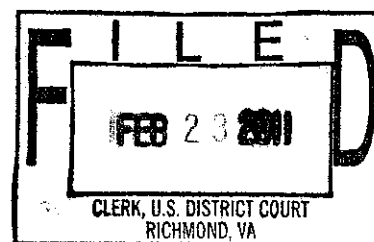


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Richmond Division



UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 3:10cr308
	)	
ISRAEL CRUZ MILLAN, (1)	)	18 U.S.C. § 1962(d)
a/k/a "El Muerto,"	)	Racketeering Conspiracy
	)	(Count 1)
CHRISTIAN MARTINEZ-	)	
ARELLANO, a/k/a "Chachito," (2)	)	18 U.S.C. § 1959(a)(1)
(phone number (804) 617-4235),	)	Kidnapping in Aid of Racketeering Activity
	)	(Counts 5 and 7)
JAVIER ZUBIATE-LOPEZ, (3)	)	
a/k/a "Pelon,"	)	18 U.S.C. § 1959(a)(1)
(phone number (804) 306-3804),	)	Murder in Aid of Racketeering Activity
	)	(Count 4)
JOSE SANCHEZ-HERRERA (4)	)	
(phone numbers (804) 469-1038	)	18 U.S.C. § 1959(a)(3)
and (843) 467-1304),	)	Assault in Aid of Racketeering
	)	(Counts 2, 6, and 8)
JOSE CHAVARRIA RAMIREZ, (5)	)	
a/k/a "Negrito,"	)	18 U.S.C. § 924(c)
(phone number (804) 822-7809),	)	Possessing a Firearm in Furtherance of a
	)	Crime of Violence
	)	(Counts 3, 9, and 10)
KEVIN GARCIA FUERTES , (8)	)	
a/k/a "Kerlin Esquivel-Fuentes,"	)	
"Cirilio" and "Honduras,"	)	18 U.S.C. § 1028(f)
(phone number (804) 469-1038),	)	Conspiracy to Possess, Produce and Transfer
	)	False Identification Documents and
	)	Possess a Document-Making Implement
ARMANDO GONZALEZ MEDINA, (9)	)	(Count 11)
a/k/a "Pablito,"	)	
(phone number (804) 420-5963),	)	
	)	18 U.S.C. § 1956(h)
EDY OLIVEREZ-JIMINEZ, (11)	)	Money Laundering Conspiracy
a/k/a "Daniel," "Erasmus," "Ulysses,"	)	(Count 12)
and "Jesus,"	)	
(phone number (757) 575-0584),	)	Notice of Special Sentencing Allegation
	)	

ERIK MARTINEZ-ORTIZ, (12) )  
 a/k/a "Enrique Ortiz-Matrinez" )  
 and "Perruchi," )  
 )  
 FRANCISCO FERNANDEZ- )  
 ALCANTARA, (14) )  
 a/k/a "Paco" and "Panteclan," )  
 )  
 EULALIO ALCANTARA CRUZ, (15) )  
 a/k/a "Homero" and "Romero," )  
 (phone number (703) 986-6616), )  
 )  
 RICARDO PATINA VARGUS, (17) )  
 a/k/a "Perruchi," )  
 (phone number (401) 481-4817), )  
 )  
 DIEGO CORTEZ-ANGEL, (18) )  
 a/k/a "Arian," )  
 (phone number (479) 283-9953), )  
 )  
 ISMAEL KEVIN QUINTANA- )  
 RAMIREZ, (19) )  
 a/k/a "Perron," )  
 (phone number (502) 310-2289), )  
 )  
 JORGE ALEJANDRO GONZALEZ- )  
 GARCIA, (20) )  
 (phone number (574) 601-7502), )  
 )  
 LUIS ZUNIGA-GALVAN, (21) )  
 a/k/a "Pisa" and "Rana," )  
 (phone number (617) 963-9232), )  
 )  
 ALFONSO ALCARAZ-PALOMARES, (22) )  
 a/k/a "El Pina," )  
 (phone numbers (501) 612-7013 )  
 and (501) 256-3799), )  
 )  
 IVAN ZARATE CURI, (23) )  
 a/k/a "Loces," )  
 (phone number (615) 405-3076), )  
 )  
 DORIAN SANCHEZ-ACOSTA, (24) )  
 a/k/a "Doriel Sanchez" and "Pancho," )  
 (phone number (919) 841-6228), )

JOSE FRANCISCO RUIZ-SANCHEZ, (25) )  
a/k/a "Jose Francisco Sanchez-Ruiz" )  
and "Pancho," )  
(phone number (216) 244-4271), )  
GABRIEL SOBERANAS-GRADA, (26) )  
(phone number (336) 415-1050), )  
JUAN ARROYO-PANTOJA, (28) )  
a/k/a "Juan Carlos Arroyo-Pantojo" )  
(phone number (910) 393-9912), )  
Defendants. )

SECOND SUPERSEDING INDICTMENT

February 2011 Term - At Richmond, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE  
(Racketeering Conspiracy)

The Enterprise

At all times relevant to this Indictment:

1. The defendants:

ISRAEL CRUZ MILLAN,  
a/k/a "El Muerto,"

CHRISTIAN MARTINEZ-ARELLANO,  
a/k/a "Chachito,"  
(phone number (804) 617-4235),

JAVIER ZUBIATE-LOPEZ,  
a/k/a "Pelon"  
(phone number (804) 306-3804),

JOSE SANCHEZ-HERRERA,  
(phone numbers (804) 469-1038 and (843) 467-1304),

JOSE CHAVARRIA RAMIREZ,  
a/k/a "Negrito,"  
(phone number (804) 822-7809),

KEVIN GARCIA FUERTES,  
a/k/a "Kerlin Esquivel-Fuentes," "Cirilio," and "Honduras,"  
(phone number (804) 469-1038),

ARMANDO GONZALEZ MEDINA,  
a/k/a "Pablito,"  
(phone number (804) 420-5963),

EDY OLIVEREZ-JIMINEZ,  
a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus"  
(phone number (757) 575-0584),

ERIK MARTINEZ-ORTIZ,  
a/k/a "Enrique Ortiz-Matrinez" and "Perruchi,"

FRANCISCO FERNANDEZ-ALCANTARA,  
a/k/a "Paco" and "Panteclan,"

EULALIO ALCANTARA CRUZ,  
a/k/a "Homero" and "Romero,"  
(phone number (703) 986-6616),

RICARDO PATINA VARGUS,  
a/k/a "Perruchi,"  
(phone number (401) 481-4817),

DIEGO CORTEZ-ANGEL,  
a/k/a "Arian,"  
(phone number (479) 283-9953),

ISMAEL KEVIN QUINTANA-RAMIREZ,  
a/k/a "Perron,"  
(phone number (502) 310-2289),

JORGE ALEJANDRO GONZALEZ-GARCIA,  
(phone number (574) 601-7502),

LUIS ZUNIGA-GALVAN,  
a/k/a "Pisa" and "Rana,"  
(phone number (617) 963-9232),

ALFONSO ALCARAZ-PALOMARES,  
a/k/a "El Pina,"  
(phone numbers (501) 612-7013 and (501) 256-3799),

IVAN ZARATE CURI,  
a/k/a "Loces"  
(phone number (615) 405-3076),

DORIAN SANCHEZ-ACOSTA,  
a/k/a "Doriel Sanchez" and "Pancho,"  
(phone number (919) 841-6228),

JOSE FRANCISCO RUIZ-SANCHEZ,  
a/k/a "Jose Francisco Sanchez-Ruiz" and "Pancho,"  
(phone number (216) 244-4271),

GABRIEL SOBERANAS-GRADA,  
(phone number (336) 415-1050),

JUAN ARROYO-PANTOJA,  
a/k/a "Juan Carlos Arroyo-Pantojo,"  
(phone number (910) 393-9912),

and others known and unknown to the Grand Jury, were members and associates of the Fraudulent Documents Enterprise, hereinafter referred to as the "FDE." The FDE operated in the Eastern District of Virginia and elsewhere within the jurisdiction of the Court and was a criminal organization whose members and associates engaged in criminal acts, including murder, kidnapping, trafficking in false identification documents, and money laundering.

2. The FDE, including its members and associates, constituted an "Enterprise" as defined by Title 18, United States Code, Section 1961(4) (hereinafter "the Enterprise"), that is, a group of individuals associated in fact. At all times relevant and as described in greater detail below, the FDE members and associates participated in the operation and management of the FDE's affairs. The Enterprise constituted an ongoing organization whose leaders, members, and close associates functioned as a continuing unit for the common purpose of achieving the

objectives of the Enterprise. This Enterprise was engaged in, and its activities affected, interstate and foreign commerce.

3. **FDE Structure and Hierarchy** - The FDE was a highly organized criminal Enterprise devoted to the production and sale of false identification documents with a defined, multi-level chain of command.

a. The overall supervisor of the organization was based in Mexico. Within the United States, the FDE was composed of individual cells located at various cities throughout the country. From at least early 2010 through the execution of search and arrest warrants on November 18, 2010, the FDE had cells operating in Richmond, Norfolk, Virginia Beach, and Manassas, Virginia; Fayetteville and Little Rock, Arkansas; New Haven, Connecticut; Mishawaka, Indiana; Lexington and Louisville, Kentucky; Chelsea, Massachusetts; St. Louis, Missouri; Chapel Hill, Greensboro, Raleigh, and Wilmington, North Carolina; Cincinnati, Ohio; Providence, Rhode Island; and Nashville, Tennessee.

b. From at least January 2010 through on or about November 18, 2010, the overall manager of the FDE's operations within the United States was ISRAEL CRUZ MILLAN, a/k/a "El Muerto."

c. Beneath CRUZ MILLAN in each of the cities were managers, who would supervise the production of false identification documents in each of the cities.

d. Beneath the managers were "runners" who solicited illegal aliens interested in purchasing false identification documents to facilitate their presence within the United States.

