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CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY VPC DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
September 2016 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE ROBERTO LOPEZ-ALBARRAN (1),
[REDACTED] (2),

[REDACTED] (3),

[REDACTED] (4),

Defendants.

Case No. 18 CR 1128 GPC

I N D I C T M E N T

Title 18, U.S.C.,
Secs. 1956(a)(3)(A) and 1956(h) -
Conspiracy to Launder Monetary
Instruments; Title 18, U.S.C.,
Sec. 982 - Criminal Forfeiture

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing to the date of this Indictment, within the Southern District of California and elsewhere, defendants JOSE ROBERTO LOPEZ-ALBARRAN, [REDACTED] [REDACTED] did knowingly and intentionally conspire together and with each other and with other persons, known and unknown to the grand jury, with the intent to promote the carrying on of specified unlawful activity, to conduct financial transactions affecting interstate and foreign commerce involving property represented to be proceeds of specified unlawful activity, that is, the felonious importation and distribution of controlled substances punishable under

1 Title 21, United States Code, Chapter 13; in violation of Title 18,
2 United States Code, Sections 1956(a)(3)(A) and 1956(h).

3 Count 2

4 Beginning at a date unknown to the grand jury and continuing to
5 the date of this Indictment, within the Southern District of California
6 and elsewhere, defendants JOSE ROBERTO LOPEZ-ALBARRAN and [REDACTED]
7 [REDACTED] did knowingly and intentionally conspire together and with each
8 other and with other persons, known and unknown to the grand jury, with
9 the intent to promote the carrying on of specified unlawful activity,
10 to conduct a financial transaction affecting interstate and foreign
11 commerce involving property represented to be proceeds of specified
12 unlawful activity, that is, the felonious importation and distribution
13 of controlled substances punishable under Title 21, United States Code,
14 Chapter 13; all in violation of Title 18, United States Code,
15 Sections 1956(a)(3)(A), and 1956(h).

16 FORFEITURE ALLEGATIONS

17 1. The allegations contained in Counts 1 through 2 are realleged
18 and by their reference fully incorporated herein for the purpose of
19 alleging forfeiture to the United States of America pursuant to the
20 provisions of Title 18, United States Code, Section 982(a)(1).

21 2. Upon conviction of one or more of the offenses alleged in
22 Counts 1 and 2 of this Indictment, and pursuant to Title 18, United
23 States Code, Section 982(a)(1), defendants JOSE ROBERTO LOPEZ-ALBARRAN,
24 [REDACTED] shall
25 forfeit to the United States, all property, real and personal, involved
26 in such offenses, and all property traceable to such property.

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1 3. If any of the above-described forfeitable property, as a
2 result of any act or omission of the defendants:

- 3 a. cannot be located upon the exercise of due diligence;
- 4 b. has been transferred or sold to, or deposited with, a
5 third party;
- 6 c. has been placed beyond the jurisdiction of the Court;
- 7 d. has been substantially diminished in value; or
- 8 e. has been commingled with other property which cannot be
9 subdivided without difficulty; it is the intent of the United States,
10 pursuant to Title 18, United States Code, Section 982(b) which
11 incorporates the provisions of Title 21, United States Code,
12 Section 853(p), to seek forfeiture of any other property of the
13 defendants up to the value of the property listed above as being subject
14 to forfeiture.


15 All pursuant to Title 18, United States Code, Section 982.

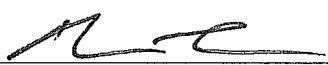
16 DATED: March 2, 2018.

17 A TRUE BILL:

18 
19 _____
Foreperson

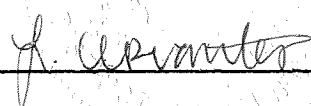
20 ADAM L. BRAVERMAN
21 United States Attorney

22 By: 
23 _____
MATTHEW J. SUTTON
24 Assistant U.S. Attorney

25 By: 
26 _____
DAVID J. RAWLS
27 Assistant U.S. Attorney

28 I hereby attest and certify on 3/8/18
That the foregoing document is a full, true and correct
copy of the original on file in my office and in my legal
custody.

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

By:  Deputy