

2013 DEC 20 PM 4:33

SEALED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

September 2013 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE RODRIGO ARECHIGA-GAMBOA,
aka "Chino Antrax,"
aka "Norberto
Sicairos-Garcia,"

Defendant.

Case No.

13CR4517DMS

I N D I C T M E N T

Title 21, U.S.C., Secs. 959, 960,
and 963 - Conspiracy to Distribute
Methamphetamine, Cocaine and
Marijuana Intended for
Importation; Title 21, U.S.C.,
Secs. 952, 960, and 963 -
Conspiracy to Import
Methamphetamine, Cocaine and
Marijuana; Title 21, U.S.C.,
Sec. 853 - Criminal Forfeiture

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up
to and including December 20, 2013, defendant JOSE RODRIGO ARECHIGA-
GAMBOA, aka "Chino Antrax," aka "Norberto Sicairos-Garcia," did
knowingly and intentionally conspire with other persons known and
unknown to the grand jury to distribute 500 grams and more of a
mixture and substance containing a detectable amount of
methamphetamine and 5 kilograms and more of cocaine, both Schedule II
Controlled Substances; and 100 kilograms and more of a mixture and

1 substance containing a detectable amount of marijuana; a Schedule I
2 Controlled Substance; for the purpose of unlawful importation into the
3 United States; all in violation of Title 21, United States Code,
4 Sections 959, 960, and 963.

5 Count 2

6 Beginning at a date unknown to the grand jury and continuing up
7 to and including December 20, 2013, within the Southern District of
8 California, and elsewhere, defendant JOSE RODRIGO ARECHIGA-GAMBOA,
9 aka "Chino Antrax," aka "Norberto Sicairos-Garcia," did knowingly and
10 intentionally conspire with other persons known and unknown to the
11 grand jury to import 500 grams and more of a mixture and substance
12 containing a detectable amount of methamphetamine and 5 kilograms and
13 more of cocaine, both Schedule II Controlled Substances; and
14 100 kilograms and more of a mixture and substance containing a
15 detectable amount of marijuana; a Schedule I Controlled Substance;
16 into the United States from a place outside thereof; in violation of
17 Title 21, United States Code, Sections 952, 960, and 963.

18 Criminal Forfeiture Allegations

19 1. The allegations contained in Counts 1 and 2 are realleged
20 and by reference fully incorporated herein for the purpose of alleging
21 forfeiture to the United States of America pursuant to the provisions
22 of Title 21, United States Code, Section 853.

23 2. As a result of the commission of the felony offenses alleged
24 in this Indictment, said violations being punishable by imprisonment
25 for more than one year and pursuant to Title 21, United States Code,
26 Sections 853(a)(1) and 853(a)(2), defendant JOSE RODRIGO ARECHIGA-
27 GAMBOA, aka "Chino Antrax," aka "Norberto Sicairos-Garcia," shall,
28 upon conviction, forfeit to the United States all their rights, title

1 and interest in any and all property constituting, or derived from,
2 any proceeds any defendant obtained, directly or indirectly, as the
3 result of the felony offense alleged in this Indictment, and any and
4 all property used or intended to be used in any manner or part to
5 commit and to facilitate the commission of the violation alleged in
6 this indictment.

7 3. If any of the above-described forfeitable property, as a
8 result of any act or omission of the defendant:

- 9 a. cannot be located upon the exercise of due diligence;
10 b. has been transferred or sold to, or deposited with, a
11 third party;
12 c. has been placed beyond the jurisdiction of the Court;
13 d. has been substantially diminished in value; or
14 e. has been commingled with other property which cannot be
15 subdivided without difficulty;

16 it is the intent of the United States, pursuant to Title 21,
17 United States Code, Section 853(p), to seek forfeiture of any other
18 property of the defendant up to the value of the said property listed
19 above as being subject to forfeiture.

20 All in violation of Title 21, United States Code, Section 853.

21 DATED: December 20, 2013.

22 A TRUE BILL:

23
24 Foreperson

25 I hereby attest and certify on 12/20/2013
26 That the foregoing document is a full, true and correct
copy of the original on file in my office and in my legal
custody.

27 CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

28 By _____ Deputy

25 LAURA E. DUFFY
26 United States Attorney

27 By: Adam L. Braverman
28 ADAM L. BRAVERMAN
Assistant U.S. Attorney