

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

| | | |
|----------------------------------|---|--------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | <u>INDICTMENT</u> |
| Plaintiff, |) | |
| |) | CASE NO. _____ |
| -vs- |) | |
| |) | Statutes |
| MANUEL VALDEZ-GOMEZ aka MANUEL |) | |
| VALDEZ aka MANUEL G. VALDEZ aka |) | |
| "POLO", |) | Judge _____ |
| |) | |
| JESUS SOSA-ORTIZ aka JESUS SOSA |) | |
| aka ANDRES ASENCION ORTIZ, |) | |
| |) | (FILED UNDER SEAL) |
| RAFAEL VALDEZ-GOMEZ aka RAFAEL |) | |
| VALDEZ aka RAFA, |) | |
| |) | |
| YOLANDA SOSA aka YOLANDA VALDEZ, |) | |
| |) | |
| PATRICIA HERNANDEZ aka PATRICIA |) | |
| VALDEZ, |) | |
| |) | |
| TOMAS VALDEZ-GOMEZ aka TOMAS |) | |
| VALDEZ, |) | |
| |) | |
| RICARDO ARANDA-MORENO aka |) | |
| RICARDO ARANDA aka RICARDO |) | |
| ARANDA ORNELAS aka RODOLFO |) | |
| HERRERA, aka PEDRO CHAVEZ, aka |) | |
| ERNESTO SOTO |) | |

JOSE SANTANA ARANDA-FLORES aka)
JOSE SANTA ANA ARANDA-FLORES aka)
SANTANA aka "CHOLO" aka JOSE)
ARANDA HERNANDEZ aka ERNESTO)
SOTO,)
)
JAIME HERNANDEZ-ORNELAS aka)
JAIME ORNELAS,)
)
J. SANTANA HERNANDEZ-GOMEZ aka)
SANTANA HERNANDEZ aka SANTANA)
aka SANTANA G. HERNANDEZ,)
)
ROMULO HERNANDEZ,)
)
AURORA VALDEZ aka AURORA ORTIZ,)
)
MANUEL VALDEZ JR. aka "BUBA,")
)
JESUS FLORES-CARMONA aka "CHUY",)
)
ISAIAS GARCIA-HERNANDEZ aka)
ISAIAS GARCIA aka ISAIAS GARCIA)
aka GARCIA TORRES,)
)
ISMAEL VALDEZ aka JIMMY VALDEZ,)
aka FAUSTINO MARTINEZ,)
)
GUADALUPE J. HERNANDEZ aka JOSE)
GUADALUPE HERNANDEZ aka "ZORRA")
aka GUADALUPE HERNANDEZ,)
)
JOSE VALDEZ aka JOSE VALDEZ-)
BERMUDEZ,)
)
RICARDO G. ORTIZ aka RICHARD G.)
ORTIZ,)
)
ELIDIA HERNANDEZ aka ELIDIA)
SALDANA DE HERNANDEZ,)
)
SIMON VALDEZ-AMARO,)
)
MARTIN VALDEZ,)
)
BASILLIO VALDEZ,)
)
)

JUAN LOZA-ARANDA, and)
)
 ISIDRO ARANDA aka ISIDRO ARANDA-)
 FLORES,)
)
 Defendants.)

COUNT 1

Conspiracy to Smuggle Aliens into and within the United States

8 U.S.C. § 1324(a)(1)(A)(v)(I)

The Grand Jury charges that:

1. Beginning on or about January 1, 1997, the exact date being unknown, and continuing until the date of the filing of this indictment, within the Northern District of Ohio, Eastern Division, and elsewhere, MANUEL VALDEZ-GOMEZ aka MANUEL VALDEZ aka MANUEL G. VALDEZ aka “POLO”; JESUS SOSA-ORTIZ aka JESUS SOSA aka ANDRES ASENCION ORTIZ; RAFAEL VALDEZ-GOMEZ aka RAFAEL VALDEZ aka “RAFA”; YOLANDA SOSA aka YOLANDA VALDEZ; PATRICIA HERNANDEZ aka PATRICIA VALDEZ; TOMAS VALDEZ-GOMEZ aka TOMAS VALDEZ; RICARDO ARANDA-MORENO aka RICARDO ARANDA aka RICARDO ARANDA ORNELAS aka Rodolfo HERRERA aka PEDRO CHAVEZ aka ERNESTO SOTO; JOSE SANTANA ARANDA-FLORES, aka JOSE SANTA ANA ARANDA-FLORES aka SANTANA aka “CHOLO” aka JOSE ARANDA HERNANDEZ aka ERNESTO SOTO; JAIME HERNANDEZ-ORNELAS aka JAIME ORNELAS; J. SANTANA HERNANDEZ-GOMEZ aka SANTANA HERNANDEZ aka SANTANA aka SANTANA G. HERNANDEZ; ROMULO HERNANDEZ; AURORA VALDEZ aka AURORA ORTIZ; MANUEL VALDEZ JR. aka “BUBA”; JESUS

FLORES-CARMONA aka “CHUY”; ISAIAS GARCIA-HERNANDEZ aka ISAIAS GARCIA aka ISAIAS GARCIA aka GARCIA TORRES; ISMAEL VALDEZ aka JIMMY VALDEZ aka FAUSTINO MARTINEZ; JOSE VALDEZ; RICARDO G. ORTIZ aka RICHARD G. ORTIZ; SIMON VALDEZ-AMARO; MARTIN VALDEZ and, ISIDRO ARANDA aka ISIDRO ARANDA-FLORES, defendants (and hereinafter collectively referred to as “coconspirators”), and Gregorio Aranda-Moreno (not charged in this indictment) and other persons whose identities are known and unknown to the Grand Jury, did knowingly, willfully, intentionally, and unlawfully combine, conspire, confederate, and agree together and with each other to commit offenses against the United States in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I). The objects of the conspiracy were as follows:

a. to smuggle, induce and bring into the United States aliens who were known to be undocumented aliens for an average fee of approximately \$1,800 to \$2,000 for each alien, through a network of smugglers in Mexico who were paid by MANUEL VALDEZ-GOMEZ to provide those services in conjunction with other coconspirators who then brought the aliens to a safe house in Phoenix, Arizona, and thereafter to various interior states, including Ohio, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i);

b. to transport for a fee undocumented aliens who were illegally present in the United States, to final destinations within the interior of the United States, including locations in the Northern District of Ohio, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii);

c. to conceal, harbor, and shield from detection undocumented aliens in a network of safe houses and vehicles while being transported throughout the United States,

including locations in and to Phoenix, Arizona, and the Northern District of Ohio, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii); and

d. to encourage and induce aliens to come to, enter, and reside in the United States, knowing, and in reckless disregard of the fact, that such coming to, entry, and residence is a violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

MANNER AND MEANS OF THE CONSPIRACY

2. It was a part of the conspiracy that MANUEL VALDEZ-GOMEZ operated an alien smuggling organization, initially utilizing the assistance of relatives and thereafter expanding the operation to include non-relatives who assisted him with fee arrangements to smuggle aliens into the United States. The coconspirators would use safe houses under their control to temporarily situate aliens who had been escorted across the border from Mexico to the Nogales, Arizona, area. During the course of the conspiracy, hundreds of undocumented aliens were smuggled into the United States.

3. It was a part of the conspiracy that JESUS SOSA-ORTIZ, JAIME HERNANDEZ-ORNELAS, J. SANTANA HERNANDEZ-GOMEZ, Gregorio Aranda-Moreno (not charged in this indictment), and other coconspirators would assist MANUEL VALDEZ-GOMEZ in operating the safe houses, collecting smuggling fees owed, making arrangements and negotiating fees to smuggle aliens into the country, and manage a group of drivers who would transport the aliens from the border area to Phoenix, Arizona, and thereafter to ultimate destinations in Ohio, California, Florida, Nevada, Michigan, Illinois, Indiana, and other interior states.

4. It was a part of the conspiracy that undocumented aliens would be harbored in safe houses in or near Phoenix, Arizona, until a sufficient number of aliens were present to warrant a motor vehicle trip into the interior of the United States, which would occur utilizing a series of vans and other motor vehicles with one or two drivers transporting as many as fourteen aliens on each trip into the interior of the United States, where the aliens would be met by friends or family members who would then pay the drivers the smuggling fee.

5. It was a part of the conspiracy that express mail was used by the drivers of loads of undocumented aliens as a means of transporting large amounts of cash and money orders back to the coconspirators in Phoenix, Arizona, thereby lessening the risk, if apprehended, of being identified as an alien smuggler and alien transporter.

