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WILLIAM T. WALSH, CLERK

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 15- 178- KM
	:	
ANDREINA BECERRA,	:	18 U.S.C. §§ 371, 545, 1956(h),
ROSARIO LA MARCA,	:	2320(a)(1), 2320(a)(2), and § 2;
JIANHUA LI,	:	31 U.S.C. §§ 5313(a), 5324(a)(1),
a/k/a "Jeff Li," and	:	5324(a)(3), 5324(d)(1) and
ROBERTO VOLPE	:	5324(d)(2)

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges:

COUNT ONE
**(Conspiracy to Traffic in Counterfeit Goods and Labels,
to Smuggle Goods into the United States, and
to Structure Financial Transactions)**

1. At all times relevant to this Indictment:

The Victim Companies

a. Apple Incorporated ("Apple") was a multinational corporation headquartered in Cupertino, California, that designed, developed, and sold consumer electronic devices, computer software, online services, and personal computers, including a tablet computer known as the Apple iPad ("iPad"), a mobile telephone known as the Apple iPhone ("iPhone"), and a portable digital music player known as the Apple iPod ("iPod"). Apple registered trademarks for the iPad, iPhone, and iPod on the principal register in the United States Patent and Trademark Office ("USPTO").

b. Sony Corporation (“Sony”) was a multinational conglomerate corporation headquartered in Kōnan Minato, Tokyo, Japan, with offices in the United States. Its diversified business was primarily focused on manufacturing electronic products, including combination video and camera recorders, such as the Sony Camcorder (“Camcorder”). Sony registered trademarks for the Camcorder on the principal register in the USPTO.

The Defendants and their Companies

c. Defendant JIANHUA LI, a/k/a “Jeff Li,” was the Sales Manager at Dream Digitals Technology (HK) Co., Ltd. (“Dream Digitals”), and its predecessor company Mathron Tech Ltd. (“Mathron Tech”), both located in Hong Kong, with manufacturing and storage facilities in the People’s Republic of China (“PRC”). Among other things, Dream Digitals and Mathron Tech produced and sold tablet computers, cellular telephones, and portable digital music players bearing counterfeit Apple trademarks, and labels and packaging for these devices also bearing counterfeit Apple trademarks.

d. ANDREINA BECERRA (“BECERRA”) was the President of VAS Export Corporation (“VAS”), which operated out of a residence located in Miami, Florida. From in or about 2009 through in or about 2013, BECERRA and VAS wired over \$1,100,000 to LI and Dream Digitals for the purchase of nearly 40,000 electronic devices, accessories, and labels and packaging, most bearing counterfeit Apple marks, which were all smuggled into the United States.

e. ROSARIO LA MARCA (“LA MARCA”) was the president of RLN Incorporated (“RLN”), located in North Bergen, New Jersey. From in or about 2009 through in or about 2013, BECERRA and VAS shipped thousands of electronic devices, accessories, and packaging bearing counterfeit Apple marks purchased from LI and Dream Digitals to LA MARCA and RLN in New Jersey, or had them shipped directly from LI and Dream Digitals to LA MARCA and RLN in New Jersey. LA MARCA also warehoused and distributed electronic devices, accessories, and labels and packaging bearing counterfeit Sony marks. LA MARCA and RLN then shipped these electronic devices to individuals all over the United States for resale to unsuspecting customers who believed they were purchasing genuine Apple and Sony products.

f. ROBERTO VOLPE (“VOLPE”) was married to and lived with BECERRA. VOLPE assisted BECERRA with: operating VAS; importing electronic devices, and labels and packaging, bearing counterfeit Apple marks from LI and Dream Digitals and elsewhere; and distributing these electronic devices to LA MARCA and RLN and to other individuals across the United States.

Seizures of the Defendants’ Imports

g. On at least five occasions between July 2009 and August 2013, United States Customs and Border Protection (“CBP”) seized shipments of electronic devices, and labels and packaging, originating in the PRC and consigned to BECERRA, LA MARCA, or VOLPE. After each seizure, CBP served

the consignee with written notice of the reason for the seizure – that the seized goods bore counterfeit Apple marks.

