

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA, ) No. \_\_\_\_\_  
)  
Plaintiff, )  
) COUNT ONE: All Defendants  
) 21 U.S.C. §§ 841(a)(1), (b)(1)(A) and (B)  
v. ) and 846  
) NLT 10 Years and NMT Life Imprisonment  
JUAN ANTONIO MARRON, ) NMT \$4,000,000 Fine  
a/k/a "Casper" ) NLT 5 Years Supervised Release  
[DOB: 02/26/1978] ) Class A Felony  
)  
DAVID HERNANDEZ-MONTOYA, ) COUNT TWO: All Defendants  
[DOB: 02/19/1979] ) 18 U.S.C. §§ 1956 (a)(1)(A)(i) and (h)  
) NMT 20 Years Imprisonment  
MARIO MARRON, ) NMT \$500,000 Fine  
[DOB: 02/29/1976] ) NMT 3 Years of Supervised Release  
) Class C Felony  
PETER ADAM FLORES, )  
[DOB: 08/31/1972] ) ALLEGATION OF CRIMINAL FORFEITURE  
) 21 U.S.C. § 853  
ROBERT JOSEPH OLVERA, )  
[DOB: 07/17/1963] ) \$100 Mandatory Special Assessment for each  
) Count of conviction  
ANTHONY FRANCIS ALVAREZ, )  
[DOB: 03/23/1975] )  
)  
BENITO CASTILLO GUTIERREZ, )  
[DOB: 11/12/1977] )  
)  
JOHN GASCA, JR., )  
[DOB: 06/15/1980] )  
)  
JASON RICHARDSON, )  
[DOB: 11/11/1979] )  
)  
MARCO ANTONIO MURSIA, )  
[DOB: 10/04/1982] )  
)  
ARMANDO MENDEZ, )  
[DOB: 04/22/1976] )  
)  
DESHAUN LATKEEK CERUTI, )  
[DOB: 09/11/1974] )

MARIA MARRON, )  
a/k/a "LUZ" )  
[DOB: 03/13/1955] )  
) )  
RAFAEL ZAMORA, )  
[DOB: 10/08/1977] )  
) )  
JOSEPH MICHAEL LOPEZ, )  
[DOB: 12/23/1980] )  
) )  
FRANK MICHAEL ALVAREZ, )  
[DOB: 08/13/1978] )  
) )  
GILBERT LUPERCIO, )  
[DOB: 12/05/1979] )  
) )  
MARGOT CHARLENE DAVIDSON )  
[DOB: 12/27/1953] )  
) )  
MUHAMMAD IBRAHIM ROLLIE, )  
[DOB: 10/09/1987] )  
) )  
Defendants. )

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or between January 1, 2006 and November 17, 2010, said dates being approximate, in the Western District of Missouri and elsewhere, JUAN ANTONIO MARRON, a/k/a "Casper"; DAVID HERNANDEZ-MONTOYA; MARIO MARRON; PETER ADAM FLORES; ROBERT JOSEPH OLVERA; ANTHONY FRANCIS ALVAREZ; BENITO CASTILLO GUTIERREZ; JOHN GASCA, JR.; JASON RICHARDSON; MARCO ANTONIO MURSIA; ARMANDO MENDEZ; DESHAUN LATKEEK CERUTI; MARIA MARRON, a/k/a "Luz"; RAFAEL ZAMORA; JOSEPH MICHAEL LOPEZ; FRANK MICHAEL ALVAREZ; GILBERT

LUPERCIO; MARGOT CHARLENE DAVIDSON, and MUHAMMAD IBRAHIM ROLLIE, defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other and others, both known and unknown to the grand jury, to distribute: (1) five (5) kilograms or more of cocaine, a Schedule II controlled substance; (2) fifty (50) grams or more of cocaine base (a/k/a “crack”), a schedule II controlled substance; and (3) One hundred (100) kilograms or more of marijuana, a Schedule I controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and (B), all in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or between January 1, 2006 and November 17, 2010, in the Western District of Missouri, and other places, JUAN ANTONIO MARRON, a/k/a “Casper”; DAVID HERNANDEZ-MONTOYA; MARIO MARRON; PETER ADAM FLORES; ROBERT JOSEPH OLVERA; ANTHONY FRANCIS ALVAREZ; BENITO CASTILLO GUTIERREZ; JOHN GASCA, JR.; JASON RICHARDSON; MARCO ANTONIO MURSIA; ARMANDO MENDEZ; DESHAUN LATKEEK CERUTI; MARIA MARRON, a/k/a “Luz”; RAFAEL ZAMORA; JOSEPH MICHAEL LOPEZ; FRANK MICHAEL ALVAREZ; GILBERT LUPERCIO; MARGOT CHARLENE DAVIDSON, and MUHAMMAD IBRAHIM ROLLIE, defendants herein, and others, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, did knowingly and intentionally combine, conspire, confederate and agree with each other and others, both known and unknown to the grand jury, to conduct financial transactions, which in fact involved the proceeds of a specified unlawful activity, to wit: the conspiracy to distribute controlled substances contrary to

the provisions of Title 21, United States Code, Section 841(a)(1) and Title 21, United States Code, Section 846 charged in Count One, with the intent to promote the carrying on of that specified unlawful activity, in that cash obtained from drug sales was then used, in whole or part, to purchase additional drugs for sale, thus promoting the drug conspiracy.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (h).

