

**FILED**  
Mar 20 2020  
CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY *s/ ArianaF* DEPUTY

**FILED**  
DEC - 4 2015  
CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY *np* DEPUTY

REDACTED

~~SEALED~~

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

March 2015 Grand Jury

1 UNITED STATES OF AMERICA,  
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Plaintiff,  
  
v.

Case No. 15CR0950-BEN

I N D I C T M E N T  
(3rd Superseding)

OMAR AYON-DIAZ (1),  
aka Omar,  
aka Ahijado,  
aka Ahijado VIP,  
aka Thor,  
aka Cejas,  
BIANCA ACEDO-OJEDA (2),  
aka Bianca,  
aka Bernice,  
JOEL ACEDO-OJEDA (3),  
aka Joel,  
aka Peludo,  
aka Peludin,  
aka Bisholo,  
aka Manuel,  
OSVALDO CONTRERAS-ARRIAGA (4),  
aka OCA,  
aka Osv,  
aka El Gober,  
aka Occa,  
aka EL Taquero,

Title 18, U.S.C., Sec. 1956(h) -  
Conspiracy to Launder Monetary  
Instruments; Title 21, U.S.C.,  
Secs. 952, 960, and 963 -  
Conspiracy to Import Cocaine,  
Heroin, and Methamphetamine;  
Title 18, U.S.C., Sec. 982(a)(1),  
and Title 21, U.S.C., Sec. 853 -  
Criminal Forfeiture

1 ROBERTO GALLEGOS-LECHUGA (6),  
2 aka Viejano,  
3 aka Lic Criminologia,  
4 aka Sonorizaciones,  
5 aka Juan,  
6 OSCAR RODRIGUEZ-GUEVARA (7),  
7 aka Traxx,  
8 aka Werito,  
9 aka Wero,

10 GIBRAN RODRIGUEZ-MEJIA (9),  
11 aka Campeon,  
12 aka Fatzoe,  
13 aka The Tourist,  
14 aka Zaid,

15 CESAR HERNANDEZ-MARTINEZ (10),  
16 aka Cesar,  
17 aka Rober,  
18 aka Cesarin,  
19 aka CPA Rober,

20 JORGE VALENZUELA-VERDUGO (11),  
21 aka Lord,  
22 aka Choclos,  
23 aka El Principe,  
24 aka Mario,

25 Defendants.

26 The grand jury charges:

27 At all times relevant to this 3rd Superseding Indictment:

28 Count 1

18 U.S.C. § 1956(h)

(Conspiracy to Launder Monetary Instruments)

1. Beginning in or about April 2013, and continuing through the date of this Third Superseding Indictment, within the Southern District of California and elsewhere, defendants OMAR AYON-DIAZ, aka Omar, aka Ahijado, aka Ahijado VIP, aka Thor, aka Cejas, BIANCA ACEDO-OJEDA, aka Bianca, aka Bernice, JOEL ACEDO-OJEDA, aka Joel, aka Peludo, aka Peludin, aka Bisholo, aka Manuel, OSVALDO CONTRERAS-

1 ARRIAGA, aka OCA, aka Osv, aka El Gober, aka Occa, aka El Taquero,  
2 ROBERTO GALLEGOS-LECHUGA, aka Viejano, aka Lic Criminologia, aka  
3 Sonorizaciones, aka Juan, OSCAR RODRIGUEZ-GUEVARA, aka Traxx, aka  
4 Werito, aka Wero, GIBRAN RODRIGUEZ-MEJIA, aka Campeon, aka Fatzoe, aka The Tourist, aka  
5 Zaid, CESAR HERNANDEZ-MARTINEZ, aka Cesar, aka Rober, aka Cesarin, aka  
6 CPA Rober, and JORGE VALENZUELA-VERDUGO, aka Lord, aka Choclos, aka El  
7 Principe, aka Mario, did knowingly and intentionally conspire and  
8 agree with each other, and with other persons, known and unknown to  
9 the Grand Jury, to commit offenses against the United States, in  
10 violation of Title 18, United States Code, Section 1956, including:

12 a. to transport, transmit, and transfer, and attempt to  
13 transport, transmit, and transfer a monetary instrument and funds from  
14 a place in the United States to and through a place outside the United  
15 States and to a place in the United States from and through a place  
16 outside the United States with the intent to promote the carrying on  
17 of specified unlawful activity, that is, the distribution of  
18 Controlled Substances, in violation of Title 18, United States Code,  
19 Section 1956(a)(2)(A); and

