelphia, PA, Account # 4612935198 in name of Tri-Country Auto Sales, Inc.
93	12/22/11	\$4,000 cash deposit to PNC Bank, 1001 East Erie Ave. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
94	4/15/12	\$7,500 cash deposit to PNC Bank, 4710 Rising Sun Ave. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
95	7/12/12	\$7,700 cash deposit to PNC Bank, 1001 East Erie Ave. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
96	7/17/12	\$8,000 cash deposit to PNC Bank, 4356 Frankford Ave. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
97	10/4/12	\$9,000 cash deposit to PNC Bank, 4710 Rising Sun Ave. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
98	10/4/12	\$9,000 cash deposit to PNC Bank, 123 Old York Rd. Jenkintown, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.

99	11/13/12	\$20,000 cash deposit to PNC Bank, 3707 Hulmeville Rd., Bensalem, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc..
100	11/30/12	\$9,000 cash deposit to PNC Bank, 4060 City Ave. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
101	12/3/12	\$9,000 cash deposit to PNC Bank, 109 E. DeKalb Pike King of Prussia, PA Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
102	12/3/12	\$9,000 cash deposit to PNC Bank, 310 S. Henderson Rd. King of Prussia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
103	12/3/12	\$8,000 cash deposit to PNC Bank, 100 E. Germantown Pike, East Norriton, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.
104	1/15/13	\$30,000 cash deposit to PNC Bank, 4060 City Ave. Philadelphia, PA, Account # XXXXXX5198 in name of Tri-Country Auto Sales, Inc.

3. When conducting, aiding, abetting, and willfully causing, the financial transactions described in paragraph 2 above, defendants **ANTONIO LAREDO** and **OSMAR FLORES** knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

4. The financial transactions described in paragraph 2 above involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute 1 kilogram or more of heroin and the distribution of hundreds of kilograms of heroin, in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A), and defendants **ANTONIO LAREDO** and **OSMAR FLORES** acted

with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT ONE HUNDRED FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs Three through Eleven of Count Forty-Four are incorporated here.

At all times material to this indictment:

2. From on or about September 24, 2008, to on or about December 28, 2013, using collected funds representing proceeds of heroin sales, deposited in cash, by Laredo DTO heroin distributors in the Philadelphia area, , in the Eastern District of Pennsylvania, and elsewhere, defendants

**ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan," and
DANIELA GOMEZ VELASQUEZ**

knowingly conducted, and attempted to conduct, and aided, abetted, and willfully caused, the following financial transactions affecting interstate commerce: 125 Western Union international wire money transfers, representing proceeds of heroin sales by Laredo DTO heroin distributors in the Philadelphia, Pennsylvania area, from the United States, primarily from the Philadelphia, Pennsylvania region, to Mexico, in the total sum of \$152,170.

3. When conducting, aiding, abetting, and willfully causing, the financial transactions described in paragraph 2 above, defendants **ISMAEL LAREDO** and **DANIELA GOMEZ VELASQUEZ** knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

4. The financial transactions described in paragraph 2 above involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute 1 kilogram or more of

heroin and the distribution of 1 kilogram or more of heroin, in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A), and defendants **ISMAEL LAREDO** and **DANIELA GOMEZ VELASQUEZ** acted with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT ONE HUNDRED SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs Three through Eleven of Count Forty-Four are incorporated here.

At all times material to this indictment:

2. From on or about March 14, 2011, to on or about March 6, 2013, based upon instructions provided by members of the Laredo DTO, Philadelphia based heroin distributors and members of the Laredo DTO, using collected funds representing proceeds of heroin sales by Laredo DTO heroin distributors in the Philadelphia area and deposited as cash to identified bank accounts, in the Eastern District of Pennsylvania, and elsewhere, defendants

ANTONIO LAREDO
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo," and
MERCEDES BARRIOS HERNANDEZ

knowingly conducted, and attempted to conduct, and aided, abetted, and willfully caused, the following financial transactions affecting interstate commerce: 71 Western Union international wire money transfers, representing proceeds of heroin sales by Laredo DTO heroin distributors in the Philadelphia, Pennsylvania area, from the United States, primarily from the Philadelphia, Pennsylvania region, to Mexico, in the total sum of \$77,149.

3. When conducting, aiding, abetting, and willfully causing, the financial transactions described in paragraph 2 above, defendants **ANTONIO LAREDO** and **MERCEDES BARRIOS HERNANDEZ** knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

4. The financial transactions described in paragraph 2 above involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute 1 kilogram or more of heroin and the distribution of 1 kilogram or more of heroin, in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A), and defendants **ANTONIO LAREDO** and **MERCEDES BARRIOS HERNANDEZ** acted with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT ONE HUNDRED SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs Three through Eleven of Count Forty-Four are incorporated here.