The Conspiracy

2. From at least as early as in or about July 2009 through in or about February 2014, in Bergen County, in the District of New Jersey, and elsewhere, defendants

**ANDREINA BECERRA,
ROSARIO LA MARCA,
JIANHUA LI,
a/k/a “Jeff Li,” and
ROBERTO VOLPE**

did knowingly and intentionally conspire and agree with each other, and with others known and unknown, to commit offenses against the United States, namely, to:

a. intentionally traffic in goods, namely, electronic devices, knowingly using a counterfeit mark on and in connection with such goods, contrary to Title 18, United States Code, Section 2320(a)(1);

b. intentionally traffic in labels, stickers, boxes, and packaging for such goods, knowing that a counterfeit mark had been applied thereto, the use of which was likely to cause confusion, to cause mistake, and to deceive, contrary to Title 18, United States Code, Section 2320(a)(2);

c. fraudulently and knowingly import and bring into the United States merchandise contrary to law, namely, electronic devices, accessories, and packaging bearing counterfeit marks, and receive, conceal, buy, sell, and facilitate the transportation, concealment, and sale of such merchandise after

importation, knowing the same to have been imported and brought into the United States contrary to law, contrary to Title 18, United States Code, Section 545; and

d. knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder by: (i) causing and attempting to cause a domestic financial institution to fail to file a report required under Section 5313(a) of Title 31, and any regulation prescribed under such section, contrary to Title 31, United States Code, Section 5324(a)(1); and (ii) structuring and assisting in structuring one or more transactions with domestic financial institutions, by breaking down amounts of United States currency into amounts of less than \$10,000 prior to depositing such currency with said financial institutions, contrary to Title 31, United States Code, Section 5324(a)(3).

Object of the Conspiracy

3. The object of the conspiracy was for defendants LI, BECERRA, LA MARCA, VOLPE, and others to enrich themselves by: (i) purchasing electronic devices, accessories, and packaging bearing counterfeit Apple and Sony marks at prices substantially below those for genuine Apple and Sony products; (ii) smuggling these items into the United States from Hong Kong and the PRC; (iii) displaying and using counterfeit Apple and Sony marks on these items in order to make them appear genuine; (iv) selling these electronic devices and accessories at substantial profits to unsuspecting customers who believed they

were buying genuine Apple and Sony products; (v) structuring cash deposits of the sales proceeds into United States bank accounts, including those of VAS and RLN; and (vi) transferring a portion of those proceeds to bank accounts in Italy.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendants BECERRA and VOLPE, from in or about July 2009 through in or about October 2013, used VAS to order from defendant LI and Dream Digitals over 360 shipments containing over 40,000 electronic devices and accessories, along with labels and packaging, most bearing counterfeit Apple marks, including fake iPads, iPhones, and iPods. The sum of the estimated manufacturer's suggested retail prices for an equivalent number of genuine items would have exceeded \$15,000,000.

5. It was further part of the conspiracy that defendant BECERRA, communicating primarily by email, instructed defendant LI where to send the shipments of counterfeit goods. Although some shipments went to defendants BECERRA, VOLPE, and others, most went to defendant LA MARCA and/or LA MARCA's company RLN in New Jersey.

6. It was further part of the conspiracy that defendant LI, in an effort to avoid detection after CBP seized some of his shipments of counterfeit goods, began taking certain precautions, such as shipping electronic devices and accessories, without any counterfeit marks, separately from labels and packaging bearing counterfeit Apple marks. Defendants BECERRA, LA

MARCA, VOLPE, and others would then label and package the devices and accessories once they were safely in the United States.

7. It was further part of the conspiracy that defendants BECERRA, LA MARCA, and VOLPE in turn distributed and shipped the electronic devices and accessories bearing counterfeit Apple and Sony marks to known and unknown co-conspirators located in New Jersey, New York, Massachusetts, North Carolina, Pennsylvania, California, Oklahoma, Louisiana, and other parts of the United States.

8. It was further part of the conspiracy that defendants BECERRA, LA MARCA, LI, and VOLPE, in order to promote and continue the smuggling and trafficking of electronic devices, accessories, and packaging bearing counterfeit Apple marks, caused over 100 monetary instruments and funds totaling over \$1,100,000 to be wired, transferred and transmitted from accounts in the United States controlled by defendants BECERRA, LA MARCA, and VOLPE into accounts in Hong Kong and the PRC controlled by defendant LI and others.

