

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn on May 18, 2011

UNITED STATES OF AMERICA	)	CRIMINAL NO. _____
	)	
	)	UNDER SEAL
v.	)	
	)	21 U.S.C. §§ 959, 960, 963
	)	(Conspiracy to Distribute Five
FAUSTO ISIDRO MEZA FLORES,	)	Kilograms or More of Cocaine,
also known as "Chapo Isidro"	)	Fifty Grams or More of
and "Chapito Isidro,"	)	Methamphetamine, One
	)	Kilogram or More of Heroin and
AGUSTIN FLORES APODACA,	)	One Thousand Kilograms or
also known as "El Niño,"	)	More of Marijuana for
"El Barbon" and "El Ingeniero,"	)	Importation into the
	)	United States)
SALOME FLORES APODACA,	)	
also known as "Pelon" and "Fino,"	)	18 U.S.C. §§ 924(c)(1)(A)(i),
	)	924(c)(1)(A)(ii), 924(c)(1)(B)(ii)
Defendants.	)	(Use of a Firearm)
	)	
	)	18 U.S.C. § 2
	)	(Aiding and Abetting)
	)	
	)	21 U.S.C. § 853
	)	21 U.S.C. § 970
	)	(Criminal Forfeiture)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

From in or about January 2000, and continuing thereafter, up to and including May 2012, both dates being approximate and inclusive, in the countries of Mexico, the United States, and elsewhere, the defendants, **FAUSTO ISIDRO MEZA FLORES, also known as "Chapo**

**Isidro” and “Chapito Isidro,” AGUSTIN FLORES APODACA, also known as “El Niño,” “El Barbon” and “El Ingeniero,” and SALOME FLORES APODACA, also known as “Pelon” and “Fino,”** with each other and with others both known and unknown to the Grand Jury, did knowingly and intentionally conspire to commit offenses against the United States, to wit: (1) to knowingly and intentionally distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance; (2) to knowingly and intentionally distribute 50 grams or more of methamphetamine, or 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; (3) to knowingly and intentionally distribute 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance; and (4) to knowing and intentionally distribute 1,000 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, knowing and intending that said controlled substances would be unlawfully imported into the United States from a place outside thereof; all in violation of Title 21, United States Code, Sections 959, 960, 963, and Title 18, United States Code, Section 2.

(Conspiracy to distribute five kilograms or more of cocaine, fifty grams or more of methamphetamine, one kilogram or more of heroin and one thousand kilograms or more of marijuana for importation into the United States in violation of Title 21, United States Code, Sections 959, 960 and 963, and aiding and abetting in violation of Title 18, United States Code, Section 2.)

### COUNT TWO

From in or about July 2010, and continuing thereafter, up to and including May 2012, both dates being approximately and inclusive, pursuant to Title 18, United States Code, Section 3238, within the venue of the United States District Court for the District of Columbia, the defendants **FAUSTO ISIDRO MEZA FLORES, also known as “Chapo Isidro” and**

**“Chapito Isidro,” AGUSTIN FLORES APODACA, also known as “El Niño,” “El Barbon” and “El Ingeniero,” and SALOME FLORES APODACA, also known as “Pelon” and “Fino,”** did knowingly and intentionally use, carry and brandish a firearm, during and in relation to one or more drug trafficking crimes, to wit: the crimes charged in Count One, and did knowingly and intentionally possess a firearm in furtherance of such drug trafficking crimes

(Use of a Firearm, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(B)(ii), and aiding and abetting in violation of Title 18, United States Code, Section 2.)

### **CRIMINAL FORFEITURE ALLEGATION**

The United States hereby gives notice to the defendants that upon conviction of the Title 21 offense alleged in Count One of this indictment, the government will seek forfeiture in accordance with Title 21, United States Code, Sections 853 and 970, of all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the alleged Title 21 violation, and all property used or intended to be used in any manner or part to commit and to facilitate the commission of such offense.

Said property includes, but is not limited to:

A sum of money equal to all proceeds the defendant obtained directly or indirectly as a result of the Title 21 offense charged in this indictment, and all property used or intended to be used to facilitate such offenses, that is, not less than a sum of money representing the amount of funds involved in the offense, and all interest and proceeds traceable thereto; in that such sum, in aggregate, was received by the defendants in exchange for the distribution of controlled substances or is traceable thereto. If any of the above-described forfeitable property, as a result of any act or omission of the defendant –

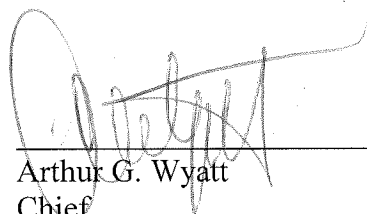
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot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

it is the intent of the United States, pursuant to 21, U.S.C. § 853(p) to seek forfeiture of any other property of the said defendant up to the value of the above forfeitable property.


(Criminal Forfeiture, in violation of Title 21, United States Code, Sections 853 and 970)

A True Bill.

\_\_\_\_\_  
Foreperson

  
\_\_\_\_\_  
Arthur G. Wyatt  
Chief  
Narcotic and Dangerous Drug Section  
Criminal Division  
U.S. Department of Justice  
Washington, D.C. 20530

By:

  
\_\_\_\_\_  
Andrea Goldberg  
Assistant Deputy Chief  
Narcotic and Dangerous Drug Section  
Criminal Division  
U.S. Department of Justice  
Washington, D.C. 20530