

SEALED**FILED****SEALED**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

2010 JUN -2 PM 1:49

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE ALONSO-GARIBAY, (1)

SERGIO MIGUEL ZAMORA-
LUPERCIO, (2)

AUVYE TRAMMELL, (3)

JESSE PAUL MALDONADO, JR., (4)

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CRIMINAL NO.

CLERK U.S. DISTRICT COURT

WESTERN DISTRICT OF TEXAS

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[Vio.: 21 U.S.C. § 846:

Conspiracy to Distribute and

Possess With Intent to

Distribute Marijuana; 21

U.S.C. § 841(a)(1)): Possession

With Intent to Distribute

Marijuana.]

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. § 846]

That on or about October 23, 2009, the exact date unknown to the Grand Jury, and continuing until on or about April 12, 2010, in the Western District of Texas, Defendants,

JOSE ALONSO-GARIBAY,
SERGIO MIGUEL ZAMORA-LUPERCIO,
AUVYE TRAMMELL, AND
JESSE PAUL MALDONADO, JR.

did unlawfully, knowingly and intentionally combine, conspire, confederate, and agree together and with one another and with others known and unknown to the Grand Jury, to distribute and possess with intent to distribute a controlled substance, which offense involved 100 kilograms or more of marijuana, a Schedule I Controlled Substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and in violation of Title 21, United States Code, Section 846.

COUNT TWO

[21 U.S.C. § 841(a)(1)]
[18 U.S.C. § 2]

That on or about October 23, 2009, in the Western District of Texas, Defendants,

JOSE ALONSO-GARIBAY, AND
SERGIO MIGUEL ZAMORA-LUPERCIO,

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved 50 kilograms or more of marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THREE

[21 U.S.C. § 841(a)(1)]
[18 U.S.C. § 2]

That on or about December 18, 2009, in the Western District of Texas, Defendants,

JOSE ALONSO-GARIBAY,
AUVYE TRAMMELL, AND
JESSE PAUL MONDONADO, JR.

and others known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved 50 kilograms or more of marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code,

Section 2.

COUNT FOUR

[21 U.S.C. § 841(a)(1)]
[18 U.S.C. § 2]

That on or about January 10, 2010, in the Western District of Texas, Defendants,

JOSE ALONSO-GARIBAY, AND
AUVYE TRAMMELL,

and others known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved 50 kilograms or more of marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FIVE

[21 U.S.C. § 841(a)(1)]
[18 U.S.C. § 2]

That on or about April 12, 2010, in the Western District of Texas, Defendants,

JOSE ALONSO-GARIBAY,
AUVYE TRAMMELL, AND
JESSE PAUL MALDONADO, JR.,

and others known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved 50 kilograms or more of marijuana, a Schedule I Controlled

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

A TRUE BILL.


FOREPERSON

JOHN E. MURPHY
United States Attorney

By: 

CHARLIE STRAUSS
Assistant United States Attorney