9. It was further part of the conspiracy that defendants BECERRA, VOLPE, and LA MARCA caused proceeds from the sale of electronic devices and accessories bearing counterfeit Apple and Sony marks to be deposited into bank accounts they controlled in New Jersey and Florida. In order to conceal and disguise the unlawful source of these proceeds, and to avoid United States bank currency reporting requirements, defendants BECERRA, VOLPE, and LA MARCA caused these proceeds to be structured, that is, broken into multiple

cash deposits of less than \$10,000 each so that banks would not have to report the deposits to the United States government.

10. It was further part of the conspiracy that defendants LA MARCA, BECERRA, and VOLPE then caused a portion of these proceeds to be transferred to known and unknown co-conspirators located in Italy, further disguising their source.

Overt Acts

11. In furtherance of the conspiracy, and in order to effectuate the unlawful objects thereof, defendants BECERRA, LA MARCA, LI, VOLPE, and others committed and caused to be committed the following acts, among others, in the District of New Jersey and elsewhere:

a. On or about July 16, 2009, approximately 250 fake iPods were shipped from outside the United States to defendant VOLPE in Florida; they were seized by CBP.

b. On or about July 16, 2009, approximately 250 fake iPods were shipped from outside the United States to defendant LA MARCA in New Jersey; they were seized by CBP.

c. On or about September 26, 2009, defendant LI sent an email to defendant BECERRA listing the prices for stickers, boxes, and packaging, all purporting to bear counterfeit Apple marks, which he was offering for sale.

d. On or about October 14, 2009, defendant BECERRA sent an email to defendant LI placing an order for an additional "300 pieces." In the

same email, defendant BECERRA asked defendant LI to lower his price for fake iPhones.

e. On or about November 13, 2010, approximately 50 fake iPads were shipped from outside the United States to defendant LA MARCA in New Jersey; they were seized by CBP.

f. On or about November 29, 2010, defendant BECERRA sent an email to defendant LI complaining, among other things, that the electronic devices he had sent previously had poor-quality batteries, and insisting that the Apple logo appear when the device was turned on and off.

g. On or about January 18, 2011, defendant LI shipped approximately 124 fake iPads, in four separate shipments, from outside the United States to defendant LA MARCA in New Jersey.

h. On or about May 29, 2011, defendant LI shipped approximately 75 fake iPhones from outside the United States to defendant BECERRA in Florida.

i. On or about August 9, 2012, defendant LA MARCA possessed, at a storage unit located in North Bergen, New Jersey, labels, stickers, boxes, and packaging bearing counterfeit Apple and Sony counterfeit marks.

j. On or about November 7, 2012, approximately 5 fake iPhones were shipped from outside the United States to defendant BECERRA in Florida; they were seized by CBP.

k. On or about December 7, 2012, defendant LI sent an email to defendant BECERRA confirming that she was his “VIP customer,” that defendant LI trusted only her, that he would not contact any other client in New Jersey or New York, and asking defendant BECERRA to find out what people there needed from him.

l. On or about December 11, 2012, defendant LI sent an email to defendant BECERRA confirming that he had wired funds from his Chase bank account in the United States to his Hong Kong bank account – adding that he rarely used his United States account in order to avoid paying taxes there.

m. On or about December 24, 2012, defendant LI sent an email to defendant BECERRA stating that he had sent a shipment via DHL to defendant LA MARCA at an address in Edgewater, New Jersey.

n. On or about December 24, 2012, defendant LI sent an email to defendant BECERRA in which he confirmed that all 200 fake iPhones from a previous order had been shipped, along with an extra 50 intended to replace those seized by “Customs.”

o. On or about January 4, 2013, defendant BECERRA sent an email to defendant LI mentioning a previous order for 200 fake iPhones and requesting that defendant LI reduce the price of a new order for 200 fake iPhones and 150 fake iPads.

p. On or about February 17, 2013, defendant BECERRA sent an email to defendant LI placing an order for 250 fake iPhones.

q. On or about February 17, 2013, defendant LI sent an email responding to defendant BECERRA's February 17 email, stating that he had shipped part of her order for fake iPhones and that he would send another shipment on the following day.

r. On or about February 25, 2013, defendant BECERRA sent a second email to defendant LI with instructions that a shipment be delivered to a UPS Store in Hattiesburg, Mississippi for pick-up by defendant VOLPE.

