

EAG:MEL/NJM
F. #2021R00335

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

I N D I C T M E N T

1:21-cr-00622(DG)(SJB)

- against -

Cr. No. _____
(T. 18, U.S.C., §§ 371, 981(a)(1)(C),
1591(a)(1), 1591(a)(2), 1591(b)(1),
1591(b)(2), 1594(d), 1951(a), 1952(a)(3)(A),
2423(a), 2423(e), 2 and 3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

LUZ ELVIRA CARDONA,
also known as "Lucy,"
ROBERTO CESAR CID DOMINGUEZ,
CRISTIAN NOE GODINEZ,
also known as "El Chapparo"
and "Alex,"
BLANCA HERNANDEZ MORALES,
also known as "Nancy," "Maria Elena,"
and "Malena,"
JOSE FACUNDO ZARATE MORALES,
also known as "El Guero," and
WAYNE PEIFFER,

Defendants.

----- X

THE GRAND JURY CHARGES:

At all times relevant to this Indictment, unless otherwise indicated:

INTRODUCTION

I. The Defendants and Relevant Entities

1. LUZ ELVIRA CARDONA, also known as "Lucy," ROBERTO CESAR CID DOMINGUEZ, BLANCA HERNANDEZ MORALES, also known as "Nancy," "Maria Elena" and "Malena," and JOSE FACUNDO ZARATE MORALES, also known as "El Guero," were members of an organization that engaged in the sex trafficking of women and minor girls

and worked to promote prostitution (the “Cid-Hernandez Sex Trafficking Organization”). The Cid-Hernandez Sex Trafficking Organization was based in Queens, New York.

2. CRISTIAN NOE GODINEZ, also known as “El Chapparo” and “Alex,” was a driver for a business that promoted prostitution (the “Godinez Prostitution Business”). The Godinez Prostitution Business was based in Queens, New York.

3. Since December 1, 2006, WAYNE PEIFFER was a police officer who was employed by the Village of Brewster Police Department (“BPD”) in Brewster, New York.

II. The Cid-Hernandez Sex Trafficking Organization

4. Since approximately May 2002, members of the Cid-Hernandez Sex Trafficking Organization engaged in the sex trafficking of women and minor girls and the promotion of prostitution.

5. The defendants LUZ ELVIRA CARDONA, ROBERTO CESAR CID DOMINGUEZ, BLANCA HERNANDEZ MORALES and JOSE FACUNDO ZARATE MORALES, together with others, used force, threats of force, fraud and coercion to cause young women and minor girls from Mexico to engage in prostitution in the United States.

6. The Cid-Hernandez Sex Trafficking Organization regularly caused women and minor girls to be transported from locations in Queens, New York, to various locations throughout New York, including Brewster, New Jersey and Connecticut, for the purpose of engaging in prostitution.

7. The Cid-Hernandez Sex Trafficking Organization controlled “routes,” which were comprised of contact lists of potential clients in specific areas, and employed individuals who served as drivers. The drivers were responsible for transporting women along preassigned routes to prostitution clients.

III. The Godinez Prostitution Business

8. The Godinez Prostitution Business regularly caused women to be transported from a location in Queens, New York, to various locations, including Brewster, New York, for the purpose of engaging in prostitution.

9. The Godinez Prostitution Business controlled “routes,” which were comprised of contact lists of potential clients in specific areas, and employed individuals who served as drivers. The drivers were responsible for transporting women along preassigned routes to prostitution clients.

IV. The Bribery Schemes

10. Since at least 2004, the Cid-Hernandez Sex Trafficking Organization had drivers transport women from Queens, New York to various locations in Brewster, New York for the purpose of engaging in prostitution.

11. Since at least 2017, the Godinez Prostitution Business had drivers transport women from Queens, New York to various locations in Brewster, New York for the purpose of engaging in prostitution.

12. Both the Cid-Hernandez Sex Trafficking Organization and the Godinez Prostitution Business took steps to protect against interference by law enforcement in Brewster, New York, including the BPD. The Cid-Hernandez Sex Trafficking Organization and the Godinez Prostitution Business provided the defendant WAYNE PEIFFER, a BPD officer, with prostitution services at no cost to PEIFFER in exchange for PEIFFER’s protection, including advance notice of increased law enforcement activities and assistance with avoiding detection and apprehension by law enforcement.

COUNT ONE
(Conspiracy to Transport Minors)

13. The allegations contained in paragraphs one and four through seven are realleged and incorporated as if fully set forth in this paragraph.

