

FILED

MAY 14 2009

SUPERIOR COURT  
IMPERIAL COUNTY CA.  
JOSE O. GULLEN, CLERK  
BY *[Signature]* DEPUTY  
TANIA BETANCOURT

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF IMPERIAL

The People of the State of California,

Case No.: JCF23611

Plaintiff,

INDICTMENT

vs.

~~\_\_\_\_\_~~ 10  
RODRIGO SANCHEZ GRIHALVA,  
JOSE ABRAHAM GUZMAN, 12

Defendant(s).

The Grand Jury of the County of Imperial, State of California, accuses the Defendant(s) of committing, in the County of Imperial, State of California, before the finding of this indictment, the following crime(s):

**COUNT 1- CONSPIRACY TO COMMIT A CRIME, a felony, in violation of Penal Code section 182(a)(1).**

On or about 17<sup>TH</sup> day of February, 2009, ~~\_\_\_\_\_~~,  
**RODRIGO SANCHEZ GRIHALVA and JOSE ABRAHAM GUZMAN**, did unlawfully, conspire together and with another person and persons whose identity is unknown to commit the crime of **TRANSPORTATION OF COCAINE TO NON-CONTIGUOUS COUNTY**, in violation of Section **11352(b)** of the Health and Safety Code a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the county of **IMPERIAL**:

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1 **OVERT ACT III:**

2 Defendants delivered the cocaine to customers in San Bernardino County.

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4 **IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **10**

5 **KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(3).

6

7 **COUNT 3-TRANSPORT FOR SALE/NON-CONTIGUOUS COUNTY, a felony, in violation of**

8 **Health and Safety Code section 11352(b).**

9 On or about 17<sup>TH</sup> day of February, 2009, **RODRIGO SANCHEZ GRIHALVA and**  
10 **JOSE ABRAHAM GUZMAN**, did unlawfully, transport **COCAINE**, for sale from **IMPERIAL** County  
11 to **SAN BERNARDINO** County, a non-contiguous county.

12

13 **IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **10**

14 **KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(3).

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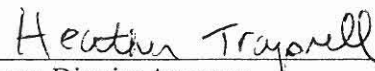
17 **NOTICE:** Pursuant to Penal Code §1054.1, the People are hereby disclosing to the defendant and to  
18 his attorney that the prosecutor intends to call as witnesses at trial of the above-entitled action, those  
19 persons whose names and work addresses are set forth within the written discovery provided to defendant's  
20 attorney.

21

22 **"A TRUE BILL"**

**GILBERT G. OTERO, District Attorney**

23   
24 Foreperson of the Grand Jury

  
Deputy District Attorney

25

26 Dated: 5/14/09

Dated: 5/14/09

27

28

Imperial County District Attorney's Office  
939 West Main Street • El Centro, CA 92243  
Telephone: [760] 483-4331 • Fax: [760] 352-4474

MAY 14 2009

**SUPERIOR COURT  
IMPERIAL COUNTY CA.  
JOSE O. GUILLEN, CLERK  
BY *[Signature]* DEPUTY**

**TANIA BETANCOURT**

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF IMPERIAL**

**The People of the State of California,**

Case No.: ICF23616

**Plaintiff,**

**INDICTMENT**

vs.

~~\_\_\_\_\_~~ 13  
**RODRIGO SANCHEZ GRIHALVA,** 14  
**CESAR YASERF LARA,** 15  
**LORENA LARA,** 16  
**JUAN BERUMEN SANDOVAL,** 17

**Defendant(s).**

The Grand Jury of the County of Imperial, State of California, accuses the Defendant(s) of committing, in the County of Imperial, State of California, before the finding of this indictment, the following crime(s):

**COUNT 1- CONSPIRACY TO COMMIT A CRIME, a felony, in violation of Penal Code section 182(a)(1).**

On or about 20<sup>TH</sup> day of February, 2009, \_\_\_\_\_

**RODRIGO SANCHEZ GRIHALVA, CESAR YASERF LARA, LORENA LARA and JUAN BERUMEN SANDOVAL,** did unlawfully, conspire together and with another person and persons whose identity is unknown to commit the crime of **TRANSPORTATION OF COCAINE TO NON-CONTIGUOUS COUNTY,** in violation of Section 11352(b) of the Health and Safety Code a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the county of **IMPERIAL:**

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**OVERT ACT I:**

Defendants transported cocaine via car from Imperial County to San Bernardino County.

