

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA )  
)  
v. )  
)  
JORGE GUADALUPE AYALA-GERMAN, ) No. 09 CR 546  
JORGE LUIS TORRES-GALVAN, )  
aka "Jose Manuel Castell-Villot," )  
aka "Choche," ) Violations: Title 21, United  
JOSE GONZALEZ-ZAVALA, ) States Code, Sections  
aka "Panda," ) 841(a)(1), 843(b), 846 and  
EZEQUEL HERNANDEZ-PATINO, ) 856; and Title 18, United  
aka "Cheque," ) States Code, Sections 1952,  
ISMAEL FLORES, ) 1960 and 2  
aka "Bobby," )  
aka "Cunado," ) **SUPERSEDING**  
aka "Primo," and ) **INDICTMENT**  
OSCAR BUENO )

**COUNT ONE**

The SPECIAL JANUARY 2009 GRAND JURY charges:

1. Beginning no later than 2007, and continuing until at least in or around August 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JORGE GUADALUPE AYALA-GERMAN,  
JORGE LUIS TORRES-GALVAN, aka "Jose Manuel Castell-Villot," aka "Choche,"  
JOSE GONZALEZ-ZAVALA, aka "Panda,"  
EZEQUEL HERNANDEZ-PATINO, aka "Cheque,"  
ISMAEL FLORES, aka "Bobby," aka "Cunado," aka "Primo," and  
OSCAR BUENO,

defendants herein, did conspire with each other and with Individual A, and others known and unknown to the Grand Jury, to knowingly and intentionally possess with

the intent to distribute and to distribute controlled substances, namely, five kilograms or more of mixtures and substances containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. It was part of the conspiracy that there existed a drug trafficking organization based in Michoacan, Mexico, and known to its members and associates as “La Familia Michoacana” or “La Familia.”

3. It was further part of the conspiracy that La Familia Michoacana members and associates operating in the Chicago area (the “distribution cell”), together with Individual A, who was located in Mexico, formed a command and control group designed for the efficient distribution of thousands of kilograms of cocaine to, and collection of United States currency derived from the sale of cocaine (“cash drug proceeds”) from, multiple wholesale distributors and their associates located in the greater Chicago area and elsewhere, including: Oscar Manuel Flores-Candelario, aka “Manolo,” Miguel Godinez-Gonzalez, aka “Compadre,” aka “Pedro,” Celso Corona-Sanchez, aka “Ponciano,” aka “Poncia,” Javier Soto-Medina, aka “Chuchi,” Carlos Gascar-Corona, aka “Carlos Uvaldo-Cardenas,” Edwin Sanchez, Hector Lopez-Medina, aka “Nino,” aka “Ninon,” Saul Carbajal, aka “Mario Guillermo Morales-Rosa,” Anai Magana Gonzalez, aka “Ana,” Jesus Hernandez, aka “J.C.,” aka “Yesi,” aka “Yessy del 19,” aka “Jesse,” Francisco Ramirez, aka “El Gato,” Bartolo Lucatero, aka “Pelon,” and Jose Rodriguez and other wholesale distributors (collectively, the “wholesale distributors”).

*Members of the Conspiracy*

4. It was further part of the conspiracy that Individual A authorized the distribution of cocaine to various wholesale distributors located in the Chicago area and elsewhere; ordered JORGE LUIS TORRES-GALVAN, JOSE GONZALEZ-ZAVALA and other local managers and supervisors to distribute multi-kilogram quantities of cocaine to various wholesale distributors and to collect and ship cash drug proceeds; and ordered his co-conspirators to keep him abreast of the distribution cell's progress towards the distribution of cocaine and collection of cash drug proceeds.

5. It was further part of the conspiracy that JORGE LUIS TORRES-GALVAN was a manager and supervisor of the distribution cell who was responsible for the distribution of quantities of cocaine to various wholesale distributors.

6. It was further part of the conspiracy that JOSE GONZALEZ-ZAVALA was a leader and supervisor of the distribution cell who was responsible for overseeing the distribution of narcotics and the collection of cash drug proceeds in the Chicago area. GONZALEZ-ZAVALA maintained frequent contact with Individual A, and advised Individual A of the distribution cell's progress. GONZALEZ-ZAVALA oversaw and instructed JORGE GUADALUPE AYALA-GERMAN, EZEQUEL HERNANDEZ-PATINO and other members of the distribution cell in connection with the distribution of cocaine and collection of cash drug proceeds.