14. In or about and between January 2004 and May 2008, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LUZ ELVIRA CARDONA, also known as “Lucy,” ROBERTO CESAR CID DOMINGUEZ, BLANCA HERNANDEZ MORALES, also known as “Nancy,” “Maria Elena” and “Malena,” and JOSE FACUNDO ZARATE MORALES, also known as “El Guero,” together with others, did knowingly and intentionally conspire to transport one or more individuals who had not attained the age of 18 years in interstate and foreign commerce, with intent that such individuals engage in prostitution, contrary to Title 18, United States Code, Section 2423(a).

(Title 18, United States Code, Sections 2423(e) and 3551 et seq.)

COUNT TWO
(Sex Trafficking of a Minor – Jane Doe #1)

15. The allegations contained in paragraphs one and four through seven are realleged and incorporated as if fully set forth in this paragraph.

16. In or about and between January 2004 and June 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ROBERTO CESAR CID DOMINGUEZ and BLANCA HERNANDEZ MORALES, also known as “Nancy,” “Maria Elena” and “Malena,” together with others, did knowingly and intentionally recruit, entice, harbor, transport, provide and obtain by any means a person, to wit: Jane Doe #1, an individual whose identity is known to the Grand Jury, in and affecting interstate

and foreign commerce, and did benefit, financially and by receiving anything of value, from participation in a venture which engaged in such acts, knowing that (1) force, fraud and coercion would be used to cause Jane Doe #1 to engage in one or more commercial sex acts, and (2) Jane Doe #1 had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts, which offense was effected by means of force, fraud and coercion.

(Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(1), 1591(b)(2), 2 and 3551 et seq.)

COUNT THREE

(Transportation of a Minor – Jane Doe #1)

17. The allegations contained in paragraphs one and four through seven are realleged and incorporated as if fully set forth in this paragraph.

18. In or about and between January 2004 and June 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ROBERTO CESAR CID DOMINGUEZ and BLANCA HERNANDEZ MORALES, also known as “Nancy,” “Maria Elena” and “Malena,” together with others, did knowingly and intentionally transport an individual who had not attained the age of 18 years, to wit: Jane Doe #1, in interstate and foreign commerce, with intent that Jane Doe #1 engage in prostitution.

(Title 18, United States Code, Sections 2423(a), 2 and 3551 et seq.)

COUNT FOUR

(Sex Trafficking of a Minor – Jane Doe #2)

19. The allegations contained in paragraphs one and four through seven are realleged and incorporated as if fully set forth in this paragraph.

20. In or about and between September 2007 and May 2008, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the

defendants LUZ ELVIRA CARDONA, also known as “Lucy,” BLANCA HERNANDEZ MORALES, also known as “Nancy,” “Maria Elena” and “Malena,” and JOSE FACUNDO ZARATE MORALES, also known as “El Guero,” together with others, did knowingly and intentionally recruit, entice, harbor, transport, provide and obtain by any means a person, to wit: Jane Doe #2, an individual whose identity is known to the Grand Jury, in and affecting interstate and foreign commerce, and did benefit, financially and by receiving anything of value, from participation in a venture which engaged in such acts, knowing that (1) force, fraud and coercion would be used to cause Jane Doe #2 to engage in one or more commercial sex acts, and (2) Jane Doe #2 had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts, which offense was effected by means of force, fraud and coercion.

(Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(1), 1591(b)(2), 2 and 3551 et seq.)

COUNT FIVE

(Transportation of a Minor – Jane Doe #2)

21. The allegations contained in paragraphs one and four through seven are realleged and incorporated as if fully set forth in this paragraph.

22. In or about and between September 2007 and May 2008, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LUZ ELVIRA CARDONA, also known as “Lucy,” BLANCA HERNANDEZ MORALES, also known as “Nancy,” “Maria Elena” and “Malena,” and JOSE FACUNDO ZARATE MORALES, also known as “El Guero,” together with others, did knowingly and intentionally transport an individual who had not attained the age of 18 years, to wit: Jane Doe #2, in interstate and foreign commerce, with intent that Jane Doe #2 engage in prostitution.

(Title 18, United States Code, Sections 2423(a), 2 and 3551 et seq.)

COUNT SIX

(Hobbs Act Extortion Conspiracy – Cid-Hernandez Sex Trafficking Organization)

23. The allegations contained in paragraphs one, three through seven, ten and 12 are realleged and incorporated as if fully set forth in this paragraph.

