

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

MARIA DEL CARMEN VASQUEZ, :

JORGE VASQUEZ-RAMIREZ, :

JUAN JOSE JIMENEZ BRAVO, :

a/k/a "Juan Carlos," :

MAYTE ZUNIGA BRACHO, :

ENARDYS FERNANDEZ, :

CARLOS SANTANA, :

JORGE GONZALEZ, :

a/k/a "Jorgito," :

a/k/a "Barbie," and :

ELSA GUADALUPE DURAN, :

a/k/a "Elsa Cruz," :

Defendants.

- - - - - X

16 CRIM 208
SEALED INDICTMENT

16 Cr. ___ ()

COUNT ONE

The Grand Jury charges:

1. From in or about June 2015, up to and including in or about October 2016, in the Southern District of New York and elsewhere, MARIA DEL CARMEN VASQUEZ, JORGE VASQUEZ-RAMIREZ, JUAN JOSE JIMENEZ BRAVO, a/k/a "Juan Carlos," MAYTE ZUNIGA BRACHO, ENARDYS FERNANDEZ, CARLOS SANTANA, JORGE GONZALEZ, a/k/a "Jorgito," a/k/a "Barbie," and ELSA GUADALUPE DURAN, a/k/a "Elsa Cruz," the defendants, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit,

violations of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(A)(iii).

2. It was a part and an object of the conspiracy that MARIA DEL CARMEN VASQUEZ, JORGE VASQUEZ-RAMIREZ, JUAN JOSE JIMENEZ BRAVO, a/k/a "Juan Carlos," MAYTE ZUNIGA BRACHO, ENARDYS FERNANDEZ, CARLOS SANTANA, JORGE GONZALEZ, a/k/a "Jorgito," a/k/a "Barbie," and ELSA GUADALUPE DURAN, a/k/a "Elsa Cruz," the defendants, and others known and unknown, knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, would and did transport, and move and attempt to transport and move such alien within the United States by means of transportation and otherwise, in furtherance of such violation of law, and did so for private financial gain.

3. It was further a part and an object of the conspiracy that MARIA DEL CARMEN VASQUEZ, JORGE VASQUEZ-RAMIREZ, JUAN JOSE JIMENEZ BRAVO, a/k/a "Juan Carlos," MAYTE ZUNIGA BRACHO, ENARDYS FERNANDEZ, CARLOS SANTANA, JORGE GONZALEZ, a/k/a "Jorgito," a/k/a "Barbie," and ELSA GUADALUPE DURAN, a/k/a "Elsa Cruz," the defendants, knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield from detection, and did attempt to conceal, harbor and shield from

detection, such alien in any place, including any building and any means of transportation, and did so for private financial gain.

OVERT ACTS

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about August 2015, MARIA DEL CARMEN VASQUEZ, the defendant, traveled from Laredo, Texas, through the Southern District of New York in order to obtain payment for her role in transporting and harboring illegal aliens.

b. In or about August 2015, JORGE VASQUEZ-RAMIREZ, the defendant, traveled from Laredo, Texas, through the Southern District of New York in order to obtain payment for his role in transporting and harboring illegal aliens.

c. In or about September 2015, JUAN JOSE JIMENEZ BRAVO, a/k/a "Juan Carlos," the defendant, traveled from Laredo, Texas, through the Southern District of New York in order to obtain payment for his role in transporting and harboring illegal aliens.

d. In or about September 2015, MAYTE ZUNIGA BRACHO, the defendant, transported an illegal alien to a hotel in the vicinity of Laredo, Texas, and arranged payment for the hotel room, in order to harbor that person.

e. In or about January 2016, ENARDYS FERNANDEZ, the defendant, attempted to transport illegal aliens past a United States Border Patrol checkpoint located in Laredo, Texas.

f. In or about September 2015, CARLOS SANTANA, the defendant, met with BRAVO in order to provide BRAVO with money in exchange for BRAVO's role in harboring and transporting illegal aliens from Texas through the Southern District of New York.

g. In or about November 2015, JORGE GONZALEZ, a/k/a "Jorgito," a/k/a "Barbie," the defendant, attempted to harbor and transport illegal aliens across the United States-Mexico border and into Texas.

h. In or about September 2015, ELSA GUADALUPE DURAN, a/k/a "Elsa Cruz," the defendant, arranged to rent vehicles from a car rental facility so that the vehicles could be used to transport co-conspirators and illegal aliens from Texas through the Southern District of New York.

(Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and
1324(a)(1)(B)(i).)

FORFEITURE

5. As a result of committing the offense alleged in Count One of this Indictment, MARIA DEL CARMEN VASQUEZ, JORGE VASQUEZ-RAMIREZ, JUAN JOSE JIMENEZ BRAVO, a/k/a "Juan Carlos," MAYTE ZUNIGA BRACHO, ENARDYS FERNANDEZ, CARLOS SANTANA, JORGE GONZALEZ, a/k/a "Jorgito," a/k/a "Barbie," and ELSA GUADALUPE DURAN, a/k/a "Elsa Cruz," the defendants, shall forfeit to the United States pursuant to Title 8, United States Code, Section 1324(b) and Title 18 United States Code Section 982(a)(6), all conveyances, including any vessel, vehicle, or aircraft, used in the commission of the offense charged in Count One of the Indictment, and all property traceable to such conveyances; the gross proceeds of said offense, and all property traceable to such proceeds; all property, real and personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense charged in Count One of the Indictment; and all property, real or personal, that was used to facilitate, or was intended to be used to facilitate, the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

SUBSTITUTE ASSETS PROVISION

6. 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;


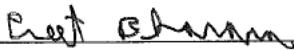
d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 8, United States Code, Section 1324;
Title 18, United States Code, Section 982;
Title 21, United States Code, 853; and
Title 28, United States Code, 2461.)

 FOREPERSON



PREET BHARARA
United States Attorney

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SEALED INDICTMENT

16 Cr. ____ ()

Title 8, United States Code, Sections
1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i)

PREET BHARARA

United States Attorney.

A TRUE BILL

Foreperson.
