

FILED OCT 30 PM 3:09  
CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DAVID W. SHAPIRO (NYSB 2054054)  
United States Attorney

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

CR 01-1111

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JORGE HUMBERTO ZAMORA-SUAREZ,  
a/k/a Jose Rudolfo Zamora-O,  
a/k/a Jose A Gomez Saavedra, and  
ESTEBAN CALDERON,  
  
Defendants.

No.  
  
VIOLATIONS: 18 U.S.C. § 371 – **VRW**  
Conspiracy; 18 U.S.C. § 1951(a) –  
Interference with Commerce by Violence;  
18 U.S.C. § 924(c) – Possession of a  
Firearm in Relation to Crime of Violence;  
18 U.S.C. § 2 -- Aiding and Abetting  
  
SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. § 371)

On or about and between August 2, 2001 to September 4, 2001, both dates being approximate and inclusive, in the Northern District of California, and elsewhere, the defendants

JORGE HUMBERTO ZAMORA-SUAREZ,  
a/k/a Jose Rudolfo Zamora-O,  
a/k/a Jose A Gomez Saavedra, and  
ESTEBAN CALDERON,

and others, did knowingly and willfully conspire to transport and transfer goods having a value of more than \$5,000 in interstate commerce, specifically, between the States of California and New

1 York and elsewhere, knowing such goods to have been stolen, in violation of Title 18, United  
2 States Code, Section 2314.

3 OVERT ACTS

4 In furtherance of the conspiracy and to attain the objects thereof, the defendants and their  
5 coconspirators committed the following overt acts, in the Northern District of California, and  
6 elsewhere:

- 7 1. On August 2, 2001, in Santa Maria, California, the conspirators robbed A. Ghandi at knife  
8 point, taking jewelry valued at approximately \$25,000.
- 9 2. On August 16, 2001, in San Francisco, California, the conspirators robbed O. Guremen at  
10 gunpoint, taking jewelry valued at approximately \$200,000.
- 11 3. On August 23, 2001, in Sacramento, California, defendant JORGE HUMBERTO ZAMORA-  
12 SUAREZ, and other coconspirators, robbed G. Orinakain, using a gun and knives, taking  
13 jewelry valued at approximately \$200,000.
- 14 4. On August 24, 2001, in Sausalito, California, the conspirators robbed W. Vickers at  
15 gunpoint, taking jewelry valued at approximately \$50,000.
- 16 5. On August 29, 2001, in Millbrae, California, defendant JORGE HUMBERTO ZAMORA-  
17 SUAREZ, and other coconspirators, robbed C. Au, S. Lo, and S. Chong at gunpoint, taking  
18 jewelry valued at approximately \$500,000.
- 19 6. On September 1, 2001, defendant ESTEBAN CALDERON drove to California from New  
20 York.
- 21 7. On September 4, 2001, defendant ESTEBAN CALDERON checked into the Eldorado Motor  
22 Inn, in Los Angeles, California.
- 23 8. On September 4, 2001, defendants JORGE HUMBERTO ZAMORA-SUAREZ and  
24 ESTEBAN CALDERON, and other conspirators, met at the Eldorado Motor Inn.
- 25 9. On September 4, 2001, defendant JORGE HUMBERTO ZAMORA-SUAREZ, and other  
26 coconspirators, delivered stolen jewelry to defendant ESTEBAN CALDERON.

27 All in violation of Title 18, United States Code, Section 371.

28 INDICTMENT

1 COUNT TWO: (18 U.S.C. § 1951(a) and 18 U.S.C. § 2)

2 On or about and between August 29, 2001 to September 4, 2001, both dates being  
3 approximate and inclusive, in the Northern District of California, and elsewhere, the defendants

4 JORGE HUMBERTO ZAMORA-SUAREZ,  
5 a/k/a Jose Rudolfo Zamora-O,  
6 a/k/a Jose A Gomez Saavedra, and  
7 ESTEBAN CALDERON,

8 and others, did knowingly and unlawfully obstruct, delay and affect commerce, and the  
9 movement of articles in interstate and foreign commerce, to wit: approximately \$500,000 in  
10 jewelry shipped in foreign commerce, by the armed robbery of representatives of Henry's  
11 Jewelry, Hong Kong, and conspired so to do, all in violation of Title 18, United States Code,  
12 Section 1951(a) and Title 18, United States Code, Section 2.

13 //  
14 //  
15 //  
16 //  
17 //  
18 //  
19 //  
20 //  
21 //  
22 //  
23 //  
24 //  
25 //  
26 //  
27 //  
28 //

INDICTMENT

1 COUNT THREE: (18 U.S.C. § 924(c)(1) and 18 U.S.C. § 2)

2 On or about August 29, 2001, in the County of San Mateo, Northern District of  
3 California, defendant

4 JORGE HUMBERTO ZAMORA-SUAREZ,  
5 a/k/a Jose Rudolfo Zamora-O,  
6 a/k/a Jose A Gomez Saavedra,

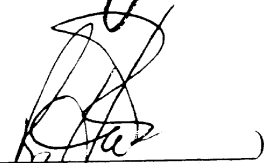
7 and others, did knowingly possess, carry, use, and brandish a firearm during and in relation to the  
8 commission of a crime of violence, to wit: the conspiracy to obstruct and delay commerce by the  
9 robbery of representatives of Henry's Jewelry, as alleged in Count Two of this Indictment, in  
10 violation of Title 18, United States Code, Section 924(c)(1), and Title 18, United States Code,  
11 Section 2.

12 DATED: A TRUE BILL.

13 FOREPERSON

14  
15 DAVID W. SHAPIRO  
16 United States Attorney

17   
18 SUSAN E. BADGER  
19 Acting Criminal Chief

20  
21 (Approved as to form:   
22 AUSA HARDIE

23  
24  
25  
26  
27  
28  
INDICTMENT