6. It was a part of the conspiracy that between February 9, 2000, and December 9, 2003, large amounts of money representing proceeds of alien smuggling and document vending were wired by Western Union Financial Services, Inc., from drivers, collectors, and safehouse operators to MANUEL VALDEZ-GOMEZ, sending the currency by wire to a number of individuals who collected the money on his behalf. The following aggregate amounts of proceeds from the illegal activities of the conspiracy were received between February 9, 2000, and December 9, 2003, by the following coconspirators: \$304,499 to MANUEL VALDEZ-GOMEZ; \$291,926 to RAFAEL VALDEZ-GOMEZ; \$256,855 to YOLANDA SOSA; \$164,030 to PATRICIA HERNANDEZ; \$42,900 to ISIDRO ARANDA; \$32,100 to JOSE VALDEZ; and \$16,995 to RICARDO ARANDA-MORENO.

OVERT ACTS

7. In furtherance of the conspiracy and to effect its object thereof, the following overt acts, among others, were committed in the Northern District of Ohio and elsewhere:
- a. In 1997, in Phoenix, Arizona, MANUEL VALDEZ-GOMEZ and YOLANDA SOSA drove undocumented aliens to the airport.
 - b. On or about February 5, 1998, in Phoenix, Arizona, MANUEL VALDEZ-GOMEZ sold fraudulent documents to an undocumented alien.
 - c. On or about February 7, 1998, in Ashtabula, Ohio, Gregorio Aranda Moreno (not charged in this indictment) operated a motor vehicle containing undocumented aliens.
 - d. On March 12, 1999, in Rocky River, Ohio, RICARDO ARANDA MORENO operated a van registered to MANUEL VALDEZ-GOMEZ, containing undocumented aliens.
 - e. On May 18, 2000, in the area of Amarillo, Texas, RICARDO ARANDA MORENO operated a van with Michigan license plates containing one undocumented alien.
 - f. On May 18, 2000, in the area of Amarillo, Texas, RICARDO ARANDA-MORENO possessed false identification documents.
 - g. On April 1, 2001, in Norton County, Kansas, JESUS FLORES-CARMONA traveled in a van containing undocumented aliens.
 - h. On April 20, 2001, in Gillette, Wyoming, JESUS SOSA-ORTIZ operated a van with Michigan license plates containing undocumented aliens.

- i. On April 23, 2001, in Craig, Colorado, RICARDO ARANDA-MORENO operated a motor vehicle containing 14 undocumented aliens.
- j. In January or February of 2002, in Ashtabula, Ohio, JESUS SOSA-ORTIZ operated a motor vehicle containing undocumented aliens.
- k. On June 16, 2002, near Monticello, Utah, ISIDRO ARANDA operated a Ford Thunderbird registered to RICARDO ARANDA-MORENO containing undocumented aliens.
- l. On December 5, 2002, in Blanding, Utah, JOSE ARANDA FLORES operated a Chevrolet Silverado containing undocumented aliens.
- m. In March, 2003, in Ashtabula, Ohio, JESUS SOSA-ORTIZ operated a motor vehicle containing undocumented aliens.
- n. In June, 2003, in Ashtabula, Ohio, JESUS SOSA-ORTIZ operated a motor vehicle containing undocumented aliens.
- o. On May 29, 2004, MANUEL VALDEZ-GOMEZ engaged in a telephone conversation placed from Ashtabula, Ohio.
- p. On or about February 10, 2005, in Phoenix, Arizona, RICARDO G. ORTIZ operated a motor vehicle containing undocumented aliens.
- q. On or about February 15, 2005, between Painesville, Ohio and Ashtabula, Ohio, JESUS SOSA-ORTIZ operated a motor vehicle containing undocumented aliens.
- r. On May 11, 2005, in Painesville, Ohio, JESUS SOSA-ORTIZ possessed fraudulent identification documents and genuine identification documents in the name of MANUEL VALDEZ, JR.

- s. On May 12, 2005, MANUEL VALDEZ-GOMEZ participated in a telephone conversation placed from Ashtabula, Ohio.
- t. On May 15, 2005, JAIME HERNANDEZ-ORNELAS participated in a telephone conversation placed from Ashtabula, Ohio.
- u. On May 17, 2005, JAIME HERNANDEZ-ORNELAS participated in two telephone conversations, each placed from Ashtabula, Ohio.
- v. On May 20, 2005, JOSE SANTANA ARANDA-FLORES participated in a telephone conversation placed from Ashtabula, Ohio.
- w. On May 20, 2005, in Cleveland, Ohio, JOSE SANTANA ARANDA-FLORES operated a van containing an undocumented alien.
- x. On November 9, 2005, in the area of Grand Rapids, Michigan, JOSE SANTANA ARANDA-FLORES operated a motor vehicle containing undocumented aliens.

All in violation of Title 8, Section 1324(a)(1)(A)(v)(I), United States Code, and punishable under Title 8, Section 1324(a)(2)(B)(iii), United States Code.

COUNT 2

Conspiracy to Smuggle Aliens into and within the United States

8 U.S.C. § 1324(a)(1)(A)(v)(I)

The Grand Jury further charges that:

1. Beginning on or about October 1, 2004, the exact date being unknown, and continuing until the date of the filing of this indictment, within the Northern District of Ohio, Eastern Division, and elsewhere, J. SANTANA HERNANDEZ-GOMEZ aka SANTANA

HERNANDEZ aka SANTANA aka SANTANA G. HERNANDEZ; RICARDO ARANDA-MORENO aka RICARDO ARANDA aka RICARDO ARANDA ORNELAS aka Rodolfo HERRERA, aka PEDRO CHAVEZ, aka ERNESTO SOTO; JOSE SANTANA ARANDA-FLORES aka JOSE SANTA ANA ARANDA-FLORES aka SANTANA aka "CHOLO" aka JOSE ARANDA HERNANDEZ aka ERNESTO SOTO; ROMULO HERNANDEZ; JESUS FLORES-CARMONA aka "CHUY;" GUADALUPE J. HERNANDEZ aka JOSE GUADALUPE HERNANDEZ aka "ZORRA" aka GUADALUPE HERNANDEZ; ELIDIA HERNANDEZ; BASILLIO VALDEZ; and JUAN LOZA-ARANDA; Gregorio Aranda-Moreno (not charged in this indictment); Albaro Loza-Aranda (not charged in this indictment); and other persons whose identities are known and unknown to the Grand Jury, did knowingly, willfully, intentionally, and unlawfully combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I). The objects of the conspiracy were as follows:

- a. to smuggle, induce and bring into the United States aliens who were known to be undocumented aliens for an average fee of approximately \$1,800 to \$2,000 for each alien, through a network of smugglers in Mexico who were paid by J. SANTANA HERNANDEZ-GOMEZ and Gregorio Aranda-Moreno (not charged in this indictment) to provide those services in conjunction with other coconspirators who then brought the aliens to a safe house in Phoenix, Arizona, and thereafter to various interior states, including Ohio, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(I);
- b. to transport for a fee undocumented aliens who were illegally present in the United States, to final destinations within the interior of the United States, including

locations in the Northern District of Ohio, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii);

c. to conceal, harbor, and shield from detection undocumented aliens in a network of safe houses and vehicles while being transported throughout the United States, including locations in, and transportation to, Phoenix, Arizona, and the Northern District of Ohio, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii); and

d. to encourage and induce aliens to come to, enter, and reside in the United States, knowing, and in reckless disregard of the fact, that such coming to, entry, and residence is a violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

MANNER AND MEANS OF THE CONSPIRACY

2. It was a part of the conspiracy that J. SANTANA HERNANDEZ-GOMEZ and Gregorio Aranda-Moreno (not charged in this indictment) each originally participated in the conspiracy detailed in Count 1 of this indictment; that they both, independently of each other, split off from that conspiracy; that they each initiated operating an alien smuggling organization; and they shared resources with each other to conduct the alien smuggling operation. J. SANTANA HERNANDEZ-GOMEZ and Gregorio Aranda-Moreno (not charged in the indictment) enlisted the aid of other coconspirators to operate safe houses under their control to temporarily house aliens who had been escorted across the border from Mexico to the Nogales, Arizona, area.

3. It was a part of the conspiracy that J. SANTANA HERNANDEZ-GOMEZ and Gregorio Aranda-Moreno (not charged in this indictment), with the assistance of other coconspirators, operated the safe houses, collected smuggling fees owed, made arrangements and

negotiated fees to smuggle aliens into the country, and managed a group of drivers who would transport the aliens from the border area to Phoenix, Arizona, and thereafter to ultimate destinations in Ohio, California, Florida, Nevada, Michigan, Illinois, Indiana, and other interior states as part of the fee, with drivers often transporting a combined load of undocumented aliens who had made separate arrangements with J. SANTANA HERNANDEZ-GOMEZ and Gregorio Aranda-Moreno (not charged in this indictment). During the course of the conspiracy, in excess of one hundred undocumented aliens were smuggled into the United States.