4. **FDE Operations** - Through its operations, the FDE produced, transferred, and sold false identification documents to illegal aliens residing within the United States.

a. Within each cell, the FDE produced and sold high-quality false identification documents, including Permanent Resident Alien, Social Security, state identification and foreign identification cards. Those documents were sold by the runners in exchange for a set price that depended on a particular location's market, generally ranging from \$150-\$250 for a set of false documents (*i.e.*, a Social Security card and Permanent Resident Alien card). The runners generally used alias names, as opposed to their true identities, in connection with these transactions.

b. To advertise the FDE's business, the runners distributed business cards (called "18's," referring to how 18 cards can be printed on one piece of paper) in the Hispanic community with alias names and contact cellular telephones, which were generally Sprint pre-paid phones subscribed to fictitious names and addresses.

c. Once a customer was identified, the runner would make arrangements to meet with the customer to exchange information and money. Typically, a customer would provide a down payment for the purchase of false identification documents, such as a counterfeit Permanent Resident Alien and Social Security cards. Other documents were also available, including driver's licenses from a number of different states and foreign countries. Members of the FDE frequently used camera phones to take photographs of the customers and then texted the photograph and biographical data to the document manufacturer (usually the cell leader) for that specific market.

d. Once the set of false identification documents was complete, the runner would meet with the customer. During that meeting, the runner would provide the false identification documents to the customer in exchange for the remaining payment due. Each cell generally maintained detailed sales records recording the details about the sales transactions.

e. The proceeds from each sale would be divided between the runner, the cell manager, and the upper level managers of the organization. On a regular basis, CRUZ MILLAN instructed cell leaders to wire illegal proceeds to upper management in Mexico through a variety of methods, including Western Union. Western Union records reflect that from January 2008 through November 2010, members of the FDE wire transferred in excess of \$1,000,000 to Mexico.

5. **FDE Management and Control** - To facilitate the Enterprise's ongoing operations, the FDE had significant internal controls and perpetrated violent acts within and outside the enterprise.

a. Within the Enterprise, CRUZ MILLAN regularly corresponded with cell leaders regarding various FDE activities, including inventory, bi-weekly sales reports, and competition. Deviation from these protocols was not accepted and members who violated internal rules were subject to discipline, which included shaving of eyebrows, wearing weights, spankings, beatings, and more violent acts.

b. The FDE structured its operations in similar fashion to a business, including strictly defined positions and allowances for potential promotion within the FDE. In the event there were problems with the manufacturing process or cell members violating the FDE's rules, CRUZ MILLAN would be advised of the situation and he would dictate the steps in resolving a particular issue.

c. Outside of the Enterprise, the FDE engaged in extensive violent acts with the goal of driving out the competition from each of the cell cities. The FDE would identify the competitors and lure them to particular locations for kidnappings, beatings, and, on at least one occasion, murder.

6. **Management of Document Production Cells by Defendant ISRAEL CRUZ**

**MILLAN, a/k/a "El Muerto"** - Beginning prior to January 2010, the exact date being unknown, defendant ISRAEL CRUZ MILLAN, also known as "El Muerto," established his control and authority over managing various document production cells located at various locations within the United States, including Virginia, Arkansas, Connecticut, Indiana, Kentucky, Massachusetts, Missouri, North Carolina, Ohio, Rhode Island, and Tennessee. Over the course of the conspiracy, CRUZ MILLAN managed and supervised the day-to-day operations of the cells by repeated contact with the managers and others at each document production cell. At various times from in or about August 2010 and continuing through in or about November 2010, CRUZ MILLAN had direct contact with the following document production cell managers located throughout the United States. The substance of some of those contacts are further described below in this indictment, which are accordingly divided by regions:

- a. CHRISTIAN MARTINEZ-ARELLANO, a/k/a "Chachito," (phone number (804) 617-4235) (Richmond, Virginia area);
- b. EDY OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus" (phone number (757) 575-0584) (Virginia Beach, Virginia area);
- c. EULALIO ALCANTARA CRUZ, a/k/a "Homero" and "Romero," (phone number (703) 986-6616) (Manassas, Virginia area);
- d. ALFONSO ALCARAZ-PALOMARES, a/k/a "El Pina," (phone numbers (501) 612-7013 and (501) 256-3799) (Little Rock, Arkansas area);
- e. DIEGO CORTEZ-ANGEL, a/k/a "Arian," (phone number (479) 283-9953) (Fayetteville, Arkansas area);

- f. JORGE ALEJANDRO GONZALEZ-GARCIA, (phone number (574) 601-7502) (Mishawaka, Indiana area);
- g. ISMAEL KEVIN QUINTANA-RAMIREZ, a/k/a "Perron," (phone number (502) 310-2289) (Fairdale, Kentucky area);
- h. LUIS ZUNIGA-GALVAN, a/k/a "Pisa" and "Rana," (phone number (617) 963-9232) (Chelsea, Massachusetts area);
- i. DORIAN SANCHEZ-ACOSTA, a/k/a "Doriel Sanchez" and "Pancho," (phone number (919) 841-6228) (Raleigh, North Carolina area);
- j. GABRIEL SOBERANAS-GRADA, (phone number (336) 415-1050) (Greensboro, North Carolina area);
- k. JUAN ARROYO-PANTOJA, a/k/a "Juan Carlos Arroyo-Pantojo," (phone number (910) 393-9912) (Wilmington, North Carolina area);
- l. JOSE FRANCISCO RUIZ-SANCHEZ, a/k/a "Jose Francisco Sanchez-Ruiz" and "Pancho," (phone number (216) 244-4271) (Cincinnati, Ohio area);
- m. RICARDO PATINA VARGUS, a/k/a "Perruchi," (phone number (401) 481-4817) (Pawtucket, Rhode Island area); and
- n. IVAN ZARATE CURI, a/k/a "Loces" (phone number (615) 405-3076) (Nashville, Tennessee area).

**Purposes and Objectives of the Enterprise**

- 7. The purposes of the Enterprise included the following:
  - a. Establishing a network within the United States for the sale of false identification documents by organizing cells within targeted cities, taking into account each

location's amount of competition, profitability, law enforcement presence, and potential client base comprising of illegal aliens.

b. Structuring each cell location with an overall manager who supervised a number of runners dedicated to advertising and selling false identification documents to illegal aliens residing within the cell area.

c. Selling large numbers of false identification documents to illegal aliens residing in the cell areas in exchange for United States currency.

d. Maintaining control over the distribution of false identification documents by requiring the cell managers to answer to the overall supervisor for operations in the United States regarding the amount of sales, inventory, and other details relating to each cell's operation.

e. Keeping members of the Enterprise under control and preventing theft from the FDE through the use of intimidation, violence, and threats of violence.

f. Distributing the proceeds and funding the ongoing operation of the Enterprise through the sale of false identification documents and dispersing the proceeds within the cell and up the management chain through a variety of methods, including Western Union wire transfers.

g. Eliminating competitors of the Enterprise through acts of violence, including murder, kidnapping, assault, and threats of violence.

h. Maintaining the security of the Enterprise and avoiding law enforcement scrutiny by establishing the cells within areas that may have a limited law enforcement presence and changing practices or relocating members when a particular cell is subjected to law enforcement scrutiny.

### Means and Methods of the Enterprise

8. As part of the ongoing affairs of the Enterprise, the defendants and their associates, in conducting, participating, and achieving the purposes of the Enterprise and Racketeering Conspiracy, would:

- a. establish document production cells at various locations within the United States, selecting areas that are more profitable and secure based on several criteria, including the amount of competition, profitability, law enforcement presence, and potential client base comprised of illegal aliens;
- b. relocate managers and runners from other locations to operate new document production cells;
- c. maintain control over the cell locations through inventory control, detailed sales reports, telephone contacts, acts of violence, and threats of violence;
- d. maintain control of document production market by identifying and targeting competitor operators for harassment and violent acts, including murder, kidnapping, assault, and threats of violence;
- e. advertise the document production centers to the client base through daily distribution of business cards (referred to as "18's"), word of mouth, and other methods;
- f. recruit clients who sought to obtain false identification documents, including counterfeit Permanent Resident Alien Cards (also known as "Green Cards"), Social Security Cards, out-of-state identification cards, and various international documents;
- g. relay identifying information and photographs from clients to the managers of the document control centers via cellular telephones and direct contact;

- h. use a document-making implement to produce false identification documents, depending on the nature of the order received from a particular client;
- i. transfer the false identification documents to customers in exchange for United States currency;
- j. provide bi-weekly reports up the chain of the organization, relaying details regarding income, expenses, and inventory; and
- k. funnel proceeds from the document production cells to the upper management of the organization through a variety of methods, including Western Union wire transfers under \$1,000 to various individuals within and outside the United States.

**The Racketeering Conspiracy**

9. Beginning at least in 2008, the exact date being unknown to the Grand Jury, and continuing thereafter up to and including November 18, 2010, in the Eastern District of Virginia, and elsewhere within the jurisdiction of the Court, the defendants:

ISRAEL CRUZ MILLAN,  
a/k/a "El Muerto,"

CHRISTIAN MARTINEZ-ARELLANO,  
a/k/a "Chachito,"  
(phone number (804) 617-4235),

JAVIER ZUBIATE-LOPEZ,  
a/k/a "Pelon"  
(phone number (804) 306-3804),

JOSE SANCHEZ-HERRERA,  
(phone numbers (804) 469-1038 and (843) 467-1304),

JOSE CHAVARRIA RAMIREZ,  
a/k/a "Negrito,"  
(phone number (804) 822-7809),

KEVIN GARCIA FUERTES,  
a/k/a "Kerlin Esquivel-Fuentes," "Cirilio," and "Honduras,"  
(phone number (804) 469-1038),

ARMANDO GONZALEZ MEDINA,  
a/k/a "Pablito,"  
(phone number (804) 420-5963),

EDY OLIVEREZ-JIMINEZ,  
a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus"  
(phone number (757) 575-0584),

ERIK MARTINEZ-ORTIZ,  
a/k/a "Enrique Ortiz-Matrinez" and "Perruchi,"

FRANCISCO FERNANDEZ-ALCANTARA,  
a/k/a "Paco" and "Panteclan,"

EULALIO ALCANTARA CRUZ,  
a/k/a "Homero" and "Romero,"  
(phone number (703) 986-6616),