7. It was further part of the conspiracy that GONZALEZ-ZAVALA also made arrangements with wholesale distributors, including but not limited to Miguel Godinez-Gonzalez, Celso Corona-Sanchez, Carlos Gascar-Corona, Jesus Rodriguez, Anai Magana Gonzalez, Jesus Hernandez and Bartolo Lucatero concerning the distribution of multi-kilogram quantities of cocaine and the collection of well over ten million dollars in cash drug proceeds.

8. It was further part of the conspiracy that EZEQUEL HERNANDEZ-PATINO was a member of the distribution cell who was responsible for distributing multi-kilogram quantities of narcotics to wholesale distributors in the Chicago area.

9. It was further part of the conspiracy that JORGE GUADALUPE AYALA-GERMAN was a member of the distribution cell who was responsible for, among other things, maintaining a stash house (as defined below) for the distribution cell.

10. It was further part of the conspiracy that ISMAEL FLORES acted as a cash drug proceeds courier for the distribution cell. FLORES transported multi-million dollar quantities of United States currency from Chicago to Dallas, Texas, including, among other things, the transport of cash drug proceeds on or about May 22, 2008 and on or about April 16, 2009.

11. It was further part of the conspiracy that OSCAR BUENO acted as a cash drug proceeds courier for the distribution cell. Among other things, BUENO assisted FLORES in the transportation of cash drug proceeds on or about April 16, 2009.

*Means and Methods of the Conspiracy*

12. It was further part of the conspiracy that the distribution cell “fronted” multi-kilogram quantities of cocaine to its wholesale distributors and their associates, meaning the distribution cell delivered the cocaine to wholesale distributors and their associates without requiring payment at the time of delivery, and wholesale distributors made payment later.

13. It was further part of the conspiracy that the distribution cell rented multiple residential dwellings in the greater Chicago, Illinois area for use as “stash houses,” that is, as locations where bulk quantities of cocaine were stored for subsequent distribution to wholesale distributors, where bulk quantities of cash drug proceeds received from wholesale distributors were kept safe, and where vehicles equipped with hidden compartments designed to carry cocaine could be loaded and unloaded in private. The distribution cell used vehicles with hidden compartments to deliver cocaine to various locations in the greater Chicago, Illinois area where La Familia Michoacana’s wholesale distributors would take possession of the cocaine.

14. It was further part of the conspiracy that members of the distribution cell were responsible for collecting and picking up cash drug proceeds from La Familia Michoacana’s wholesale distributors and delivering cash drug proceeds to various stash houses maintained by the distribution cell. Members of the distribution cell used vehicles with hidden compartments to transport cash drug proceeds. Members of the distribution cell were also responsible for counting and packaging the cash drug proceeds, and reporting to Individual A on the amount of cash drug proceeds collected.

15. It was further part of the conspiracy that members of the distribution cell kept notebooks, ledgers and other written accounts (“drug ledgers”) of their narcotics trafficking activities, including but not limited to entries relating to: amounts of cocaine received by the distribution cell to be distributed to La Familia Michoacana’s wholesale distributors; amounts of cocaine provided to certain wholesale distributors; cash drug proceeds received from certain wholesale distributors; outstanding cash balances owed by certain wholesale distributors for cocaine previously provided on credit; and contact information for certain wholesale distributors, including cellular telephone and “push-to-talk” radio numbers. Members of the distribution cell used these drug ledgers to keep track of their narcotics trafficking activities and to provide their periodic progress reports to Individual A.

16. It was further part of the conspiracy that the distribution cell used the services of various couriers, including ISMAEL FLORES and OSCAR BUENO, to transport drug proceeds from the greater Chicago, Illinois area to destinations in the southern United States.

17. It was further part of the conspiracy that the members of the distribution cell used cellular telephones to communicate with each other and to facilitate their narcotics trafficking activities. Members of the distribution cell and the wholesale distributors often used multiple cellular telephones at the same time and frequently replaced cellular telephones, with the purpose of evading detection by law enforcement.

18. It was further part of the conspiracy that defendants and their co-conspirators would and did hide, misrepresent, conceal, and cause to be

misrepresented, concealed, and hidden, the purposes of acts done in furtherance of the conspiracy, and would and did use coded language, surveillance, counter-surveillance and other means to avoid detection and apprehension by law enforcement authorities.

