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CLERK OF DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

September 2016 Grand Jury

**18 CR 1129 GPC**

1 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 JOSE ROBERTO LOPEZ-ALBARRAN (1),  
14 ALFREDO CARDENAS-URIARTE (2),  
15 JUAN DUARTE-TELLO (3),  
16 DIANA AURORA HOLGUIN-GALLEGOS (4),  
17 [REDACTED] (5),  
18 SHONTAIL MARIE HOCKER (6),  
19 NEREIDA VALDEZ (7),  
20 [REDACTED] (8),  
21 [REDACTED] (9),  
22 [REDACTED] (10),  
23 JOSE LUIS FUENTES (11),  
24 [REDACTED] (12),  
25 MIGUEL ANGEL FLORES (13),  
26 [REDACTED] (14),  
27 [REDACTED] (15),  
28 LUIS SANCHEZ BAEZ (16),  
[REDACTED] (17),  
HENDRY MATEO (18),  
[REDACTED] (19),  
[REDACTED] (20),  
[REDACTED] (21),  
[REDACTED] (22),  
CHRISTIAN BROWN (23),  
JOSE FIGUEROA (24),  
ALFREDIN MEJIA SOTO (25),

Defendants.

Case No. \_\_\_\_\_

I N D I C T M E N T

Title 18, U.S.C.,  
Secs. 1956(a)(2)(A),  
1956(a)(2)(B)(i), and 1956(h) -  
Conspiracy to Launder Monetary  
Instruments; Title 18, U.S.C.,  
Sec. 982 - Criminal Forfeiture

1 The grand jury charges:

2 Count 1

3 Beginning on a date unknown to the grand jury and continuing to  
4 the date of this Indictment, within the Southern District of California  
5 and elsewhere, defendants JOSE ROBERTO LOPEZ-ALBARRAN, ALFREDO CARDENAS-  
6 URIARTE, JUAN DUARTE-TELLO, DIANA AURORA HOLGUIN-GALLEGOS, [REDACTED]

7 [REDACTED] SHONTAIL MARIE HOCKER, NEREIDA VALDEZ, [REDACTED]

8 [REDACTED] JOSE LUIS FUENTES, [REDACTED]

9 [REDACTED] MIGUEL ANGEL FLORES, [REDACTED]

10 [REDACTED] LUIS SANCHEZ BAEZ, [REDACTED]

HENDRY MATEO, [REDACTED]

11 [REDACTED]  
12 CHRISTIAN BROWN, JOSE FIGUEROA, and ALFREDIN MEJIA SOTO did knowingly  
13 and intentionally conspire and agree with each other, and with other  
14 persons, known and unknown to the Grand Jury:

15 a. to transport, transmit, and transfer a monetary instrument and  
16 funds from a place in the United States to and through a place outside  
17 the United States with the intent to promote the carrying on of specified  
18 unlawful activity, that is, the felonious importation and distribution  
19 of controlled substances punishable under Title 21, United States Code,  
20 Chapter 13, in violation of Title 18, United States Code,  
21 Section 1956(a)(2)(A); and

22 b. to transport, transmit, and transfer a monetary instrument and  
23 funds from a place in the United States to and through a place outside  
24 the United States, knowing that the monetary instrument and funds  
25 involved in the transportation, transmission and transfer represented  
26 the proceeds of some form of unlawful activity and knowing that such  
27 transportation, transmission and transfer was designed in whole and in  
28 part to conceal and disguise the nature, the location, the source, the

1 ownership, and the control of the proceeds of specified unlawful  
2 activity, that is, the felonious importation and distribution of  
3 controlled substances punishable under Title 21, United States Code,  
4 Chapter 13, in violation of Title 18, United States Code,  
5 Section 1956(a)(2)(B)(i).

6 MANNER AND MEANS OF THE CONSPIRACY

7 The following were among the manner and means used by the defendants  
8 and their co-conspirators to accomplish the objects of the conspiracy:

9 1. It was part of the conspiracy that coconspirators and  
10 residents of Mexico, defendants JOSE ROBERTO LOPEZ-ALBARRAN and ALFREDO  
11 CARDENAS-URIARTE, would provide currency transportation and transmission  
12 services to drug traffickers in Mexico and throughout the United States,  
13 including Kansas City, Missouri; New York, New York; Los Angeles,  
14 California; Cincinnati, Ohio; Dayton, Ohio; Lexington, Kentucky; San  
15 Diego, California; Boston, Massachusetts; Philadelphia, Pennsylvania;  
16 and Chicago, Illinois.