RICARDO PATINA VARGUS,  
a/k/a "Perruchi,"  
(phone number (401) 481-4817),

DIEGO CORTEZ-ANGEL,  
a/k/a "Arian,"  
(phone number (479) 283-9953),

ISMAEL KEVIN QUINTANA-RAMIREZ,  
a/k/a "Perron,"  
(phone number (502) 310-2289),

JORGE ALEJANDRO GONZALEZ-GARCIA,  
(phone number (574) 601-7502),

LUIS ZUNIGA-GALVAN,  
a/k/a "Pisa" and "Rana,"  
(phone number (617) 963-9232),

ALFONSO ALCARAZ-PALOMARES,  
a/k/a "El Pina,"  
(phone numbers (501) 612-7013 and (501) 256-3799),

IVAN ZARATE CURI,  
a/k/a "Loces"  
(phone number (615) 405-3076),

DORIAN SANCHEZ-ACOSTA,  
a/k/a "Doriel Sanchez" and "Pancho,"  
(phone number (919) 841-6228),

JOSE FRANCISCO RUIZ-SANCHEZ,  
a/k/a "Jose Francisco Sanchez-Ruiz" and "Pancho,"  
(phone number (216) 244-4271),

GABRIEL SOBERANAS-GRADA,  
(phone number (336) 415-1050),

JUAN ARROYO-PANTOJA,  
a/k/a "Juan Carlos Arroyo-Pantojo,"  
(phone number (910) 393-9912),

being persons employed by and associated with the Enterprise, as described in Paragraphs 1 through 8, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons, known and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity involving multiple acts indictable under the following provisions of federal law:

- a. 18 U.S.C. section 1028(a) (fraud and related activity in connection with identification documents)
- b. 18 U.S.C. section 1028(f) (attempt and conspiracy to violate section 1028(a))
- c. 18 U.S.C. section 1956(a)(1) and 1956(a)(2) (money laundering)
- d. 18 U.S.C. section 1956(h) (money laundering conspiracy)

and multiple acts involving state offenses chargeable under the following provisions of state law:

- e. Murder in violation of Ark. Code Ann. §§ 5-10-101, 5-10-102, 5-3-401 (conspiracy), 5-2-403 (accomplices), 5-3-201 (attempt).
- f. Kidnapping in violation of Ark. Code Ann. §§ 5-11-102 (kidnapping), 5-3-401 (conspiracy), 5-2-403 (accomplices); 5-3-201 (attempt).

10. It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

**Overt Acts**

11. In furtherance of the racketeering conspiracy and to effect the purposes of the Enterprise, the following overt acts, among others not listed herein, were committed by the defendants and other conspirators in the Eastern District of Virginia and elsewhere:

**Document Production Cell Operating In and Around the Richmond, Virginia Area:  
(Defendants 1, 2, 3, 4, 5, 8, 9, 11, and 12)**

***Management Activities and Kidnapping Within the Richmond, Virginia Document Production Cell:***

12. Beginning before in or about January 2008 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant MARTINEZ-ARELLANO, a/k/a "Chachito," managed the Richmond, Virginia document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." In that capacity, MARTINEZ-ARELLANO, a/k/a "Chachito," provided oversight for a number of "runners," who recruited clients for the organization. Those runners included JAVIER ZUBIATE-LOPEZ, a/k/a "Pelon," (phone number (804) 306-3804), JOSE SANCHEZ-HERRERA, (phone numbers (804) 469-1038 and (843) 467-1304), JOSE CHAVARRIA RAMIREZ, a/k/a "Negrito," (phone number (804) 822-7809), KEVIN GARCIA FUERTES, a/k/a "Kerlin Esquivel-Fuentes," "Cirilio," and "Honduras," (phone number (804) 469-1038), and ARMANDO GONZALEZ MEDINA, a/k/a "Pablito," (phone number (804) 420-5963).

13. At some point prior to on or about June 16, 2009, the exact date being unknown to the Grand Jury, defendants CHRISTIAN MARTINEZ-ARELLANO, a/k/a "Chachito," (phone number (804) 617-4235), ERIK MARTINEZ-ORTIZ, a/k/a "Enrique Ortiz-Matrinez" and "Perruchi," and others unknown to the Grand Jury, identified F.A.U. as a competitor who was selling false identification documents in and around the Richmond, Virginia area. MARTINEZ-ARELLANO, MARTINEZ-ORTIZ, and others targeted F.A.U. for acts of violence aimed at deterring him (F.A.U.) and his associates from selling documents in the area.

14. On or about June 16, 2009, a person unknown to the Grand Jury, using telephone number (859) 608-2382, placed a telephone call to F.A.U. inquiring about the purchase of false identification documents. Through this call, F.A.U. arranged to meet the unknown individual at 5519 Folkstone Drive, Richmond, Virginia that same evening for the transaction.

15. On or about June 16, 2009, F.A.U. and an associate, O.A., arrived at 5519 Folkstone Drive, Richmond, Virginia, where the two victims were attacked by a group of Hispanic males, including MARTINEZ-ARELLANO and MARTINEZ-ORTIZ. MARTINEZ-ARELLANO, MARTINEZ-ORTIZ, and their co-conspirators bound the victims' hands, feet, and mouth with duct tape; repeatedly struck them with a baseball bat; and cut the victims with a knife. One of the FDE members placed the barrel of a semi-automatic handgun in F.A.U.'s mouth and warned him about selling false identification documents in Richmond. MARTINEZ-ARELLANO, MARTINEZ-ORTIZ, and the other unknown Hispanic males departed the premises and left the two victims bound on the floor.

16. On or about August 29, 2010, MARTINEZ-ARELLANO, a/k/a "Chachito," sent an inventory request to CRUZ MILLAN asking for a number of items to be used for printing counterfeit identification documents, including various identification cards for different states

and countries and three bottles of ink. "Chachito" requested that these items be sent to 5608 Melmark Road, Richmond, Virginia 23225 (the location of the Richmond, Virginia document production cell).

17. On or about September 4, 2010, EDY OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," (phone number (757) 575-0584) (the manager of the Virginia Beach, Virginia document production cell) and MARTINEZ-ARELLANO, a/k/a "Chachito," discussed "Daniel's" difficulties in printing identification cards. "Chachito" provided "Daniel" with instructions on how to print a "new one" (referring to a Resident Alien Card) and a license (referring to a state driver's license).

18. On or about September 14, 2010, OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," provided identification information for customer S.R.G. to MARTINEZ-ARELLANO, a/k/a "Chachito," for use in printing a counterfeit identification document.

19. On or about October 9, 2010, CRUZ MILLAN and MARTINEZ-ARELLANO, a/k/a "Chachito," discussed the amount of counterfeit documents recently sold by the Richmond, Virginia document production cell. "Chachito" described the amount sold, including 148 "new ones" (referring to Green Cards), 30 for "Hondura," 40 for "cuate," and 40 for "Salvador."

***Activities Involving "Runners" from the Richmond, Virginia Document Production Cell:***

20. On or about April 8, 2010, a confidential source contacted JAVIER ZUBIATE-LOPEZ, a/k/a "Pelon," at phone number (804) 306-3804 and inquired about the purchase of counterfeit identification documents. Later, ZUBIATE-LOPEZ, a/k/a "Pelon," and the confidential source agreed to meet at a location in Richmond, Virginia.

21. On or about April 8, 2010, ZUBIATE-LOPEZ, a/k/a "Pelon," met with the confidential source and obtained the source's picture and biographical information for use in creating the counterfeit documents. The confidential source paid \$60 to ZUBIATE-LOPEZ, a/k/a "Pelon."

22. On or about April 8, 2010, ZUBIATE-LOPEZ, a/k/a "Pelon," delivered counterfeit Resident Alien and Social Security cards to the confidential source in exchange for an additional \$140 for a total of \$200 paid for the fraudulent documents.

23. On or about May 27, 2010, a confidential source contacted JOSE SANCHEZ-HERRERA at phone number (804) 469-1038 and inquired about the purchase of counterfeit identification documents. SANCHEZ-HERRERA advised that it would cost \$200 for counterfeit Resident Alien and Social Security cards.

24. On or about May 27, 2010, SANCHEZ-HERRERA met with the confidential source and obtained the source's picture and biographical information for use in creating the counterfeit documents. The confidential source paid \$100 to SANCHEZ-HERRERA.

25. On or about May 28, 2010, SANCHEZ-HERRERA delivered counterfeit Resident Alien and Social Security cards to the confidential source in exchange for an additional \$100 for a total of \$200 paid for the fraudulent documents.

26. On or about August 13, 2009, JOSE CHAVARRIA RAMIREZ, a/k/a "Negrito," met with an undercover officer who requested the production of counterfeit identification documents. Approximately five hours after obtaining the undercover officer's picture and biographical information, RAMIREZ provided the undercover officer with a counterfeit Social Security Card and a counterfeit Resident Alien Card in exchange for \$250.

27. On or about October 15, 2010, MARTINEZ-ARELLANO, a/k/a "Chachito," and RAMIREZ discussed details regarding the production of a counterfeit Permanent Resident Alien Card, including the proper placement of the words "Resident Permanent Card" and "USA" on the card.

28. On or about October 11, 2010, MARTINEZ-ARELLANO, a/k/a "Chachito," told KEVIN GARCIA FUERTES, a/k/a "Kerlin Esquivel-Fuentes," "Cirilio," and "Honduras," that he ("Chachito") was going to Virginia Beach and asked if "Cirilio" needed anything. "Cirilio" advised that he had one license, but that it contained the wrong numbers. "Chachito" instructed "Cirilio" to resend the information and that he ("Chachito") would remake the license.

29. On or about October 29, 2010, FUERTES, a/k/a "Kerlin Esquivel-Fuentes," "Cirilio," and "Honduras," asked MARTINEZ-ARELLANO, a/k/a "Chachito," about the status of a social security card. "Chachito" responded that he had completed the jobs and provided them to the runners.

30. On or about November 1, 2010, FUERTES, a/k/a "Kerlin Esquivel-Fuentes," "Cirilio," and "Honduras," asked MARTINEZ-ARELLANO, a/k/a "Chachito," about the status of the "five" he had previously sent. "Chachito" responded that he ("Chachito") is drunk and, therefore, needed to wait two hours.

