

FILED

May 03 2024

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY *[Signature]* DEPUTY

ORDERED UNSEALED on 05/07/2024 s/ Judge Peters

SEALED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

February 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESSE CLARK GARCIA (1),
DIEGO BONILLO (2),
[REDACTED]

Defendants.

Case No. '24 CR0908 RBM

I N D I C T M E N T

Title 21, U.S.C., Secs. 952, 960,
and 963 - Conspiracy to Import
Controlled Substances; Title 21,
U.S.C., Secs. 952 and 960 -
Importation of Controlled
Substances; Title 18, U.S.C.,
Sec. 2 - Aiding and Abetting;
Title 21, U.S.C., Sec. 853 -
Criminal Forfeiture

The grand jury charges:

Count 1

(Conspiracy to Import Controlled Substances)

Beginning on a date unknown to the grand jury and at least continuing up to and including February 25, 2024, within the Southern District of California, and elsewhere, defendants JESSE CLARK GARCIA, DIEGO BONILLO, and [REDACTED], did knowingly and intentionally conspire with each other and with other persons known and unknown to the grand jury, to import 400 grams and more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly known as fentanyl), a Schedule II Controlled Substance; 500 grams and more of a mixture and substance

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1 containing a detectable amount of methamphetamine, a Schedule II
2 Controlled Substance; 1 kilogram and more of a mixture and substance
3 containing a detectable amount of heroin, a Schedule I Controlled
4 Substance; and 5 kilograms and more of a mixture and substance containing
5 a detectable amount of cocaine, a Schedule II Controlled Substance;
6 all in violation of Title 21, United States Code, Sections 952, 960,
7 and 963.

8 Count 2

9 (Importation of Fentanyl)

10 On or about April 18, 2021, within the Southern District of
11 California, and elsewhere, defendants JESSE CLARK GARCIA and [REDACTED]
12 [REDACTED], did knowingly and intentionally import 400 grams and more,
13 to wit: approximately 63.68 kilograms (140.39 pounds) of a mixture and
14 substance containing a detectable amount of N-phenyl-N-[1-(2-
15 phenylethyl)-4-piperidinyl] propenamide (commonly known as fentanyl), a
16 Schedule II Controlled Substance; in violation of Title 21, United States
17 Code, Sections 952 and 960, Title 18, United States Code, Section 2, and
18 Pinkerton v. United States, 328 U.S. 640 (1946).

19 Count 3

20 (Importation of Methamphetamine)

21 On or about April 18, 2021, within the Southern District of
22 California, and elsewhere, defendants JESSE CLARK GARCIA and [REDACTED]
23 [REDACTED], did knowingly and intentionally import 500 grams and more,
24 to wit: approximately 11.7 kilograms (25.79 pounds) of a mixture
25 and substance containing a detectable amount of methamphetamine, a
26 Schedule II Controlled Substance; in violation of Title 21, United States
27 Code, Sections 952 and 960, Title 18, United States Code, Section 2, and
28 Pinkerton v. United States, 328 U.S. 640 (1946).

Count 4

(Importation of Fentanyl)

On or about August 22, 2023, within the Southern District of California, and elsewhere, defendant JESSE CLARK GARCIA did knowingly and intentionally import 400 grams and more, to wit: approximately 3.99 kilograms (8.80 pounds) of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly known as fentanyl), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 952 and 960, Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

Count 5

(Importation of Cocaine)

On or about August 22, 2023, within the Southern District of California, and elsewhere, defendant JESSE CLARK GARCIA did knowingly and intentionally import 5 kilograms and more, to wit: approximately 216 kilograms (476.20 pounds) of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 952 and 960, Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

Count 6

(Importation of Fentanyl)

On or about February 6, 2024, within the Southern District of California, and elsewhere, defendant JESSE CLARK GARCIA did knowingly and intentionally import 400 grams and more, to wit: approximately 32.35 kilograms (71.32 pounds) of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]

propenamide (commonly known as fentanyl), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 952 and 960, Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

Count 7

(Importation of Methamphetamine)