24. In or about and between 2010 and October 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ROBERTO CESAR CID DOMINGUEZ and WAYNE PEIFFER, together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that CID DOMINGUEZ, PEIFFER and others agreed that PEIFFER would obtain property, to wit: sexual services from the Cid-Hernandez Sex Trafficking Organization, without payment, from one or more drivers for the Cid-Hernandez Sex Trafficking Organization, with the drivers' and CID DOMINGUEZ's consent, which consent was to be induced under color of official right, to wit: PEIFFER's position as a BPD Officer.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT SEVEN

(Hobbs Act Extortion Conspiracy – Godinez Prostitution Business)

25. The allegations contained in paragraphs two, three, eight, nine, 11 and 12 are realleged and incorporated as if fully set forth in this paragraph.

26. In or about and between April 2017 and March 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants CRISTIAN NOE GODINEZ, also known as "El Chapparo" and "Alex," and WAYNE PEIFFER, together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by

extortion, in that GODINEZ, PEIFFER and others agreed that PEIFFER would obtain property, to wit: sexual services from the Godinez Prostitution Business, without payment, from GODINEZ, with GODINEZ's consent, which consent was to be induced under color of official right, to wit: PEIFFER's position as a BPD Officer.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT EIGHT

(Travel Act Conspiracy – Cid-Hernandez Sex Trafficking Organization)

27. The allegations contained in paragraphs one, three through seven, ten and 12 are realleged and incorporated as if fully set forth in this paragraph.

28. In or about and between May 2002 and October 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LUZ ELVIRA CARDONA, also known as "Lucy," ROBERTO CESAR CID DOMINGUEZ, BLANCA HERNANDEZ MORALES, also known as "Nancy," "Maria Elena" and "Malena," JOSE FACUNDO ZARATE MORALES, also known as "El Guero," and WAYNE PEIFFER, together with others, did knowingly and willfully conspire to use one or more facilities in interstate and foreign commerce with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of unlawful activity, to wit: a business enterprise involving prostitution, in violation of the laws of the State of New York, and thereafter to perform acts to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of such unlawful activity, contrary to Title 18, United States Code, Section 1952(a)(3).

29. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants LUZ ELVIRA CARDONA, also known as "Lucy," ROBERTO CESAR CID DOMINGUEZ, BLANCA HERNANDEZ

MORALES, also known as “Nancy,” “Maria Elena” and “Malena,” JOSE FACUNDO ZARATE MORALES, also known as “El Guero,” and WAYNE PEIFFER, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) In or about and between January 2004 and June 2006, CID DOMINGUEZ and HERNANDEZ MORALES transported, and arranged to transport, Jane Doe #1 from Queens, New York to various locations in New York to engage in prostitution.

(b) In or about and between September 2007 and May 2008, CARDONA, HERNANDEZ MORALES and ZARATE MORALES transported, and arranged to transport, Jane Doe #2 from Queens, New York to various locations in New York to engage in prostitution.

(c) In or about and between 2010 and 2018, HERNANDEZ MORALES and ZARATE MORALES transported, and arranged to transport, women from Queens, New York to Port Chester, New York to engage in prostitution.

(d) In or about 2010, CID DOMINGUEZ recruited an individual (“Co-Conspirator #1”) to serve as driver for the Cid-Hernandez Sex Trafficking Organization.

(e) In or about and between 2010 and 2014, Co-Conspirator #1 drove women engaged in prostitution to PEIFFER to provide PEIFFER with commercial sex services.

(f) In or about and between 2010 and 2014, CID DOMINGUEZ provided payment to the women who Co-Conspirator #1 drove to PEIFFER and provided PEIFFER with commercial sex services.

(g) In or about 2013, CID DOMINGUEZ recruited an individual (“Co-Conspirator #2”) to serve as a driver for the Cid-Hernandez Sex Trafficking Organization.

(h) In or about and between 2014 and 2018, Co-Conspirator #2 drove women engaged in prostitution to PEIFFER to provide PEIFFER with commercial sex services.

(i) In or about and between 2014 and 2018, CID DOMINGUEZ provided payment to the women whom Co-Conspirator #2 drove to PEIFFER and provided PEIFFER with commercial sex services.

(j) On or about June 10, 2018, PEIFFER sent a text message to Co-Conspirator #2 asking if Co-Conspirator #2 was driving a woman that evening.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT NINE

(Travel Act Conspiracy – Cid-Hernandez Sex Trafficking Organization)

30. The allegations contained in paragraphs one, three through seven, ten and 12 are realleged and incorporated as if fully set forth in this paragraph.