**OVERT ACT II:**

Defendants met and switched vehicles to facilitate transporting cocaine.

**OVERT ACT III:**

Defendants drove in tandem utilizing counter surveillance tactics to elude law enforcement.

**OVERT ACT IV:**

Defendants engaged in telephone calls to facilitate the transportation of cocaine.

**IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded 10 **KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(3).

**COUNT 2- CONSPIRACY TO COMMIT A CRIME, a felony, in violation of Penal Code section 182(a)(1).**

On or about 20<sup>TH</sup> day of February, 2009, **CESAR**

**RODRIGO SANCHEZ GRIHALVA, YASERF LARA, LORENA LARA and JUAN BERUMEN**

**SANDOVAL**, did unlawfully, conspire together and with another person and persons whose identity is unknown to commit the crime of **POSSESSION FOR SALE OF A CONTROLLED SUBSTANCE**, in violation of Section **11351** of the Health and Safety Code a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the county of **IMPERIAL:**

**OVERT ACT I:**

Defendants transported cocaine via car from Imperial County to San Bernardino County.

**OVERT ACT II:**

Defendants met and switched vehicles to facilitate transporting cocaine.

Imperial County District Attorney's Office  
939 West Main Street • 11C Centro, CA 92243  
Telephone: [760] 483-4331 • Fax: [760] 352-4474

1 **OVERT ACT III:**

2 Defendants drove in tandem utilizing counter surveillance tactics to elude law enforcement.

3 **OVERT ACT IV:**

4 Defendants engaged in telephone calls to facilitate the transportation of cocaine.

5  
6 **IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **10**  
7 **KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(3).

8  
9 **COUNT 3-TRANSPORT FOR SALE/NON-CONTIGUOUS COUNTY, a felony, in violation of**  
10 **Health and Safety Code section 11352(b).**


11 On or about 17<sup>TH</sup> day of February, 2009, **CESAR YASERF LARA**, did unlawfully  
12 transport **COCAINE**, for sale from **IMPERIAL** County to **SAN BERNARDINO** County, a non-  
13 contiguous county.

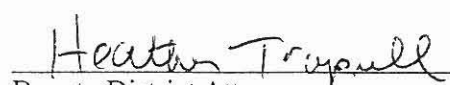
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15 **IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **10**  
16 **KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(3).

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19 **NOTICE:** Pursuant to Penal Code §1054.1, the People are hereby disclosing to the defendant and to  
20 his attorney that the prosecutor intends to call as witnesses at trial of the above-entitled action, those  
21 persons whose names and work addresses are set forth within the written discovery provided to defendant's  
22 attorney.

23 **"A TRUE BILL"**

**GILBERT G. OTERO, District Attorney**

24  
25  
26   
Foreperson of the Grand Jury

  
Deputy District Attorney

27  
28 Dated: 5/14/09

Dated: 5/14/09

Imperial County District Attorney's Office  
939 West Main Street • El Centro, CA 92247  
Telephone: [760] 483-4331 • Fax: [760] 352-4474


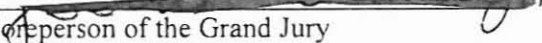


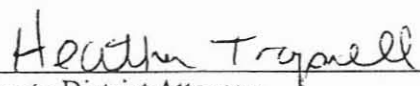
1 IT IS FURTHER ALLEGED that the substance in the above charged offense exceeded 20  
2 KILOGRAMS, by weight within the meaning of Health and Safety Code section 11370.4(a)(4).

3  
4 NOTICE: Pursuant to Penal Code §1054.1, the People are hereby disclosing to the defendant and to  
5 his attorney that the prosecutor intends to call as witnesses at trial of the above-entitled action, those  
6 persons whose names and work addresses are set forth within the written discovery provided to defendant's  
7 attorney.