4. It was a part of the conspiracy that undocumented aliens would be harbored in a safe house in or near Phoenix, Arizona, until a sufficient number were present to warrant a motor vehicle trip into the interior of the United States, and that multiple trips would occur utilizing a series of vans and other motor vehicles with one or two drivers transporting as many as fourteen aliens on each trip into the interior of the United States, where the aliens would be met by friends or family members who would then pay the drivers the smuggling fee.

OVERT ACTS

5. In furtherance of the conspiracy and to effect its object thereof, the following overt acts, among others, were committed in the Northern District of Ohio and elsewhere:

a. On February 16, 2005, in Lorain, Ohio, JOSE SANTANA ARANDA-FLORES operated a motor vehicle containing undocumented aliens.

b. On February 24, 2005, RICARDO ARANDA-MORENO participated in a telephone conversation placed from Cleveland Heights, Ohio

c. On June 5, 2005, in Eastlake, Ohio, Albaro Loza-Aranda (not charged in this indictment) operated a van containing 7 undocumented aliens.

d. On July 30, 2005, in Painesville, Ohio, JUAN LOZA-ARANDA operated a motor vehicle containing undocumented aliens.

e. On September 29, 2005, in Painesville, Ohio, Gregorio Aranda-Moreno (not charged in this indictment) drove three undocumented Mexican aliens in a Nissan Ultima rental automobile.

All in violation of Title 8, Section 1324(a)(1)(A)(v)(I), United States Code, and punishable under Title 8, Section 1324(a)(2)(B)(iii), United States Code.

COUNT 3

Conspiracy to Commit Mail Fraud, Wire Fraud, Document Fraud, and Structuring

Financial Transactions

18 U.S.C. § 371

The Grand Jury further charges that:

1. The Grand Jury realleges all the allegations in Count 1.
2. Beginning on or about January 1, 1997, the exact date being unknown, and continuing until the date of the filing of this indictment, within the Northern District of Ohio, Eastern Division, and elsewhere, MANUEL VALDEZ-GOMEZ aka MANUEL VALDEZ aka MANUEL G. VALDEZ aka "POLO"; JESUS SOSA-ORTIZ aka JESUS SOSA aka ANDRES ASENCION ORTIZ; RAFAEL VALDEZ-GOMEZ aka RAFAEL VALDEZ aka "RAFA"; YOLANDA SOSA aka YOLANDA VALDEZ; PATRICIA HERNANDEZ aka PATRICIA VALDEZ; TOMAS VALDEZ-GOMEZ aka TOMAS VALDEZ; RICARDO ARANDA-MORENO aka RICARDO ARANDA aka RICARDO ARANDA ORNELAS aka RODOLFO

HERRERA, aka PEDRO CHAVEZ, aka ERNESTO SOTO; JOSE SANTANA ARANDA-FLORES aka JOSE SANTA ANA ARANDA-FLORES aka SANTANA aka “CHOLO” aka JOSE ARANDA HERNANDEZ aka ERNESTO SOTO; JAIME HERNANDEZ-ORNELAS aka JAIME ORNELAS; J. SANTANA HERNANDEZ-GOMEZ aka SANTANA HERNANDEZ aka SANTANA aka SANTANA G. HERNANDEZ; ROMULO HERNANDEZ; AURORA VALDEZ aka AURORA ORTIZ; MANUEL VALDEZ JR. aka “BUBA”; JESUS FLORES-CARMONA aka “CHUY”; ISAIAS GARCIA-HERNANDEZ aka ISAIAS GARCIA aka ISAIAS GARCIA aka GARCIA TORRES; ISMAEL VALDEZ aka JIMMY VALDEZ, aka FAUSTINO MARTINEZ; JOSE VALDEZ; RICARDO G. ORTIZ aka RICHARD G. ORTIZ; SIMON VALDEZ-AMARO; MARTIN VALDEZ; and ISIDRO ARANDA aka ISIDRO ARANDA-FLORES, defendants (and hereinafter collectively referred to as “co-conspirators”); Gregorio Aranda-Moreno (not charged in this indictment); and other persons whose identities are known and unknown to the Grand Jury, did knowingly, willfully, intentionally, and unlawfully combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, in violation of Title 31, Section 5324(a)(3), United States Code, and Title 18, Sections 1028(A)(2), 1341, 1343, and 1956(a)(1)(A)(I), United States Code. The objects of the conspiracy were as follows:

a. to devise a scheme and artifice to furnish or procure any counterfeit article, and, for the purpose of executing such scheme and artifice, to place and cause to be placed in a post office and authorized depository for mail matter, things to be sent and delivered by the U.S. Postal Service, to wit: alien registration receipt cards also known as “permanent resident cards” and “green cards,” and social security cards, which documents were fraudulently

procured from conspirators in Arizona, and payment for those identification documents mailed to members of the conspiracy, in violation of Title 18, United States Code, Section 1341;

b. to devise a scheme and artifice to defraud and, for the purpose of executing such scheme and artifice, to place and cause to be placed in a post office and authorized depository for mail matter, things to be sent and delivered by the U.S. Postal Service, to wit: money orders and cash which represent proceeds of a scheme to defraud the United States by smuggling aliens into the United States without submitting them to inspection, by transporting aliens utilizing a network of drivers and vans into the deep interior of the United States (to the Northern District of Ohio, and elsewhere) to further conceal them from detection by the Border Patrol, Customs and Border Protection, and Immigration and Customs Enforcement, and to use the mails to send proceeds of the illegal activity back to Arizona so that returning drivers, if caught, would not be in possession of sizeable funds indicative of the true scope and nature of the coconspirators' criminal activities; in violation of Title 18, United States Code, Section 1341;

c. to possess, obtain, accept, receive, and transfer any alien registration card and other document prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, knowing it to be forged, counterfeited, and falsely made, and otherwise procured by fraud and unlawfully obtained, in violation of Title 18, United States Code, Section 1028;

d. for the purpose of evading the reporting requirements of Title 18, Sections 5313(a) and 5325, United States Code (and the implementing regulations) with respect to such transaction, to willfully structure and assist in structuring, and attempt to structure and assist in

attempting to structure, transactions with Western Union Financial Services, Inc., in violation of Title 31, Section 5324(a)(3), United States Code;

e. to devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did knowingly transmit and cause to be transmitted in interstate commerce, by means of wire communications, transfers of cash, in violation of Title 18, Section 1343, United States Code; and

f. to conduct financial transactions that involve proceeds of unlawful activity with Western Union Financial Services, Inc., knowing that the cash involved was proceeds of the unlawful activity of alien smuggling and that those financial transactions intended to promote the unlawful activity and avoid detection, in violation of Title 18, Section 1956(a)(1)(A)(I), United States Code.

MANNER AND MEANS OF THE CONSPIRACY

3. It was a part of the conspiracy that in support of an alien smuggling operation, undocumented aliens were provided with fraudulently made sets of alien registration cards, social security cards, and other identification documents, for an additional fee over and above the fee they were paying to be smuggled into and within the United States, and that the United States mails were often used to transport fraudulent documents, information necessary to preparing those fraudulent documents, and payments.

4. It was a part of the conspiracy that express mail was used by the drivers of loads of undocumented aliens as a means of transporting large amounts of cash and money orders back

to the coconspirators in Phoenix, Arizona, thereby lessening the risk, if apprehended, of being identified as an alien smuggler and alien transporter.

5. It was a part of the conspiracy that the drivers and operators of safe houses located in northern states would avoid detection and facilitate sending the proceeds of the illegal alien smuggling activities in a structured way, knowing that action would avoid the reporting requirements related to cash transactions greater than \$10,000 and \$3,000. The coconspirators would divide payments of large amounts of money intended for MANUEL VALDEZ-GOMEZ, which represented the proceeds of alien smuggling, into smaller transactions (often \$2,900) and would further divide payments by wiring them to different individuals in the Phoenix, Arizona area, knowing the payments were truly intended for MANUEL VALDEZ-GOMEZ.

