

SEALED

FILED

MAR 2 2021

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

PEDRO SANTIAGO CABRERA,
ROLANDO REYNA REYES,
DESIREE LORAINÉ CATANEDA,
a/k/a "DESIREE LORAINÉ
CASTANEDA,"
ERNESTO CERDA,
JORGE GUERRERO PEREZ,
LUIS RODRIGUEZ,
GABRIEL VIDALES-MORENO
CARLOS YEPEZ,
GERARDO YEPEZ,
JORGE YEPEZ,

Defendants.

) Case No. 20-CR-248-CVE

) FILED UNDER SEAL

) SUPERSEDING INDICTMENT

) [COUNT 1: 21 U.S.C. §§ 846 and
) 841(b)(1)(A)(viii) – Drug Conspiracy;
) COUNTS 2 through 4: 21 U.S.C.
) §§ 841(a)(1) and 841(b)(1)(A)(viii) –
) Possession With Intent to Distribute
) and Distribution of
) Methamphetamine;
) COUNT 5: 21 U.S.C. §§ 856(a)(1) and
) 856(b) – Maintaining a Drug Involved
) Premises;
) COUNTS 6 through 16: 21 U.S.C.
) §§ 843(b) and 843(d)(1) – Use of a
) Communication Facility in
) Committing, Causing, and Facilitating
) the Commission of a Drug Trafficking
) Felony;
) Forfeiture Allegation: 21 U.S.C. § 853
) – Drug Forfeiture]

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 846 and 841(b)(1)(A)(viii)]

Beginning in or about September 2020 and continuing to on or about the date of this Indictment, in the Northern District of Oklahoma, the defendants, **PEDRO SANTIAGO CABRERA, ROLANDO REYNA REYES, DESIREE LORAINÉ CATANEDA, a/k/a "DESIREE LORAINÉ CASTANEDA," ERNESTO CERDA, JORGE GUERRERO PEREZ, LUIS RODRIGUEZ, GABRIEL VIDALES-MORENO, CARLOS YEPEZ,**

SEALED

GERARDO YEPEZ, and **JORGE YEPEZ**, did knowingly and intentionally conspire, confederate, and agree together, and with others, both known and unknown to the Grand Jury, to commit certain offenses against the United States, to-wit: to manufacture, to possess with intent to distribute, and to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A)(viii).

COUNT TWO
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about October 14, 2020, in the Northern District of Oklahoma, the defendants,

PEDRO SANTIAGO CABRERA and **ROLANDO REYNA REYES**, did knowingly and intentionally possess with intent to distribute and distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT THREE
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about January 28, 2021, in the Northern District of Oklahoma, the defendant, **CARLOS YEPEZ**, did knowingly and intentionally possess with intent to distribute and distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT FOUR
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about February 25, 2021, in the Northern District of Oklahoma, the defendant, **LUIS RODRIGUEZ**, did knowingly and intentionally possess with intent to distribute and distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT FIVE
[21 U.S.C. §§ 856(a)(1) and 856(b)]

Beginning in or about September 2020 and continuing to on or about October 14, 2020, in the Northern District of Oklahoma, the defendants, **PEDRO SANTIAGO CABRERA, ROLANDO REYNA REYES, and DESIREE LORAINÉ CATANEDA, a/k/a “DESIREE LORAINÉ CASTANEDA,”** did knowingly open, use, and maintain a place located at 3514 East 32nd Street North, in Tulsa, Oklahoma, for the purpose of manufacturing, storing, and distributing methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 856(a)(1) and 856(b).