31. On or about October 16, 2010, ARMANDO GONZALEZ MEDINA, a/k/a "Pablito," (phone number (804) 420-5963) requested that MARTINEZ-ARELLANO, a/k/a "Chachito," make a Guatemalan license for A.F. in reference to an order from the previous night. "Chachito" asked what was wrong with it and asked who "finished" (referring to printing) the document. "Pablito" responded that the last name was misspelled and that he ("Pablito") had finished the document.

32. On or about November 18, 2010, MARTINEZ-ARELLANO and other members of the Richmond cell were found in possession of more than 400 fraudulent identification documents, as well as the following evidence related to the production and distribution of fraudulent identifications: computers, printers, counterfeit documents, business cards, packages of card-making stock, ledgers detailing the cell's sale activities, and miscellaneous document making tools.

**Document Production Cell Operating In and Around the Norfolk and Virginia Beach, Virginia Areas: (Defendants 1, 11, 12, 14)**

***Management Activities Within the Norfolk and Virginia Beach, Virginia Document Production Cell:***

33. Beginning before in or about August 2010 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant EDY OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," (phone number (757) 575-0584), managed the Norfolk and Virginia Beach, Virginia document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." Before relocating to the Virginia Beach area, OLIVEREZ-JIMINEZ managed the Little Rock, Arkansas document production cell. In that capacity, OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," provided oversight for a number of "runners," who recruited clients for the organization. Those runners included ERIK MARTINEZ-ORTIZ, a/k/a "Enrique Ortiz-Matrinez" and "Perruchi," and FRANCISCO FERNANDEZ-ALCANTARA, a/k/a "Paco" and "Panteclan." Leading up to and including in or about June 2010, KEVIN GARCIA FUERTES, a/k/a "Kerlin Esquivel-Fuentes," "Cirilio," and "Honduras," also served as a runner in this area prior to moving to the Richmond, Virginia document production cell.

34. On or about August 24, 2010, OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," reported bi-weekly sales figures to CRUZ MILLAN including "50 new ones, 20 North Carolina, 20 Honduras" for "1315 White Pine CT #200, Virginia Beach, VA 23453," which was the location of the document production cell.

35. On or about September 17, 2010, OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," provided CRUZ MILLAN with Western Union wire transfer information concerning various wire transfers of profits from the Virginia Beach and Norfolk, Virginia document production cells to Mexico.

36. On or about September 17, 2010, OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," caused the following Western Union wire transfer transactions to occur, each instance being a separate overt act in furtherance of the conspiracy:

Date (on or about)	Control Number	Sender Phone	Sender Initials	Amount of Transfer	Receiving Country
9/17/2010	128506475	(757) 575-0584	E.O.	\$988.00	Mexico
9/17/2010	128506611	(757) 575-0584	O.Z.C.	\$988.00	Mexico
9/17/2010	128506761	(757) 575-0584	U.P.G.	\$988.00	Mexico
9/17/2010	1793031445	(757) 575-0584	I.P.	\$985.00	Mexico
9/17/2010	9065267250	(757) 575-0584	A.C.	\$985.00	Mexico

***Activities Involving "Runners" from the Norfolk and Virginia Beach, Virginia Document Production Cell:***

37. On or about June 14, 2010, a confidential source contacted KEVIN GARCIA FUERTES, a/k/a "Kerlin Esquivel-Fuentes," "Cirilio," and "Honduras," at phone number (757) 952-4904 to inquire about the purchase of counterfeit identification documents. FUERTES instructed the confidential source to send him a text message containing the source's picture and biographical information that he (the source) wished to appear on counterfeit Resident Alien and

Social Security cards. FUERTES instructed the confidential source to meet him at a specified location the following day to receive the counterfeit identification documents.

38. On or about June 15, 2010, the confidential source met FUERTES, a/k/a "Kerlin Esquivel-Fuentes," "Cirilio," and "Honduras," in Chesapeake, Virginia. FUERTES provided the source with counterfeit Social Security and Resident Alien cards in exchange for \$150.

39. On or about August 2, 2010, a confidential source contacted OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," at (757) 575-0584 and inquired about the purchase of counterfeit identification documents. "Daniel" told the confidential source that the documents would cost \$160. "Daniel" also provided details about how the process would work and how much time it would take to return counterfeit Resident Alien and Social Security cards.

40. On or about August 2, 2010, OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," met with the confidential source. During the meeting, "Daniel" recorded the confidential source's biographical information and took a picture of the source. "Daniel" also collected a deposit of \$40 from the confidential source.

41. On or about August 3, 2010, OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," told the confidential source that another person would deliver the counterfeit identification documents.

42. On or about August 3, 2010, the confidential source met with co-conspirator Oscar Zaraut-Correa, a/k/a "Chapparro," "Carlos," and "Oscar," (not named as a defendant herein) who provided the source with counterfeit Resident Alien and Social Security cards in exchange for an additional payment of \$120. Before departing, "Carlos" provided the confidential source with two business cards for future counterfeit document purchases. The

business cards identified the phone numbers of "Carlos" at (757) 581-0201 and "Tony" at (757) 383-2646.

43. On or about September 9, 2010, a confidential source contacted FRANCISCO FERNANDEZ-ALCANTARA, a/k/a "Paco" and "Panteclan," at phone number (757) 592-4904, to inquire about the purchase of counterfeit identification documents. FERNANDEZ-ALCANTARA told the confidential source that counterfeit Resident Alien and Social Security cards would cost \$150. FERNANDEZ-ALCANTARA instructed the confidential source to send him a photograph using a camera phone.

44. On or about September 9, 2010, the confidential source met FERNANDEZ-ALCANTARA, who provided the source with counterfeit Social Security and Resident Alien cards in exchange for \$150.

45. On or about September 22, 2010, FERNANDEZ-ALCANTARA told CRUZ MILLAN about FERNANDEZ-ALCANTARA's distrust of OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," and his desire to work for "Pina" or "Chachito" (referring to MARTINEZ-ARELLANO, a/k/a "Chachito," the manager of the of the Richmond, Virginia document production cell). CRUZ MILLAN told FERNANDEZ-ALCANTARA that it would be more expensive in Richmond and instructed him to contact "Daniel" and resolve the problem, because they (referring to the organization) are all one group and should work together. During the conversation, FERNANDEZ-ALCANTARA told CRUZ MILLAN that he had passion for the job and wanted to be a "printer."

46. On or about October 16, 2010, ERIK MARTINEZ-ORTIZ, a/k/a "Enrique Ortiz-Matrinez" and "Perruchi," told CHRISTIAN MARTINEZ-ARELLANO, a/k/a "Chachito," that he had sent him ("Chachito") some "jobs" for processing.

47. On or about November 18, 2010, OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," and other members of the Virginia Beach cell were found in possession of more than 65 fraudulent identification documents, as well as the following evidence related to the production and distribution of fraudulent identifications: computers, printers, counterfeit documents, business cards, packages of card-making stock, and miscellaneous document making tools.

**Document Production Cell Operating In and Around the Manassas, Virginia Area:  
(Defendants 1 and 15)**

***Management Activities Within the Manassas, Virginia Document Production Cell:***

48. Beginning before in or about August 2010 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant EULALIO ALCANTARA CRUZ, a/k/a "Homer" and "Romero," (phone number (703) 986-6616), managed the Manassas, Virginia document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." In that capacity, CRUZ, a/k/a "Homer" and "Romero," provided oversight for a number of "runners," who recruited clients for the organization.

49. On or about August 30, 2010, CRUZ, a/k/a "Homer" and "Romero," requested additional supplies for document production from CRUZ MILLAN. Specifically, "Homer" requested "300 new 50 tps 4 tintas," referring to the type and amount of cards and ink needed to manufacture fraudulent documents.

50. On or about September 22, 2010, CRUZ, a/k/a "Homer" and "Romero," provided CRUZ MILLAN with information related to a transfer of funds derived from the sale of counterfeit identification documents.

51. On or about October 2, 2010, CRUZ MILLAN told CRUZ, a/k/a "Homero" and "Romero," to send the "stuff" from the biweekly and discussed the sales figures associated with the Manassas, Virginia document production cell's biweekly production.

52. On or about October 23, 2010, CRUZ, a/k/a "Homero" and "Romero," and MARTINEZ-ARELLANO, a/k/a "Chachito" (phone number (804) 617-4235) discussed information for various "jobs." During this conversation, "Homero" told "Chachito" that various runners operating within the organization had sent identifications for Tennessee, Guatemala, North Carolina, and Salvador.

53. On or about November 18, 2010, CRUZ, a/k/a "Homero" and "Romero," and other members of the Manassas cell were found in possession of more than 100 fraudulent documents, as well as printing equipment, business cards related to the organization, card stock, and other items related to the production and distribution of fraudulent documents.

**Document Production Cell Operating In and Around the Little Rock, Arkansas Area: (Defendants 1, 11, and 22)**

***Management Activities and Murder Within the Little Rock, Arkansas Document Production Cell:***

54. Beginning before in or about February 2010 and continuing through in or about July 2010, the exact dates being unknown to the Grand Jury, defendant EDY OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," managed the Little Rock, Arkansas document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." In that capacity, OLIVEREZ-JIMINEZ provided oversight for a number of "runners," who recruited clients for the organization.

55. At some point before on or about July 4, 2010, the exact date being unknown to the Grand Jury, defendant OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and

“Jesus,” and others unknown to the Grand Jury, identified P.R. as a competitor who was selling false identification documents in and around the Little Rock, Arkansas area. OLIVEREZ-JIMINEZ and others targeted P.R. for acts of violence aimed at deterring him (P.R.) and his associates from selling documents in the area.

56. On or about July 5, 2010, OLIVEREZ-JIMINEZ caused a person known to the Grand Jury to place a call to P.R. and inquire about the purchase of false identification documents. Through this call, P.R. arranged to meet the unknown individual at a Rally’s restaurant located in Little Rock, Arkansas.

