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2 District of Arizona
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8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE DISTRICT OF ARIZONA

11 United States of America,
12 Plaintiff,

13 vs.

14 Webster Batista, et. al.,
15 Defendant.
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CR-21-00955-DLR

Joint Stipulation on Restitution

19 The United States, counsel for Webster Batista, and counsel for Jose Teran,
20 respectfully stipulate to the restitution amount of \$3,365,352.85. Along with the other
21 standard conditions concerning the repayment of restitution, the parties agree that Webster
22 Batista and Jose Teran will be jointly and severally liable for the restitution, restitution is
23 due immediately, and Batista and Teran be ordered to make minimum monthly payments
24 -- in an amount determined by the Court and as recommend by the pre-trial services officer
25 -- to commence 60 days after their release from imprisonment to a term of supervised
26 release. The restitution amount is set out in Attachments A and B, and attributed to the
27 following victims and/or victim representatives:
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Victim or Victim Representative	Restitution Amount
El Ojo (For Certain Artists Set Out in Attachment A)	\$15,179.64
Cecilia Ramirez (Los Caminantes)	\$149,227.23
Eleazar Torres Gloria (Vagon Chicano)	\$98,069.04
Enrique Ortega (Jose Luis Perales)	\$153,039.04
Gustavo Lopez (Don Omar)	\$20,978.38
INAMU (For Certain Artists Set Out in Attachment A)	\$11,067.39
Fonovisa Records (Grupo Mandingo)	\$67,188.96
Regalias Digitales (For Certain Artists Set Out in Attachment A)	\$1,395,143.87
Luciano Napolitano (Pappo)	\$1,975.88
Morrie Sanchez (SPARX)	\$49,115.45
Nancy Ramirez	\$100,181.02
Pablo Gonclaves (La Renga)	\$707.26
Sergio Villarreal (Grupo Ladron)	\$55,759.93
Recording Industry Association of America "RIAA" (For Certain Artists Set Out in Attachment B)	\$1,247,719.76
Total:	\$3,365,352.85

The parties request that the criminal judgments (Dkt. #s 93 and 104) be amended to reflect the stipulated restitution amount, and that the Court vacate the restitution hearing set on November 20, 2023. Defense Counsels have consulted with Webster Batista and Jose Teran on the stipulated amount. Both Defendants agree to the stipulated restitution amount of \$3,365,352.85.

1 Respectfully submitted this 8th day of November, 2023.

2 GARY M. RESTAINO
3 United States Attorney
4 District of Arizona

5 S/ Raymond K. Woo
6 RAYMOND K. WOO
7 SETH GOERTZ
8 Assistant U.S. Attorneys

9 **CERTIFICATE OF SERVICE**

10 I hereby certify that on November 8, 2023, I electronically transmitted the attached
11 document to the Clerk's Office using the CM/ECF System for filing a copy to the following
12 CM/ECF registrant:

13 Andrew Pacheco, Esq.
14 Jason M. Silver, Esq.
15 Attorneys for Defendant Jose Teran

16 RJ Suzuki, Esq.
17 Attorney for Defendant Webster Batista

18 By: S/ Daniel Parke
19 U.S. Attorney's Office
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