On or about February 6, 2024, within the Southern District of California, and elsewhere, defendant JESSE CLARK GARCIA did knowingly and intentionally import 500 grams and more, to wit: approximately 37.1 kilograms (81.79 pounds) of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 952 and 960, Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

Count 8

(Importation of Cocaine)

On or about February 6, 2024, within the Southern District of California, and elsewhere, defendant JESSE CLARK GARCIA did knowingly and intentionally import 5 kilograms and more, to wit: approximately 54.6 kilograms (120.37 pounds) of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 952 and 960, Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

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Count 9

(Importation of Methamphetamine)

On or about February 6, 2024, within the Southern District of California, and elsewhere, defendant JESSE CLARK GARCIA did knowingly and intentionally import 500 grams and more, to wit: approximately 58.87 kilograms (129.79 pounds) of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 952 and 960, Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

Count 10

(Importation of Fentanyl)

On or about February 15, 2024, within the Southern District of California, and elsewhere, defendant DIEGO BONILLO did knowingly and intentionally import 400 grams and more, to wit: approximately 45.6 kilograms (100.53 pounds) of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly known as fentanyl), a Schedule II Controlled Substance; in violation of Title 21, United States Code, Sections 952 and 960, Title 18, United States Code, Section 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

Count 11

(Importation of Heroin)

On or about February 15, 2024, within the Southern District of California, and elsewhere, defendant DIEGO BONILLO did knowingly and intentionally import 1 kilogram and more, to wit: approximately 1.01 kilograms (2.23 pounds) of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; in

1 violation of Title 21, United States Code, Sections 952 and 960,
2 Title 18, United States Code, Section 2, and Pinkerton v. United States,
3 328 U.S. 640 (1946).

4 FORFEITURE ALLEGATIONS

5 1. The allegations contained in Counts 1 through 11 are realleged
6 and by their reference fully incorporated herein for the purpose of
7 alleging forfeiture to the United States of America pursuant to the
8 provisions of Title 21, United States Code, Section 853.

9 2. Upon conviction of one and more of the felony offenses alleged
10 in Counts 1 through 11 of this Indictment, said violations being
11 punishable by imprisonment for more than one year and pursuant to
12 Title 21, United States Code, Sections 853(a)(1) and 853(a)(2),
13 defendants JESSE CLARK GARCIA, DIEGO BONILLO, and [REDACTED]
14 shall, upon conviction, forfeit to the United States all their rights,
15 title, and interest in any and all property constituting, and derived
16 from, any proceeds the defendants obtained, directly and indirectly, as
17 the result of the offenses, and any and all property used and intended
18 to be used in any manner and part to commit and to facilitate the
19 commission of the violations alleged in Counts 1 through 11 of this
20 Indictment.

21 3. If any of the above-described forfeitable property, as a
22 result of any act or omission of the defendants:

- 23 a. cannot be located upon the exercise of due diligence;
24 b. has been transferred or sold to, or deposited with, a
25 third party;
26 c. has been placed beyond the jurisdiction of the Court;
27 d. has been substantially diminished in value; or
28

1 e. has been commingled with other property which cannot be
2 subdivided without difficulty;

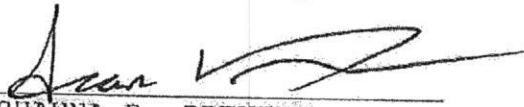
3 it is the intent of the United States, pursuant to Title 21, United
4 States Code, Section 853(p), to seek forfeiture of any other property
5 of the defendants up to the value of the property listed above as being
6 subject to forfeiture.

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

8 DATED: May 3, 2024.

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12 TARA K. McGRATH
United States Attorney

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14 By:

15 
SHAUNA R. PREWITT
16 SEAN VAN DEMARK
Assistant U.S. Attorneys

I hereby attest and certify on May 03, 2024 that the foregoing
document is a full, true and correct copy of the original on file
in my office and in my legal custody.

Clerk, U.S. District Court
Southern District of California

By: s/ A. Islas
Deputy