COUNTS SIX THROUGH SIXTEEN
[21 U.S.C. §§ 843(b) and 843(d)(1)]

On or about the dates listed below, in the Northern District of Oklahoma and elsewhere, the defendants, **ERNESTO CERDA, JORGE GUERRERO PEREZ, GABRIEL VIDALES-MORENO, CARLOS YEPEZ, GERARDO YEPEZ**, and others known to the Grand Jury, knowingly and intentionally used a communication facility, that is, a telephone (cellular or otherwise), in committing, causing, and facilitating the commission of acts constituting felonies under Title 21, United States Code, Sections 841 and 846, in that the defendants used the telephones to discuss various matters concerning the conspiracy to possess with intent to distribute and to distribute methamphetamine, a Schedule II controlled substance, as set forth in the chart below:

COUNT	DATE	DEFENDANTS	DESCRIPTION OF CALL
6	1/21/21	GERARDO YEPEZ	Gerardo Yepez arranged to receive payment for drug proceeds
7	1/28/21	GERARDO YEPEZ	Gerardo Yepez agreed to sell one kilogram of methamphetamine
8	2/12/21	GERARDO YEPEZ and CARLOS YEPEZ	Carlos Yepez ordered an "abodera", meaning one kilogram of methamphetamine, from Gerardo Yepez
9	2/12/21	JORGE GUERRERO PEREZ and GERARDO YEPEZ	Perez and Gerardo Yepez made arrangements for the sale of "16," or \$16,000 worth of methamphetamine
10	2/14/21	GERARDO YEPEZ	Yepez requests "100", a quantity of methamphetamine
11	2/16/21	GABRIEL VIDALES-MORENO and GERARDO YEPEZ	Vidales-Moreno asked for the status of his "medicine," or methamphetamine

COUNT	DATE	DEFENDANTS	DESCRIPTION OF CALL
12	2/17/21	GABRIEL VIDALES-MORENO and GERARDO YEPEZ	Vidales-Moreno asked for the status of the "tool," or methamphetamine
13	2/18/21	ERNESTO CERDA and GERARDO YEPEZ	Cerda and Yepez discuss the inability to manufacture methamphetamine in the cold weather
14	2/20/21	JORGE GUERRERO PEREZ and GERARDO YEPEZ	Perez orders "ceviche," or methamphetamine
15	2/21/21	JORGE GUERRERO PEREZ and GERARDO YEPEZ	Perez orders "primer," or methamphetamine
16	2/25/21	GERARDO YEPEZ and CARLOS YEPEZ	Gerardo Yepez instructs Carlos Yepez to deliver the "tools," or methamphetamine

All in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

FORFEITURE ALLEGATION
[21 U.S.C. § 853]

The allegations contained in this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

Upon conviction of any of the offenses alleged in this Superseding Indictment, as a part of their sentences, the defendants, **PEDRO SANTIAGO CABRERA, ROLANDO REYNA REYES, DESIREE LORAINÉ CATANEDA, a/k/a “DESIREE LORAINÉ CASTANEDA,” ERNESTO CERDA, JORGE GUERRERO PEREZ, LUIS RODRIGUEZ, GABRIEL VIDALES-MORENO, CARLOS YEPEZ, GERARDO YEPEZ, and JORGE YEPEZ,** shall forfeit to the United States any property constituting, or derived from, or traceable to, proceeds obtained, directly or indirectly, as a result of such conspiracies and violations and any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such drug offenses, including but not limited to:

MONEY JUDGMENT

Money judgments in an amount representing proceeds obtained by defendants **PEDRO SANTIAGO CABRERA, ROLANDO REYNA REYES, DESIREE LORAINÉ CATANEDA, a/k/a “DESIREE LORAINÉ CASTANEDA,” ERNESTO CERDA, JORGE GUERRERO PEREZ, LUIS RODRIGUEZ, GABRIEL VIDALES-MORENO, CARLOS YEPEZ, GERARDO YEPEZ, and JORGE YEPEZ** as a result of the drug offenses.


Pursuant to Title 21, United States Code, Section 852(p), the defendants shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendants, the property described above, or any portion thereof, cannot

be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

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

CLINTON J. JOHNSON
ACTING UNITED STATES ATTORNEY

A TRUE BILL



BEN TONKIN
Assistant United States Attorney

/s/ Grand Jury Foreperson

Grand Jury Foreperson