17 2. It was part of the conspiracy that money couriers in various  
18 U.S. cities, including coconspirators JUAN DUARTE-TELLO, DIANA AURORA  
19 HOLGUIN-GALLEGOS, [REDACTED] SHONTAIL MARIE HOCKER, NEREIDA  
20 VALDEZ, [REDACTED]  
21 JOSE LUIS FUENTES, [REDACTED] MIGUEL ANGEL FLORES, [REDACTED]  
22 [REDACTED] LUIS SANCHEZ BAEZ, [REDACTED]  
23 [REDACTED] HENDRY MATEO, [REDACTED]  
24 [REDACTED] CHRISTIAN BROWN, JOSE FIGUEROA, and  
25 ALFREDIN MEJIA SOTO, would receive large amounts of U.S. currency  
26 constituting proceeds of drug trafficking and deliver the same to  
27 individuals sent by LOPEZ-ALBARRAN and CARDENAS-URIARTE who, unbeknownst  
28

1 to members of the conspiracy, were undercover agents and confidential  
2 sources.

3 3. It was part of the conspiracy that LOPEZ-ALBARRAN and  
4 CARDENAS-URIARTE would arrange to have the undercover agents deposit the  
5 currency into the agents' domestic "business" accounts then, for a fee  
6 constituting a percentage of the currency received, wire the deposited  
7 funds to foreign bank accounts at the direction of LOPEZ-ALBARRAN and  
8 CARDENAS-URIARTE.

9 4. It was part of the conspiracy that members of the conspiracy  
10 would use cellular telephones, WhatsApp, BlackBerry Messenger, and coded  
11 language to communicate with each other to coordinate the movement and  
12 delivery of bulk currency.

13 5. It was part of the conspiracy that members of the conspiracy  
14 would use pre-arranged code phrases like "Fanny de parte de Flaco" or  
15 "Jilgerillas on behalf of W" to establish their bona fides when meeting  
16 for currency deliveries.

17 All in violation of Title 18, United States Code, Section 1956(h).

18 FORFEITURE ALLEGATIONS

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

23 2. Upon conviction of one or more of the offenses alleged in  
24 Count 1 of this Indictment, and pursuant to Title 18, United States  
25 Code, Section 982(a)(1), defendants JOSE ROBERTO LOPEZ-ALBARRAN, ALFREDO  
26 CARDENAS-URIARTE, JUAN DUARTE-TELLO, DIANA AURORA HOLGUIN-GALLEGOS,  
27 [REDACTED] SHONTAIL MARIE HOCKER, NEREIDA VALDEZ, [REDACTED]  
28 [REDACTED] JOSE LUIS FUENTES,

1 [REDACTED] MIGUEL ANGEL FLORES, [REDACTED]

2 [REDACTED] LUIS SANCHEZ BAEZ, [REDACTED] HENDRY MATEO,

3 [REDACTED]

4 [REDACTED] CHRISTIAN BROWN, JOSE FIGUEROA, and ALFREDIN MEJIA SOTO, shall  
5 forfeit to the United States, all property, real and personal, involved  
6 in such offenses, and all property traceable to such property.

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

9 a. cannot be located upon the exercise of due diligence;

10 b. has been transferred or sold to, or deposited with, a  
11 third party;

12 c. has been placed beyond the jurisdiction of the Court;

13 d. has been substantially diminished in value; or

14 e. has been commingled with other property which cannot be

15 subdivided without difficulty; it is the intent of the United States,

16 pursuant to Title 18, United States Code, Section 982(b) which

17 incorporates the provisions of Title 21, United States Code,

18 Section 853(p), to seek forfeiture of any other property of the

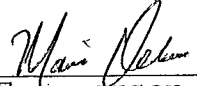
19 defendants up to the value of the property listed above as being subject

20 to forfeiture.


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

22 DATED: March 2, 2018.

23 A TRUE BILL:


24   
Foreperson

25 ADAM L. BRAVERMAN  
United States Attorney

26 By:   
27 MATTHEW J. SUTTON  
DAVID J. RAWLS  
28 Assistant U.S. Attorneys

I hereby attest and certify on 3/5/18  
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

5 By  Deputy