

<p>County Court, Adams County, Colorado Justice Center 1100 Judicial Center Drive Brighton, CO 80601</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO,</p> <p>v. Martin MENA-FLORES, Gustavo MENA-FLORES, Andres LLANAS, Guillermo ZAVALA JIMENEZ, Manuel MARQUEZ, Edgar GUTIERREZ ALVAREZ, Martin QUEZADA MORENO, Anthony Ray ARROYOS, Eloy MORENO-PAYAN, Ricardo ALVARADO ROBLEDO, Vivian RENTERIA MONTES, Jorge VAZQUEZ CERVANTES, Jose Luis CHAVEZ, Nestor GARCIA CHAVEZ, Defendants.</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>Brian S. Mason Seventeenth Judicial District District Attorney, # 38008 1000 Judicial Center Drive Brighton, CO 80601 Phone Number: 303-659-7720</p>	<p>GJ Case No.: 23CV100</p> <p>Ctrm: 305</p>
<p>SEVENTEENTH JUDICIAL DISTRICT GRAND JURY INDICTMENT</p>	

Of the 2023-2024 term of the Seventeenth Judicial District Grand Jury in the year 2023; 2023-2024 Seventeenth Judicial District Grand Jurors, chosen, selected, and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

COUNT 1: COCCA – Pattern of Racketeering –
37284 Participation in an Enterprise; § 18-17-104(3), C.R.S., (F2)

Martin MENA-FLORES, Gustavo MENA-FLORES,
Andres LLANAS, Guillermo ZAVALA JIMENEZ,
Manuel MARQUEZ, Edgar GUTIERREZ ALVAREZ

- COUNT 2:
37284 COCCA – Conspiracy; § 18-17-104(4), C.R.S., (F2)
Martin MENA-FLORES, Gustavo MENA-FLORES,
Andres LLANAS, Guillermo ZAVALA JIMENEZ,
Manuel MARQUEZ, Edgar GUTIERREZ ALVAREZ
- COUNT 3:
12213C Conspiracy to Commit Money Laundering;
§ 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)
Martin MENA-FLORES, Gustavo MENA-FLORES,
Andres LLANAS
- COUNT 4:
8102B Distribution of a Controlled Substance—Schedule II;
§ 18-18-405(1),(2)(c)(I), C.R.S., (DF3)
Andres LLANAS
- COUNT 5:
33A49 Special Offender – Controlled Substance – School/Housing
Development; § 18-18-407(1)(g), C.R.S., (DF1)
Andres LLANAS
- COUNT 6:
12213C Conspiracy to Commit Money Laundering;
§ 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)
Martin MENA-FLORES, Gustavo MENA-FLORES,
Andres LLANAS
- COUNT 7:
12213 Money Laundering;
§ 18-5-309(1)(b)(I),(II) C.R.S., (F3)
Martin MENA-FLORES, Andres LLANAS
- COUNT 8:
8105L Conspiracy to Distribute a Controlled Substance—Schedule II—
More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
Martin MENA-FLORES, Gustavo MENA-FLORES,
Andres LLANAS
- COUNT 9:
8102D Distribution of a Controlled Substance—Schedule II—
More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
Martin MENA-FLORES

- COUNT 10: Possession with Intent to Distribute a Controlled Substance—
81048 Schedule II—More than 225 Grams;
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Andres LLANAS
- COUNT 11: Conspiracy to Distribute a Controlled Substance—Schedule II—
8105K 14 - 225 Grams; § 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)
- Martin MENA-FLORES, Martin QUEZADA MORENO
- COUNT 12: Distribution of a Controlled Substance—Schedule II—
8102C 14 - 225 Grams; § 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)
- Martin MENA-FLORES
- COUNT 13: Possession with Intent to Distribute a Controlled Substance—
81047 Schedule II—14 - 225 Grams;
§ 18-18-405(1),(2)(b)(I)(A), C.R.S., (DF2)
- Martin QUEZADA MORENO
- COUNT 14: Possession with Intent to Distribute a Controlled Substance—
81048 Schedule II—More than 225 Grams;
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Andres LLANAS, Anthony Ray ARROYOS
- COUNT 15: Special Offender – Controlled Substance – School/Housing
33A49 Development; § 18-18-407(1)(g), C.R.S., (DF1)
- Andres LLANAS, Anthony Ray ARROYOS
- COUNT 16: Conspiracy to Manufacture a Controlled Substance—Schedule II—
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)
- Martin MENA-FLORES, Gustavo MENA-FLORES,
Guillermo ZAVALA JIMENEZ, Eloy MORENO-PAYAN
- COUNT 17: Conspiracy to Distribute a Controlled Substance—Schedule II;
8105J § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)
- Martin MENA-FLORES, Gustavo MENA-FLORES

COUNT 18: Conspiracy to Commit Money Laundering;
12213C § 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)

Martin MENA-FLORES, Gustavo MENA-FLORES

COUNT 19: Distribution of a Controlled Substance—Schedule II;
8102B § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)

Martin MENA-FLORES

COUNT 20: Money Laundering;
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)

Martin MENA-FLORES

COUNT 21: Conspiracy to Distribute a Controlled Substance—Schedule II;
8105J § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)

Martin MENA-FLORES, Ricardo ALVARADO ROBLEDO

COUNT 22: Distribution of a Controlled Substance—Schedule II;
8102B § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)

Martin MENA-FLORES

COUNT 23: Possession with Intent to Distribute a Controlled Substance—
81046 Schedule II; § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)

Ricardo ALVARADO ROBLEDO

COUNT 24: Special Offender – Controlled Substance – School/Housing
33A49 Development; § 18-18-407(1)(g), C.R.S., (DF1)

Martin MENA-FLORES, Ricardo ALVARADO ROBLEDO

COUNT 25: Conspiracy to Distribute a Controlled Substance—Schedule II—
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Martin MENA-FLORES, Gustavo MENA-FLORES,
Manuel MARQUEZ, Vivian RENTERIA MONTES,
Jorge VAZQUEZ CERVANTES, Guillermo ZAVALA JIMENEZ

COUNT 26: Distribution of a Controlled Substance—Schedule II—
8102D More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Martin MENA-FLORES, Vivian RENTERIA MONTES,
Jorge VAZQUEZ CERVANTES

COUNT 27: Possession with Intent to Distribute a Controlled Substance—
81048 Schedule II—More than 225 Grams;
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Guillermo ZAVALA JIMENEZ

COUNT 28: Conspiracy to Distribute a Controlled Substance—Schedule II;
8105J § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)