57. On or about July 6, 2010, a person unknown to the Grand Jury placed a telephone call to P.R. inquiring about the purchase of false identification documents. Through this call, P.R. arranged to meet the unknown individual at 9500 S. Heights, Cove B, Lot # 187, Little Rock, Arkansas for the transaction.

58. On or about July 6, 2010, P.R. and an associate arrived at an abandoned trailer house located at 9500 S. Heights, Cove B, Lot # 187, Little Rock, Arkansas. P.R. entered the trailer house, where he was attacked by a group of unknown Hispanic males, including OLIVEREZ-JIMINEZ. OLIVEREZ-JIMINEZ and his coconspirators bound the victim’s hands, feet, mouth, and eyes with duct tape; repeatedly beat him; and, ultimately, caused P.R.’s death. At some point during the encounter, P.R.’s associate, who was waiting in a car, was brought into the residence. The associate was also bound with duct tape and beaten by the attackers. OLIVEREZ-JIMINEZ and the other unknown Hispanic males departed the premises and left the two victims bound on the floor. P.R. was later pronounced dead at the scene of the attack.

59. In or about July 2010, the exact dates being unknown, OLIVEREZ-JIMINEZ and other members of the Little Rock, Arkansas cell relocated to Virginia to avoid the law enforcement investigation surrounding the murder of P.R.

60. Beginning before in or about August 2010 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant ALFONSO ALCARAZ-PALOMARES, a/k/a "El Pina," (phone numbers (501) 612-7013 and (501) 256-3799), managed the Little Rock, Arkansas document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." In that capacity, ALCARAZ-PALOMARES, a/k/a "El Pina," provided oversight for a number of "runners," who recruited clients for organization.

61. On or about August 29, 2010, a person unknown to the Grand Jury sent a request for additional ink and card supplies to CRUZ MILLAN. The unknown individual requested that the items be sent to 2400 McCain Boulevard, North Little Rock, Arkansas 72116, which was the location of the document production cell.

62. On or about September 10, 2010, ALCARAZ-PALOMARES, a/k/a "El Pina," and OLIVEREZ-JIMINEZ discussed the amount of business in their respective document production cells. During the conversation, "El Pina" complained that he had delivered 1,000 cards, but did not get a raise. "Daniel" replied that 1,000 is "nothing." "El Pina" replied that sometimes he ran out of time, because he had to pick up "jobs" from these guys, referring to the runners.

63. On or about September 30, 2010, ALCARAZ-PALOMARES, a/k/a "El Pina," and CRUZ MILLAN discussed "El Pina's" distrust of a customer who was buying false documents. "El Pina" described how he was now being followed by two individuals, who were

actually law enforcement officers working in an undercover capacity. CRUZ MILLAN instructed "El Pina" to get rid of everything, including pictures, text messages, contacts, and other items. CRUZ MILLAN further instructed "El Pina" that the cell members could keep their phones, but would need to erase the memory.

64. On or about November 18, 2010, ALCARAZ-PALOMARES, a/k/a "El Pina" and other members of the Little Rock cell were found in possession of more than 270 fraudulent documents, as well as a total of \$5,307.00 in cash, 21 cellular telephones, four laptop computers, two paper cutters, four external storage media devices, two prepaid air cards, and one digital camera.

**Document Production Cell Operating In and Around the Fayetteville, Arkansas Area: (Defendants 1 and 18)**

***Management Activities Within the Fayetteville, Arkansas Document Production Cell:***

65. Beginning before in or about September 2010 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant DIEGO CORTEZ-ANGEL, a/k/a "Arian," (phone number (479) 283-9953), managed the Fayetteville, Arkansas document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." In that capacity, CORTEZ-ANGEL, a/k/a "Arian," provided oversight for a number of "runners," who recruited clients for the organization.

66. On or about August 30, 2010, a person unknown to the Grand Jury individual sent an inventory request to CRUZ MILLAN, asking for various card and ink supplies to be sent to 1320 N. Oakland Avenue, Apartment 14, Fayetteville, Arkansas 72703, the location of the document production cell.

67. On or about September 24, 2010, CRUZ MILLAN instructed CORTEZ-ANGEL, a/k/a "Arian," to send funds to R.J.M.T. Later that same day, CORTEZ-ANGEL, a/k/a "Arian," provided CRUZ MILLAN with Western Union wire transfer information relating to the requested transfer of funds to R.J.M.T. involving transaction number 1324915873. Western Union records confirm that on the same day, the following wire transfer transaction took place:

Date (on or about)	Control Number	Sender Phone	Recipient Initials	Amount of Transfer	Receiving Country
9/24/2010	1324915873	(479) 544-1116	R.J.M.T.	\$985.00	Mexico

68. On or about September 30, 2010, CORTEZ-ANGEL, a/k/a "Arian," told CRUZ MILLAN that he had the "mid-month" (referring to biweekly report) ready for CRUZ MILLAN. CORTEZ-ANGEL, a/k/a "Arian," told CRUZ MILLAN the total was \$5090.

69. On or about November 18, 2010, CORTEZ-ANGEL, a/k/a "Arian," and other members of the Fayetteville cell were found in possession of more than 110 fraudulent documents, as well as various supplies related to the production of fraudulent documents, including a laptop computer, card printer, card stock, and a ledger detailing sales.

**Document Production Cell Operating In and Around the Mishawaka, Indiana Area:  
(Defendants 1 and 20)**

***Management Activities Within the Mishawaka, Indiana Document Production Cell:***

70. Beginning before in or about September 2010 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant JORGE ALEJANDRO GONZALEZ-GARCIA (phone number (574) 601-7502), managed the Mishawaka, Indiana document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto."

71. On or about August 29, 2010, a person unknown to the Grand Jury sent a request for additional ink and card supplies to CRUZ MILLAN. The unknown individual requested that the items be sent to 918 Burdette Street, Mishawaka, Indiana, the location of the document production cell.

72. On or about October 1, 2010, GONZALEZ-GARCIA provided a bi-weekly report to CRUZ MILLAN of \$1,920, which reduced to \$1,530 after he deducted the operating expenses. CRUZ MILLAN instructed GONZALEZ-GARCIA to divide the profit amount in three parts, yielding \$512 each for GONZALEZ-GARCIA, "Perro," and the "boss."

73. On or about November 18, 2010, GONZALEZ-GARCIA of the Mishawaka cell was found in possession of more than 460 fraudulent documents, as well as the following items related to the production of fraudulent identifications: two laptop computers, a card printer, a printer, scanner, paper cutter, and cellular telephone phone.

**Document Production Cell Operating In and Around the Fairdale, Kentucky Area:  
(Defendants 1 and 19)**

***Management Activities Within the Fairdale, Kentucky Document Production Cell:***

74. Beginning before in or about September 2010 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant ISMAEL KEVIN QUINTANA-RAMIREZ, a/k/a "Perron," (phone number (502) 310-2289), managed the Fairdale, Kentucky document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." In that capacity, QUINTANA-RAMIREZ, a/k/a "Perron," provided oversight for a number of "runners," who recruited clients for the organization.

75. On or about August 29, 2010, a person unknown to the Grand Jury sent a request for additional ink and card supplies to CRUZ MILLAN. The unknown individual requested that

the items be sent to 306 Glen Ellen Road, Fairdale, Kentucky, the location of the document production cell.

76. On or about September 24, 2010, QUINTANA-RAMIREZ, a/k/a "Perron," advised CRUZ MILLAN of difficulties he ("Perron") was having with cell phone reception and the printing equipment. CRUZ MILLAN provided QUINTANA-RAMIREZ, a/k/a "Perron," with step-by-step instructions on how to correct the printing problems.

77. On or about October 1, 2010, QUINTANA-RAMIREZ, a/k/a "Perron," informed CRUZ MILLAN that the mid-month report was \$1,500. "Perron" continued that he had to do the work himself because the individuals working for him were worthless.

78. On or about November 18, 2010, QUINTANA-RAMIREZ, a/k/a "Perron," and other members of the Fairdale cell were found in possession of more than 190 fraudulent documents, as well as the following items related to the production of fraudulent identifications: two computers, a "thumb" drive, a box of card stock for identifications, printer ink for cards, two card printers, ledgers detailing the cell's activities, business cards, two firearms and ammunition.

**Document Production Cell Operating In and Around the Chelsea, Massachusetts Area:  
(Defendants 1, 21, and 24)**

***Management Activities Within the Chelsea, Massachusetts Document Production Cell:***

79. Beginning in or about September 2010 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant LUIS ZUNIGA-GALVAN, a/k/a "Pisa" and "Rana," (phone number (617) 963-9232), managed the Chelsea, Massachusetts document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." In that capacity, ZUNIGA-GALVAN, a/k/a "Pisa" and "Rana,"

oversaw the opening and continued operation of the document production cell in the Chelsea, Massachusetts area.

80. On or about September 23, 2010, CRUZ MILLAN provided SANCHEZ-ACOSTA, a/k/a "Doriel Sanchez" and "Pancho," (phone number (919) 841-6228) with the location for a new document production cell in Massachusetts: 101 Addison Street, Apartment 3, Chelsea, Massachusetts.

81. On or about September 23, 2010, ZUNIGA-GALVAN, a/k/a "Pisa" and "Rana," and CRUZ MILLAN discussed promotional efforts to get the Chelsea, Massachusetts document production cell in operation. "Rana" told CRUZ MILLAN that when people ask for a price, he was quoting them a rate of \$200 or \$180.

82. On or about September 27, 2010, ZUNIGA-GALVAN, a/k/a "Pisa" and "Rana," and CRUZ MILLAN discussed how the document production process was going in the new cell. "Rana" told CRUZ MILLAN that he was having difficulty editing the picture, but can now do it. "Rana" also advised that he had purchased a paper shredder and had retained the receipt and warranty. CRUZ MILLAN instructed "Rana" to add the shredder to his "expense list."

83. On or about October 26, 2010, ZUNIGA-GALVAN, a/k/a "Pisa" and "Rana," advised CRUZ MILLAN that there had been an error in the printing process and that one of his distributors claimed that "Rana" had not provided one of the cards. Because of this error, the client wanted the jobs for free. CRUZ MILLAN instructed "Rana" to correct the error, but to tell the distributor that this would be the last time it would be allowed.