s. On or about March 11, 2013, defendant BECERRA sent an email to defendant LI inquiring about 100 fake iPhones. Defendant BECERRA asked about the colors of the fake iPhones and stated that she wanted them to have 64GB capacity, adding that the last 50 defendant LI sent did not. Defendant BECERRA further instructed defendant LI to send immediately 50 fake iPhones to Miami and 50 to New Jersey. Defendant BECERRA also informed defendant LI that the boxes for the fake iPhones needed to have "iPhone 5" "imprinted" on them.

t. On or about April 3, 2013, defendant LI sent an email to defendant BECERRA confirming that he had shipped fake iPhones and was shipping the labels with the Apple logo separately.

u. On or about August 16, 2013, approximately 60 fake iPhones were shipped from outside the United States to defendant VOLPE in Florida; they were seized by CBP.

v. On or about October 31, 2013, defendant VOLPE, while in Alabama, possessed approximately 272 fake iPhones and 210 labels bearing counterfeit Apple marks.

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

COUNT TWO
(Trafficking in Counterfeit Goods)

1. The allegations set forth in Paragraphs 1 and 4 through 11 of Count One of this Indictment are hereby repeated, realleged, and incorporated as if set forth in full herein.

2. From in or about July 2009 through in or about October 2013, in Bergen County, in the District of New Jersey and elsewhere, defendants

**ANDREINA BECERRA,
ROSARIO LA MARCA,
JIANHUA LI,
a/k/a "Jeff Li," and
ROBERTO VOLPE**

intentionally trafficked and attempted to traffic in goods, namely, electronic devices and accessories, and knowingly used a counterfeit mark on and in connection with such goods.

In violation of Title 18, United States Code, Section 2320(a)(1), and Title 18, United States Code, Section 2.

COUNT THREE
(Trafficking in Counterfeit Labels and Packaging)

1. The allegations set forth in Paragraphs 1 and 4 through 11 of Count One of this Indictment are hereby repeated, realleged, and incorporated as if set forth in full herein.

2. From in or about July 2009 through in or about October 2013, in Bergen County, in the District of New Jersey and elsewhere, defendants

ANDREINA BECERRA,
ROSARIO LA MARCA,
JIANHUA LI,
a/k/a “Jeff Li,” and
ROBERTO VOLPE

intentionally trafficked and attempted to traffic in labels, stickers, boxes, and packaging for electronic devices and accessories, knowing that a counterfeit mark had been applied thereto, the use of which was likely to cause confusion, to cause mistake, and to deceive.

In violation of Title 18, United States Code, Section 2320(a)(2), and Title 18, United States Code, Section 2.

COUNT FOUR
(Smuggling Goods into the United States)

1. The allegations set forth in Paragraphs 1 and 4 through 11 of Count One of this Indictment are hereby repeated, realleged, and incorporated as if set forth in full herein.

2. From in or about July 2009 through in or about October 2013, in Bergen County, in the District of New Jersey and elsewhere, defendants

**ANDREINA BECERRA,
ROSARIO LA MARCA,
JIANHUA LI,
a/k/a "Jeff Li," and
ROBERTO VOLPE**

did fraudulently and knowingly import and bring into the United States merchandise contrary to law, namely, electronic devices and accessories bearing counterfeit marks, and receive, conceal, buy, sell, and facilitate the transportation, concealment, and sale of such merchandise after importation, knowing the same to have been imported and brought into the United States contrary to law.

In violation of Title 18, United States Code, Section 545, and Title 18, United States Code, Section 2.

COUNT FIVE
(Structuring – 31 U.S.C. § 5324(a)(1))

1. The allegations set forth in Paragraphs 1 and 4 through 11 of Count One of this Indictment are hereby repeated, realleged, and incorporated as if set forth in full herein.

2. At all times relevant to this Indictment:

a. Bank of America was a domestic financial institution within the meaning of Title 31, United States Code, Sections 5312 and 5313(a).

b. Title 31, United States Code, Section 5313(a) required that domestic financial institutions file Currency Transaction Reports with the Internal Revenue Service for transactions in currency of more than \$10,000, including deposits, withdrawals, exchanges of currency, and other payments and transfers by, through, or to a domestic financial institution.