Martin MENA-FLORES, Gustavo MENA-FLORES,
Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ,
Edgar GUTIERREZ ALVAREZ

COUNT 29: Distribution of a Controlled Substance—Schedule II;
8102B § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)

Martin MENA-FLORES, Manuel MARQUEZ

COUNT 30: Possession with Intent to Distribute a Controlled Substance—
81046 Schedule II; § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)

Edgar GUTIERREZ ALVAREZ

COUNT 31: Conspiracy to Distribute a Controlled Substance—Schedule II—
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Martin MENA-FLORES, Gustavo MENA-FLORES,
Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ,
Edgar GUTIERREZ ALVAREZ

COUNT 32: Distribution of a Controlled Substance—Schedule II—
8102D More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Martin MENA-FLORES, Manuel MARQUEZ

COUNT 33: Possession with Intent to Distribute a Controlled Substance—
81048 Schedule II—More than 225 Grams;
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Edgar GUTIERREZ ALVAREZ

COUNT 34: Distribution of a Controlled Substance—Schedule II;
8102B § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)

Edgar GUTIERREZ ALVAREZ, Jose Luis CHAVEZ

COUNT 35: Conspiracy to Distribute a Controlled Substance—Schedule II—
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Martin MENA-FLORES, Gustavo MENA-FLORES,
Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ,
Vivian RENTERIA MONTES, Jorge VAZQUEZ CERVANTES

COUNT 36: Conspiracy to Commit Money Laundering;
12213C § 18-2-201(1); 18-5-309(1)(b)(I),(II) C.R.S., (F4)

Martin MENA-FLORES, Gustavo MENA-FLORES,
Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ,
Vivian RENTERIA MONTES, Jorge VAZQUEZ CERVANTES

COUNT 37: Distribution of a Controlled Substance—Schedule II—
8102D More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Vivian RENTERIA MONTES, Jorge VAZQUEZ CERVANTES

COUNT 38: Possession with Intent to Distribute a Controlled Substance—
81048 Schedule II—More than 225 Grams;
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Martin MENA-FLORES

COUNT 39: Money Laundering;
12213 § 18-5-309(1)(b)(I),(II) C.R.S., (F3)

Martin MENA-FLORES, Edgar GUTIERREZ ALVAREZ

COUNT 40: Conspiracy to Distribute a Controlled Substance—Schedule II;
8105J § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)

Martin MENA-FLORES, Ricardo ALVARADO ROBLEDO

COUNT 41: Distribution of a Controlled Substance—Schedule II;
8102B § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)

Martin MENA-FLORES

COUNT 42: Possession with Intent to Distribute a Controlled Substance—
81046 Schedule II; § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)

Ricardo ALVARADO ROBLEDO

COUNT 43: Special Offender – Controlled Substance – School/Housing
33A49 Development; § 18-18-407(1)(g), C.R.S., (DF1)

Martin MENA-FLORES, Ricardo ALVARADO ROBLEDO

COUNT 44: Conspiracy to Distribute a Controlled Substance—Schedule II—
8105L More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Martin MENA-FLORES, Gustavo MENA-FLORES,

COUNT 45: Distribution of a Controlled Substance—Schedule II—
8102D More than 225 Grams; § 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Martin MENA-FLORES

COUNT 46: Possession with Intent to Distribute a Controlled Substance—
81048 Schedule II—More than 225 Grams;
§ 18-18-405(1),(2)(a)(I)(A), C.R.S., (DF1)

Martin MENA-FLORES

COUNT 47: Special Offender – Controlled Substance – School/Housing
33A49 Development; § 18-18-407(1)(g), C.R.S., (DF1)

Martin MENA-FLORES

COUNT 48: Possession with Intent to Distribute a Controlled Substance—
81046 Schedule II; § 18-18-405(1),(2)(c)(I), C.R.S., (DF3)

Eloy MORENO PAYAN, Nestor GARCIA CHAVEZ

Defendant:	Charges:
Martin MENA-FLORES	1, 2, 3, 6, 7, 8, 9, 11, 12, 16, 17, 18, 19, 20, 21, 22, 24, 25, 26, 28, 29, 31, 32, 35, 36, 38, 39, 40, 41, 43, 44, 45, 46, 47
Gustavo MENA-FLORES	1, 2, 3, 6, 8, 16, 17, 18, 25, 28, 31, 35, 36, 44
Andres LLANAS	1, 2, 3, 4, 5, 6, 7, 8, 10, 14, 15
Guillermo ZAVALA JIMENEZ	1, 2, 16, 25, 27, 28, 31, 35, 36,
Manuel MARQUEZ	1, 2, 25, 28, 29, 31, 32, 35, 36,
Edgar GUTIERREZ ALVAREZ	1, 2, 28, 30, 31, 33, 34, 35, 36, 39,
Martin QUEZADA MORENO	11, 13,
Anthony Ray ARROYOS	14, 15
Eloy MORENO-PAYAN	16, 48
Ricardo ALVARADO ROBLEDO	21, 23, 24, 40, 42, 43
Vivian RENTERIA MONTES	25, 26, 35, 36, 37,
Jorge VAZQUEZ CERVANTES	25, 26, 35, 36, 37,
Jose Luis CHAVEZ	34
Nestor GARCIA CHAVEZ	48

COUNT 1
**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT —
PATTERN OF RACKETEERING—
PARTICIPATION IN AN ENTERPRISE, (F2)**

Between the dates of February 1, 2023, and July 13, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES, Andres LLANAS, Guillermo ZAVALA JIMENEZ, Manuel MARQUEZ, Edgar GUTIERREZ ALVAREZ**, and others both known and unknown to the Grand Jury, while employed by or associated with an enterprise, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity; in violation of § 18-17-104(3) and § 18-17-105, C.R.S.

COUNT 2
**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT —
CONSPIRACY, (F2)**

Between the dates of February 1, 2023, and July 13, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES, Andres LLANAS, Guillermo ZAVALA JIMENEZ, Manuel MARQUEZ, Edgar GUTIERREZ ALVAREZ**, and others both known and unknown to the Grand Jury, unlawfully, knowingly, and feloniously conspired to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity; in violation of § 18-17-104(4) and § 18-17-105, C.R.S.