31. In or about and between 2010 and October 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ROBERTO CESAR CID DOMINGUEZ and WAYNE PEIFFER, together with others, did knowingly and willfully conspire to use one or more facilities in interstate and foreign commerce with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of unlawful activity, to wit: bribery, in violation of the laws of the State of New York, and thereafter to perform acts to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of such unlawful activity, contrary to Title 18, United States Code, Section 1952(a)(3).

32. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants ROBERTO CESAR CID

DOMINGUEZ and WAYNE PEIFFER, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) In or about 2010, CID DOMINGUEZ recruited Co-Conspirator #1 to serve as driver for the Cid-Hernandez Sex Trafficking Organization.

(b) In or about and between 2010 and 2014, Co-Conspirator #1 drove women engaged in prostitution to PEIFFER to provide PEIFFER with commercial sex services.

(c) In or about and between 2010 and 2014, CID DOMINGUEZ provided payment to the women whom Co-Conspirator #1 drove to PEIFFER and provided PEIFFER with commercial sex services.

(d) In or about 2013, CID DOMINGUEZ recruited Co-Conspirator #2 to serve as a driver for the Cid-Hernandez Sex Trafficking Organization.

(e) In or about and between 2014 and 2018, Co-Conspirator #2 drove women engaged in prostitution to PEIFFER to provide PEIFFER with commercial sex services.

(f) In or about and between 2014 and 2018, CID DOMINGUEZ provided payment to the women whom Co-Conspirator #2 drove to PEIFFER and provided PEIFFER with commercial sex services.

(g) On or about June 10, 2018, PEIFFER sent a text message to Co-Conspirator #2 asking if Co-Conspirator #2 was driving a woman that evening.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TEN

(Travel Act Conspiracy – Godinez Prostitution Business)

33. The allegations contained in paragraphs two, three, eight, nine, 11 and 12 are realleged and incorporated as if fully set forth in this paragraph.

34. In or about and between April 2017 and March 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants CRISTIAN NOE GODINEZ, also known as “El Chapparo” and “Alex,” and WAYNE PEIFFER, together with others, did knowingly and willfully conspire to:

(a) use one or more facilities in interstate and foreign commerce with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of unlawful activity, to wit: a business enterprise involving prostitution, in violation of the laws of the State of New York, and thereafter to perform acts to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of such unlawful activity, contrary to Title 18, United States Code, Section 1952(a)(3); and

(b) use one or more facilities in interstate and foreign commerce with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of unlawful activity, to wit: bribery, in violation of the laws of the State of New York, and thereafter to perform acts to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of such unlawful activity, contrary to Title 18, United States Code, Section 1952(a)(3).

35. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants CRISTIAN NOE GODINEZ, also known as “El Chapparo” and “Alex,” and WAYNE PEIFFER, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about April 23, 2017, GODINEZ and PEIFFER agreed that GODINEZ would drive a woman engaged in prostitution to the BPD station to provide commercial sex services to PEIFFER.

(b) On or about September 16, 2017, GODINEZ and PEIFFER agreed that GODINEZ would drive a woman engaged in prostitution to the BPD station to provide commercial sex services to PEIFFER.

(c) On or about December 2, 2017, GODINEZ and PEIFFER agreed that GODINEZ would drive a woman engaged in prostitution to the BPD station to provide commercial sex services to PEIFFER.

(d) On or about February 24, 2018, GODINEZ and PEIFFER agreed that GODINEZ would drive a woman engaged in prostitution to the BPD station to provide commercial sex services to PEIFFER.

(e) On or about May 1, 2020, GODINEZ drove a woman to Brewster, New York, for the purpose of engaging in the business of prostitution.

(f) On or about March 2, 2021, GODINEZ sent one or more text messages to customers of his prostitution business in Brewster, New York.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT ELEVEN
(Promotion of Prostitution)

36. The allegations contained in paragraphs one, three through seven, ten and 12 are realleged and incorporated as if fully set forth in this paragraph.

37. In or about and between 2010 and October 2018, both dates being approximate and inclusive, within the Southern District of New York, the defendants ROBERTO

CESAR CID DOMINGUEZ and WAYNE PEIFFER, together with others, did knowingly and intentionally use one or more facilities in interstate commerce, to wit: one or more cellular telephones, with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on, of unlawful activity, to wit: a business enterprise involving prostitution, in violation of the laws of the State of New York, and thereafter performed and attempted to perform the promotion, management, establishment, carrying on and facilitation of the promotion, management, establishment and carrying on of such unlawful activity.

