



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

GMP:MPR
F. #2009R01065

*271 Cadman Plaza East
Brooklyn, New York 11201*

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TO BE FILED UNDER SEAL

By ECF and Email

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Re: United States v. Joaquin Archivaldo Guzman Loera
Criminal Docket No. 09-466 (S-4) (BMC)

Dear Counsel:

Pursuant to Federal Rule of Criminal Procedure 7(f), the government hereby provides you with a bill of particulars specifying the murder conspiracy victims and dates relating to Violation Eighty-Five of Count One, charging conspiracy to murder individuals who posed a threat to the Sinaloa Cartel. The government intends to prove the following murder conspiracies at trial, which were part of the defendant's continuing series of violations of Title 21, United States Code, Sections 841(a), 846, 959(a) and 960(a) as set forth in the Fourth Superseding Indictment (the "Indictment") in the above-captioned case. This bill of particulars supplements the government's bill of particulars letter dated July 20, 2018. The government has updated it in light of its disclosure of 18 U.S.C. § 3500 material on October 16, 2018. This letter is marked "Protected Material" and is subject to the terms of the Court's April 3, 2017 Protective Order. See Dkt. No. 57.

Violation Eighty-Five

(Conspiracy to Murder Individuals Who Posed a Threat to the Sinaloa Cartel)

Approx. Date(s)	Murder Conspiracy Victim(s)
2004-2008	Informants
January 2008-September 2014	Members of Beltran-Leyva Organization
September 2004-September 2014	Members of Carrillo-Fuentes Organization
January 2001-September 2014	Members of Los Zetas
January 1990-December 2011	Members of Arellano-Felix Organization
November 8, 1992	Members of the Arellano-Felix Organization at Christine's Discotheque
Mid-1990s	"Tesoro" Salazar
1998-2000	Miguel Martinez Martinez
February 10, 2002	Ramon Arellano-Felix
2003-2007	Tirso Martinez Sanchez
September 11, 2004	Rodolfo Carrillo-Fuentes
July 13, 2005	Julio Cesar Beltran Quintero
2005 - 2006	FNU LNU, Law Enforcement Officer
June 26, 2007	Juan Jose Lindoro (also known as "Teco")
2007-2009	Juan Pablo Ledezma (also known as "JL")
2007	Roberto Velasco Bravo
2007	Nemesio
2007	Commander Rafita
2007	Jose Luis Santiago Vasconcelos
2008	Amadeo Vega Vergara (also known as "El Caimán")
2009	Juan Ramon Zapata (also known as "Juan Bonito")
2009	Yamileth Bonnilla
2009 - 2010	Vicente Zambada Niebla
2010	Saltiel Beltran Leyva
October 2010	Israel Rincon Martinez (also known as "El Guacho" or "El Wuacho")
March 2013	Telmo Castro
December 15, 2011	Juan Guzman Rocha (also known as "Juancho" or "Virgo")
December 15, 2011	Jose Miguel Bastidas Manjares (also known as "Guero Bastidas")
September/October 2012	Cesar Gastelum Serrano
December 7, 2012	Leopoldo Ochoa (also known as "Polo Ochoa")
2012	John Peter Liodakis (also known as "El Grieco," "Cabezón" and "Julius")
2013	Javier Rey

PROTECTED MATERIAL

2013	Stephen Tello
2013-2014	Andrea Fernandez Velez
January 3, 2014	Hector Rios Espinosa
April 9, 2014	Manuel Alejandro Aponte Gomez (also known as "Bravo")
2015	Ingeniero Barrozo
February 16, 2015	Francisco Aceves Urias (also known as "Barbarino")
December 11, 2015	Cristobal Muro Valdez (also known as "02")

The government reserves the right to amend this bill of particulars. See Fed. R. Crim. P. 7(f) ("The government may amend a bill of particulars subject to such conditions as justice requires."); United States v. Salazar, 485 F.2d 1272, 1277 (2d Cir. 1973) (affirming district court's acceptance of supplemental bill of particulars).

Per Court order, the government also is enclosing an updated index cross-referencing portions of its cooperating witness § 3500 material that address each murder conspiracy in the bill of particulars the government has issued for Violation 85 of Count One of the Indictment.

Very truly yours,

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cc: Clerk of the Court (BMC) (by ECF)