The offenses alleged in Counts One and Two were committed in the following manner:

The Enterprise

The criminal enterprise alleged in Counts One and Two was primarily a group of individuals, associated in fact, although not a legal entity. The enterprise included, but was not limited to, the following associated in fact individuals and/or legal entities: **Martin MENA-FLORES, Gustavo MENA-FLORES, Andres LLANAS, Guillermo ZAVALA JIMENEZ, Manuel MARQUEZ, Edgar GUTIERREZ ALVAREZ**, and others both known and unknown to the Grand Jury.

The individuals associated with the enterprise had a primary objective and a common purpose to import illegal controlled substances, including cocaine, into the state of Colorado, and to further distribute these illegal controlled substances to various customers throughout the Brighton and Denver Metro area. In order to support and facilitate this drug trafficking activity, members and associates of the criminal enterprise utilized motor vehicles to transport quantities of the illicit controlled substances.

Each of the members of the criminal enterprise relied upon and utilized a complex system of cellular telephones and electronic communication devices to arrange and execute the importation, transportation, and distribution of these illegal controlled substances and to facilitate the collection and transfer of the related criminal proceeds. Because the members of the criminal enterprise used telecommunication devices so extensively to conduct the operations of the enterprise, the members often utilized coded terminology when speaking to each other over the telephone in order to conceal their criminal activities.

Pattern of Racketeering Activity

Martin MENA-FLORES, Gustavo MENA-FLORES, Andres LLANAS, Guillermo ZAVALA JIMENEZ, Manuel MARQUEZ, Edgar GUTIERREZ ALVAREZ, and others both known and unknown to the Grand Jury directly and in concert engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, including any lesser offenses, related to the conduct of the enterprise, with at least one of which took place in the state of Colorado after July 1, 1981, and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

- Conspiracy to Distribute a Controlled Substance (Colorado Revised Statutes)
- Distribution of a Controlled Substance (Colorado Revised Statutes)
- Possession with Intent to Distribute a Controlled Substance (Colorado Revised Statutes)
- Conspiracy to Commit Money Laundering (Colorado Revised Statutes)
- Money Laundering (Colorado Revised Statutes)
- Unlawful Use of a Telecommunications Facility (United States Code)

Pursuant to C.R.S. § 18-17-103(5)(a), “**Racketeering Activity**” includes any conduct defined as “racketeering activity” under 18 U.S.C. 1961 (1)(A), (1)(B), (1)(C), and (1)(D), including the act of Unlawful Use of a Telecommunications Facility, in violation of 21 U.S.C. § 843.

Racketeering Activity

The acts of racketeering activity that the above named persons committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated another person to commit, consist of the following predicate acts, including any lesser included offenses:

Predicate Act 1
Conspiracy to Commit Money Laundering (F4)

On or about March 1, 2023, in the state of Colorado, **Martin MENA-FLORES**, **Gustavo MENA-FLORES**, and **Andres LLANAS**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

Predicate Act 1 was committed in the manner described in Count 3.

Predicate Act 2
Distribution of a Controlled Substance – Schedule II (DF3)

On or about March 3, 2023, in the state of Colorado, **Andres LLANAS** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

Predicate Act 2 was committed in the manner described in Counts 4-5.

Predicate Act 3
Conspiracy to Commit Money Laundering, (F4)

On or about March 5, 2023, in the state of Colorado, **Martin MENA-FLORES**, **Gustavo MENA-FLORES**, and **Andres LLANAS**, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

Predicate Act 4
Money Laundering, (F3)

On or about March 5, 2023, in the state of Colorado, **Martin MENA-FLORES** and **Andres LLANAS** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

Predicate Acts 3-4 were committed in the manner described in Counts 6-7.

Predicate Act 5
**Conspiracy to Distribute a Controlled Substance—Schedule II—
More than 225 Grams, (DF1)**

Between and including the dates of March 5, 2023, and March 6, 2023, in the state of Colorado, **Martin MENA-FLORES**, **Gustavo MENA-FLORES**, and **Andres LLANAS** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 6
**Distribution of a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about March 6, 2023, in the state of Colorado, **Martin MENA-FLORES** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 7
**Possession with Intent to Distribute a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about March 6, 2023, in the state of Colorado, **Andres LLANAS** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 8
Unlawful Use of a Communication Facility

Between and including the dates of March 5, 2023, and March 6, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES, and Andres LLANAS** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

Predicate Acts 5-8 were committed in the manner described in Counts 8-10

Predicate Act 9
**Conspiracy to Distribute a Controlled Substance—Schedule II—
14 - 225 Grams, (DF2)**

On or about March 11, 2023, in the state of Colorado, **Martin MENA-FLORES** and **Martin QUEZADA MORENO** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

Predicate Act 10
**Distribution of a Controlled Substance—
Schedule II—14 - 225 Grams, (DF2)**

On or about March 11, 2023, in the state of Colorado, **Martin MENA-FLORES** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

Predicate Act 11
Unlawful Use of a Communication Facility

On or about March 11, 2023, in the state of Colorado, **Martin MENA-FLORES** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

Predicate Acts 9-11 were committed in the manner described in Counts 11-13

Predicate Act 12
**Possession with Intent to Distribute a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about March 16, 2023, in the state of Colorado, **Andres LLANAS** and Anthony Ray ARROYOS unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 12 was committed in the manner described in Counts 14-15

Predicate Act 13
**Conspiracy to Manufacture a Controlled Substance—Schedule II—
More than 225 Grams, (DF1)**

Between and including the dates of March 23, 2023, and March 24, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES, Guillermo ZAVALA JIMENEZ,** and Eloy MORENO-PAYAN unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or manufacture a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 14
Unlawful Use of a Communication Facility

Between and including the dates of March 23, 2023, and March 24, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES, and Guillermo ZAVALA JIMENEZ** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Manufacture a Controlled Substance, in violation of 21 U.S.C. §§ 841

and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

Predicate Acts 13-14 were committed in the manner described in Count 16

Predicate Act 15

Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about April 1, 2023, in the state of Colorado, **Martin MENA-FLORES**, **Gustavo MENA-FLORES**, and Mary ARROYOS unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

Predicate Act 16

Conspiracy to Commit Money Laundering, (F4)

On or about April 1, 2023, in the state of Colorado, **Martin MENA-FLORES**, **Gustavo MENA-FLORES**, and Mary ARROYOS, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

Predicate Act 17

Distribution of a Controlled Substance—Schedule II (DF3)

On or about April 1, 2023, in the state of Colorado, **Martin MENA-FLORES** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

Predicate Act 18
Money Laundering, (F3)

On or about April 1, 2023, in the state of Colorado, **Martin MENA-FLORES** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