20 b. to transport, transmit, and transfer, and attempt to  
21 transport, transmit, and transfer a monetary instrument and funds from  
22 a place in the United States to and through a place outside the  
23 United States and to a place in the United States from and through a  
24 place outside the United States, knowing that the monetary instrument  
25 and funds involved in the transportation, transmission, and transfer  
26 represented the proceeds of some form of unlawful activity and knowing  
27 that such transportation, transmission, and transfer was designed  
28 in whole or in part to conceal and disguise the nature, the location,

1 the source, the ownership, and the control of the proceeds of  
2 specified unlawful activity, that is, the distribution of Controlled  
3 Substances, in violation of Title 18, United States Code,  
4 Section 1956(a) (2) (B) (i).

5 OBJECT OF THE CONSPIRACY

6 The object of the conspiracy was to move U.S. bulk currency,  
7 representing the proceeds of distribution of Controlled Substances, to  
8 Mexico in order to further the activities of those involved in drug  
9 trafficking and money laundering.

10 MANNER AND MEANS OF THE CONSPIRACY

11 The following were among the manner and means used by the  
12 defendants and their co-conspirators to accomplish the object of the  
13 conspiracy:

14 2. It was a part of the conspiracy that the defendants and  
15 their co-conspirators would arrange for large quantities of illegal  
16 drugs to be smuggled from Mexico to the United States for  
17 distribution.

18 3. It was a part of the conspiracy that the defendants and  
19 their co-conspirators would arrange for couriers to smuggle drug  
20 proceeds in the form of U.S. bulk currency from the United States to  
21 currency exchange houses in Mexico.

22 4. It was a part of the conspiracy that the couriers would  
23 drive vehicles containing secret compartments used to store the U.S.  
24 bulk currency so as to avoid detection by law enforcement.

25 5. It was a part of the conspiracy that the defendants and  
26 their co-conspirators would arrange for couriers to transport the U.S.  
27 bulk currency from Mexico to U.S. banks for deposit and then wire-

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Count 3

21 U.S.C. §§ 952, 960, & 963

(Conspiracy to Import Cocaine and Methamphetamine into the United States)

10. Beginning in or about November 2013, and continuing through the date of this Third Superseding Indictment, within the Southern District of California and elsewhere, defendants [REDACTED] and OSCAR RODRIGUEZ-GUEVARA, aka Traxx, aka Werito, aka Wero, did knowingly and intentionally conspire and agree with each other, and with other persons, known and unknown to the Grand Jury, to import five (5) kilograms or more of cocaine, a Schedule II Controlled Substance; and 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, into the United States from a place outside thereof; all in violation of Title 21, United States Code, Sections 952, 960, and 963.

Count 4

21 U.S.C. §§ 952, 960, & 963

(Conspiracy to Import Cocaine, Heroin, and Methamphetamine into the United States)

11. Beginning in or about August 2013, and continuing through the date of this Third Superseding Indictment, within the Southern District of California and elsewhere, defendants ROBERTO GALLEGOS-LECHUGA, aka Viejano, aka Lic Criminologia, aka SonORIZACIONES, aka Juan, and JORGE VALENZUELA-VERDUGO, aka Lord, aka Choclos, aka El Principe, aka Mario, did knowingly and intentionally conspire and agree with other persons, known and unknown to the Grand Jury, to import five (5) kilograms or more of cocaine, a Schedule II Controlled Substance; one (1) kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled

1 Substance; and 500 grams or more of a mixture and substance containing  
2 a detectable amount of methamphetamine, a Schedule II Controlled  
3 Substance, into the United States from a place outside thereof; all in  
4 violation of Title 21, United States Code, Sections 952, 960, and 963.

5 FORFEITURE ALLEGATIONS

6 12. The allegations contained in Counts 1 through 4 of this  
7 Third Superseding Indictment are hereby re-alleged and incorporated by  
8 reference for the purpose of alleging forfeiture pursuant to Title 18,  
9 United States Code, Section 982(a)(1), and Title 21, United States  
10 Code, Section 853.

