

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
FRANCISCO LOPEZ : **VIOLATIONS:**
: **18 U.S.C. § 1956(a)(3)**
: **(money laundering - 31 counts)**
: **18 U.S.C. § 2 (aiding & abetting)**
: **Notice of forfeiture**

INDICTMENT

COUNTS ONE THROUGH THIRTY-ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Defendant FRANCISCO LOPEZ was the manager of Servimundo, located at 4801 North Front Street, Philadelphia, Pennsylvania. Servimundo is a money transfer center offering domestic and international money transmitting services to the public.
2. Defendant FRANSISCO LOPEZ operated as a licensed money transmitter for Ria Envía, a money transmitter licensed in the Commonwealth of Pennsylvania. Ria Envía has numerous money transfer locations throughout the United States and is required to comply with the anti-money laundering and currency reporting requirements of the Bank Secrecy Act, 31 U.S.C. § 5311 et. seq.
3. Ria Envía provides training to each of their agents on the money

laundering laws and currency reporting requirements. This company provides manuals and updates to all of their agents specifically advising agents as to the laws regarding illegal money laundering, the sanctions for illegal money laundering, and the requirements for reporting suspicious transactions.

4. Defendant FRANCISCO LOPEZ received a training manual and other documentation and information from Ria Envía regarding the reporting requirements and the possible criminal penalties associated with violating the anti-money laundering and currency transaction reporting requirements of the Bank Secrecy Act. Defendant LOPEZ retained the training manual and other documents and information on the premises of Servimundo.

5. Western Union, BHD Corporation, and Vigo Remittance are all money transmitters licensed in the Commonwealth of Pennsylvania. Western Union, BHD Corporation, and Vigo Remittance have numerous money transfer locations throughout the United States and are required to comply with the anti-money laundering and currency reporting requirements of the Bank Secrecy Act, 31 U.S.C. § 5311 et. seq.

6. Defendant FRANCISCO LOPEZ conducted financial transactions which were represented to him by a cooperating witness (CW), working at the direction of federal officials, to be the proceeds of illegal drug trafficking, in violation of Title 21, United States Code, Section 841. Specifically, with regard to these funds, defendant LOPEZ arranged for international transfers of money, exchanged blank money orders for cash, and exchanged small denominations of bills for larger denominations of bills. Defendant LOPEZ structured the transactions to evade and defeat the currency transaction reporting requirements and permitted

the use of false identification and fictitious names to prevent discovery of the sender's true identity and to evade the reporting requirements.

7. On or about the dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania, defendant

FRANCISCO LOPEZ

knowingly conducted and aided and abetted the following financial transactions affecting interstate commerce:

COUNT	DATE	AMOUNT LAUNDERED	WIRE SERVICE USED	WIRE TRANSFER COMPANY FEE(S)
1	2-20-04	\$2,000.00 wired	BHD Corp.	\$350.00
2	2-27-04	\$4,800.00 wired	Western Union	\$700.00
3	3-5-04	\$4,000.00 wired	Western Union	\$760.00
4	3-12-04	\$4,300.00 wired (split into 2 separate wire transfers)	BHD & Western Union	\$780.00
5	3-19-04	\$4,140.00 wired (split into 2 separate wire transfers)	BHD & Vigo	\$720.00
6	4-7-04	\$3,600.00 wired (split into 2 separate wire transfers)	BHD & Western Union	\$660.00
7	4-30-04	\$3,500.00 wired (split into 2 separate wire transfers)	Vigo	\$550.00
9	5-14-04	\$3,600.00 wired (split into 2 separate wire transfers)	Vigo & BHD	\$560.00
10	11-23-04	\$2,500.00 wired (split into 2 separate wire transfers)	BHD & Vigo	\$300.00

11	12-2-04	\$3,415.00 wired (split into 2 separate wire transfers)	BHD & Ria	\$500.00
12	12-10-04	\$3,800.00 wired (split into 2 separate wire transfers)	BHD & Ria	\$600.00
13	2-10-05	\$3,000.00 wired (split into 2 separate wire transfers)	Vigo & BHD	\$500.00
14	2-23-05	\$2,500.00 wired (split into 2 separate wire transfers)	BHD & Vigo	\$400.00
15	3-3-05	\$4,000.00 wired (split into 3 separate wire transfers)	BHD, BHD & Vigo	\$600.00
16	3-17-05	\$3,000.00 wired (split into 2 separate wire transfers)	Vigo & BHD	\$500.00
17	5-12-05	\$2,000.00 wired (split into 2 separate wire transfers)	BHD & Vigo	\$350.00
18	5-26-05	\$3,000.00 wired (split into 3 separate wire transfers)	BHD, BHD & Vigo	\$500.00
19	8-11-05	\$3,920.00 wired (split into 3 separate wire transfers)	BHD, Vigo & Ria	\$700.00
20	8-18-05	\$3,945.00 wired (split into 3 separate wire transfers)	BHD, Vigo & Ria	\$700.00
21	9-15-05	\$3,620.00 wired (split into 2 separate wire transfers)	BHD & Ria	\$660.00

22	10-5-05	\$3,850.00 wired (split into 3 separate wire transfers)	Ria, BHD & Vigo	\$750.00
23	10-12-05	\$3,910.00 wired (split into 3 separate wire transfers)	Ria, BHD & Vigo	\$700.00
24	10-13-05	\$3,000.00 wired (split into 2 separate wire transfers)	Vigo & BHD	\$500.00
		\$4,000.00 exchanged for money orders		\$300.00
25	10-19-05	\$900.00 wired	Ria	\$315.00
26	10-20-05	\$5,000.00 exchanged for currency-smaller denominations for larger ones		\$500.00
27	10-26-05	\$6,000.00 exchanged for currency-smaller denominations for larger ones		\$600.00
28	10-27-05	\$3,369.00 wired (split into 2 separate wire transfers)	Ria & BHD	\$731.00
29	11-3-05	\$1,900.00 wired (split into 2 separate wire transfers)	Ria & Vigo	\$400.00
30	11-4-05	\$6,000.00 exchanged for currency-smaller denominations for larger ones		\$600.00
31	11-16-05	\$6,000.00 exchanged for currency-smaller denominations for larger ones		\$600.00
		TOTAL:	\$116,169.00	\$17,946

8. When conducting the financial transactions described in paragraph 7 above, defendant FRANCISCO LOPEZ acted with the intent to conceal and disguise the nature, location, source, ownership and control of what he believed were the proceeds of the specified unlawful activity, and with the intent to promote the carrying on of such specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(3) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1956(a)(3) described in this indictment, defendant

FRANCISCO LOPEZ

shall forfeit to the United States any and all property, real or personal, involved in those violations, or any property traceable to such property, including, but not limited to, the following:

- a. Approximately \$2,679 in United States currency seized from Servimundo; and
- b. Approximately \$17,946.00, the value of the fees paid to the defendant LOPEZ.

2. In the event the forfeitable property described above, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sole to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), to

seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 982.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**