Predicate Act 19
Unlawful Use of a Communication Facility

On or about April 1, 2023, in the state of Colorado, **Martin MENA-FLORES** and **Gustavo MENA-FLORES** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

Predicate Acts 15-19 were committed in the manner described in Counts 17-20

Predicate Act 20
Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about April 1, 2023, in the state of Colorado, **Martin MENA-FLORES** and **Ricardo ALVARADO ROBLEDO** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

Predicate Act 21
Distribution of a Controlled Substance—Schedule II (DF3)

On or about April 1, 2023, in the state of Colorado, **Martin MENA-FLORES** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

Predicate Act 22
Unlawful Use of a Communication Facility

On or about April 1, 2023, in the state of Colorado, **Martin MENA-FLORES** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

Predicate Acts 20-22 were committed in the manner described in Counts 21-24

Predicate Act 23
**Conspiracy to Distribute a Controlled Substance—Schedule II—
More than 225 Grams, (DF1)**

Between and including the dates of April 14, 2023, and April 15, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Vivian RENTERIA MONTES, Jorge Luis VAZQUEZ CERVANTES, and Guillermo ZAVALA JIMENEZ** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 24
**Distribution of a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about April 15, 2023, in the state of Colorado, **Martin MENA-FLORES, Vivian RENTERIA MONTES, and Jorge Luis VAZQUEZ CERVANTES** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 25
**Possession with Intent to Distribute a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about April 15, 2023, in the state of Colorado, **Guillermo ZAVALA JIMENEZ** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 26
Unlawful Use of a Communication Facility

Between and including the dates of April 14, 2023, and April 15, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Vivian RENTERIA MONTES, Jorge Luis VAZQUEZ CERVANTES, and Guillermo ZAVALA JIMENEZ** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

Predicate Acts 23-26 were committed in the manner described in Counts 25-27

Predicate Act 27
Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about April 26, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ, and Edgar GUTIERREZ ALVAREZ** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

Predicate Act 28
Distribution of a Controlled Substance—Schedule II (DF3)

On or about April 26, 2023, in the state of Colorado, **Martin MENA-FLORES and Manuel MARQUEZ** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

Predicate Act 29

**Possession with Intent to Distribute a Controlled Substance—Schedule II
(DF3)**

On or about April 26, 2023, in the state of Colorado, **Edgar GUTIERREZ ALVAREZ** unlawfully, feloniously, and knowingly possessed with intent to distribute a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

Predicate Act 30

Unlawful Use of a Communication Facility

On or about April 26, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ,** and **Edgar GUTIERREZ ALVAREZ** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

Predicate Acts 27-30 were committed in the manner described in Counts 28-30

Predicate Act 31

**Conspiracy to Distribute a Controlled Substance— Schedule II—
More than 225 Grams (DF1)**

On or about April 29, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ,** and **Edgar GUTIERREZ ALVAREZ** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 32

**Distribution of a Controlled Substance— Schedule II—
More than 225 Grams (DF1)**

On or about April 29, 2023, in the state of Colorado, **Martin MENA-FLORES** and **Manuel MARQUEZ** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 33
**Possession with Intent to Distribute a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about April 29, 2023, in the state of Colorado, **Edgar GUTIERREZ ALVAREZ** unlawfully, feloniously, and knowingly possessed with intent to distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 34
Unlawful Use of a Communication Facility

On or about April 29, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ,** and **Edgar GUTIERREZ ALVAREZ** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

Predicate Acts 31-34 were committed in the manner described in Counts 31-33

Predicate Act 35
Distribution of a Controlled Substance—Schedule II (DF3)

On or about May 3, 2023, in the state of Colorado, **Edgar GUTIERREZ ALVAREZ** and Jose Luis CHAVEZ unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

Predicate Act 35 was committed in the manner described in Count 34

Predicate Act 36
**Conspiracy to Distribute a Controlled Substance—Schedule II—
More than 225 Grams, (DF1)**

On or about May 6, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ, Edgar GUTIERREZ ALVAREZ**, Vivian RENTERIA MONTES, and Jorge Luis VAZQUEZ CERVANTES unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 37
Conspiracy to Commit Money Laundering, (F4)

On or about May 6, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ, Edgar GUTIERREZ ALVAREZ**, Vivian RENTERIA MONTES, and Jorge Luis VAZQUEZ CERVANTES, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

Predicate Act 38
**Possession with Intent to Distribute a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about May 6, 2023, in the state of Colorado, **Martin MENA-FLORES** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 39
Money Laundering (F3)

On or about May 6, 2023, in the state of Colorado, **Martin MENA-FLORES** and **Edgar GUTIERREZ ALVAREZ** unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

Predicate Act 40
Unlawful Use of a Communication Facility

On or about May 6, 2023, in the state of Colorado, **Martin MENA-FLORES**, **Gustavo MENA-FLORES**, **Manuel MARQUEZ**, **Guillermo ZAVALA JIMENEZ**, and **Edgar GUTIERREZ ALVAREZ** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

Predicate Acts 36-40 were committed in the manner described in Counts 35-39

Predicate Act 41
Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about May 19, 2023, in the state of Colorado, **Martin MENA-FLORES** and **Ricardo ALVARADO ROBLEDO** unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

Predicate Act 42
Distribution of a Controlled Substance—Schedule II (DF3)

On or about May 19, 2023, in the state of Colorado, **Martin MENA-FLORES** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

Predicate Act 43
Unlawful Use of a Communication Facility

On or about May 19, 2023, in the state of Colorado, **Martin MENA-FLORES** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

Predicate Acts 41-43 were committed in the manner described in Counts 40-43

Predicate Act 44
**Conspiracy to Distribute a Controlled Substance—Schedule II—
More than 225 Grams, (DF1)**

On or about May 20, 2023, in the state of Colorado, **Martin MENA-FLORES, Gustavo MENA-FLORES,** and Mary ARROYOS unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 45
**Distribution of a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about May 20, 2023, in the state of Colorado, **Martin MENA-FLORES** unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 46
Unlawful Use of a Communication Facility

On or about May 20, 2023, in the state of Colorado, **Martin MENA-FLORES** and **Gustavo MENA-FLORES** did knowingly or intentionally use a communications facility, namely, a cellular telephone, to facilitate the commission of a felony, namely, Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. §§ 841 and 846, such use of a communications facility being unlawful, and in violation of 21 U.S.C. § 843.