84. On or about November 18, 2010, ZUNIGA-GALVAN, a/k/a "Pisa" and "Rana," and other members of the Chelsea cell were found in possession of more than 100 fraudulent documents, as well as the following items related to the production of fraudulent identifications:

a laptop computer, two printers (one of which was designed to print on plastic identifications), a large box containing card stock with holographic images related to drivers licenses, employment authorization documents, lawful permanent resident documents, other forms of state/ government issued identification, two paper cutters, several packages of card stock and printing paper, a glue gun, fraudulent social security cards, a document shredder, numerous business cards, notebooks/ ledgers, memory cards, and blank plastic identification making materials.

**Document Production Cell Operating In and Around the Raleigh, North Carolina Area:  
(Defendants 1 and 24)**

***Management Activities and Assault of FDE Member Suspected of Stealing Within the Raleigh, North Carolina Document Production Cell:***

85. Beginning before in or about August 2010 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant DORIAN SANCHEZ-ACOSTA, a/k/a "Doriel Sanchez" and "Pancho," (phone number (919) 841-6228), managed the Raleigh, North Carolina document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." In that capacity, SANCHEZ-ACOSTA, a/k/a "Doriel Sanchez" and "Pancho," provided oversight for a number of "runners," who recruited clients for the organization.

86. On or about August 30, 2010, SANCHEZ-ACOSTA, a/k/a "Doriel Sanchez" and "Pancho," sent a request for additional ink and card supplies to CRUZ MILLAN. SANCHEZ-ACOSTA requested that the items be sent to 4739 White Hall Avenue, Raleigh, North Carolina 27604, the location of the document production cell.

87. On or about September 22, 2010, SANCHEZ-ACOSTA, a/k/a "Doriel Sanchez" and "Pancho," provided CRUZ MILLAN with Western Union wire transfer information relating

to the transfer of \$200 involving transaction number 2309668717. Western Union records confirm that on the same day, the following wire transfer transaction took place:

<b>Date (on or about)</b>	<b>Control Number</b>	<b>Sender Phone</b>	<b>Sender Initials</b>	<b>Amount of Transfer</b>	<b>Receiving Country</b>
9/22/2010	2309668717	(919) 841-6004	J.L.G.	\$200.00	United States

88. On or about September 27, 2010, SANCHEZ-ACOSTA, a/k/a "Doriel Sanchez" and "Pancho," and CRUZ MILLAN discussed whether "Pancho" had enough paper to print the "18's," referring to business cards that are used for advertisement. "Pancho" advised that he had enough paper. CRUZ MILLAN instructed "Pancho" to make the cards big and nice.

89. On or about October 6, 2010, CRUZ MILLAN told SANCHEZ-ACOSTA, a/k/a "Doriel Sanchez" and "Pancho," that he needed to be working more or that he would have to move. "Pancho" responded that he is working, to which CRUZ MILLAN responded that he (CRUZ MILLAN) didn't see it.

90. On or about October 29, 2010, CRUZ MILLAN set up a conference call including a number of cell managers from around the country. During the call, CRUZ MILLAN told the cell managers that he (CRUZ MILLAN) had discovered that a FDE member had sold "smurfs" (referring to Social Security cards) and stole the money. As CRUZ MILLAN explained over the telephone both during and after the beating, he hoped that by conducting the beating over the telephone, members of the FDE would be dissuaded from stealing from the Enterprise. During the call, the listeners could hear sounds of the victim screaming as a result of the beating.

**Document Production Cell Operating In and Around the Greensboro, North Carolina Area: (Defendants 1 and 26)**

***Management Activities Within the Greensboro, North Carolina Document Production Cell:***

91. Beginning before in or about September 2010 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant GABRIEL SOBERANAS-GRADA, (phone number (336) 415-1050), managed the Greensboro, North Carolina document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." In that capacity, SOBERANAS-GRADA, a/k/a "Pancho," provided oversight for a number of "runners," who recruited clients for the organization.

92. On or about August 29 2010, SOBERANAS-GRADA sent a request for additional card supplies to CRUZ MILLAN. He requested that the items be sent to 5515 W. Market Street, Apartment 406, North Carolina 27284, which was the location of the document production cell.

93. On or about October 2, 2010, SOBERANAS-GRADA and CRUZ MILLAN discussed an individual who had arrived at SOBERANAS-GRADA's apartment. CRUZ MILLAN instructed SOBERANAS-GRADA to allow the individual to stay at the apartment and that some will go with "Perron" and some will go with "Yuca." CRUZ MILLAN further stated that each person will report and have a new crew to move around with.

**Document Production Cell Operating In and Around the Wilmington, North Carolina Area: (Defendants 1 and 28)**

***Management Activities Within the Wilmington, North Carolina Document Production Cell:***

94. Beginning before in or about October 2010 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant JUAN

ARROYO-PANTOJA, a/k/a "Juan Carlos Arroyo-Pantojo," (phone number (910) 393-9912), managed the Wilmington, North Carolina document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." In that capacity, ARROYO-PANTOJA provided oversight for a number of "runners," who recruited clients for the organization.

95. On or about October 1, 2010, ARROYO-PANTOJA provided CRUZ MILLAN with the bi-weekly sales information for Wilmington, North Carolina (\$3,260) and Myrtle Beach, South Carolina (\$1,660), for a combined total of \$4,920. ARROYO-PANTOJA identified the total expenses as \$2,970. CRUZ MILLAN questioned ARROYO-PANTOJA about the expenses. ARROYO-PANTOJA listed the expenses for CRUZ MILLAN, including \$800 for salary.

96. On or about November 18, 2010, ARROYO-PANTOJA and other members of the Wilmington cell were found in possession of several fraudulent documents, as well as the following items related to the production of fraudulent identifications: a computer, 15 cellular telephones, card stock for producing identifications, laminator, ink cartridges, a card printer, and a second printer.

**Document Production Cell Operating In and Around the Cincinnati, Ohio Area:  
(Defendants 1, 2, and 25)**

***Management Activities Within the Cincinnati, Ohio Document Production Cell:***

97. Beginning before in or about September 2010 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant JOSE FRANCISCO RUIZ-SANCHEZ, a/k/a "Jose Francisco Sanchez-Ruiz" and "Pancho," (phone number (216) 244-4271), managed the Cincinnati, Ohio document production cell under the

supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." In that capacity, RUIZ-SANCHEZ provided oversight for a number of "runners," who recruited clients for the organization.

98. On or about September 21, 2010, RUIZ-SANCHEZ told CRUZ MILLAN that he was in Lexington, but wanted guidance on where to go. CRUZ MILLAN advised RUIZ-SANCHEZ to avoid the "hot spots" because law enforcement would be there.

99. On or about October 2, 2010, CRUZ MILLAN instructed RUIZ-SANCHEZ to send funds to A.G. Later that same day, RUIZ-SANCHEZ provided CRUZ MILLAN with Western Union wire transfer information relating to the requested transfer of \$550 involving transaction number 2683450509. Western Union records confirm that on the same day, the following wire transfer transaction took place:

<b>Date (on or about)</b>	<b>Control Number</b>	<b>Sender Phone</b>	<b>Recipient Initials</b>	<b>Amount of Transfer</b>	<b>Receiving Country</b>
10/2/2010	2683450509	(513) 571-8212	A.G.	\$550.00	United States

100. On or about October 5, 2010, CRUZ MILLAN asked RUIZ-SANCHEZ how much money he had. RUIZ-SANCHEZ advised that he had \$400-\$500. CRUZ MILLAN stated that he needed money to pay for the phones for the group.

101. On or about November 1, 2010, CRUZ MILLAN provided a message to MARTINEZ-ARELLANO, a/k/a "Chachito," (phone number (804) 617-4235), requesting ink for 30 Mexican licenses associated with the address of 7438 Timber Drive, Apartment 10, Cincinnati, Ohio 45241, which was the location of the document production cell.

102. On or about November 1, 2010, CRUZ MILLAN and MARTINEZ-ARELLANO, a/k/a "Chachito," discussed the request that CRUZ MILLAN had previously sent for the Ohio

address. CRUZ MILLAN told "Chachito" that the address was in need of "ink" and asked "Chachito" for this favor. "Chachito" responded that he had already sent one to Kentucky and believed he had one left. "Chachito" agreed to carry out CRUZ MILLAN's request to send ink to the Ohio address.

103. On or about November 18, 2010, RUIZ-SANCHEZ and other members of the Cincinnati cell were found in possession of more than 400 fraudulent documents, as well as the following items related to the production of fraudulent identifications: a laptop computer, printers, fraudulent identifications, ledgers, card stock, and a firearm.

**Document Production Cell Operating In and Around the Pawtucket, Rhode Island Area: (Defendants 1 and 17)**

***Management Activities Within the Pawtucket, Rhode Island Document Production Cell:***

104. Beginning in or about September 2010 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant RICARDO PATINA VARGUS, a/k/a "Perruchi," (phone number (401) 481-4817), started and managed the Pawtucket, Rhode Island document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." In that capacity, VARGUS, a/k/a "Perruchi," provided oversight for a number of "runners," who recruited clients for the organization.

105. On or about September 21, 2010, CRUZ MILLAN travelled to 102 Sabin Street, Apartment 3, Pawtucket, Rhode Island, which was the location of the new Pawtucket, Rhode Island document production cell.

106. On or about September 23, 2010, CRUZ MILLAN told VARGUS, a/k/a "Perruchi," that he (CRUZ MILLAN) would send information for five or six "jobs."

107. On or about October 4, 2010, VARGUS, a/k/a "Perruchi," and CRUZ MILLAN discussed whether "Perruchi" had received any "tint" (referring to ink) for the machine (referring to document printer). "Perruchi" advised that he had received two other "tints," but that they were for the wrong machine.

108. On or about October 4, 2010, VARGUS, a/k/a "Perruchi," and CRUZ MILLAN discussed items involved in the document production process, including "new ones," referring to the plastic cards used to manufacture counterfeit Resident Alien cards.