#### CRIMINAL FORFEITURE ALLEGATION

The allegations contained in Count One of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 21, United States Code, Sections 853(a)(1), 853(a)(2) and 853(p) and Title 18, United States Code, Section 982(a)(1) and Rule 32.2(a).

As a result of the commission of the violations charged in Count One of this Indictment, JUAN ANTONIO MARRON, a/k/a “Casper”; DAVID HERNANDEZ-MONTOYA; MARIO MARRON, DESHAUN LATKEEK CERUTI; MARIA MARRON, a/k/a “Luz”; RAFAEL ZAMORA; JOSEPH MICHAEL LOPEZ, JASON RICHARDSON, and GILBERT LUPERCIO, defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds that the defendants obtained directly or indirectly as a result of the violations charged in Count One and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Count One of this indictment, including but not limited to the following:

#### REAL PROPERTY

All lots or parcels of land, together with their buildings, appurtenances, improvements,

fixtures, attachments and easements, at the addresses listed and described below:

1. **111 South Lawn Avenue, Kansas City, Missouri**

Owner of record - Cosme and Irene ANZUA; Lender: Wells Fargo Bank  
Currently occupied by Stephanie A. Alvarez-Marron, Juan Marron and Maria Marron.

**PERSONAL PROPERTY**

**CONVEYANCES** with all attachments thereon:

1. Tan/Green 2000 Ford Explorer bearing Missouri license MF1B8M (Registered to Maria Marron, of 414 Hardesty, Kansas City, Missouri. No Lien holder Listed )
2. Tan 1998 Ford Windstar minivan bearing Missouri license UA4Z8L (Registered to Juan Marron of 1223 Colorado, Kansas City, Missouri )  
VIN: 2FMDA5145WBA51087. Lien holder: Vest Auto Sales, 408 NE 32<sup>nd</sup> Street, Kansas City, Missouri
3. Black Chevrolet Avalanche bearing Missouri license 7ML910 (Registered to Mary-Lou Torres, 2612 Lawndale, Kansas City, Missouri)  
VIN: 3GNEK13T02G125436. Lien holder: Vest Auto Sales, 408 NE 32<sup>nd</sup> Street, Kansas City, Missouri.
4. Black 2006 Chevrolet Malibu bearing Missouri license 6BG42C (Registered to Stephanie A. Alvarez-Marron and Juan Marron of 111 Lawn Avenue, Kansas City, Missouri). No Lien holder listed.
5. Tan 2003 Chevrolet Trailblazer bearing Missouri license WA5F8T (Registered to Sonia and Mario Marron, of 1830 Holly, Kansas City, Missouri)  
VIN: 1GNDDT13S332261795. Lien holder: Drive Financial Services, P.O. Box, 560583, Dallas, Texas.
6. Black 1997 Chevrolet pick-up bearing Missouri license 7SG892 (Registered to Stephanie A. Alvarez-Marron and Juan Marron of 111 Lawn Avenue, Kansas City, Missouri) VIN: 2GCEC19R0V1186915. Lien holder: GMAC  
P.O. Box 8116, Cockeysville, MD.
7. Red 2004 Ford F-250, VIN-1FTNW20P94EB97207, displaying a Missouri Temporary Tag C7617A. Registration; Mary-Lou Torrez of 2612 Lawndale Avenue, Kansas City, Missouri. Lien holder unknown, lien unknown.

8. Silver/grey 2005 Chevrolet Avalanche bearing Missouri license 5SN463  
Registration: Rafael ZAMORA, 2908 Holly Street, Kansas City, Missouri.  
VIN: 3GNEK12Z85G191386. Lien holder: Wachovia Dealer Services,  
P.O. Box 997517, Sacramento, CA 95899
9. Blue 1999 Durango arrive bearing Missouri license number HC2Z6C,  
Registration: Eldora Jackson, 308 Spruce Avenue, Kansas City, Missouri.  
VIN: 1B4HS28Z1XF673086. No lien holder listed
10. Black 1999 Chevy Camaro bearing Missouri license AC7-K5F (Registered to  
LOPEZ, Joseph M. of 111 North Monroe, Kansas City, Missouri)  
VIN: 2G1FP22G8X2140438. Lien holder: Gardner National Bank, P.O. Box 429,  
Gardner, KS.
11. Black Chrysler 300, driven by Gilbert Lupercio. No further identifying  
information known. Lien holder unknown, lien unknown.

#### CURRENCY

1. U.S. Currency in the amount of \$5,700.00 recovered on May 12, 2010 from the  
residence of David Montoya, pursuant to a search warrant of 2612 Lawndale,  
Kansas City, Missouri.

#### FORFEITURE MONEY JUDGEMENT

A sum of money equal to \$950,000 in United States Currency, representing the amount of  
proceeds obtained as a result of the offenses alleged in Count One.

#### SUBSTITUTE ASSETS

If the above-described forfeitable property, as a result of any act or omission of the  
defendants,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or

- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above-described forfeitable property, all in violation of Title 21, United States Code, Sections 841 and 853, including but not limited to any of the above listed property or other property located subsequently in which any defendant has an ownership interest.

A TRUE BILL.

Dated: 11/17/10

/s/ Micheal R. Bailey  
FOREPERSON OF THE GRAND JURY

/s/ Bruce Rhoades  
Bruce Rhoades  
Assistant United States Attorney