Predicate Acts 44-46 were committed in the manner described in Counts 44-45

Predicate Act 47
**Possession with Intent to Distribute a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about June 15, 2023, in the state of Colorado, **Martin MENA-FLORES** unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

Predicate Act 47 was committed in the manner described in Count 46

COUNT 3
Conspiracy to Commit Money Laundering (F4)

On or about March 1, 2023, in the state of Colorado, Martin MENA-FLORES, Gustavo MENA-FLORES, and Andres LLANAS, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

The offense alleged in Count 3 was committed in the following manner:

On or about March 1, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Martin MENA-FLORES, Gustavo MENA-FLORES, and Andres LLANAS made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that Martin MENA-FLORES and LLANAS would collect an amount of bulk US currency and that Martin MENA-FLORES would transmit that bulk US currency to Gustavo MENA-FLORES with the intent to promote the commission of a criminal offense, namely the trafficking and distribution of cocaine. In furtherance of this agreement, on March 1, 2023, Martin MENA-FLORES collected an amount of bulk US currency from LLANAS and transmitted some of the bulk US currency to Gustavo MENA-FLORES via a wire transmission service.

COUNT 4
Distribution of a Controlled Substance – Schedule II (DF3)

On or about March 3, 2023, in the state of Colorado, Andres LLANAS unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

COUNT 5
Special Offender – Controlled Substance – School/Housing Development (DF1)

On or about April 27, 2022, in the state of Colorado, Andres LLANAS committed the felony offense[s] charged in COUNT 4 within or upon the grounds of a public or private elementary school, middle school, junior high school, high school, vocational school or public housing development, or within one thousand feet of the perimeter of the school or public housing development grounds on a street, alley, parkway, sidewalk, public park, playground or other area or premises which was accessible to the public, or within a private dwelling which was accessible to the public for the

purpose of the sale, distribution, use, exchange, manufacture, or attempted manufacture of controlled substance in violation of section 18-18-407(1)(g), C.R.S.

The offenses alleged in Counts 4-5 were committed in the following manner:

On March 3, 2023, Andres LLANAS distributed one gram of cocaine to a third party at his residence at 1401 9th Street, #166, Fort Lupton, Colorado. This location is approximately 721 feet from Twombly Elementary School, 1600 9th Street, Fort Lupton, Colorado.

COUNT 6
Conspiracy to Commit Money Laundering, (F4)

On or about March 5, 2023, in the state of Colorado, Martin MENA-FLORES, Gustavo MENA-FLORES, and Andres LLANAS, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

COUNT 7
Money Laundering, (F3)

On or about March 5, 2023, in the state of Colorado, Martin MENA-FLORES, and Andres LLANAS unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

The offenses alleged in Counts 6-7 were committed in the following manner:

On or about March 5, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Martin MENA-FLORES, Gustavo MENA-FLORES, and Andres LLANAS made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that Martin MENA-FLORES and LLANAS would collect an amount of bulk US currency and that Martin MENA-FLORES would transmit that bulk US currency to Gustavo MENA-FLORES with the intent to promote the commission of a criminal offense, namely the trafficking and distribution of cocaine.

In furtherance of this agreement, on March 5, 2023, Martin MENA-FLORES collected drug proceeds in the form of bulk US currency from LLANAS and transported the bulk US currency to his own residence in order to make payment to a drug courier as payment for a pending load of cocaine.

COUNT 8

**Conspiracy to Distribute a Controlled Substance—Schedule II—
More than 225 Grams, (DF1)**

Between and including the dates of March 5, 2023, and March 6, 2023, in the state of Colorado, Martin MENA-FLORES, Gustavo MENA-FLORES, and Andres LLANAS unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT 9

**Distribution of a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about March 6, 2023, in the state of Colorado, Martin MENA-FLORES unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT 10

**Possession with Intent to Distribute a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about March 6, 2023, in the state of Colorado, Andres LLANAS unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

The offenses alleged in Counts 8-10 were committed in the following manner:

Between and including the dates of March 5, 2023, and March 6, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Martin MENA-FLORES, Gustavo MENA-FLORES, and Andres LLANAS made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that Gustavo MENA-FLORES would arrange and coordinate for a load of cocaine to be delivered to Martin MENA-

FLORES in Adams County, Colorado, and that Martin MENA-FLORES would then transfer that load of cocaine to Andres LLANAS, who would store and safeguard the cocaine at his residence for further distribution. In furtherance of this agreement, on March 6, 2023, Martin MENA-FLORES met with a third party (Martin Holguin), who transferred two (2) kilograms of cocaine to Martin MENA-FLORES in the vicinity of 695 S. 4th Avenue, Brighton, CO. Upon receiving the two kilograms of cocaine, Martin MENA-FLORES transported the cocaine to LLANAS at his residence, at 1401 9th Street, #166, Fort Lupton, Colorado. At that location, Martin MENA-FLORES distributed a quantity of cocaine to LLANAS, who took custody of the kilograms of cocaine and stored them there for further distribution.

COUNT 11

**Conspiracy to Distribute a Controlled Substance—Schedule II—
14 - 225 Grams, (DF2)**

On or about March 11, 2023, in the state of Colorado, Martin MENA-FLORES and Martin QUEZADA MORENO unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

COUNT 12

**Distribution of a Controlled Substance—
Schedule II—14 - 225 Grams, (DF2)**

On or about March 11, 2023, in the state of Colorado, Martin MENA-FLORES unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

COUNT 13

**Possession with Intent to Distribute a Controlled Substance—
Schedule II—14 - 225 Grams, (DF2)**

On or about March 11, 2023, in the state of Colorado, Martin QUEZADA MORENO unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than fourteen grams but not more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(b)(I)(A), C.R.S.

The offenses alleged in Counts 11-13 were committed in the following manner:

On or about March 11, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Martin MENA-FLORES and Martin QUEZADA MORENO made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that Martin MENA-FLORES would deliver a quantity of cocaine to QUEZADA MORENO. In furtherance of this agreement, on March 11, 2023, MENA-FLORES delivered approximately 14 grams of cocaine to QUEZADA MORENO in the vicinity of 4980 E. Bromley Lane, Brighton, CO.

COUNT 14

**Possession with Intent to Distribute a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about March 16, 2023, in the state of Colorado, Andres LLANAS and Anthony Ray ARROYOS unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT 15

**Special Offender – Controlled Substance – School/Housing Development
(DF1)**

On or about April 27, 2022, in the state of Colorado, Andres LLANAS and Anthony Ray ARROYOS committed the felony offense[s] charged in COUNT 14 within or upon the grounds of a public or private elementary school, middle school, junior high school, high school, vocational school or public housing development, or within one thousand feet of the perimeter of the school or public housing development grounds on a street, alley, parkway, sidewalk, public park, playground or other area or premises which was accessible to the public, or within a private dwelling which was accessible to the public for the purpose of the sale, distribution, use, exchange, manufacture, or attempted manufacture of controlled substance in violation of section 18-18-407(1)(g), C.R.S.