6. It was a part of the conspiracy that between February 9, 2000, and December 9, 2003, large amounts of money representing proceeds of alien smuggling and document vending were wired by Western Union Financial Services, Inc., from drivers, collectors, and safehouse operators to MANUEL VALDEZ-GOMEZ, sending the currency by wire to a number of individuals who collected the money on his behalf. The following aggregate amounts of proceeds from the illegal activities of the conspiracy were received between February 9, 2000, and December 9, 2003, by the following coconspirators: \$304,499 to MANUEL VALDEZ-GOMEZ; \$291,926 to RAFAEL VALDEZ-GOMEZ; \$256,855 to YOLANDA SOSA; \$164,030 to PATRICIA HERNANDEZ; \$42,900 to ISIDRO ARANDA; \$32,100 to JOSE VALDEZ; and \$16,995 to RICARDO ARANDA-MORENO.

OVERT ACTS

7. In furtherance of the conspiracy and to effect its object thereof, the following overt acts, among others, were committed in the Northern District of Ohio and elsewhere:
- a. On April 22, 2000, in Fremont, Ohio, MANUEL VALDEZ-GOMEZ wired, through Western Union Financial Services, Inc. \$2,000 to PATRICIA HERNANDEZ in Phoenix, Arizona.
 - b. On September 9, 2001, in Grand Rapids, Michigan, Albaro Loza-Aranda (not charged in this indictment) wired, through Western Union Financial Services, Inc., \$2,500 to PATRICIA HERNANDEZ in Phoenix, Arizona.
 - c. On October 12, 2001, in Ashtabula, Ohio, JOSE SANTANA-ARANDA-FLORES wired, through Western Union Financial Services, Inc., \$2,700 to YOLANDA SOSA in Phoenix, Arizona.
 - d. On September 9, 2001, in Grand Rapids, Michigan, Albaro Loza-Aranda (not charged in this indictment) wired, through Western Union Financial Services, Inc., \$2,500 to YOLANDA SOSA in Phoenix, Arizona.
 - e. On February 24, 2002, in Painesville, Ohio, GUADALUPE J. HERNANDEZ wired, through Western Union Financial Services, Inc., \$4,000 to YOLANDA SOSA in Phoenix, Arizona.
 - f. On March 12, 2002, in Painesville, Ohio, JESUS SOSA-ORTIZ wired, through Western Union Financial Services, Inc., \$2,900 to PATRICIA HERNANDEZ in Phoenix, Arizona.

g. On March 12, 2002, in Painesville, Ohio, ISAIAS GARCIA-HERNANDEZ wired, through Western Union Financial Services, Inc., \$3,000 to MANUEL VALDEZ-GOMEZ in Phoenix, Arizona.

h. On April 14, 2002, in Grand Rapids, Michigan, TOMAS VALDEZ-GOMEZ wired, through Western Union Financial Services, Inc., \$2,900 to MANUEL VALDEZ-GOMEZ in Phoenix, Arizona.

i. On May 4, 2002, in Painesville, Ohio, JOSE SANTANA-ARANDA-FLORES wired, through Western Union Financial Services, Inc., \$2,900 to ISIDRO ARANDA in Phoenix, Arizona.

j. On June 3, 2002, in Grand Rapids, Michigan, TOMAS VALDEZ-GOMEZ wired, through Western Union Financial Services, Inc., \$2,900 to RAFAEL VALDEZ-GOMEZ in Phoenix, Arizona.

k. On June 4, 2002, in Grand Rapids, Michigan, SIMON VALDEZ wired, through Western Union Financial Services, Inc., \$2,900 to MANUEL VALDEZ-GOMEZ in Phoenix, Arizona.

l. On June 25, 2002, in Grand Rapids, Michigan, SIMON VALDEZ wired, through Western Union Financial Services, Inc., \$2,900 to RAFAEL VALDEZ-GOMEZ in Phoenix, Arizona.

m. On July 3, 2002, in Grand Rapids, Michigan, TOMAS VALDEZ-GOMEZ wired, through Western Union Financial Services, Inc., \$2,900 to MANUEL VALDEZ-GOMEZ in Phoenix, Arizona.

- n. On September 26, 2002, at 3:41 p.m., in Grand Rapids, Michigan, MARTIN VALDEZ wired, through Western Union Financial Services, Inc., \$2,900 to PATRICIA HERNANDEZ in Phoenix, Arizona.
- o. On September 26, 2002, at 4:06 p.m., in Grand Rapids, Michigan, MARTIN VALDEZ wired, through Western Union Financial Services, Inc., \$2,900 to PATRICIA HERNANDEZ in Phoenix, Arizona.
- p. On February 16, 2003, in Painesville, Ohio, JOSE SANTANA-ARANDA-FLORES wired, through Western Union Financial Services, Inc., \$2,900 to PATRICIA HERNANDEZ in Phoenix, Arizona.
- q. On February 26, 2003, in Westlake, Ohio, Gregorio Aranda-Moreno (not charged in this indictment) wired, through Western Union Financial Services, Inc., \$2,900 to MANUEL VALDEZ-GOMEZ in Phoenix, Arizona.
- r. On February 26, 2003, in Westlake, Ohio, Gregorio Aranda-Moreno (not charged in this indictment) wired, through Western Union Financial Services, Inc., \$2,500 to RAFAEL VALDEZ-GOMEZ in Phoenix, Arizona.
- s. On March 10, 2003, in Grand Rapids, Michigan, Albaro Loza-Aranda (not charged in this indictment) wired, through Western Union Financial Services, Inc., \$2,500 to MANUEL VALDEZ-GOMEZ in Phoenix, Arizona.
- t. On February 14, 2005, JESUS SOSA-ORTIZ purchased \$2,900 in postal service money orders from the Painesville, Ohio Post Office, payable to YOLANDA SOSA.
- u. On February 14, 2005, JESUS SOSA-ORTIZ sent an express mail parcel from Painesville, Ohio to YOLANDA SOSA in Phoenix, Arizona.

v. On February 15, 2005, in Painesville, Ohio, JOSE SANTANA ARANDA-FLORES sent an express mail parcel addressed to MANUEL VALDEZ-GOMEZ in Phoenix, Arizona.

x. On March 15, 2005, ISMAEL VALDEZ sent an express mail parcel from Painesville, Ohio to PATRICIA HERNANDEZ in Phoenix, Arizona, containing \$9,000 in blank postal service and Western Union money orders.

y. On March 15, 2005, JAIME HERNANDEZ ORNELAS sent an express mail parcel from Painesville, Ohio to an address in Avondale, Arizona, containing \$6,000 in blank Western Union money orders.

z. On July 20, 2005, in Grand Rapids, Michigan, SIMON VALDEZ-AMARO sent an express mail parcel addressed to MANUEL VALDEZ-GOMEZ in Phoenix, Arizona.

aa. On August 18, 2005, in Grand Rapids, Michigan, TOMAS VALDEZ sent two express mail parcels addressed to MANUEL VALDEZ-GOMEZ in Phoenix, Arizona.

bb. On December 5, 2005, in Grand Rapids, Michigan, TOMAS VALDEZ sent an express mail parcel addressed to MANUEL VALDEZ-GOMEZ in Phoenix, Arizona.

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

COUNT 4**Conspiracy to Commit Mail Fraud and Document Fraud****18 U.S.C. § 371**

The Grand Jury further charges that:

1. The Grand Jury realleges all the allegations in Count 2.
2. Beginning on or about October 1, 2004, the exact date being unknown, and continuing until the date of the filing of this indictment, within the Northern District of Ohio, Eastern Division, and elsewhere, J. SANTANA HERNANDEZ-GOMEZ aka SANTANA HERNANDEZ aka SANTANA aka SANTANA G. HERNANDEZ; RICARDO ARANDA-MORENO aka RICARDO ARANDA aka RICARDO ARANDA ORNELAS aka RODOLFO HERRERA aka PEDRO CHAVEZ aka ERNESTO SOTO; JOSE SANTANA ARANDA-FLORES aka JOSE SANTA ANA ARANDA-FLORES aka SANTANA aka “CHOLO” aka JOSE ARANDA HERNANDEZ aka ERNESTO SOTO; ROMULO HERNANDEZ; JESUS FLORES-CARMONA aka “CHUY”; GUADALUPE J. HERNANDEZ aka JOSE GUADALUPE HERNANDEZ aka “ZORRA” aka GUADALUPE HERNANDEZ; ELIDIA HERNANDEZ; BASILLIO VALDEZ; JUAN LOZA-ARANDA; Gregorio Aranda-Moreno (not charged in this indictment); Albaro Loza-Aranda (not charged in this indictment); and other persons whose identities are known and unknown to the Grand Jury, did knowingly, willfully, intentionally, and unlawfully combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, in violation of Title 18, Sections 1028(A)(2) and 1341, United States Code. The objects of the conspiracy were as follows:

a. to devise a scheme and artifice to procure and furnish any counterfeit article and, for the purpose of executing such scheme and artifice, to place and cause to be placed in a post office and authorized depository for mail matter, things to be sent and delivered by the U.S. Postal Service, to wit: alien registration receipt cards also known as “permanent resident cards” and “green cards,” and social security cards, which documents were fraudulently procured from conspirators in Arizona, and payment for those identification documents, mailed to members of the conspiracy, in violation of Title 18, United States Code, Section 1341;

b. to devise a scheme and artifice to defraud and for the purpose of executing such scheme and artifice, to place and cause to be placed in a post office and authorized depository for mail matter, things to be sent and delivered by the U.S. Postal Service, to wit: money orders and cash which represent proceeds of a scheme to defraud the United States by smuggling aliens into the United States without submitting them to inspection, by transporting aliens utilizing a network of drivers and vehicles into the deep interior of the United States (to the Northern District of Ohio, and elsewhere) to further conceal them from detection by the Border Patrol, Customs and Border Protection, and Immigration and Customs Enforcement, and to use the mails to send proceeds of the illegal activity back to Arizona so that returning drivers, if caught, are not in possession of sizeable funds indicative of the true scope and nature of their criminal activities, in violation of Title 18, United States Code, Section 1341; and

c. to obtain, accept, receive, possess, and transfer any alien registration card and other document prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, knowing it to be forged, counterfeited, and

falsely made, and otherwise procured by fraud and unlawfully obtained, in violation of Title 18, United States Code, Section 1028, United States Code;

MANNER AND MEANS OF THE CONSPIRACY

3. It was a part of the conspiracy that in support of an alien smuggling operation, undocumented aliens were provided with fraudulently made sets of alien registration cards, social security cards, and other identification documents, for an additional fee over and above the fee they were paying to be smuggled into and within the United States, and that the United States mails were often used to transport fraudulent documents, information necessary to preparing those fraudulent documents, and payments.

4. It was a part of the conspiracy that express mail was used by the drivers of loads of undocumented aliens as a means of transporting large amounts of cash and money orders back to the coconspirators in Phoenix, Arizona, thereby lessening the risk, if apprehended, of being identified as an alien smuggler and alien transporter.

OVERT ACTS

5. In furtherance of the conspiracy and to effect its object thereof, the following overt acts, among others, were committed in the Northern District of Ohio and elsewhere:

a. On February 24, 2005, Gregorio Aranda-Moreno (not charged in this indictment) had a telephone conversation with a person in the Northern District of Ohio regarding the acquisition of counterfeit identification documents.

b. On March 3, 2005, RICARDO ARANDA-MORENO sent an express mail parcel to Lakewood, Ohio, containing fraudulent identification documents.

c. On August 22, 2005, RICARDO ARANDA-MORENO sent an express mail parcel to an address in Painesville, Ohio, containing two fraudulent identification documents.

d. On September 26, 2005, in Painesville, Ohio, a coconspirator, whose name is known to the grand jury, sent an express mail parcel addressed to J. SANTANA HERNANDEZ-GOMEZ in Glendale, Arizona.

e. On October 1, 2005, in Arcadia, Florida, JESUS FLORES-CARMONA sent an express mail parcel addressed to ELIDIA HERNANDEZ in Glendale, Arizona.

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

COUNT 5

Aiding and Abetting the Bringing of an Alien into the United States

8 U.S.C. § 1324(a)(2) and 18 U.S.C. § 2

The Grand Jury further charges:

Between approximately January 1, 2002, and February 28, 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, MANUEL VALDEZ-GOMEZ, JESUS SOSA-ORTIZ, and Gregorio Aranda-Moreno (not charged in this indictment), knowing, and in reckless disregard of the fact, that an alien had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States an alien for the purpose of commercial advantage or private financial gain, to wit: one alien who is a citizen of Mexico was brought over the southern border into the United States at or near Nogales, Arizona, and was thereafter transported to the Northern District of Ohio; in violation of Title 8, Section 1324(a)(2),

United States Code, and Title 18, Section 2, United States Code, and punishable under Title 8, Section 1324(a)(2)(B)(ii), United States Code.

COUNT 6

Aiding and Abetting the Bringing of an Alien into the United States

8 U.S.C. § 1324(a)(2) and 18 U.S.C. § 2

The Grand Jury further charges:

Between approximately March 1, 2003, and March 31, 2003, in the Northern District of Ohio, Eastern Division, and elsewhere, MANUEL VALDEZ-GOMEZ and JESUS SOSA-ORTIZ, knowing, and in reckless disregard of the fact, that an alien had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States an alien for the purpose of commercial advantage or private financial gain, to wit, one alien who is a citizen of Mexico was brought over the southern border into the United States at or near Nogales, Arizona, and was thereafter transported to the Northern District of Ohio; in violation of Title 8, Section 1324(a)(2), United States Code, and Title 18, Section 2, United States Code, and punishable under Title 8, Section 1324(a)(2)(B)(ii), United States Code.

COUNT 7

Aiding and Abetting the Bringing of an Alien into the United States

8 U.S.C. § 1324(a)(2) and 18 U.S.C. § 2

The Grand Jury further charges:

Between approximately June 1, 2003, and June 30, 2003, in the Northern District of Ohio, Eastern Division, and elsewhere, MANUEL VALDEZ-GOMEZ and JESUS SOSA-

ORTIZ, knowing, and in reckless disregard of the fact, that an alien had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States an alien for the purpose of commercial advantage or private financial gain, to wit, one alien who is a citizen of Mexico was brought over the southern border into the United States at or near Nogales, Arizona, and thereafter was transported to the Northern District of Ohio; in violation of Title 8, Section 1324(a)(2), United States Code, and Title 18, Section 2, United States Code, and punishable under Title 8, Section 1324(a)(2)(B)(ii), United States Code.

COUNT 8

Aiding and Abetting the Bringing of an Alien into the United States

8 U.S.C. § 1324(a)(2) and 18 U.S.C. § 2

The Grand Jury further charges:

Between approximately February 5, 2005, and February 15, 2005, in the Northern District of Ohio, Eastern Division, and elsewhere, MANUEL VALDEZ-GOMEZ, JESUS SOSA-ORTIZ, and RICARDO G. ORTIZ, knowing, and in reckless disregard of the fact, that an alien had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States an alien for the purpose of commercial advantage or private financial gain, to wit, one alien who is a citizen of Mexico, was brought over the southern border into the United States at or near Nogales, Arizona, and thereafter was transported to the Northern District of Ohio; in violation of Title 8, Section 1324(a)(2), United States Code, and Title 18, Section 2, United States Code, and punishable under Title 8, Section 1324(a)(2)(B)(ii), United States Code.

COUNT 9

Aiding and Abetting Bringing of an Alien into the United States

8 U.S.C. § 1324(a)(2) and 18 U.S.C. § 2

The Grand Jury further charges:

Between approximately February 16, 2005, and February 23, 2005, in the Northern District of Ohio, Eastern Division, and elsewhere, JOSE SANTANA ARANDA-FLORES, and Gregorio Aranda-Moreno (not charged in this indictment) knowing, and in reckless disregard of the fact, that an alien had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States an alien for the purpose of commercial advantage or private financial gain, to wit: an alien who is a citizen of Mexico, was brought over the southern border into the United States at or near Nogales, Arizona, and thereafter was transported to the Northern District of Ohio; in violation of Title 8, Section 1324(a)(2), United States Code, and Title 18, Section 2, United States Code, and punishable under Title 8, Section 1324(a)(2)(B)(ii), United States Code.

COUNT 10

Aiding and Abetting the Bringing of an Alien into the United States

8 U.S.C. § 1324(a)(2) and 18 U.S.C. § 2

The Grand Jury further charges:

Between approximately June 1, 2005 and June 5, 2005, in the Northern District of Ohio, Eastern Division, and elsewhere, RICARDO ARANDA-MORENO, GUADALUPE J. HERNANDEZ, Gregorio Aranda-Moreno (not charged in this indictment), and Albaro Loza-

Aranda (not charged in this indictment), knowing, and in reckless disregard of the fact, that an alien had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States an alien for the purpose of commercial advantage or private financial gain, to wit: one alien who is a citizen of Mexico was brought over the southern border into the United States at or near Nogales, Arizona, and was thereafter transported to the Northern District of Ohio; in violation of Title 8, Section 1324(a)(2), United States Code, and Title 18, Section 2, United States Code and punishable under Title 8, Section 1324(a)(2)(B)(ii), United States Code.