109. On or about November 18, 2010, VARGUS, a/k/a "Perruchi," and other members of the Rhode Island cell were found in possession of more than 200 fraudulent documents, as well as the following items related to the production of fraudulent identifications: a card-making machine, ledgers detailing sales, computers, and card stock.

**Document Production Cell Operating In and Around the Nashville, Tennessee Area:  
(Defendants 1 and 23)**

***Management Activities and Conspiracy to Commit Kidnapping and Murder Within the Nashville, Tennessee Document Production Cell:***

110. Beginning before in or about September 2010 and continuing through on or about November 18, 2010, the exact dates being unknown to the Grand Jury, defendant IVAN ZARATE CURI, a/k/a "Loces" (phone number (615) 405-3076), managed the Nashville, Tennessee document production cell under the supervision of ISRAEL CRUZ MILLAN, a/k/a "El Muerto." In that capacity, ZARATE CURI provided oversight for a number of "runners," who recruited clients for the organization.

111. On or about November 11, 2010, CRUZ MILLAN, a/k/a "El Muerto" spoke with ZARATE CURI, a/k/a "Loces," about the Nashville cell's activities. During the conversation, "Loces" informed "El Muerto" that some "dudes" [i.e. rival sellers] who had "got beat up the

first time” were still making fraudulent licenses. In response, “El Muerto” told “Loces” to see if there was an “empty house.” “Loces” agreed that they should “do the damage in a house and go to hell.” “El Muerto” further instructed “Loces” to put gloves on as soon as he entered the house to avoid leaving fingerprints. “Loces” indicated that he would be “clean” and that he already had a gun for the job. In response, “El Muerto” stated that it couldn’t be with a gun because a gun would create too much noise and that “Loces” should “start searching like [they] agreed upon.”

112. On or about September 23, 2010, ZARATE CURI provided CRUZ MILLAN with biweekly sales information for the Nashville, Tennessee document production cell, including a total of \$4,150 in proceeds and \$1,684 in expenses.

113. On or about September 24, 2010, CRUZ MILLAN instructed ZARATE CURI to send funds to R.J.M.T. Later that same day, ZARATE CURI provided CRUZ MILLAN with Western Union wire transfer information related to the requested transfer of funds to R.J.M.T.

114. On or about November 18, 2010, ZARATE CURI and other members of the Nashville cell were found in possession of more than 75 fraudulent documents, as well as the following items related to the production of fraudulent identifications: a Lexar thumb drive, cellular telephones, and miscellaneous documents.

(In violation of Title 18, United States Code, Section 1962(d)).

**Notice of Special Sentencing Allegations (Count One)**

1. On or about July 6, 2010, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant EDY OLIVEREZ-JIMINEZ, a/k/a “Daniel,” “Erasmus,” “Ulysses,” and “Jesus,” and others unknown to the Grand Jury, aided and abetted by each other, and in the course of and in furtherance of a felony, did commit first degree murder by causing the death of P.R. under circumstances manifesting

extreme indifference to the value of human life, in violation of Ark. Code Ann. §§ 5-10-102(1) and 5-2-403.

2. On or about July 6, 2010, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant EDY OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," and others unknown to the Grand Jury, aided and abetted by each other, did kidnap P.R. and A.C., to wit, the defendant did restrain P.R. and A.C., without their consent, so as to interfere substantially with their liberty with the purpose of inflicting physical injury upon P.R. and A.C., in violation of Ark. Code Ann. §§ 5-11-102 and 5-2-403.

**COUNT TWO**

(Assault of F.A.U. and O.A. in Aid of Racketeering)

1. The Grand Jury re-alleges and incorporates by reference the allegations contained above in Paragraphs 1 and 3 through 8 of Count One.

2. The Fraudulent Document Enterprise, including its leadership, membership, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. The Fraudulent Document Enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts indictable under 18 U.S.C. §§ 1028(a) and (f) (identification document fraud) and 18 U.S.C. §§ 1956(a) and (h) (money laundering).

4. On or about June 16, 2009, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendants CHRISTIAN MARTINEZ-ARELLANO, a/k/a "Chachito," and ERIK MARTINEZ-ORTIZ, a/k/a "Enrique Ortiz-Matrinez" and "Perruchi," and others unknown to the Grand Jury, aiding and abetting and aided and abetted by each other, and for the purpose of gaining entrance to, and maintaining and increasing position in, an enterprise engaged in racketeering activity, namely, the Fraudulent Document Enterprise,

did unlawfully and knowingly assault with a dangerous weapon an individual with the initials F.A.U. and an individual with the initials O.A., both rival document vendors, in violation of Va. Code Ann. § 18.2-282.

(In violation of Title 18, United States Code, Sections 1959(a)(3) and 2).

**COUNT THREE**

(Possession of a Firearm in Furtherance of a Crime of Violence)

On or about June 16, 2009, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendants CHRISTIAN MARTINEZ-ARELLANO, a/k/a "Chachito," and ERIK MARTINEZ-ORTIZ, a/k/a "Enrique Ortiz-Matrinez" and "Perruchi," and others unknown to the Grand Jury, aiding and abetting and aided and abetted by each other, and in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, to wit: assault with a dangerous weapon in aid of racketeering, as charged in Count Two of this Indictment, which counts are incorporated herein by reference, did knowingly possess a firearm.

(In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2).

**COUNT FOUR**

(Murder of P.R. in Aid of Racketeering)

1. The Grand Jury re-alleges and incorporates by reference the allegations contained above in Paragraphs 1 and 3 through 8 of Count One, and Paragraphs 1 through 3 of Count Two, as if fully set forth herein.

2. On or about July 6, 2010, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant EDY OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," and others unknown to the Grand Jury, aiding and abetting and aided and abetted by each other, and for the purpose of gaining entrance to, and maintaining and increasing position in, an enterprise engaged in racketeering activity, namely, the Fraudulent Document Enterprise, did unlawfully and knowingly murder P.R., a rival document vendor, in violation of Ark. Code Ann. §§ 5-10-102 and 5-2-403.

(In violation of Title 18, United States Code, Sections 1959(a)(1) and 2).

**COUNT FIVE**

(Kidnapping of P.R. in Aid of Racketeering)

1. The Grand Jury re-alleges and incorporates by reference the allegations contained above in Paragraphs 1 and 3 through 8 of Count One and Paragraphs 1 through 3 of Count Two, as if fully set forth herein.

2. On or about July 6, 2010, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant EDY OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," and others unknown to the Grand Jury, aiding and abetting and aided and abetted by each other, and for the purpose of gaining entrance to, and maintaining and increasing position in, an enterprise engaged in racketeering activity, namely, the Fraudulent Document Enterprise, did unlawfully and knowingly kidnap P.R., a rival document vendor, in violation of Ark. Code Ann. §§ 5-11-102 and 5-2-403.

(In violation of Title 18, United States Code, Sections 1959(a)(1) and 2).

**COUNT SIX**

(Assault of P.R. in Aid of Racketeering)

1. The Grand Jury re-alleges and incorporates by reference the allegations contained above in Paragraphs 1 and 3 through 8 of Count One, and Paragraphs 1 through 3 of Count Two, as if fully set forth herein.

2. On or about July 6, 2010, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant EDY OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," and others unknown to the Grand Jury, aiding and abetting and aided and abetted by each other, and for the purpose of gaining entrance to, and maintaining and increasing position in, an enterprise engaged in racketeering activity, namely, the Fraudulent Document Enterprise, did unlawfully and knowingly assault with a dangerous weapon P.R., a rival document vendor, in violation of Ark. Code Ann. §§ 5-13-204 and 5-2-403.

(In violation of Title 18, United States Code, Sections 1959(a)(3) and 2).

**COUNT SEVEN**

(Kidnapping of A.C. in Aid of Racketeering)

1. The Grand Jury re-alleges and incorporates by reference the allegations contained above in Paragraphs 1 and 3 through 8 of Count One, and Paragraphs 1 through 3 of Count Two, as if fully set forth herein.

2. On or about July 6, 2010, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant EDY OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," and others unknown to the Grand Jury, aiding and abetting and aided and abetted by each other, and for the purpose of gaining entrance to, and maintaining and increasing position in, an enterprise engaged in racketeering activity, namely, the Fraudulent Document Enterprise, did unlawfully and knowingly kidnap A.C., in violation of Ark. Code Ann. §§ 5-11-102 and 5-2-403.

(In violation of Title 18, United States Code, Sections 1959(a)(1) and 2).

**COUNT EIGHT**

(Assault of A.C. in Aid of Racketeering)

1. The Grand Jury re-alleges and incorporates by reference the allegations contained above in Paragraphs 1 and 3 through 8 of Count One, and Paragraphs 1 through 3 of Count Two, as if fully set forth herein.

2. On or about July 6, 2010, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant EDY OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," and others unknown to the Grand Jury, aiding and abetting and aided and abetted by each other, and for the purpose of gaining entrance to, and maintaining and increasing position in, an enterprise engaged in racketeering activity, namely, the Fraudulent Document Enterprise, did unlawfully and knowingly assault with a dangerous weapon A.C., in violation of Ark. Code Ann. §§ 5-13-204 and 5-2-403.

(In violation of Title 18, United States Code, Sections 1959(a)(3) and 2).

**COUNT NINE**

(Possession of a Firearm in Furtherance of a Crime of Violence)

On or about July 6, 2010, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant EDY OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," and others unknown to the Grand Jury, aiding and abetting and aided and abetted by each other, and in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, to wit: murder, kidnapping, and assault of P.R. in aid of racketeering, as charged in Counts Four through Six of this Indictment, which counts are incorporated herein by reference, did knowingly possess a firearm.

(In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2).

**COUNT TEN**

(Possession of a Firearm in Furtherance of a Crime of Violence)

On or about July 6, 2010, in the Eastern District of Virginia and elsewhere within the jurisdiction of this Court, the defendant EDY OLIVEREZ-JIMINEZ, a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus," and others unknown to the Grand Jury, aiding and abetting and aided and abetted by each other, and in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, to wit: kidnapping, and assault of A.C. in aid of racketeering, as charged in Counts Seven and Eight of this Indictment, which counts are incorporated herein by reference, did knowingly possess a firearm.