The offenses alleged in Counts 14-15 were committed in the following manner:

On March 16, 2023, investigators executed a search warrant at the residence of Andres LLANAS and Anthony Ray ARROYOS, 1401 9th Street, #166, Fort Lupton, Colorado. At that location, investigators recovered 362.8 grams of cocaine from within the residence. This location is approximately 721 feet from Twombly Elementary School, 1600 9th Street, Fort Lupton, Colorado.

COUNT 16
**Conspiracy to Manufacture a Controlled Substance—Schedule II—
More than 225 Grams, (DF1)**

Between and including the dates of March 23, 2023, and March 24, 2023, in the state of Colorado, Martin MENA-FLORES, Gustavo MENA-FLORES, Guillermo ZAVALA JIMENEZ, and Eloy MORENO-PAYAN unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or manufacture a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

The offense alleged in Count 16 were committed in the following manner:

Between and including the dates of March 23, 2023, and March 24, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Martin MENA-FLORES, Gustavo MENA-FLORES, Guillermo ZAVALA JIMENEZ, and Eloy MORENO-PAYAN made an agreement with each other and others to process and manufacture cocaine for further distribution. As a part of this agreement, they agreed that ZAVALA JIMENEZ would provide a quantity of bulk cocaine (which he had been safeguarding) to Martin MENA-FLORES. In turn, Martin MENA-FLORES would transfer the bulk cocaine along with processing supplies to Eloy MORENO PAYAN, who would process and manufacture the cocaine into smaller units for further distribution to customers.

COUNT 17
Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about April 1, 2023, in the state of Colorado, Martin MENA-FLORES, Gustavo MENA-FLORES, and Mary ARROYOS unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

COUNT 18
Conspiracy to Commit Money Laundering, (F4)

On or about April 1, 2023, in the state of Colorado, Martin MENA-FLORES, Gustavo MENA-FLORES, and Mary ARROYOS, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

COUNT 19

Distribution of a Controlled Substance—Schedule II (DF3)

On or about April 1, 2023, in the state of Colorado, Martin MENA-FLORES unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

COUNT 20

Money Laundering, (F3)

On or about April 1, 2023, in the state of Colorado, Martin MENA-FLORES unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

The offenses alleged in Counts 17-20 were committed in the following manner:

On or about April 1, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Martin MENA-FLORES, Gustavo MENA-FLORES, and Mary ARROYOS made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that Martin MENA-FLORES would deliver a quarter-kilogram (225 grams) quantity of cocaine to ARROYOS in exchange for \$8,000 in US currency. In furtherance of this agreement, on April 1, 2023, MENA-FLORES delivered a quarter-kilogram amount of cocaine to ARROYOS in the vicinity of the Big Lots parking lot at 889 S Kuner Road, Brighton, CO and received from ARROYOS \$8,000 USC. Martin MENA-FLORES took the US currency and transported it away from the location.

COUNT 21

Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about April 1, 2023, in the state of Colorado, Martin MENA-FLORES and Ricardo ALVARADO ROBLEDO unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

COUNT 22

Distribution of a Controlled Substance—Schedule II (DF3)

On or about April 1, 2023, in the state of Colorado, Martin MENA-FLORES unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

COUNT 23

Possession with Intent to Distribute a Controlled Substance—Schedule II (DF3)

On or about April 1, 2023, in the state of Colorado, Ricardo ALVARADO ROBLEDO unlawfully, feloniously, and knowingly possessed with intent to distribute a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

COUNT 24

Special Offender – Controlled Substance – School/Housing Development (DF1)

On or about April 1, 2022, in the state of Colorado, Martin MENA-FLORES and Ricardo ALVARADO ROBLEDO committed the felony offense[s] charged in COUNTS 21, 22, and 23 within or upon the grounds of a public or private elementary school, middle school, junior high school, high school, vocational school or public housing development, or within one thousand feet of the perimeter of the school or public housing development grounds on a street, alley, parkway, sidewalk, public park, playground or other area or premises which was accessible to the public, or within a private dwelling which was accessible to the public for the purpose of the sale, distribution, use, exchange, manufacture, or attempted manufacture of controlled substance in violation of section 18-18-407(1)(g), C.R.S.

The offenses alleged in Counts 21-24 were committed in the following manner:

On or about April 1, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Martin MENA-FLORES and Ricardo ALVARADO ROBLEDO made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that Martin MENA-FLORES would deliver a quantity of cocaine to ALVARADO ROBLEDO. In furtherance of this agreement, on April 1, 2023, MENA-FLORES delivered an amount of cocaine to ALVARADO ROBLEDO in the vicinity of MENA-FLORES' residence at 7060 Pecos Street #6108, unincorporated Adams County, CO. This location is approximately 501 feet from Colorado Sports Leadership Academy, 7001 Lipan St, Denver, CO 80221.

COUNT 25
**Conspiracy to Distribute a Controlled Substance—Schedule II—
More than 225 Grams, (DF1)**

Between and including the dates of April 14, 2023, and April 15, 2023, in the state of Colorado, Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Vivian RENTERIA MONTES, Jorge Luis VAZQUEZ CERVANTES, and Guillermo ZAVALA JIMENEZ unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT 26
**Distribution of a Controlled Substance—Schedule II—
More than 225 Grams (DF1)**

On or about April 15, 2023, in the state of Colorado, Martin MENA-FLORES, Vivian RENTERIA MONTES, and Jorge Luis VAZQUEZ CERVANTES unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT 27
**Possession with Intent to Distribute a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about April 15, 2023, in the state of Colorado, Guillermo ZAVALA JIMENEZ unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

The offenses alleged in Counts 25-27 were committed in the following manner:

Between and including the dates of April 14, 2023, and April 15, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Vivian RENTERIA MONTES, Jorge Luis VAZQUEZ CERVANTES, and Guillermo ZAVALA JIMENEZ made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that Gustavo MENA-FLORES would arrange and coordinate for a load of cocaine to be delivered to Martin MENA-FLORES in Adams County, Colorado, and that Martin MENA-FLORES would then transfer that load of cocaine to Guillermo

ZAVALA JIMENEZ, who would store and safeguard the cocaine at his residence for further distribution. As part of this agreement, Manuel MARQUEZ agreed to assist Martin MENA-FLORES in the distribution. In furtherance of this agreement, on April 15, 2023, Martin MENA-FLORES met with Vivian RENTERIA MONTES, and Jorge Luis VAZQUEZ CERVANTES, who transported one (1) kilogram of cocaine to Martin MENA-FLORES in the vicinity of 5880 Broadway, Denver, CO. Upon receiving the one kilogram of cocaine, Martin MENA-FLORES transported the cocaine to ZAVALA JIMENEZ at his residence, at 3060 E. Bridge Street, #296, Brighton, Colorado. At that location, Martin MENA-FLORES distributed the one kilogram of cocaine to ZAVALA JIMENEZ, who took custody of the cocaine and stored it there for further distribution.