At all times material to this indictment:

2. From on or about December 6, 2010, to on or about October 22, 2013, based upon instructions provided by defendant ANTONIO LAREDO, and the actions of Philadelphia based heroin distributors and members of the Laredo DTO, using collected funds representing proceeds of heroin sales by Laredo DTO heroin distributors in the Philadelphia area, and deposited as cash to identified bank accounts, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANTONIO LAREDO
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
a/k/a "Gordo,"**

knowingly conducted, and attempted to conduct, and aided, abetted, and willfully caused, the following financial transactions affecting interstate commerce: 60 Western Union international wire money transfers, representing proceeds of heroin sales by Laredo DTO heroin distributors in the Philadelphia, Pennsylvania area, from the United States, primarily from the Philadelphia, Pennsylvania region, to Mexico, in the total sum of \$62,895.

3. When conducting, aiding, abetting, and willfully causing, the financial transactions described in paragraph 2 above, defendant **ANTONIO LAREDO** knew that the property involved in those financial transactions represented the proceeds of some form of unlawful activity.

4. The financial transactions described in paragraph 2 above involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute 1 kilogram or more of heroin and the distribution of 1 kilogram or more of heroin, in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A), and defendant **ANTONIO LAREDO** acted with the knowledge that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT ONE HUNDRED EIGHT

CONTINUING CRIMINAL ENTERPRISE (CCE)

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 13 of Count One, together with the overt acts set forth in Count One, and Counts Two through Forty-Three are re-alleged and incorporated by reference here.

2. From in or about 2008 to on or about November 19, 2014, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**ANTONIO LAREDO,
a/k/a "Antonio Laredo Don Juan,"
a/k/a "Antonio Rodriguez,"
a/k/a "Gordo," and
ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan,"**

engaged in a continuing criminal enterprise in that:

a. they violated one or more provisions of subchapter I of Chapter 13 of Title 21, United States Code, which are felonies, and such violations were a part of a continuing series of violations of subchapter I of Chapter 13 of Title 21, United States Code, including but not limited to, Counts One through Forty-Three of this indictment;

b. the series of violations described in paragraph (a) were undertaken in concert with five or more persons, known and unknown to the grand jury, with respect to whom defendants ANTONIO LAREDO and ISMAEL LAREDO occupied a position of organizer, a supervisory position and a position of management; and

c. defendants ANTONIO LAREDO and ISMAEL LAREDO obtained substantial income and resources from the violations described in paragraphs (a) and

(b).

In violation of Title 21, United States Code, Section 848.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 21, United States Code, Sections 846, 841(a)(1), and 963 set forth in this indictment, defendants

ANTONIO LAREDO,
a/k/a "Antonio Rodriguez,"
a/k/a "Job Laredo Donjuan,"
ISMAEL LAREDO,
a/k/a "Ismael Laredo Don Juan,"
ANTONIO MARCELO BARRAGAN,
a/k/a "El Raton,"
ALEJANDRO SOTELO,
a/k/a "Alex,"
LUIS DEHEZA LAREDO,
a/k/a "Guicho,"
VICTOR JAIMES LAREDO,
a/k/a "Marshmallow,"
ENOC LAREDO,
a/k/a "Jose Rosales,"
OSMAR FLORES,
FRANCISCO GONZALEZ JOSE,
a/k/a "Franci,"
DARBIN VARGAS,
a/k/a "Darbi,"
GABRIEL VARGAS,
CONFESOR MONTALVADO,
MIGUEL IRIZARRY,
a/k/a "Chisito,"
JOSE RUIZ,
a/k/a "Drama,"
FRANK PERALTA,
a/k/a "Cojo,"
ARIEL RODRIGUEZ,
a/k/a "El Puro,"
JOEL PERALTA REYES,
EDWIN VIDAL,
JHONNY MENA-MARIANO,
SAMUEL PEREZ,

**MELVIN PAGAN,
ROBERT DELORBE,
JOHANA LASALS,
JOSE LUIS ROJAS-HERNANDEZ,
JACQUELINE DELGADO, and
IVET M. BANDA**

shall forfeit to the United States of America:

(a) Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense, including, but not limited to, the sums of \$314,820, \$105,118.56, \$19,319, \$89,920, and \$2,424 in United States currency; and

(b) Any property constituting, or derived from, any proceeds obtained directly or indirectly from the commission of such offense, including the sums of \$314,820, \$105,118.56, \$19,319, \$89,920, and \$2,424 and a money judgment of \$60,000,000 in United States currency.

2. If any of the property described above as being subject to forfeiture, as a result of any act of omission of the defendants:

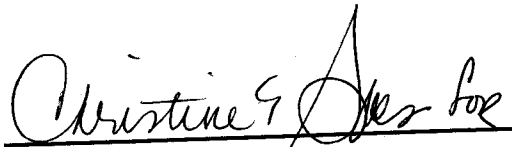
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot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

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON



ZANE DAVID MEMEGER

United States Attorney