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

**COUNT TWO**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

Beginning no later than in or around November 2007 and continuing to in or around April 2009, in the Northern District of Illinois, Eastern Division and elsewhere,

ISMAEL FLORES,

defendant herein, did knowingly conduct, control, manage, supervise, direct and own all or part of an unlicensed money transmitting business, affecting interstate and foreign commerce, namely, "Transportes Ocampo," in Chicago, Illinois, and Dallas, Texas, which was operated without a license from the State of Illinois, such operation constituting a felony under Illinois state law, 205 Ill. Comp. Stat. 657/90(h);

In violation of Title 18, United States Code, Section 1960(a).



**COUNT THREE**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about April 15, 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

OSCAR BUENO,

defendant herein, did travel in interstate commerce from Dallas, Texas to Chicago, Illinois, with intent to promote, manage, carry on, and facilitate the promotion, management, and carrying on of an unlawful activity, namely, conspiracy to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Section 846 as charged in Count One of this Indictment, and thereafter did perform an act to facilitate the promotion, management, and carrying on of such unlawful activity;

In violation of Title 18, United States Code, Section 1952(a)(3).

**COUNT FOUR**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about April 15, 2009, at approximately 2:59 p.m., in the Northern District of Illinois, Eastern Division,

JOSE GONZALEZ-ZAVALA, aka "Panda,"

defendant herein, knowingly and intentionally used a communications facility, namely, a telephone (call session 202), in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT FIVE**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about April 15, 2009, at approximately 5:51 p.m., in the Northern District of Illinois, Eastern Division,

JOSE GONZALEZ-ZAVALA, aka "Panda," and  
EZEQUEL HERNANDEZ-PATINO, aka "Cheque,"

defendants herein, knowingly and intentionally used a communications facility, namely, a telephone (call session 217), in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT SIX**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about April 15, 2009, in the Northern District of Illinois, Eastern Division,

JOSE GONZALEZ-ZAVALA, aka "Panda," and  
EZEQUEL HERNANDEZ-PATINO, aka "Cheque,"

defendants herein, knowingly and intentionally did distribute a controlled substance, namely, five kilograms or more of mixtures and substances containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

**COUNT SEVEN**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about April 21, 2009, at approximately 10:11 a.m., in the Northern District of Illinois, Eastern Division,

JOSE GONZALEZ-ZAVALA, aka "Panda,"

defendant herein, knowingly and intentionally used a communications facility, namely, a telephone (call session 62), in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT EIGHT**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about April 21, 2009, at approximately 10:13 a.m., in the Northern District of Illinois, Eastern Division,

JOSE GONZALEZ-ZAVALA, aka "Panda," and  
EZEQUEL HERNANDEZ-PATINO, aka "Cheque,"

defendants herein, knowingly and intentionally used a communications facility, namely, a telephone (call session 41), in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT NINE**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about April 21, 2009, at Chicago, in the Northern District of Illinois,  
Eastern Division,

JOSE GONZALEZ-ZAVALA, aka "Panda," and  
EZEQUEL HERNANDEZ-PATINO, aka "Cheque,"

defendants herein, knowingly and intentionally did distribute a controlled substance,  
namely, five kilograms or more of mixtures and substances containing a detectable  
amount of cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

**COUNT TEN**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about May 13, 2009, at approximately 10:21 a.m., in the Northern District of Illinois, Eastern Division,

JORGE GUADALUPE AYALA-GERMAN,

defendant herein, knowingly and intentionally used a communications facility, namely, a telephone (call session 478), in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).



**COUNT ELEVEN**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about May 18, 2009, at approximately 9:48 a.m., in the Northern District of Illinois, Eastern Division,

JOSE GONZALEZ-ZAVALA, aka "Panda,"

defendant herein, knowingly and intentionally used a communications facility, namely, a telephone (call session 58), in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT TWELVE**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about May 18, 2009, at Chicago, in the Northern District of Illinois,  
Eastern Division,

JOSE GONZALEZ-ZAVALA, aka "Panda," and  
EZEQUEL HERNANDEZ-PATINO, aka "Cheque,"

defendants herein, knowingly and intentionally did distribute a controlled substance,  
namely, five kilograms or more of mixtures and substances containing a detectable  
amount of cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

**COUNT THIRTEEN**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about May 18, 2009, at approximately 12:41 p.m., in the Northern District of Illinois, Eastern Division,