COUNT 11

Aiding and Abetting the Bringing of an Alien into the United States

8 U.S.C. § 1324(a)(2) and 18 U.S.C. § 2

The Grand Jury further charges:

Between approximately July 26, 2005 and July 30, 2005, in the Northern District of Ohio, Eastern Division, and elsewhere, JUAN LOZA ARANDA, RICARDO ARANDA-MORENO, JESUS FLORES CARMONA, and Gregorio Aranda-Moreno (not charged in this indictment), knowing, and in reckless disregard of the fact, that an alien had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States an alien for the purpose of commercial advantage or private financial gain, to wit: one alien who is a citizen of Mexico brought over the southern border into the United States at or near Nogales, Arizona, and thereafter transported to the Northern District of Ohio; in violation of Title 8, Section 1324(a)(2), United States Code, and Title 18, Section 2, United States Code and punishable under Title 8, Section 1324(a)(2)(B)(ii), United States Code.

COUNT 12

Aiding and Abetting Mail Fraud - 18 U.S.C. §§ 1341 and 2

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein the allegations contained in Counts 1 and 3 of the Indictment.
2. On or about February 14, 2005, JESUS SOSA-ORTIZ purchased three postal service money orders in the aggregate amount of \$2,900 from the Painesville, Ohio Post Office.
3. On or about February 14, 2005, in the Northern District of Ohio, Eastern Division, and elsewhere, JESUS SOSA-ORTIZ and YOLANDA SOSA, having devised a scheme and artifice to defraud and a scheme and artifice to furnish or procure any counterfeit article, for the purpose of executing such scheme and artifice, did place and cause to be placed in a post office and authorized depository for mail matter things to be sent and delivered by the U.S. Postal Service, to wit: express mail parcel no. ED551540887US addressed to YOLANDA SOSA, 6405 W. LaReata Ave., Phoenix, AZ 85035, bearing a return address of Andreas A. Ortiz, 164 Prospect St., Painesville, OH 44077, the express mail parcel having been mailed from the Painesville, Ohio Post Office; all in violation of Title 18, Sections 1341 and 2, United States Code.

COUNT 13**Mail Fraud - 18 U.S.C. § 1341**

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein the allegations contained in of Counts 2 and 4 of the Indictment.
2. Between on or about March 2, 2005, and March 4, 2005, in the Northern District of Ohio, Eastern Division, and elsewhere, RICARDO ARANDA-MORENO, having devised a scheme and artifice to defraud and a scheme and artifice to furnish or procure any counterfeit article, to wit: an alien registration receipt card also known as “permanent resident card” and “green card,” and a social security card, for the purpose of executing such scheme and artifice, did place and cause to be placed in a post office and authorized depository for mail matter things to be sent and delivered by the U.S. Postal Service, to wit: RICARDO ARANDA-MORENO directed the purchaser of fraudulent identification documents to complete the order by sending a \$160 postal service money order and passport-sized photographs by express mail, which the purchaser sent on March 2, 2005, in express mail parcel no. ED665808005US addressed to RICARDO ARANDA, 904 Brinker, Avondale, AZ 85323 bearing a return address in Lakewood, Ohio; and on March 4, 2005, RICARDO ARANDA-MORENO mailed express mail parcel no. ED711342645US, addressed to an address in Lakewood, Ohio, bearing a return address of PEDRO CHAVEZ, 904 E. Brinker Dr., Avondale, AZ 85323, containing one social security card and one permanent resident card in the name of the person who placed the order for fraudulent documents; all in violation of Title 18, Section 1341, United States Code.

COUNT 14**Aiding and Abetting Mail Fraud - 18 U.S.C. §§ 1341 and 2**

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein the allegations contained in Counts 1 and 3 of the Indictment.
2. On or about March 15, 2005, in the Northern District of Ohio, Eastern Division, and elsewhere, JAIME HERNANDEZ-ORNELAS, ISMAEL VALDEZ, PATRICIA HERNANDEZ, and MANUEL VALDEZ-GOMEZ, having devised a scheme and artifice to defraud and a scheme and artifice to furnish or procure any counterfeit article, for the purpose of executing such scheme and artifice, did place and cause to be placed in a post office and authorized depository for mail matter things to be sent and delivered by the U.S. Postal Service, to wit: express mail parcel no. ED869948860US addressed to PATRICIA HERNANDEZ, 6334 W. Mulberry Dr., Phoenix, AZ 85033, bearing a return address of ISMAEL VALDEZ, 2477 S. 8th St., Milwaukee, WI 53215, containing \$4,000 in blank postal money orders and \$5,000 in blank Western Union money orders, and express mail parcel no. ED869948025US addressed to an individual with an address of 908 E. Brinker Dr., Avondale, AZ 85323 bearing the return address of JAIME HERNANDEZ-O., 2477 S. 8th St., Milwaukee, WI 53215, containing \$6,000 in blank Western Union money orders, both of the express mail parcels having been mailed from the Painesville, Ohio Post Office; all in violation of Title 18, Sections 1341 and 2, United States Code.

COUNT 15**Mail Fraud - 18 U.S.C. §§ 1341**

The Grand Jury further charges:

1. The Grand Jury realleges as if fully set forth herein the allegations contained in Counts 2 and 4 of the Indictment.
2. Between on or about August 18, 2005 and August 23, 2005, in the Northern District of Ohio, Eastern Division, and elsewhere, RICARDO ARANDA-MORENO, having devised a scheme and artifice to defraud and a scheme and artifice to furnish or procure any counterfeit article, to wit: an alien registration receipt card also known as “permanent resident card” and “green card,” and a social security card, for the purpose of executing such scheme and artifice, did place and cause to be placed in a post office and authorized depository for mail matter things to be sent and delivered by the U.S. Postal Service, to wit: RICARDO ARANDA-MORENO directed the purchaser of fraudulent identification documents to complete the order by sending a \$160 postal service money order and passport-sized photographs by express mail, which the purchaser sent on August 18, 2005, in express mail parcel no. EQ134090250US addressed to RICARDO ARANDAS, 904 E. Brinker Dr., Aborinker [sic], AZ 85323 bearing a return address in Painesville, Ohio; and on August 22, 2005, RICARDO ARANDA-MORENO mailed express mail parcel no. ED710179784US, addressed to an address in Painesville, Ohio, bearing a return address of ERNESTO SOTO, 904 E. Brinker Dr., Avondale, AZ 85323, containing one fraudulent social security card and one fraudulent permanent resident card in the name of the person who placed the order for fraudulent documents; all in violation of Title 18, Section 1341, United States Code.

COUNT 16**Aiding and Abetting the Structuring of Money Transactions****31 U.S.C. §§ 5324(a)(3) and 5324(d)(2), and 18 U.S.C. § 2**

The Grand Jury further charges:

From on or about July 31, 2002, through August 1, 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, MANUEL VALDEZ-GOMEZ, YOLANDA SOSA, RAPHAEL VALDEZ-GOMEZ, and Gregorio Aranda-Moreno (not charged in this indictment), for the purpose of evading the reporting requirements of Title 18, Sections 5313(a) and 5325, United States Code (and the implementing regulations) with respect to such transaction, did willfully structure and assist in structuring, and attempt to structure and assist in attempting to structure, a transaction with Western Union Financial Services, Inc., a domestic financial institution. It was part of this offense that:

1. Gregorio Aranda-Moreno (not charged in this indictment) sent a number of money transfers through Western Union Financial Services, Inc., on the following dates and times, in the following amounts, to the following payees, and from the following locations:

| <u>Date</u> | <u>Time</u> | <u>Amount</u> | <u>Payee</u> | <u>Location</u> |
|-------------|-------------|---------------|----------------------|------------------|
| 07/31/02 | 2:22 p.m. | \$2,900 | RAPHAEL VALDEZ-GOMEZ | Painesville, OH |
| 07/31/02 | 3:00 p.m. | \$2,900 | YOLANDA SOSA | Painesville, OH |
| 07/31/02 | 3:07 p.m. | \$2,900 | MANUEL VALDEZ-GOMEZ | Painesville, OH |
| 07/31/02 | 10:45 p.m. | \$2,900 | RAPHAEL VALDEZ-GOMEZ | Chesterville, OH |

2. The following payees, or persons representing to be the designated payees, each received payment of the following amounts of money on the following dates, by having Western Union Financial Services, Inc., issue and cash money orders in the aggregate amounts listed for each payee at the following offices of Western Union Financial Services, Inc., each located in Phoenix, Arizona:

| <u>Date</u> | <u>Amount</u> | <u>Payee</u> | <u>Location</u> |
|-------------|---------------|----------------------|------------------------|
| 07/31/02 | \$2,900 | RAPHAEL VALDEZ-GOMEZ | 1160 East Van Buren |
| 07/31/02 | \$2,900 | YOLANDA SOSA | 5828 West Thomas |
| 07/31/02 | \$2,900 | MANUEL VALDEZ-GOMEZ | 1160 East Van Buren |
| 08/01/02 | \$2,900 | RAPHAEL VALDEZ-GOMEZ | 4248 Indian School Rd. |

All in violation of Title 31, Section 5324(a)(3), United States Code, and Title 18, Section 2, United States Code and punishable under Title 31, Section 5322(b), United States Code.

