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6 Attorneys for Plaintiff
7 United States of America

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10	UNITED STATES OF AMERICA,)	Case No. 09cr1336-JAH
11)	
	Plaintiff,)	BILL OF PARTICULARS FOR
12)	FORFEITURE OF PROPERTY
	v.)	
)	
13	PAUL LOAIZA (1),)	
	ZACARIAS FELIX-CUTINO (2),)	
14	EDON MOYAL (3),)	
	LUIS CARLOS MONTIEL (4),)	
15	DANNY ELIA SAEED DALY(5),)	
	ANTHONY SIERRA (6),)	
16	BRIAN SANFORD HAMPTON (7),)	
	ERNESTO PRADO-BUZO (8),)	
17	JONATHON JESUS MILLAN (9),)	
	JOSEPH DEMITRIUS AGUILAR (10),)	
18	MICHAEL PATRICK SIERRA (11),)	
	CHRISTOPHER ROBERT BALL (12),)	
19)	
	Defendants.)	
20	_____)	

21 Plaintiff, the United States of America, by and through its counsel, Karen P. Hewitt,
22 United States Attorney, and John R. Kraemer, Assistant United States Attorney, hereby files the
23 following Bill of Particulars for Forfeiture of Property.

24 Through the violations of Title 21, United States Code, Sections 846 and 841(a)(1), as alleged
25 in the Superseding Indictment, which violations are punishable by imprisonment of more than one year,
26 the United States seeks forfeiture in the Forfeiture Allegation of the following additional property
27 pursuant to 21 U.S.C. § 853:

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1. United States currency in the amount of \$33,615 seized from defendant Danny Elia Saeed Daly on December 11, 2008, and having United States Drug Enforcement Administration (hereafter “DEA”) Asset Identification Number 09-DEA-509387.
2. United States currency in the amount of \$18,468 seized from defendant Paul Loaiza on March 19, 2009, and having DEA Asset Identification number 09-DEA-513702.
3. United States currency in the amount of \$3,110 seized from Dan Fleyschman on March 19, 2009, and having DEA Asset Identification number 09-DEA-513704.
4. United States currency in the amount of \$1,261 seized from defendant Paul Loaiza on March 19, 2009, and having DEA Asset Identification number 09-DEA-513705.
5. United States currency in the amount of \$921 seized from defendant Zacarias Felix-Cutino and having DEA Asset Identification number 09-DEA-513706.
6. Sixty-five (65) American Express Travelers Cheques having a total value of \$6,500, seized from defendant Paul Loaiza and Tatiana Maribel Torres on March 19, 2009, and having DEA Asset Identification number 09-DEA-513707.
7. United States currency in the amount of \$40,500 seized from defendant Edon Moyal on March 19, 2009, and having DEA Asset Identification number 09-DEA-513709.
8. United States currency in the amount of \$1,500 seized from defendant Ernesto Prado-Buzo on March 19, 2009, and having DEA Asset Identification number 09-DEA-513733.
9. A 2007 BMW M6 automobile, seized from defendant Paul Loaiza and Carmen Martinez on March 19, 2009 with an estimated value of \$61,200 and having DEA Asset Identification number 09-DEA-513772.
10. A 2003 Ford F-150 truck, seized from defendant Paul Loaiza on March 19, 2009 with an estimated value of \$5,000.00 and having DEA Asset Identification number 09-DEA-513854.
11. United States currency in the amount of \$46,067 seized from defendant Paul Loaiza on March 19, 2009, and having DEA Asset Identification number 09-DEA-513973.

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- 12. A 2008 Mercedes Benz GL550 automobile seized from Tatiana Maribel Torres on March 27, 2009 with an estimated value of \$64,500 and having DEA Asset Identification number 09-DEA-514045.
- 13. A 2005 Chaparral Signature 330 Powerboat seized from Dan Fleyschman on March 27, 2009 with an estimated value of \$109,015 and having DEA Asset Identification number 09-DEA-514270.
- 14. United States currency in the amount of \$800 seized from defendant Paul Loaiza on March 27, 2009, and having DEA Asset Identification number 09-DEA-515207.
- 15. A 2002 Jaguar X Type automobile seized from Loretta F. Peraza on March 19, 2009 with an estimated value of \$6,100 and having DEA Asset Identification number 09-DEA-525234.
- 16. A men’s Breitling Flying B Stainless Steel Wrist Watch seized from defendant Paul Loaiza on March 19, 2009 with an estimated value of \$7,600 and having DEA Asset Identification number 09-DEA-515868.
- 17. Eight items of assorted jewelry seized from defendant Paul Loaiza and Tatiana Maribel Torres on March 19, 2009 with an estimated value of \$33,760 and having DEA Asset Identification number 09-DEA-515874.
- 18. A 2000 Lexus GS400 automobile seized from Ruby Espinoza on June 18, 2009 with an estimated value of \$8,450 and having DEA Asset Identification number 09-DEA-519233.
- 19. United States currency in the amount of \$21,000 seized from Troy Penn on November 25, 2008, and having DEA Asset Identification number 09-DEA-508670.

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20. United States currency in the amount of \$34,020 seized from Armando Quevedo-Jimenez on March 10, 2009 and having DEA Asset Identification number 09-DEA-513203.

DATED: September 15, 2009

KAREN P. HEWITT
United States Attorney

s/ John R. Kraemer
JOHN R. KRAEMER
Assistant U.S. Attorney
Attorneys for Plaintiff
United States of America
E-mail: john.kraemer@usdoj.gov

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Criminal Case No. 09cr1336-JAH
)	
Plaintiff,)	CERTIFICATE OF SERVICE
)	
v.)	
)	
PAUL LOAIZA (1), et al.,)	
)	
Defendants.)	
_____)	

IT IS HEREBY CERTIFIED that:

I, John R. Kraemer, am a citizen of the United States and am at least eighteen years of age. My business address is 880 Front Street, Room 6293, San Diego, CA 92101-8893.

I am not a party to the above-entitled action. I have caused service of BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

- 1. Eugene G. Iredale
- 2. Michael J. McCabe
- 3. James F. Pokorny
- 4. Mark A. Chambers
- 5. Vikas Bajaj
- 6. Robert Carriedo
- 7. Frederick Matthew Carroll
- 8. Walter Maund
- 9. Leroy George Siddell
- 10. Charles L. Rees
- 11. Casey J. Donovan, Jr.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: September 15, 2009

s/ John R. Kraemer
JOHN R. KRAEMER