3. From on or about May 18, 2010 through on or about February 3, 2014, in Bergen County, in the District of New Jersey and elsewhere, defendants

**ANDREINA BECERRA,
ROSARIO LA MARCA, and
ROBERTO VOLPE**

knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, did knowingly cause and attempt to cause a domestic financial institution, namely, Bank of America, to fail to file a report required under Section 5313(a) of Title 31, and any regulation prescribed under such section, by causing the following structured deposits to be made totaling approximately

\$113,075 into two Bank of America accounts, namely, VAS account ending in 9926, and RLN account ending in 4567, as set forth below:

Date	Cash Deposit	Account	Location
5/18/2010	\$5,400	VAS / 9926	Fairview, NJ
5/18/2010	\$5,400	VAS / 9926	Fairview, NJ
6/4/2010	\$7,150	VAS / 9926	Framingham, MA
6/4/2010	\$2,925	VAS / 9926	Framingham, MA
6/4/2010	\$440	VAS / 9926	Framingham, MA
7/6/2010	\$5,860	VAS / 9926	Fairview, NJ
7/6/2010	\$4,500	VAS / 9926	Fairview, NJ
10/12/2010	\$7,000	VAS / 9926	Fairview, NJ
10/12/2010	\$4,000	VAS / 9926	Fairview, NJ
10/18/2010	\$5,000	VAS / 9926	Fairview, NJ
10/18/2010	\$5,000	VAS / 9926	Fairview, NJ
10/18/2010	\$3,000	VAS / 9926	Fairview, NJ
10/25/2010	\$9,000	VAS / 9926	Fairview, NJ
10/25/2010	\$5,000	VAS / 9926	Fairview, NJ
7/2/2012	\$5,000	RLN / 4567	Midland, TX
7/2/2012	\$5,000	RLN / 4567	Midland, TX
11/6/2012	\$5,000	RLN / 4567	El Paso, TX
11/6/2012	\$5,000	RLN / 4567	El Paso, TX
11/6/2012	\$2,500	RLN / 4567	El Paso, TX
12/9/2013	\$1,000	RLN / 4567	Fairview, NJ
12/9/2013	\$6,100	RLN / 4567	Fairview, NJ
12/9/2013	\$3,300	RLN / 4567	Fairview, NJ
2/3/2014	\$6,000	RLN / 4567	Fairview, NJ
2/3/2014	\$4,500	RLN / 4567	Fairview, NJ

In violation of Title 31, United States Code, Sections 5324(a)(1) and 5324(d)(1), and Title 18, United States Code, Section 2.

COUNT SIX
(Structuring – 31 U.S.C. § 5324(a)(3))

1. The allegations set forth in Paragraphs 1 and 4 through 11 of Count One and Paragraph 2 of Count Five of this Indictment are hereby repeated, realleged, and incorporated as if set forth in full herein.

2. From on or about April 26, 2010 through on or about February 12, 2014, in Bergen County, in the District of New Jersey and elsewhere, defendants

**ANDREINA BECERRA,
 ROSARIO LA MARCA, and
 ROBERTO VOLPE**

knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, knowingly structured, assisted in structuring, and attempted to structure and assist in structuring transactions with a domestic financial institution, namely, Bank of America, by breaking down amounts of United States currency into amounts of less than \$10,000 prior to depositing such currency with said financial institution, and did so as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period, including the following structured deposits into four Bank of America accounts, namely, VAS accounts ending in 3978 and 9926, RLN account ending in 4567, and an account ending in 1809 in the name of defendant LA MARCA:

Date	Cash Deposit	Account	Location
4/26/2010	\$5,500	VAS / 3978	Fairview, NJ
4/27/2010	\$5,500	VAS / 3978	Fairview, NJ
6/29/2010	\$1,000	VAS / 9926	Fairview, NJ