COUNT 17

Aiding and Abetting the Structuring of Money Transactions

31 U.S.C. §§ 5324(a)(3) and 5324(d)(2), and 18 U.S.C. § 2

The Grand Jury further charges:

From on or about February 16, 2003, through February 22, 2003, in the Northern District of Ohio, Eastern Division, and elsewhere, JOSE SANTANA ARANDA-FLORES, YOLANDA SOSA, and PATRICIA HERNANDEZ, for the purpose of evading the reporting requirements of Title 18, Sections 5313(a) and 5325, United States Code (and the implementing regulations) with

respect to such transaction, did willfully structure and assist in structuring, and did attempt to structure and assist in attempting to structure, a transaction with Western Union Financial Services, Inc., a domestic financial institution. It was part of this offense that:

1. JOSE SANTANA ARANDA-FLORES and YOLANDA SOSA sent a number of money transfers through Western Union Financial Services, Inc., on the following dates and times, in the following amounts, to the following payees, and from the following locations:

| <u>Date</u> | <u>Time</u> | <u>Amount</u> | <u>Payee</u> | <u>Location</u> |
|-------------|-------------|---------------|--------------------|------------------|
| 02/16/03 | 6:43 p.m. | \$2,900 | PATRICIA HERNANDEZ | Painesville, OH |
| 02/16/03 | 7:12 p.m. | \$2,900 | YOLANDA SOSA | Painesville, OH |
| 02/22/03 | 4:32 p.m. | \$2,900 | YOLANDA SOSA | Grand Rapids, MI |
| 02/22/03 | 6:23 p.m. | \$2,900 | PATRICIA HERNANDEZ | Grand Rapids, MI |

2. The following payees, or persons representing to be the designated payees, each received payment of the following amounts of money on the following dates, by having Western Union Financial Services, Inc., issue and cash money orders in the aggregate amounts listed for each payee at the following offices of Western Union Financial Services, Inc., each located in Phoenix, Arizona:

| <u>Date</u> | <u>Amount</u> | <u>Payee</u> | <u>Location</u> |
|-------------|---------------|--------------------|------------------|
| 02/16/03 | \$2,900 | PATRICIA HERNANDEZ | 5828 West Thomas |
| 02/16/03 | \$2,900 | YOLANDA SOSA | 5828 West Thomas |
| 02/22/03 | \$2,900 | YOLANDA SOSA | 5828 West Thomas |
| 02/22/03 | \$2,900 | PATRICIA HERNANDEZ | 5828 West Thomas |

All in violation of Title 31, Section 5324(a)(3), United States Code, and Title 18, Section 2, United States Code and punishable under Title 31, Section 5322(b), United States Code.

COUNT 18

Aiding and Abetting the Structuring of Money Transactions

31 U.S.C. §§ 5324(a)(3) and 5324(d)(2), and 18 U.S.C. § 2

The Grand Jury further charges:

From on or about October 9, 2001, through October 12, 2001, in the Northern District of Ohio, Eastern Division, and elsewhere, RICARDO ARANDA-MORENO, YOLANDA SOSA, and PATRICIA HERNANDEZ, for the purpose of evading the reporting requirements of Title 18, Sections 5313(a) and 5325, United States Code (and the implementing regulations) with respect to such transaction, did willfully structure and assist in structuring, and did attempt to structure and assist in attempting to structure, a transaction with Western Union Financial Services, Inc., a domestic financial institution. It was part of this offense that:

1. RICARDO ARANDA-MORENO sent a number of money transfers through Western Union Financial Services, Inc., on the following dates and times, in the following amounts, to the following payees, and from the following locations:

| <u>Date</u> | <u>Time</u> | <u>Amount</u> | <u>Payee</u> | <u>Location</u> |
|-------------|-------------|---------------|--------------------|-----------------|
| 10/09/01 | 5:52 p.m. | \$2,700 | PATRICIA HERNANDEZ | Ashtabula, OH |
| 10/10/01 | 4:55 p.m. | \$2,700 | YOLANDA SOSA | Ashtabula, OH |
| 10/12/01 | 1:41 p.m. | \$2,700 | YOLANDA SOSA | Ashtabula, OH |

2. The following payees, or persons representing to be the designated payees, each received payment of the following amounts of money on the following dates, by having Western Union Financial Services, Inc., issue and cash money orders in the aggregate amounts listed for each payee at the following offices of Western Union Financial Services, Inc., each located in Phoenix, Arizona:

| <u>Date</u> | <u>Amount</u> | <u>Payee</u> | <u>Location</u> |
|-------------|---------------|--------------------|------------------|
| 10/09/01 | \$2,700 | PATRICIA HERNANDEZ | 5045 West Thomas |
| 10/10/01 | \$2,700 | YOLANDA SOSA | 5828 West Thomas |
| 10/12/01 | \$2,700 | YOLANDA SOSA | 5828 West Thomas |

All in violation of Title 31, Section 5324(a)(3), United States Code, and Title 18, Section 2, United States Code and punishable under Title 31, Section 5322(b), United States Code.

COUNT 19

Aiding and Abetting the Structuring of Money Transactions

31 U.S.C. §§ 5324(a)(3) and 5324(d)(2), and 18 U.S.C. § 2

The Grand Jury further charges:

From on or about March 22, 2002, through March 31, 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, ISAIAS GARCIA-HERNANDEZ, YOLANDA SOSA, and PATRICIA HERNANDEZ, for the purpose of evading the reporting requirements of Title 18, Sections 5313(a) and 5325, United States Code (and the implementing regulations) with respect to such transaction, did willfully structure and assist in structuring, and did attempt to

structure and assist in attempting to structure, a transaction with Western Union Financial Services, Inc., a domestic financial institution. It was part of this offense that:

1. ISAIAS GARCIA-HERNANDEZ sent a number of money transfers through Western Union Financial Services, Inc., on the following dates and times, in the following amounts, to the following payees, and from the following locations:

| <u>Date</u> | <u>Time</u> | <u>Amount</u> | <u>Payee</u> | <u>Location</u> |
|-------------|-------------|---------------|--------------------|-----------------|
| 03/22/02 | 6:00 p.m. | \$3,000 | YOLANDA SOSA | Painesville, OH |
| 03/25/02 | 10:54 a.m. | \$3,000 | PATRICIA HERNANDEZ | Painesville, OH |
| 03/25/02 | 10:59 a..m. | \$3,000 | YOLANDA SOSA | Painesville, OH |
| 03/31/02 | 12:51 p.m. | \$3,000 | PATRICIA HERNANDEZ | Painesville, OH |

2. The following payees, or persons representing to be the designated payees, each received payment of the following amounts of money on the following dates, by having Western Union Financial Services, Inc., issue and cash money orders in the aggregate amounts listed for each payee at the following offices of Western Union Financial Services, Inc., each located in Phoenix, Arizona:

| <u>Date</u> | <u>Amount</u> | <u>Payee</u> | <u>Location</u> |
|-------------|---------------|--------------------|------------------|
| 03/22/02 | \$3,000 | YOLANDA SOSA | 5828 West Thomas |
| 03/25/02 | \$3,000 | PATRICIA HERNANDEZ | 5828 West Thomas |
| 03/25/02 | \$3,000 | YOLANDA SOSA | 5828 West Thomas |
| 03/31/02 | \$3,000 | PATRICIA HERNANDEZ | 5828 West Thomas |

All in violation of Title 31, Section 5324(a)(3), United States Code, and Title 18, Section 2, United States Code and punishable under Title 31, Section 5322(b), United States Code.