8  
9 "A TRUE BILL"

GILBERT G. OTERO, District Attorney

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12   
For person of the Grand Jury

  
Deputy District Attorney

13 Dated: 5/14/09

Dated: 5/14/09

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Imperial County District Attorney's Office  
919 West Main Street • El Centro, CA 92243  
Telephone: (760) 883-4111 • Fax: (760) 952-4874





1 **OVERT ACT I:**

2 Defendants arranged to meet with confidential informant to arrange the delivery of cocaine.

4 **OVERT ACT II:**

5 Defendants transported the cocaine in a car across to a location where the cocaine could be stored.

7 **OVERT ACT III:**

8 Defendants unloaded the cocaine from a vehicle in a storage area.

10 **IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **20**  
11 **KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(4).

13 **IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **40**  
14 **KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(5).

16  
17 **COUNT 2- CONSPIRACY TO COMMIT A CRIME, a felony, in violation of Penal Code section**  
18 **182(a)(1).**

19 On or about 22<sup>nd</sup> day of March, 2009, \_\_\_\_\_, **MARCO**  
20 **MENDOZA, JUAN GABRIEL MOLINA and RAMON VALENZUELA**, did unlawfully, conspire  
21 together and with another person and persons whose identity is unknown to commit the crime of  
22 **POSSESSION FOR SALE OF A CONTROLLED SUBSTANCE**, in violation of Section 11351 of the  
23 Health and Safety Code a felony; that pursuant to and for the purpose of carrying out the objectives and  
24 purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and  
25 in the county of **IMPERIAL**:

Imperial County District Attorney's Office  
970 West Main Street • T1C Center, CA 92241  
Telephone: (760) 481-4331 • Fax: (760) 352-4474

1 **OVERT ACT I:**

2 Defendants arranged to meet with confidential informant to arrange the delivery of cocaine.

3

4 **OVERT ACT II:**

5 Defendants transported the cocaine in a car across to a location where the cocaine could be stored.

6

7 **OVERT ACT III:**

8 Defendants unloaded the cocaine from a vehicle in a storage area.

9

10 **IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **20**  
11 **KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(4).

12

13 **IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **40**  
14 **KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(5).

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17 **COUNT 3-SALE/TRANSPORTATION/OFFER TO SELL CONTROLLED SUBSTANCE, a felony,**  
18 **in violation of Health and Safety Code section 11352(a).**

19 On or about 22<sup>nd</sup> day of March, 2009, **MARCO MENDOZA, JUAN GABRIEL**  
20 **MOLINA and RAMON VALENZUELA**, did unlawfully, transport, import into the State of California,  
21 sell, furnish, administer, and give away, and offer to transport, import into the State of California, sell,  
22 furnish, administer, and give away, and attempt to import into the State of California and transport a  
23 controlled substance, to wit, **COCAINE**.

24

25 **"NOTICE:** Conviction of this offense will require you to register pursuant to Health and Safety Code  
26 section 11590. Failure to do so is a crime pursuant to Health and Safety Code section 11594."  
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Imperial County District Attorney's Office  
638 West Main Street • El Centro, CA 92243  
Telephone (760) 834-1311 • Fax (760) 352-4474

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**IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **20 KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(4).

**IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **40 KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(5).

**COUNT 4-POSSESSION FOR SALE OF A CONTROLLED SUBSTANCE, a felony, in violation of Health and Safety Code section 11351.**

On or about 22<sup>nd</sup> day of March, 2009, **MARCO MENDOZA, JUAN GABRIEL MOLINA and RAMON VALENZUELA**, did unlawfully possess for sale and purchase for sale a controlled substance, to wit, **COCAINE**.

**"NOTICE:** Conviction of this offense will require you to register pursuant to Health and Safety Code section 11590. Failure to do so is a crime pursuant to Health and Safety Code section 11594."

**IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **20 KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(4).

**IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **40 KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(5).

Imperial County District Attorney's Office  
919 West Main Street • El Centro, CA 92541  
Telephone: (760) 481-4111 • Fax: (760) 352-4474

1 NOTICE: Pursuant to Penal Code §1054.1, the People are hereby disclosing to the defendant and to  
2 his attorney that the prosecutor intends to call as witnesses at trial of the above-entitled action, those  
3 persons whose names and work addresses are set forth within the written discovery provided to defendant's  
4 attorney.