(In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2).

**COUNT ELEVEN**

(Conspiracy to Possess, Produce and Transfer False Identification Documents and Possess a Document-Making Implement)

\*

Beginning at some point before January 2008, the exact date being unknown to the Grand Jury, and continuing through on or about November 18, 2010, in the Richmond Division of the Eastern District of Virginia and elsewhere within the jurisdiction of the court, defendants,

ISRAEL CRUZ MILLAN,  
a/k/a "El Muerto,"

CHRISTIAN MARTINEZ-ARELLANO,  
a/k/a "Chachito,"  
(phone number (804) 617-4235),

JAVIER ZUBIATE-LOPEZ,  
a/k/a "Pelon"  
(phone number (804) 306-3804),

JOSE SANCHEZ-HERRERA,  
(phone numbers (804) 469-1038 and (843) 467-1304),

JOSE CHAVARRIA RAMIREZ,  
a/k/a "Negrito,"  
(phone number (804) 822-7809),

KEVIN GARCIA FUERTES,  
a/k/a "Kerlin Esquivel-Fuentes," "Cirilio," and "Honduras,"  
(phone number (804) 469-1038),

ARMANDO GONZALEZ MEDINA,  
a/k/a "Pablito,"  
(phone number (804) 420-5963),

EDY OLIVEREZ-JIMINEZ,  
a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus,"  
(phone number (757) 575-0584),

ERIK MARTINEZ-ORTIZ,  
a/k/a "Enrique Ortiz-Matrinez" and "Perruchi,"

FRANCISCO FERNANDEZ-ALCANTARA,  
a/k/a "Paco" and "Panteclan,"

EULALIO ALCANTARA CRUZ,  
a/k/a "Homero" and "Romero,"  
(phone number (703) 986-6616),

RICARDO PATINA VARGUS,  
a/k/a "Perruchi,"  
(phone number (401) 481-4817),

DIEGO CORTEZ-ANGEL,  
a/k/a "Arian,"  
(phone number (479) 283-9953),

ISMAEL KEVIN QUINTANA-RAMIREZ,  
a/k/a "Perron,"  
(phone number (502) 310-2289),

JORGE ALEJANDRO GONZALEZ-GARCIA,  
(phone number (574) 601-7502),

LUIS ZUNIGA-GALVAN,  
a/k/a "Pisa" and "Rana,"  
(phone number (617) 963-9232),

ALFONSO ALCARAZ-PALOMARES,  
a/k/a "El Pina,"  
(phone numbers (501) 612-7013 and (501) 256-3799),

IVAN ZARATE CURI,  
a/k/a "Loces"  
(phone number (615) 405-3076),

DORIAN SANCHEZ-ACOSTA,  
a/k/a "Doriel Sanchez" and "Pancho,"  
(phone number (919) 841-6228),

JOSE FRANCISCO RUIZ-SANCHEZ,  
a/k/a "Jose Francisco Sanchez-Ruiz" and "Pancho,"  
(phone number (216) 244-4271),

GABRIEL SOBERANAS-GRADA,  
(phone number (336) 415-1050),

JUAN ARROYO-PANTOJA,  
a/k/a "Juan Carlos Arroyo-Pantojo,"  
(phone number (910) 393-9912),

did knowingly combine, conspire, confederate and agree with each other, and with persons known and unknown to the Grand Jury, to commit the following offenses:

(a) knowingly and without lawful authority, producing a false identification document appearing to be a document issued by and under the authority of the United States in violation of 18 U.S.C. § 1028(a)(1);

(b) knowingly transferring a false identification document appearing to be a document issued by and under the authority of the United States, knowing that such document was produced without lawful authority in violation of 18 U.S.C. § 1028(a)(2);

(c) knowingly possessing with intent to transfer unlawfully five or more false identification documents appearing to be documents issued by and under the authority of the United States in violation of 18 U.S.C. § 1028(a)(3); and,

(d) knowingly possessing a document-making implement, with the intent that such document-making implement will be used in the production of a false identification document appearing to be a document issued by and under the authority of the United States in violation of 18 U.S.C. § 1028(a)(5).

**Manner and Means of the Conspiracy**

It was part of the conspiracy that the defendants and their co-conspirators would and did:

1. The Grand Jury adopts, re-alleges, and incorporates by reference herein the Manner and Means of the Conspiracy section set forth in Count One of this indictment.

**Overt Acts**

In furtherance of the conspiracy and in order to effect the objects thereof, the defendants and their co-conspirators committed and caused to be committed at least one of the following overt acts, among others, in the Eastern District of Virginia and elsewhere:

2. The Grand Jury adopts, re-alleges, and incorporates by reference herein Overt Acts 12 through 114 as set forth in Count One of this indictment.

(In violation of Title 18, United States Code, Section 1028(f)).

**COUNT TWELVE**  
(Money Laundering Conspiracy)

Beginning at some point before January 2008, the exact date being unknown to the Grand Jury, and continuing through on or about November 18, 2010, in the Richmond Division of the Eastern District of Virginia and elsewhere and within the jurisdiction of the court, defendants,

ISRAEL CRUZ MILLAN,  
a/k/a "El Muerto,"

CHRISTIAN MARTINEZ-ARELLANO,  
a/k/a "Chachito,"  
(phone number (804) 617-4235),

EDY OLIVEREZ-JIMINEZ,  
a/k/a "Daniel," "Erasmus," "Ulysses," and "Jesus,"  
(phone number (757) 575-0584),

EULALIO ALCANTARA CRUZ,  
a/k/a "Homero" and "Romero,"  
(phone number (703) 986-6616),

RICARDO PATINA VARGUS,  
a/k/a "Perruchi,"  
(phone number (401) 481-4817),

DIEGO CORTEZ-ANGEL,  
a/k/a "Arian,"  
(phone number (479) 283-9953),

ISMAEL KEVIN QUINTANA-RAMIREZ,  
a/k/a "Perron,"  
(phone number (502) 310-2289),

JORGE ALEJANDRO GONZALEZ-GARCIA,  
(phone number (574) 601-7502),

LUIS ZUNIGA-GALVAN,  
a/k/a "Pisa" and "Rana,"  
(phone number (617) 963-9232),

ALFONSO ALCARAZ-PALOMARES,  
a/k/a "El Pina,"  
(phone numbers (501) 612-7013 and (501) 256-3799),

IVAN ZARATE CURI,  
a/k/a "Loces"  
(phone number (615) 405-3076),

DORIAN SANCHEZ-ACOSTA,  
a/k/a "Doriel Sanchez" and "Pancho,"  
(phone number (919) 841-6228),

JOSE FRANCISCO RUIZ-SANCHEZ,  
a/k/a "Jose Francisco Sanchez-Ruiz" and "Pancho,"  
(phone number (216) 244-4271),

GABRIEL SOBERANAS-GRADA,  
(phone number (336) 415-1050),

JUAN ARROYO-PANTOJA,  
a/k/a "Juan Carlos Arroyo-Pantojo,"  
(phone number (910) 393-9912), and

did knowingly combine, conspire, confederate and agree with each other, and with persons known and unknown to the Grand Jury, to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, while knowing that the transactions involved the proceeds of specified unlawful activity to wit: Production of a False Identification Document in violation of 18 U.S.C. § 1028(a)(1); Transferring a False Identification Document, Knowing that Such Document Was Produced Without Lawful Authority in violation of 18 U.S.C. § 1028(a)(2); and Possessing a Document-Making Implement With the Intent that Such Document-Making Implement Will Be Used in the Production of a False Identification Document in violation of 18 U.S.C. § 1028(a)(5), while also acting in the following manners:

(a) with the intent to promote the carrying on of such specified unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and,

(b) knowing that the transactions were designed, in whole or in part, to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**Manner and Means of the Conspiracy**

It was part of the conspiracy that the defendants and their co-conspirators would and did:

1. The Grand Jury adopts, re-alleges, and incorporates by reference herein the Manner and Means of the Conspiracy section set forth in Count One of this indictment.

**Overt Acts**

In furtherance of the conspiracy and in order to effect the objects thereof, the defendants and their co-conspirators committed and caused to be committed at least one of the following overt acts, among others, in the Eastern District of Virginia and elsewhere:

1. The Grand Jury adopts, re-alleges, and incorporates by reference herein Overt Acts 12 through 114 as set forth in Count One of this indictment.

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

### FORFEITURE ALLEGATION

Pursuant to Rule 32.2, Federal Rules of Criminal Procedure, the defendants are notified that upon conviction of the counts as set out below, they shall forfeit the property described below.

As to Count One, all defendants convicted of Count One shall forfeit any interest the person has acquired or maintained in violation of 18 U.S.C. § 1962 and any interest in, security of, claim against or property or contractual right of any kind affording a source of influence over any enterprise which the person has established, operated, controlled, conducted or participated in the conduct of, in violation of section 1962, and any property constituting, or derived from proceeds which the person obtained, directly or indirectly, from any racketeering activity or unlawful debt collection in violation of section 1962.

As to Counts Three, Nine, and Ten, all defendants convicted of any of these counts shall forfeit any firearms and ammunition involved in or used in any knowing violation of 18 U.S.C. § 924.

As to Count Eleven, all defendants convicted of Count Eleven shall forfeit any property constituting or derived from proceeds the person obtained directly or indirectly as the result of such violation and all illicit authentication features, identification documents, document-making implements, or means of identification.

As to Count Twelve, all defendants convicted of Count Twelve shall forfeit any property real or personal, involved in such offense, and any property traceable to such property.

If property subject to forfeiture cannot be located, the United States will seek an order forfeiting substitute assets.

(In accordance with 18 U.S.C. §1963(a); 18 U.S.C. §924(d), 18 U.S.C. §982(a); 18 U.S.C. §1028(h); 28 U.S.C. §2461(c); 21 U.S.C. §853(p).)

A TRUE BILL

Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office

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UNITED STATES ATTORNEY

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Michael R. Gill  
Assistant United States Attorney

By: Angela Mastandrea-Miller  
Angela Mastandrea-Miller  
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By: Addison Thompson  
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