COUNT 20**Aiding and Abetting the Structuring of Money Transactions****31 U.S.C. §§ 5324(a)(3) and 5324(d)(2), and 18 U.S.C. § 2**

The Grand Jury further charges:

From on or about March 5, 2002, through March 12, 2002, in the Northern District of Ohio, Eastern Division, and elsewhere, JESUS SOSA-ORTIZ, YOLANDA SOSA, RAPHAEL VALDEZ-GOMEZ, and PATRICIA HERNANDEZ, for the purpose of evading the reporting requirements of Title 18, Sections 5313(a) and 5325, United States Code (and the implementing regulations) with respect to such transaction, did willfully structure and assist in structuring, and did attempt to structure and assist in attempting to structure, a transaction with Western Union Financial Services, Inc., a domestic financial institution. It was part of this offense that:

1. JESUS SOSA-ORTIZ sent a number of money transfers through Western Union Financial Services, Inc., on the following dates and times, in the following amounts, to the following payees, and from the following locations:

| <u>Date</u> | <u>Time</u> | <u>Amount</u> | <u>Payee</u> | <u>Location</u> |
|-------------|-------------|---------------|----------------------|-----------------|
| 03/05/02 | 5:01 p.m. | \$2,900 | PATRICIA HERNANDEZ | Chicago, IL |
| 03/05/02 | 5:02 p.m. | \$2,900 | YOLANDA SOSA | Chicago, IL |
| 03/12/02 | 1:19 p.m. | \$4,000 | RAPHAEL VALDEZ-GOMEZ | Ashtabula, OH |
| 03/12/02 | 1:57 p.m. | \$2,900 | YOLANDA SOSA | Ashtabula, OH |
| 03/12/02 | 2:00 p.m. | \$2,900 | PATRICIA HERNANDEZ | Ashtabula, OH |
| 03/12/02 | 2:40 p.m. | \$2,900 | YOLANDA SOSA | Ashtabula, OH |

2. The following payees, or persons representing to be the designated payees, each received payment of the following amounts of money on the following dates, by having Western Union Financial Services, Inc., issue and cash money orders in the aggregate amounts listed for each payee at the following offices of Western Union Financial Services, Inc., each located in Phoenix, Arizona:

| <u>Date</u> | <u>Amount</u> | <u>Payee</u> | <u>Location</u> |
|-------------|---------------|----------------------|---------------------|
| 03/05/02 | \$2,900 | PATRICIA HERNANDEZ | 5828 West Thomas |
| 03/05/02 | \$2,900 | YOLANDA SOSA | 5828 West Thomas |
| 03/12/02 | \$4,000 | RAPHAEL VALDEZ-GOMEZ | 1160 East Van Buren |
| 03/12/02 | \$2,900 | YOLANDA SOSA | 5828 West Thomas |
| 03/12/02 | \$2,900 | PATRICIA HERNANDEZ | 5828 West Thomas |
| 03/12/02 | \$2,900 | YOLANDA SOSA | 5828 West Thomas |

All in violation of Title 31, Section 5324(a)(3), United States Code, and Title 18, Section 2, United States Code and punishable under Title 31, Section 5322(b), United States Code.

COUNT 21

Social Security Fraud

42 U.S.C. § 408 (a)(7)

The Grand Jury further charges:

On or about May 11, 2005, in the Northern District of Ohio, the defendant, JESUS SOSA-ORTIZ, with the intent to deceive and for the purpose of obtaining fraudulent state

identification, falsely represented a social security number to be the social security account number assigned by the Commissioner of Social Security to JESUS SOSA-ORTIZ, when in fact such number was not the social security account number assigned to JESUS SOSA-ORTIZ, to wit: JESUS SOSA-ORTIZ presented the social security card of MANUEL VALDEZ, JR. as his own and as proof of his identity to the Registrar of Motor Vehicles for the purpose of obtaining a fraudulent State of Ohio Driver's License; in violation of Title 42, Sections 408 (a)(7) and (a)(7)(B), United States Code.

COUNT 22

Aggravated Identity Theft

18 U.S.C. § 1028A

The Grand Jury further charges:

On or about May 11, 2005, in the Northern District of Ohio, Eastern Division, and elsewhere, during and in relation to a felony violation of Title 42, Section 408 (a)(7), United States Code, the defendant, JESUS SOSA-ORTIZ, did knowingly possess and use without lawful authority a means of identification of another person, to wit: Defendant unlawfully used identification documents, including a social security card, to wit: Defendant possessed and used the name, social security account number and card, as well as a Michigan birth certificate of MANUEL VALDEZ, JR.; in violation of Title 18, Section 1028A, United States Code.

COUNT 23**Transfer of Fraudulent Identification Documents****18 U.S.C. § 1028(a)(2)**

The Grand Jury further charges:

Between on or about May 2, 2005, and May 4, 2005, in the Northern District of Ohio, Eastern Division, and elsewhere, RICARDO ARANDA-MORENO, did knowingly transfer a false identification document, purporting to be an identification document issued by and under the authority of the United States, knowing that such document was produced without lawful authority, to wit: RICARDO ARANDA-MORENO sold a forged permanent resident alien card and a social security card, delivering the forged documents by express mail parcel to an address in Lakewood, Ohio; in violation of Title 18, United States Code, Section 1028(a)(2) and punishable under Title 18, Section 1028(b)(1)(A), United States Code.

FORFEITURE: COUNT 1

The Grand Jury further charges:

1. The allegations of Count 1 are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 8 U.S.C. § 1324(b) and 28 U.S.C. § 2461(c); and, 18 U.S.C. § 982(a)(6). As a result of the foregoing offense, the defendants, and each of them, shall forfeit to the United States: a.) all property, real and personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of Count 1; b.) all property, real and personal, that was used to facilitate, or was intended to be used to facilitate, the commission of Count 1; c.) the gross

proceeds of Count 1, and all property traceable to such proceeds; and, d.) all conveyances used in the commission of Count 1, and all property traceable to such conveyances. Particularly, the United States will seek the forfeiture of the foregoing properties of the defendants; including, but not limited to:

a.) 6334 West Mulberry Drive, Phoenix, Arizona; Parcel No. 103-48-017. [PATRICIA HERNANDEZ, ROMULO HERNANDEZ]

b.) 1322 South Central Avenue, Phoenix, Arizona; Parcel No. 112-35-020. [MANUEL VALDEZ-GOMEZ]

c.) 116 South 27th Avenue, Phoenix, Arizona; Parcel No. 109-44-079. [MANUEL VALDEZ-GOMEZ]

d.) 5927 West Avalon Drive, Phoenix, Arizona; Parcel No. 103-45-060. [MANUEL VALDEZ-GOMEZ, AURORA VALDEZ]

e.) 2515 East Adams Street, Phoenix, Arizona; Parcel No. 121-63-086. [YOLANDA SOSA, JESUS SOSA-ORTIZ]

f.) 6405 West La Reata Avenue, Phoenix, Arizona; Parcel No. 103-11-162. [YOLANDA SOSA]

g.) 6955 West Northview Avenue, Glendale, Arizona; Parcel No. 143-27-126. [J. SANTANA HERNANDEZ-GOMEZ]

2. MONEY JUDGMENT. The defendants, and each of them, shall forfeit property, including but not limited to, a sum of money equal to the gross proceeds of Count 1. The defendants, and each of them, are jointly and severally liable for this forfeiture obligation.

FORFEITURE: COUNT 2

The Grand Jury further charges:

1. The allegations of Count 2 are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 8 U.S.C. § 1324(b) and 28 U.S.C. § 2461(c); and, 18 U.S.C. § 982(a)(6). As a result of the foregoing offense, the defendants, and each of them, shall forfeit to the United States: a.) all property, real and personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of Count 2; b.) all property, real and personal, that was used to facilitate, or was intended to be used to facilitate, the commission of Count 2; c.) the gross proceeds of Count 2, and all property traceable to such proceeds; and, d.) all conveyances used in the commission of Count 2, and all property traceable to such conveyances. Particularly, the United States will seek the forfeiture of the foregoing properties of the defendants; including, but not limited to:

a.) 6334 West Mulberry Drive, Phoenix, Arizona; Parcel No. 103-48-017. [ROMULO HERNANDEZ]

b.) 6955 West Northview Avenue, Glendale, Arizona; Parcel No. 143-27-126. [J. SANTANA HERNANDEZ-GOMEZ]

2. MONEY JUDGMENT. The defendants, and each of them, shall forfeit property, including but not limited to, a sum of money equal to the gross proceeds of Count 2. The defendants, and each of them, are jointly and severally liable for this forfeiture obligation.

SUBSTITUTE PROPERTY

In the event that any property subject to forfeiture under 8 U.S.C. § 1324(b) and 28 U.S.C. § 2461(c); and, 18 U.S.C. § 982(a)(6), as a result of any act or omission of the defendant[s]:

1. cannot be located upon exercise of due diligence;
2. has been transferred or sold to, or deposited with a third party;
3. has been placed beyond the jurisdiction of this Court;
4. has been substantially diminished in value; or,
5. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant[s], up to an amount equivalent to the value of the property forfeitable under 8 U.S.C. § 1324(b) and 28 U.S.C. § 2461(c); and, 18 U.S.C. § 982(a)(6).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.

UNITED STATES V. MANUEL-VALDEZ-GOMEZ, ET AL.

A TRUE BILL.

Foreperson

WILLIAM J. EDWARDS
Acting United States Attorney