

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:14-CR-151-Y

JESUS GERARDO LEDEZMA-CEPEDA (01)

JESUS GERARDO LEDEZMA-CAMPANO (02)

JOSE LUIS CEPEDA-CORTES (03)

NOTICE OF INTENT TO USE 404(b) EVIDENCE

The United States Attorney for the Northern District of Texas, by and through the undersigned Assistant United States Attorney, files this notice of evidence that may be introduced pursuant to F.R.E. 404(b). Although the United States believes the evidence listed below is intrinsic to the charged offenses, in the interest of caution, notice is being provided. The evidence listed below is offered for the purpose of proving the defendant's intent, plan, knowledge and absence of mistake or accident in the instant offenses of interstate stalking, murder for hire, and tampering with documents or proceedings.

1. Ledezma-Campano and Ledezma-Cepeda placed a tracking device on the vehicle of Luis Cortes Ochoa and Cortes Ochoa was ultimately murdered.
2. On December 2, 2011, Ledezma-Cepeda had an email with the name of Dionicio Cantu Rendon in it. Cantu-Rendon was reported missing on February 3, 2012.

3. On May 17, 2012, Ledezma-Cepeda had an email with the name of Eliseo Martinez Elizondo. During the course of the conspiracy, Ledezma-Cepeda, Ledezma-Campano and Cepeda-Cortes tracked Elizondo with a tracking device used in the tracking of J.J.G.C. Elizondo was murdered on April 26, 2013.

4. On November 30, 2011, Ledezma-Cepeda had an email with the names of Felipe Cantu Lozano and Juan Cantu Cuellar. They were found murdered on September 30, 2013.

5. On September 29, 2011, Ledezma-Cepeda had the name of Hector Javier Alvarez Reyna on his email. Reyna was found murdered on October 22, 2013.

6. Ledezma-Cepeda and Ledezma-Campano tracked Artemio Gonzalez-Wong and he was murdered on or about October 27, 2014.

7. At the time of their arrest, Ledezma-Cepeda and Ledezma-Campano were still searching for Arturo Anacleto and Armando Guerrero-Chapa.

8. In August of 2014, Ledezma-Cepeda and Ledezma-Campano tracked Rolando Caballero Diaz. He was subsequently kidnapped and is presumed dead.

9. In the late 1990's, Cepeda-Cortes was fired from his position at South Central Bell, or Southwestern Bell, for illegally tapping the phones of his ex-wife and her boyfriend, Jon Larsen. During that same timeframe, Cepeda-Cortes made statements to Larsen to the effect that, "I'll kill you" and "I'll make you disappear."

10. Months after the murder of Chapa, Ledezma-Cepeda and Ledezma-Campano picked up Casimiro Bautista near the Mexico/United States border. Bautista was on supervised release for a pending federal charge at the time of his flight.

11. On February 23, 2016, Moises Tijerina De La Garza was murdered in Monterrey, Mexico. Mr. De La Garza's contact information had previously been in emails of Ledezma-Cepeda.

Should the government become aware of any further evidence that may fall under the rubric of F.R.E. 404(b), it will immediately provide notice.

Respectfully Submitted,

JOHN R. PARKER  
UNITED STATES ATTORNEY

*s/ Joshua T. Burgess*

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 2, 2016, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who has consented in writing to accept this Notice as service of this document by electronic means.

*s/ Joshua T. Burgess*

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JOSHUA T. BURGESS  
Assistant United States Attorney