COUNT 28

Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about April 26, 2023, in the state of Colorado, Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ, and Edgar GUTIERREZ ALVAREZ unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

COUNT 29

Distribution of a Controlled Substance—Schedule II (DF3)

On or about April 26, 2023, in the state of Colorado, Martin MENA-FLORES and Manuel MARQUEZ unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

COUNT 30

**Possession with Intent to Distribute a Controlled Substance—
Schedule II (DF3)**

On or about April 26, 2023, in the state of Colorado, Edgar GUTIERREZ ALVAREZ unlawfully, feloniously, and knowingly possessed with intent to distribute a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

The offenses alleged in Counts 28-30 were committed in the following manner:

On or about April 26, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ, and Edgar GUTIERREZ ALVAREZ made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they

agreed that Martin MENA-FLORES and MARQUEZ would deliver a quantity of cocaine to GUTIERREZ ALVAREZ. In furtherance of this agreement, on April 26, 2023, MENA-FLORES and MARQUEZ picked up a quantity of cocaine from ZAVALA JIMENEZ and then delivered an amount of cocaine to GUTIERREZ ALVAREZ in the vicinity of the Family Dollar Store, at 1511 Bridge Street, Brighton, CO.

COUNT 31

**Conspiracy to Distribute a Controlled Substance— Schedule II—
More than 225 Grams (DF1)**

On or about April 29, 2023, in the state of Colorado, Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ, and Edgar GUTIERREZ ALVAREZ unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT 32

**Distribution of a Controlled Substance— Schedule II—
More than 225 Grams (DF1)**

On or about April 29, 2023, in the state of Colorado, Martin MENA-FLORES and Manuel MARQUEZ unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT 33

**Possession with Intent to Distribute a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about April 29, 2023, in the state of Colorado, Edgar GUTIERREZ ALVAREZ unlawfully, feloniously, and knowingly possessed with intent to distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

The offenses alleged in Counts 31-33 were committed in the following manner:

On or about April 29, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ, and Edgar GUTIERREZ ALVAREZ made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they

agreed that Martin MENA-FLORES and MARQUEZ would deliver a quantity of cocaine to GUTIERREZ ALVAREZ. In furtherance of this agreement, on April 26, 2023, MENA-FLORES and MARQUEZ picked up a quantity of cocaine from ZAVALA JIMENEZ and then delivered an amount of cocaine to GUTIERREZ ALVAREZ in the vicinity of the Whiskey Barrel Liquor Store located at 299 Great Western Road, Brighton, Colorado.

COUNT 34

Distribution of a Controlled Substance—Schedule II (DF3)

On or about May 3, 2023, in the state of Colorado, Edgar GUTIERREZ ALVAREZ and Jose Luis CHAVEZ unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

The offense alleged in Count 34 was committed in the following manner:

On or about May 3, 2023, GUTIERREZ ALVAREZ and CHAVEZ delivered an amount of cocaine to to a third party in the vicinity of 300 Madison Street, Adams County, CO.

COUNT 35

**Conspiracy to Distribute a Controlled Substance—Schedule II—
More than 225 Grams, (DF1)**

On or about May 6, 2023, in the state of Colorado, Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ, Edgar GUTIERREZ ALVAREZ, Vivian RENTERIA MONTES, and Jorge Luis VAZQUEZ CERVANTES unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT 36

Conspiracy to Commit Money Laundering, (F4)

On or about May 6, 2023, in the state of Colorado, Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ, Edgar GUTIERREZ ALVAREZ, Vivian RENTERIA MONTES, and Jorge Luis VAZQUEZ CERVANTES, with the intent to promote or facilitate the commission of the crime of money laundering, agreed with each other and others, both known and unknown to the Grand Jury, that one or more of them will engage in conduct which constitutes the crime of money laundering or an attempt to commit the crime of money laundering, and they agreed to aid that person or persons in the planning or

commission of the crime or the attempt to commit the crime of money laundering, in violation of § 18-2-201(1); and § 18-5-309(1)(b)(I),(II), C.R.S.

COUNT 37

**Distribution of a Controlled Substance—Schedule II—
More than 225 Grams (DF1)**

On or about May 6, 2023, in the state of Colorado, Vivian RENTERIA MONTES, and Jorge Luis VAZQUEZ CERVANTES unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT 38

**Possession with Intent to Distribute a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about May 6, 2023, in the state of Colorado, Martin MENA-FLORES unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT 39

Money Laundering (F3)

On or about May 6, 2023, in the state of Colorado, Martin MENA-FLORES and Edgar GUTIERREZ ALVAREZ unlawfully and feloniously transported, transmitted, or transferred a monetary instrument or moneys, with the intent to promote the commission of a criminal offense, or with the knowledge or belief that the monetary instrument or moneys represent the proceeds of a criminal offense and that the transportation, transmission, or transfer is designed, in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of a criminal offense; in violation of §18-5-309(1)(b)(I),(II) C.R.S.

The offenses alleged in Counts 35-39 were committed in the following manner:

On or about May 6, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Martin MENA-FLORES, Gustavo MENA-FLORES, Manuel MARQUEZ, Guillermo ZAVALA JIMENEZ, Edgar GUTIERREZ ALVAREZ, Vivian RENTERIA MONTES, and Jorge Luis VAZQUEZ CERVANTES made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that Gustavo MENA-FLORES would arrange and coordinate for a load of cocaine to be delivered to Martin MENA-FLORES in Adams County, Colorado, for further

distribution. As part of this agreement, MARQUEZ, ZAVALA JIMENEZ, and GUTIERREZ ALVAREZ agreed to assist Martin MENA-FLORES in the subsequent distribution of the cocaine.