Date	Cash Deposit	Account	Location
6/30/2010	\$4,500	VAS / 9926	Fairview, NJ
9/14/2010	\$4,000	VAS / 9926	Edgewater, NJ
9/15/2010	\$4,000	VAS / 9926	Fairview, NJ
9/17/2010	\$5,900	VAS / 9926	Fairview, NJ
9/28/2010	\$4,000	VAS / 9926	Fairview, NJ
9/30/2010	\$6,000	VAS / 9926	Fairview, NJ
10/1/2010	\$5,000	VAS / 9926	Edgewater, NJ
10/7/2010	\$8,000	VAS / 9926	Fairview, NJ
10/8/2010	\$5,000	VAS / 9926	Fairview, NJ
10/13/2010	\$5,000	VAS / 9926	Fairview, NJ
10/14/2010	\$5,000	VAS / 9926	Fairview, NJ
10/21/2010	\$2,000	VAS / 9926	Fairview, NJ
10/22/2010	\$2,140	VAS / 9926	Fairview, NJ
10/26/2010	\$5,000	VAS / 9926	Fairview, NJ
10/27/2010	\$5,020	VAS / 9926	Fairview, NJ
10/28/2010	\$4,500	VAS / 9926	Fairview, NJ
10/29/2010	\$4,000	VAS / 9926	Fairview, NJ
8/2/2011	\$5,000	VAS / 3978	Fairview, NJ
8/3/2011	\$5,000	VAS / 3978	Fairview, NJ
3/21/2012	\$2,650	RLN / 4567	Las Vegas, NV
3/26/2012	\$8,360	RLN / 4567	Las Vegas, NV
6/5/2012	\$5,000	RLN / 4567	Midland, TX
6/7/2012	\$5,000	RLN / 4567	Midland, TX
6/11/2012	\$5,000	RLN / 4567	Midland, TX
6/11/2012	\$4,500	RLN / 4567	Midland, TX
6/15/2012	\$4,500	RLN / 4567	Midland, TX
7/5/2012	\$4,000	RLN / 4567	Midland, TX
10/5/2012	\$7,000	RLN / 4567	Midland, TX
10/9/2012	\$5,000	RLN / 4567	Midland, TX
11/13/2012	\$5,000	VAS / 3978	Fairview, NJ
11/14/2012	\$5,000	VAS / 3978	Fairview, NJ
1/29/2013	\$3,050	RLN / 4567	Los Angeles, CA
1/30/2013	\$9,000	RLN / 4567	Los Angeles, CA
2/11/2013	\$8,000	RLN / 4567	Edgewater, NJ
2/12/2013	\$8,000	RLN / 4567	Fairview, NJ
2/13/2013	\$8,000	RLN / 4567	Fairview, NJ
3/5/2013	\$8,000	RLN / 4567	Fairview, NJ
3/6/2013	\$8,000	RLN / 4567	Fairview, NJ
3/8/2013	\$8,000	RLN / 4567	Fairview, NJ
3/11/2013	\$8,000	RLN / 4567	Fairview, NJ
11/6/2013	\$2,000	RLN / 4567	Fairview, NJ
11/7/2013	\$5,000	RLN / 4567	Fairview, NJ
11/8/2013	\$3,000	RLN / 4567	Fairview, NJ

Date	Cash Deposit	Account	Location
11/19/2013	\$6,000	LA MARCA / 1809	Palm Desert, CA
11/22/2013	\$8,000	LA MARCA / 1809	Palm Desert, CA
12/2/2013	\$3,560	LA MARCA / 1809	Redwood City, CA
12/4/2013	\$5,000	LA MARCA / 1809	Redwood City, CA
12/5/2013	\$7,000	RLN / 4567	Fairview, NJ
12/6/2013	\$3,000	LA MARCA / 1809	Redwood City, CA
12/6/2013	\$6,300	RLN / 4567	Fairview, NJ
12/10/2013	\$6,700	RLN / 4567	Fairview, NJ
12/11/2013	\$6,300	RLN / 4567	Fairview, NJ
12/12/2013	\$8,500	RLN / 4567	Fairview, NJ
12/13/2013	\$2,000	RLN / 4567	Fairview, NJ
2/6/2014	\$4,268	RLN / 4567	Fairview, NJ
2/7/2014	\$2,134	RLN / 4567	Fairview, NJ
2/10/2014	\$3,700	RLN / 4567	Fairview, NJ
2/10/2014	\$2,000	RLN / 4567	Fairview, NJ
2/11/2014	\$6,644	RLN / 4567	Fairview, NJ
2/12/2014	\$1,000	RLN / 4567	Fairview, NJ

In violation of Title 31, United States Code, Sections 5313(a),
 5324(a)(3) and 5324(d)(2), and Title 18, United States Code, Section 2.

COUNT SEVEN
(Money Laundering Conspiracy)

1. The allegations set forth in Paragraphs 1 and 4 through 11 of Count One of this Indictment are hereby repeated, realleged, and incorporated as if set forth in full herein.

2. From in or about July 2009 through in or about October 2013, in Bergen County, in the District of New Jersey and elsewhere, defendants

ANDREINA BECERRA,
ROSARIO LA MARCA,
JIANHUA LI,
a/k/a "Jeff Li," and
ROBERTO VOLPE

did knowingly conspire and agree with each other, and with others known and unknown, to transport, transmit, and transfer, monetary instruments and funds from a place in the United States, namely Florida, to and through a place outside the United States, namely, Hong Kong, with the intent to promote the carrying on of specified unlawful activities, namely, the crimes alleged in Counts One through Four of this Indictment, contrary to Title 18, United States Code, Section 1956(a)(2)(A).

In violation of Title 18, United States Code, Section 1956(h).

COUNT EIGHT
(Money Laundering Conspiracy)

1. The allegations set forth in Paragraphs 1 and 4 through 11 of Count One of this Indictment are hereby repeated, realleged, and incorporated as if set forth in full herein.

2. From in or about July 2009 through in or about October 2013, in Bergen County, in the District of New Jersey and elsewhere, defendants

**ANDREINA BECERRA,
ROSARIO LA MARCA, and
ROBERTO VOLPE**

did knowingly conspire and agree with each other, and with others known and unknown, to transport, transmit, and transfer, monetary instruments and funds from a place in the United States, namely New Jersey, to and through a place outside the United States, namely, Italy, knowing that the monetary instruments and funds involved in the transportation, transmission and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(2)(B)(i).

In violation of Title 18, United States, Section 1956(h).

FORFEITURE ALLEGATION AS TO COUNT ONE

1. As a result of committing the conspiracy offense alleged in Count One of this Indictment, defendants ANDREINA BECERRA, ROSARIO LA MARCA, JIANHUA LI, a/k/a “Jeff Li,” and ROBERTO VOLPE shall forfeit to the United States:

- (a) Pursuant to 18 U.S.C. § 982(a)(2)(B), any and all property constituting or derived from proceeds obtained directly or indirectly as a result of the conspiracy to violate 18 U.S.C. § 545 alleged in Count One of this Indictment;
- (b) Pursuant to 18 U.S.C. § 545 and 28 U.S.C. § 2461(c), any merchandise the defendants conspired to introduce into the United States in violation of 18 U.S.C. § 545, or the value thereof, and all property traceable to such property; and
- (c) Pursuant to 31 U.S.C. § 5317(c)(1), all property, real and personal, involved in the conspiracies to violate 31 U.S.C. § 5324 charged in Count One of this Indictment;

and all property traceable to such property, including but not limited to all right, title, and interest of the defendants in the following:

Condominium Parcel No. 912, in 50 Biscayne, a Condominium, together with its appurtenants and undivided interest or share in the common elements appurtenant thereto, also known as 50 Biscayne Boulevard, Unit 912, Miami, Miami-Dade County, Florida, 33132;

Condominium Unit No. 4, of Creek Club No. Three Condominium, a Condominium, together with its appurtenants and undivided interest or share in the common elements appurtenant thereto, also known as 8040 Tatum Waterway Drive, Unit 4, Miami Beach, Miami-Dade County, Florida, 33141;

Condominium Unit No. 501, of Harbour Pointe of Miami, a Condominium, together with its appurtenants and undivided interest or share in the common elements appurtenant thereto, also known as

1251 NE 108th Street, Unit 501, Miami, Miami-Dade County, Florida, 33161;

Condominium Unit No. B-2, of Normandy Palms Condominium, a Condominium, together with its appurtenants and undivided interest or share in the common elements appurtenant thereto, also known as 6941 Bay Drive, Unit B-2, Miami Beach, Miami-Dade County, Florida, 33141;

Condominium Unit No. 1413, of The Loft Downtown II Condominium, a Condominium, together with its appurtenants and undivided interest or share in the common elements appurtenant thereto, also known as 133 NE 2 Avenue, Unit 1413, Miami, Dade County, Florida, 33132; and

The real property and appurtenances thereto known as 1514 Country Lane, Allen, Collin County, Texas, 75002, more specifically described as Lot 22, Block G, of Country Meadow – Phase One, an Addition to the City of Allen, Collin County, Texas,

And all property traceable to such property, (hereinafter referred to collectively as the “Real Properties”).

FORFEITURE ALLEGATION AS TO COUNTS TWO AND THREE

1. As a result of committing one or both of the offenses in violation of 18 U.S.C. §§ 2320(a)(1) and (a)(2) alleged in Counts Two and Three, respectively, of this Indictment, defendants ANDREINA BECERRA, ROSARIO LA MARCA, JIANHUA LI, a/k/a “Jeff Li,” and ROBERTO VOLPE shall forfeit to the United States, pursuant to 18 U.S.C. § 2323, any and all articles, the making or trafficking of which is prohibited under 18 U.S.C. §§ 2320(a)(1) and (a)(2), as alleged in Counts Two and Three, respectively, of this Indictment; any and all property used, or intended to be used, in any manner or part to commit or facilitate the commission of such offenses; and any and all property, real and personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offenses, and all property traceable to such property, including but not limited to all right, title, and interest of the defendants in the Real Properties.

FORFEITURE ALLEGATION AS TO COUNT FOUR

1. As a result of committing the offense in violation of 18 U.S.C. § 545 alleged in Count Four of this Indictment, defendants ANDREINA BECERRA, ROSARIO LA MARCA, JIANHUA LI, a/k/a “Jeff Li,” and ROBERTO VOLPE shall forfeit to the United States,

- (a) Pursuant to 18 U.S.C. § 982(a)(2)(B), any and all property constituting or derived from proceeds obtained directly or indirectly as a result of the offense in violation of 18 U.S.C. § 545 alleged in Count Four of this Indictment; and
- (b) Pursuant to 18 U.S.C. § 545 and 28 U.S.C. § 2461(c), any merchandise introduced into the United States in violation of 18 U.S.C. § 545, or the value thereof;

and all property traceable to such property, including but not limited to all right, title, and interest of the defendants in the Real Properties.

FORFEITURE ALLEGATION AS TO COUNTS FIVE AND SIX

1. As a result of committing the offenses in violation of 31 U.S.C. § 5324 alleged in Counts Five and Six of this Indictment, defendants ANDREINA BECERRA, ROSARIO LA MARCA, and ROBERTO VOLPE shall forfeit to the United States, pursuant to 31 U.S.C. § 5317(c)(1), all property, real and personal, involved in the offenses in violation of 31 U.S.C. § 5324 alleged in Counts Five and Six of the Indictment, and all property traceable to such property, including but not limited to all right, title, and interest of the defendants in the Real Properties.

FORFEITURE ALLEGATION AS TO COUNT SEVEN

1. As a result of committing the money laundering conspiracy offense, contrary to 18 U.S.C. § 1956(a)(2)(A), in violation of 18 U.S.C. § 1956(h), alleged in Count Seven of this Indictment, defendants ANDREINA BECERRA, ROSARIO LA MARCA, JIANHUA LI, a/k/a “Jeff Li,” and ROBERTO VOLPE shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, involved in the alleged money laundering conspiracy, and all property traceable to such property, including but not limited to all right, title, and interest of the defendants in the Real Properties.

FORFEITURE ALLEGATION AS TO COUNT EIGHT

1. As a result of committing the money laundering conspiracy offense, contrary to 18 U.S.C. § 1956(a)(2)(B)(i), in violation of 18 U.S.C. § 1956(h), alleged in Count Eight of this Indictment, defendants ANDREINA BECERRA, ROSARIO LA MARCA, and ROBERTO VOLPE shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, involved in the alleged money laundering conspiracy, and all property traceable to such property, including but not limited to all right, title, and interest of the defendants in the Real Properties.

SUBSTITUTE ASSETS PROVISION
APPLICABLE TO ALL FORFEITURE ALLEGATIONS

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

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (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 subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant(s) up to the value of the above forfeitable property. Such property includes, but is not limited to, all right, title, and interest of the defendants in the Real Properties.

A TRUE BILL

FOREPERSON _____



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 15-cr-178-KM

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**ANDREINA BECERRA,
ROSARIO LA MARCA,
JIANHUA LI,
a/k/a "Jeff Li," and
ROBERTO VOLPE**

INDICTMENT FOR

**18 U.S.C. §§ 371, 545, 1956(h), 2320(a)(1), 2320(a)(2), and § 2;
31 U.S.C. §§ 5313(a), 5324(a)(1), 5324(a)(3), 5324(d)(1), and 5324(d)(2)**

PAUL J. FISHMAN

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