(Title 18, United States Code, Sections 1952(a)(3)(A), 2 and 3551 et seq.)

COUNT TWELVE
(Promotion of Prostitution)

38. The allegations contained in paragraphs two, three, eight, nine, 11 and 12 are realleged and incorporated as if fully set forth in this paragraph.

39. In or about and between April 2017 and March 2021, both dates being approximate and inclusive, within the Southern District of New York, the defendants CRISTIAN NOE GODINEZ, also known as “El Chapparo” and “Alex,” and WAYNE PEIFFER, together with others, did knowingly and intentionally use one or more facilities in interstate commerce, to wit: one or more cellular telephones, with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on, of unlawful activity, to wit: a business enterprise involving prostitution, in violation of the laws of the State of New York, and thereafter performed and attempted to perform the promotion, management, establishment, carrying on and facilitation of the promotion, management, establishment and carrying on of such unlawful activity.

(Title 18, United States Code, Sections 1952(a)(3)(A), 2 and 3551 et seq.)

COUNT THIRTEEN

(Use of Interstate Facilities to Commit Bribery)

40. The allegations contained in paragraphs one, three through seven, ten and 12 are realleged and incorporated as if fully set forth in this paragraph.

41. In or about and between 2010 and October 2018, both dates being approximate and inclusive, within the Southern District of New York, the defendants ROBERTO CESAR CID DOMINGUEZ and WAYNE PEIFFER, together with others, did knowingly and intentionally use one or more facilities in interstate and foreign commerce, to wit: one or more cellular telephones, with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of unlawful activity, to wit: bribery, in violation of the laws of the State of New York, and thereafter performed and attempted to perform the distribution of the proceeds of such unlawful activity and the promotion, management, establishment, carrying on and facilitation of the promotion, management and carrying on of such unlawful activity.

(Title 18, United States Code, Sections 1952(a)(3)(A), 2 and 3551 et seq.)

COUNT FOURTEEN

(Use of Interstate Facilities to Commit Bribery)

42. The allegations contained in paragraphs two, three, eight, nine, 11 and 12 are realleged and incorporated as if fully set forth in this paragraph.

43. In or about and between April 2017 and March 2021, both dates being approximate and inclusive, within the Southern District of New York, the defendants CRISTIAN NOE GODINEZ, also known as “El Chapparo” and “Alex,” and WAYNE PEIFFER, together with others, did knowingly and intentionally use one or more facilities in interstate and foreign commerce, to wit: one or more cellular telephones, with intent to promote, manage, establish,

carry on and facilitate the promotion, management, establishment and carrying on of unlawful activity, to wit: bribery, in violation of the laws of the State of New York, and thereafter performed and attempted to perform the distribution of the proceeds of such unlawful activity and the promotion, management, establishment, carrying on and facilitation of the promotion, management and carrying on of such unlawful activity.

(Title 18, United States Code, Sections 1952(a)(3)(A), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE, THREE AND FIVE THROUGH FOURTEEN

44. The United States hereby gives notice to the defendants charged in Counts One, Three and Five through Fourteen that, upon their conviction of any such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

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 party;
- (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 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 defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS TWO AND FOUR

45. The United States hereby gives notice to the defendants charged in Counts Two and Four that, upon their conviction of either such offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1594(d), of (a) any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offenses, and any property traceable to such property; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses, or any property traceable to such property.

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

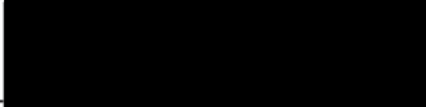
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be 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 defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 1594(d); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON



BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#2021R00700
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT
EASTERN District of NEW YORK
CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

LUZ ELVIRA CARDONA, also known as "Lucy," ROBERTO CESAR CID DOMINGUEZ, CRISTIAN NOE GODINEZ, also known as "El Chapparo" and "Alex," BLANCA HERNANDEZ MORALES, also known as "Nancy," "Maria Elena" and "Malena," JOSE FACUNDO ZARATE MORALES, also known as "El Guero," and WAYNE PEIFFER,

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 371, 1591(a)(1), 1591(a)(2), 1591(b)(1), 1591(b)(2), 1951(a), 1952(a)(3)(A), 2423(a), 2423(c), 2 and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.

[Redacted Signature]

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Margaret Lee and Nicholas J. Moscow, Assistant U.S. Attorneys (718) 254-7000