In furtherance of this agreement, on May 6, 2023, Martin MENA-FLORES met with Vivian RENTERIA MONTES, and Jorge Luis VAZQUEZ CERVANTES, who had transported two (2) kilograms of cocaine to Martin MENA-FLORES in the vicinity of 5880 Broadway, Denver, CO. Upon receiving the cocaine, Martin MENA-FLORES transported some of the cocaine to ZAVALA JIMENEZ at his residence, at 3060 E. Bridge Street, #296, Brighton, Colorado. Also in furtherance of the agreement, Martin MENA-FLORES collected drug proceeds in the form of bulk US currency from GUTIERREZ ALVAREZ and subsequently transported the bulk US currency to RENTERIA MONTES and VAZQUEZ CERVANTES as partial payment for the load of cocaine received on that date.

COUNT 40

Conspiracy to Distribute a Controlled Substance—Schedule II (DF3)

On or about May 19, 2023, in the state of Colorado, Martin MENA-FLORES and Ricardo ALVARADO ROBLEDO unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

COUNT 41

Distribution of a Controlled Substance—Schedule II (DF3)

On or about May 19, 2023, in the state of Colorado, Martin MENA-FLORES unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

COUNT 42

**Possession with Intent to Distribute a Controlled Substance—
Schedule II (DF3)**

On or about May 19, 2023, in the state of Colorado, Ricardo ALVARADO ROBLEDO unlawfully, feloniously, and knowingly possessed with intent to distribute a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

COUNT 43

**Special Offender – Controlled Substance –
School/Housing Development (DF1)**

On or about May 19, 2022, in the state of Colorado, Martin MENA-FLORES and Ricardo ALVARADO ROBLEDO committed the felony offense[s] charged in

COUNTS 40, 41, and 42 within or upon the grounds of a public or private elementary school, middle school, junior high school, high school, vocational school or public housing development, or within one thousand feet of the perimeter of the school or public housing development grounds on a street, alley, parkway, sidewalk, public park, playground or other area or premises which was accessible to the public, or within a private dwelling which was accessible to the public for the purpose of the sale, distribution, use, exchange, manufacture, or attempted manufacture of controlled substance in violation of section 18-18-407(1)(g), C.R.S.

The offenses alleged in Counts 40-43 were committed in the following manner:

On or about May 19, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Martin MENA-FLORES and Ricardo ALVARADO ROBLEDO made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that Martin MENA-FLORES would deliver a quantity of cocaine to ALVARADO ROBLEDO. In furtherance of this agreement, on May 19, 2023, MENA-FLORES delivered an amount of cocaine to ALVARADO ROBLEDO in the vicinity of MENA-FLORES' residence at 7060 Pecos Street #6108, unincorporated Adams County, CO. This location is approximately 501 feet from Colorado Sports Leadership Academy, 7001 Lipan St, Denver, CO 80221. Law enforcement officers subsequently conducted a traffic stop of ALVARADO ROBLEDO and recovered 12.88 grams of cocaine.

COUNT 44
**Conspiracy to Distribute a Controlled Substance—Schedule II—
More than 225 Grams, (DF1)**

On or about May 20, 2023, in the state of Colorado, Martin MENA-FLORES, Gustavo MENA-FLORES, and Mary ARROYOS unlawfully, feloniously, and knowingly conspired with each other and others, both known and unknown to the Grand Jury, to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT 45
**Distribution of a Controlled Substance—Schedule II—
More than 225 Grams (DF1)**

On or about May 20, 2023, in the state of Colorado, Martin MENA-FLORES unlawfully, feloniously, and knowingly sold or distributed a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

The offenses alleged in Counts 44-45 were committed in the following manner:

On or about May 20, 2023, in a series of telephone conversations and electronic communications utilizing cellular telephones and in-person discussions, Martin MENA-FLORES, Gustavo MENA-FLORES, and Mary ARROYOS made an agreement with each other and others to sell and distribute cocaine. As a part of this agreement, they agreed that Martin MENA-FLORES would deliver a quarter-kilogram (225 grams) quantity of cocaine to ARROYOS. In furtherance of this agreement, on May 20, 2023, MENA-FLORES delivered a quarter-kilogram amount of cocaine to ARROYOS in the vicinity of 893 S Kuner Road, Brighton, CO.

COUNT 46
**Possession with Intent to Distribute a Controlled Substance—
Schedule II—More than 225 Grams (DF1)**

On or about June 15, 2023, in the state of Colorado, Martin MENA-FLORES unlawfully, feloniously, and knowingly possessed with intent to sell or distribute a Schedule II controlled substance, cocaine. Further, the violation involved a material compound, mixture, or preparation that weighed more than two hundred twenty-five grams; in violation of § 18-18-405(1),(2)(a)(I)(A), C.R.S.

COUNT 47
**Special Offender – Controlled Substance – School/Housing Development
(DF1)**

On or about June 15, 2023, in the state of Colorado, Martin MENA-FLORES committed the felony offense[s] charged in COUNT 46 within or upon the grounds of a public or private elementary school, middle school, junior high school, high school, vocational school or public housing development, or within one thousand feet of the perimeter of the school or public housing development grounds on a street, alley, parkway, sidewalk, public park, playground or other area or premises which was accessible to the public, or within a private dwelling which was accessible to the public for the purpose of the sale, distribution, use, exchange, manufacture, or attempted manufacture of controlled substance in violation of section 18-18-407(1)(g), C.R.S.

The offenses alleged in Counts 46-47 were committed in the following manner:

On June 15, 2023, investigators executed a search warrant at the residence of MENA-FLORES at 7060 Pecos Street #6108, unincorporated Adams County, CO. This location is approximately 501 feet from Colorado Sports Leadership Academy, 7001 Lipan St, Denver, CO 80221. At that location, investigators recovered 1760 grams of cocaine from within the residence.

COUNT 48
Possession with Intent to Distribute a Controlled Substance—
Schedule II (DF3)

On or about June 22, 2023, in the state of Colorado, Eloy MORENO PAYAN and Nestor GARCIA CHAVEZ unlawfully, feloniously, and knowingly possessed with intent to distribute a Schedule II controlled substance, cocaine; in violation of § 18-18-405(1),(2)(c)(I), C.R.S.

The offense alleged in Counts 48 was committed in the following manner:

On June 22, 2023, investigators executed a search warrant at the residence Eloy MORENO PAYAN and Nestor GARCIA CHAVEZ at 1517 Walnut Drive, Brighton, Colorado. At that location, investigators recovered approximately 61 grams of cocaine from within the residence.