11 13. Pursuant to Title 18, United States Code, Section 982(a)(1),  
12 upon conviction of the offense alleged in Count 1 in violation of  
13 Title 18, United States Code, Section 1956, defendants OMAR AYON-DIAZ,  
14 aka Omar, aka Ahijado, aka Ahijado VIP, aka Thor, aka Cejas, BIANCA  
15 ACEDO-OJEDA, aka Bianca, aka Bernice, JOEL ACEDO-OJEDA, aka Joel, aka  
16 Peludo, aka Peludin, aka Bisholo, aka Manuel, OSVALDO CONTRERAS-  
17 ARRIAGA, aka OCA, aka Osv, aka El Gober, aka Occa, aka El Taquero,  
18 ROBERTO GALLEGOS-LECHUGA, aka Viejano, aka Lic Criminologia, aka  
19 Sonorizaciones, aka Juan, OSCAR RODRIGUEZ-GUEVARA, aka Traxx, aka  
20 Werito, aka Wero, GIBRAN RODRIGUEZ-MEJIA, aka Campeon, aka Fatzoe, aka The Tourist, aka  
21 Zaid, CESAR HERNANDEZ-MARTINEZ, aka Cesar, aka Rober, aka Cesarin, aka  
22 CPA Rober, and JORGE VALENZUELA-VERDUGO, aka Lord, aka Choclos, aka El  
23 Principe, aka Mario, forfeit to the United States any property, real  
24 or personal, involved in such offense, and any property traceable to  
25 such property, including but not limited to a money judgment in favor  
26 of the United States in an amount not less than \$45,000,000 for which  
27 the defendants will be jointly and severally liable.  
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1 14. Pursuant to Title 21, United States Code, Section 853, upon  
2 conviction of the offenses alleged in Counts 2 through 4 in violation  
3 of Title 21, United States Code, Sections 952, 960, and 963,  
4 defendants OSVALDO CONTRERAS-ARRIAGA, aka OCA, aka Osv, aka El Gober,  
5 aka Occa, aka El Taquero, [REDACTED]  
6 [REDACTED] [REDACTED] ROBERTO GALLEGOS-LECHUGA, aka Viejano, aka Lic  
7 Criminologia, aka SonORIZACIONES, aka Juan, OSCAR RODRIGUEZ-GUEVARA,  
8 aka Traxx, aka Werito, aka Wero, [REDACTED]  
9 [REDACTED] and JORGE VALENZUELA-VERDUGO, aka Lord, aka Choclos, aka El  
10 Principe, aka Mario, shall forfeit to the United States all property,  
11 real and personal, constituting and derived from proceeds of the  
12 violation, and all property, real and personal, used and intended to  
13 be used in any manner and part to commit and to facilitate the  
14 commission of the violation.

15 15. If any of the property described above in paragraphs 13  
16 and 14, as a result of any act or omission of the defendants: (a)  
17 cannot be located upon the exercise of due diligence; (b) has been  
18 transferred or sold to, or deposited with, a third party; (c) has been  
19 placed beyond the jurisdiction of the court; (d) has been  
20 substantially diminished in value; or

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1 (e) has been commingled with other property which cannot be divided  
2 without difficulty, the United States shall be entitled to forfeiture  
3 of substitute property pursuant to Title 21, United States Code,  
4 Section 853(p).

5 All pursuant to Title 18, United States Code, Section 982, <sup>(a)(1)</sup> and ~~18A~~  
6 Title 21, United States Code, Section 853.

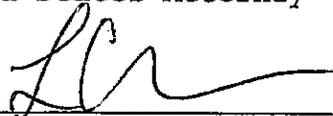
7 Dated: December 4, 2015.

8 A TRUE BILL:

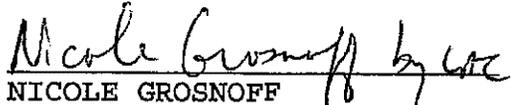
9 

10 Foreperson

11 LAURA E. DUFFY  
12 United States Attorney

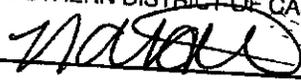
13 By:   
14 LAWRENCE A. CASPER  
15 Assistant U.S. Attorney

16 M. KENDALL DAY  
17 Chief, Asset Forfeiture &  
18 Money Laundering Section

19 By:   
20 NICOLE GROSNOFF  
21 JULIA JARRETT  
22 MARK A. IRISH  
23 Trial Attorneys

24 I hereby attest and certify on 12/7/2015  
25 That the foregoing document is a full, true and correct  
26 copy of the original on file in my office and in my legal  
27 custody.

28 CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

By:  Deputy