5

6 "A TRUE BILL"

GILBERT G. OTERO, District Attorney

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Foreperson of the Grand Jury

Deputy District Attorney

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Dated:

5/15/09

Dated:

5/15/09

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Imperial County District Attorney's Office  
979 West Main Street • 111 Centre, CA 92241  
Telephone: (760) 483-4331 • Fax: (760) 352-4374

FILED

MAY 15 2009

SUPERIOR COURT  
IMPERIAL COUNTY CA.  
JOSE O. GUILLEN, CLERK  
BY J. Garcia DEPUTY

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ORIGINAL

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF IMPERIAL

The People of the State of California,

Case No.: JCF 23624

Plaintiff,

INDICTMENT

vs.

HILARIO RODRIGUEZ,  
NORBERTO RUELAS URIAS,  
GERALD WILLIAM ANDREWS,

Defendant(s).

The Grand Jury of the County of Imperial, State of California, accuses the Defendant(s) of committing, in the County of Imperial, State of California, before the finding of this indictment, the following crime(s):

COUNT 1- CONSPIRACY TO COMMIT A CRIME, a felony, in violation of Penal Code section 182(a)(1).

On or about 25<sup>TH</sup> day of April, 2009, \_\_\_\_\_

HILARIO RODRIGUEZ, NORBERTO RUELAS URIAS, GERALD WILLIAM ANDREWS, and \_\_\_\_\_

\_\_\_\_\_ did unlawfully, conspire together and with another person and persons whose identity is unknown to commit the crime of POSSESSION FOR SALE OF A CONTROLLED SUBSTANCE, in violation of Section 11351 of the Health and Safety Code a felony; that pursuant to and

1 for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants  
2 committed the following overt act and acts at and in the county of **IMPERIAL**:

3  
4 **OVERT ACT I:**

5 Defendants met with undercover officer to arrange to buy cocaine.

6 **OVERT ACT II:**

7 Defendants negotiated with undercover officer to get a price to pay per kilogram.

8 **OVERT ACT III:**

9 Defendants negotiated with undercover officer to set a price to pay per kilogram.

10 **OVERT ACT IV:**

11 Defendants brought \$738,960.00 to purchase cocaine from the undercover officer.

12  
13 **IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **40**  
14 **KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(5).

15  
16 **COUNT 2- POSSESSION FOR SALE OF A CONTROLLED SUBSTANCE**, a felony, in violation of  
17 **Health and Safety Code section 11351.**

18 On or about 25<sup>th</sup> day of April, 2009, **HILARIO RODRIGUEZ, NORBERTO RUELAS**  
19 **URIAS and GERALD WILLIAM ANDREWS**, did unlawfully, possess for sale and purchase for sale a  
20 controlled substance, to wit, **COCAINE**.

21  
22 **IT IS FURTHER ALLEGED** that the substance in the above charged offense exceeded **40**  
23 **KILOGRAMS**, by weight within the meaning of Health and Safety Code section 11370.4(a)(5).

1 COUNT 3-POSSESSION OF MONEY OR INSTRUMENTS OVER \$100,000.00, a felony, in  
2 violation of Health and Safety Code section 11370.6(a).


3 On or about 25<sup>th</sup> day of April, 2009, HILARIO RODRIGUEZ and NORBERTO  
4 RUELAS URIAS did unlawfully, possess money and negotiable instruments in excess of \$100,000.00  
5 which were obtained as the result of the unlawful with intent to unlawfully purchase cocaine and did an act  
6 in furtherance of purchase.

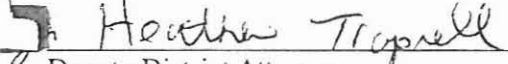
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8 "NOTICE: Conviction of this offense will require you to register pursuant to Health and Safety Code  
9 section 11590. Failure to do so is a crime pursuant to Health and Safety Code section 11594."

10  
11 NOTICE: Pursuant to Penal Code §1054.1, the People are hereby disclosing to the defendant and to  
12 his attorney that the prosecutor intends to call as witnesses at trial of the above-entitled action, those  
13 persons whose names and work addresses are set forth within the written discovery provided to defendant's  
14 attorney.

15  
16 "A TRUE BILL"

GILBERT G. OTERO, District Attorney

17  
18   
Foreperson of the Grand Jury

  
Deputy District Attorney

19  
20 Dated: 5/15/09

Dated: 4/15/09

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Imperial County District Attorney's Office  
919 West Main Street • El Centro, CA 92241  
Telephone (760) 483-4331 • Fax (760) 852-4474