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SEALED



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

June 2022 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,

v.

ABDUL KARIM CONTEH (1),
VERONICA ROBLERO PIVARAL (2),
[REDACTED]

Defendants.

Case No. 24 CR1059 JLS

I N D I C T M E N T

Title 8, U.S.C.,
Sec. 1324(a)(1)(A)(i) and (v)(I) -
Conspiracy to Bring in Aliens at a
Place Other Than Designated Port
of Entry; Title 8, U.S.C.,
Sec. 1324(a)(2)(B)(ii) - Bringing
in Aliens for Financial Gain;
Title 18, U.S.C., Sec. 2 - Aiding
and Abetting; Title 8, U.S.C.,
Sec. 1324(b), Title 18, U.S.C.,
Secs. 982(a)(6) and 982(b), and
Title 28, U.S.C., Sec. 2461(c) -
Criminal Forfeiture

The grand jury charges:

Introductory Allegations

At all times relevant:

1. Defendants ABDUL KARIM CONTEH, VERONICA ROBLERO PIVARAL,
[REDACTED]

[REDACTED] together with others, participated in a human-smuggling
organization that unlawfully smuggled thousands of migrants into the
United States.

2. The smuggled migrants originated from numerous other
countries, including Iran, Afghanistan, Uzbekistan, Pakistan,
Kazakhstan, Turkey, Somalia, Cameroon, Senegal, Mauritania, Ethiopia,

1 Egypt, and others. The migrants paid money, often tens of thousands of
2 dollars, to be transported through various countries such as Brazil,
3 Colombia, Ecuador, Panama, Costa Rica, Nicaragua, Honduras, and
4 Guatemala.

5 3. The migrants smuggled by the defendants are not United States
6 citizens and have no official authorization from the United States
7 government to come to, enter, or reside in the United States.

8 4. Defendant ABDUL KARIM CONTEH coordinated with individuals
9 throughout Mexico and other countries to facilitate the transport of
10 migrants into and through Mexico to the United States border. Once near
11 the Mexico-United States border, Defendant ABDUL KARIM CONTEH oversaw
12 and assisted with their surreptitious and unlawful entry into the United
13 States by various means, including the use of ladders and tunnels.

14 5. Defendants VERONICA ROBLERO PIVARAL, [REDACTED]
15 [REDACTED] assisted with transporting migrants
16 through Mexico to the United States border and then facilitated their
17 unlawful entry into the United States.

18 6. Defendant [REDACTED] assisted with the receipt
19 and passage of identity documents that would be used by smuggled migrants
20 to unlawfully remain in the United States, as well as facilitate payments
21 to others in the operation through mobile applications.

22 Count 1

23 ALIEN SMUGGLING (8 U.S.C. § 1324(a)(1)(A)(i) and (v)(I))

24 7. Paragraphs 1 through 6 of this Indictment are realleged and
25 incorporated as though fully set forth herein.

26 8. Beginning on a date unknown to the grand jury and continuing
27 to the date of this Indictment, within the Southern District of
28 California, and elsewhere, defendants ABDUL KARIM CONTEH, VERONICA

1 ROBLERO PIVARAL, [REDACTED]
2 [REDACTED], with the intent to violate the immigration
3 laws of the United States, did knowingly and intentionally conspire
4 together and with each other and with other persons unknown to the grand
5 jury, to bring or attempt to bring an alien to the United States, knowing
6 and in reckless disregard of the fact that said alien had not received
7 prior official authorization to come to, enter or reside in the United
8 States, and upon arrival did not bring and present said alien immediately
9 to an appropriate immigration officer at a designated port of entry; in
10 violation of Title 8, United States Code, Section 1324(a)(1)(A)(i)
11 and (v)(I).

12 Count 2

13 Alien Smuggling (8 U.S.C. § 1324(a)(2)(B)(ii) & 18 U.S.C. § 2)

14 9. Paragraphs 1 through 6 of this Indictment are realleged and
15 incorporated as though fully set forth herein.

16 10. On or about February 16, 2023, within the Southern District
17 of California, and elsewhere, defendant ABDUL KARIM CONTEH, with the
18 intent to violate the immigration laws of the United States, knowing and
19 in reckless disregard of the fact that [REDACTED], an alien, had
20 not received prior official authorization to come to, enter, and reside
21 in the United States did bring to the United States said alien for the
22 purpose of commercial advantage and private financial gain; in violation
23 of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,
24 United States Code, Section 2.

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1 FORFEITURE ALLEGATIONS

2 The allegations contained in Counts 1 through 4 are re-alleged and
3 by their reference fully incorporated herein for the purpose of alleging
4 forfeiture to the United States of America pursuant to the provisions
5 of Title 8, United States Code, Section 1324(b), Title 18, United States
6 Code, Sections 982(a)(6) and 982(b), and Title 28, United States Code,
7 Section 2461(c).

8 Upon conviction of one and more of the offense alleged in Counts 1
9 through 4, and pursuant to Title 8, United States Code, Section 1324(b),
10 Title 18, United States Code, Section 982(a)(6), and Title 28, United
11 States Code, Section 2461(c), defendants ABDUL KARIM CONTEH, VERONICA
12 ROBLERO PIVARAL, [REDACTED]

13 [REDACTED] shall forfeit to the United States all
14 conveyances used in the offenses, all property, real and personal, that
15 constitutes and is derived from proceeds received directly and
16 indirectly from the offenses, and all property used and intended to be
17 used to commit and to facilitate the commission of the offenses.

18 If any of the above-described forfeitable property, as a result of
19 any act or omission of defendants ABDUL KARIM CONTEH, VERONICA ROBLERO
20 PIVARAL, [REDACTED]

- 21 [REDACTED]
- 22 a. cannot be located upon the exercise of due diligence;
 - 23 b. has been transferred or sold to, or deposited with, a third
24 person;
 - 25 c. has been placed beyond the jurisdiction of the court; has been
26 substantially diminished in value; or

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1 d. has been commingled with other property which cannot be
2 subdivided without difficulty; it is the intent of the United States,
3 pursuant to Title 18, United States Code, Section 982(b) and Title 28,
4 United States Code, Section 2461(c), to seek forfeiture of any property
5 of the defendants up to the value of the said property listed above as
6 being subject to forfeiture.

7 All in violation of Title 8, United States Code, Section 1324(b),
8 Title 18, United States Code, Sections 982(a)(6) and 982(b), and
9 Title 28, United States Code, Section 2461(c).

10 DATED: May 22, 2024.

11 A TRUE BILL:



13 TARA K. McGRATH
United States Attorney

14
15 By: David Fawcett
16 DAVID E. FAWCETT
Assistant U.S. Attorney

17
18 By: Ryan A. Sajsedo
19 RYAN A. SAJSEDO
Assistant U.S. Attorney

I hereby attest and certify on May 22, 2024 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: A. S. Nymecojwa
Deputy