JOSE GONZALEZ-ZAVALA, aka "Panda,"

defendant herein, knowingly and intentionally used a communications facility, namely, a telephone (call session 63), in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT FOURTEEN**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about May 18, 2009, at Joliet, in the Northern District of Illinois, Eastern  
Division,

JOSE GONZALEZ-ZAVALA, aka "Panda,"

defendant herein, knowingly and intentionally did distribute a controlled substance,  
namely, five kilograms or more of mixtures and substances containing a detectable  
amount of cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

**COUNT FIFTEEN**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about June 9, 2009, at Cicero, in the Northern District of Illinois, Eastern  
Division,

JOSE GONZALEZ-ZAVALA, aka "Panda," and  
EZEQUEL HERNANDEZ-PATINO, aka "Cheque,"

defendants herein, knowingly and intentionally did distribute a controlled substance,  
namely, 500 grams or more of mixtures and substances containing a detectable amount  
of cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

**COUNT SIXTEEN**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about June 10, 2009, at approximately 1:53 p.m., in the Northern District of Illinois, Eastern Division,

JOSE GONZALEZ-ZAVALA, aka "Panda," and  
EZEQUEL HERNANDEZ-PATINO, aka "Cheque,"

defendants herein, knowingly and intentionally used a communications facility, namely, a telephone (call session 995), in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and to distribute controlled substances, as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT SEVENTEEN**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about June 10, 2009, at Cicero, in the Northern District of Illinois, Eastern  
Division,

JOSE GONZALEZ-ZAVALA, aka "Panda," and  
EZEQUEL HERNANDEZ-PATINO, aka "Cheque,"

defendants herein, knowingly and intentionally did distribute a controlled substance,  
namely, 500 grams or more of mixtures and substances containing a detectable amount  
of cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

**COUNT EIGHTEEN**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about June 12, 2009, at Joliet, in the Northern District of Illinois, Eastern  
Division,

JORGE GUADALUPE AYALA-GERMAN,  
JOSE GONZALEZ-ZAVALA, aka "Panda,"  
EZEQUEL HERNANDEZ-PATINO, aka "Cheque,"

defendants herein, knowingly and intentionally did possess with intent to distribute  
a controlled substance, namely, five kilograms or more of mixtures and substances  
containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled  
Substance;

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



**COUNT NINETEEN**

The SPECIAL JANUARY 2009 GRAND JURY further charges:

On or about June 12, 2009, at Joliet, in the Northern District of Illinois, Eastern Division,

JORGE GUADALUPE AYALA-GERMAN,

defendant herein, did knowingly maintain a house, namely a residence at 1519 Cambria Court, Joliet, Illinois, for the purpose of distributing controlled substances, namely, a quantity of mixtures and substances containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance;

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

## FORFEITURE ALLEGATION

The SPECIAL JANUARY 2009 GRAND JURY further charges:

1. The allegations of Counts One and Counts Four through Nineteen are realleged and fully incorporated herein for the purpose of alleging forfeiture to the United States pursuant to Title 21, United States Code, Section 853.

2. As a result of the violations alleged in Counts One and Counts Four through Nineteen of the foregoing Indictment,

JORGE GUADALUPE AYALA-GERMAN,  
JORGE LUIS TORRES-GALVAN, aka "Jose Manuel Castell-Villot," aka "Choche,"  
JOSE GONZALEZ-ZAVALA, aka "Panda,"  
EZEQUEL HERNANDEZ-PATINO, aka "Cheque,"  
ISMAEL FLORES, aka "Bobby," aka "Cunado," aka "Primo," and  
OSCAR BUENO,

defendants herein, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a): (1) any and all right, title, and interest they may have in any property, real and personal, which constitutes and is derived from proceeds traceable to the offenses as charged in this indictment; and (2) any and all right, title, and interest they may have in any property, real and personal, which was used, and intended to be used, in any manner or part, to commit, and to facilitate the commission of the offenses charged in the indictment.

3. The interests of the defendants, jointly and severally, subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853, include but are not limited to:

- a. at least approximately \$20,000,000 in United States currency representing the estimated proceeds of the distribution cell;

- b. Funds in the amount of approximately \$2,693,999 seized on or about April 16, 2009;
- c. Funds in the amount of approximately \$1,462,960 seized on or about May 11, 2009; and
- d. Funds in the amount of approximately \$1,385,414 seized on or about June 12, 2009.

4. If any of the forfeitable property described above, as a result of any act or omission by the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- 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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to the provisions of Title 21, United States Code, Section 853(p).

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

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY