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FILED
Nov 18 2021
2:36 pm
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY s/shelly DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

April 2021 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 21CR2546-GPC

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

ALFREDO ADOLFO IBARRA-VIDAL (1),
RICARDO VALENZUELA-GALE (2),
BRAYAN GIL-HERNANDEZ (3),
DAVID DURAN-RIVERA (4),
GERARDO SILVAS (5),
ANA FABIOLA SALCEDO-SALINAS (6),
JOSE LUIS VARGAS-ESPINOSA (7),
ROBERTO ANZALDO (8),
WENDY CAROLINA VILLEGAS-RIVERA (9),
ALAN ANDRE GARCIA-CASTRO (10),
VALERIE HERNANDEZ (11),
 aka "Valerie Jeanette Hernandez,"
DIANA BRENDA RODRIGUEZ-SANDEZ (12),
SALMA GABRIELA ALBA (13),
CHRISTIAN FERNANDEZ (14),
JULIA VIANNEY SUAZO-QUIRINO (15),
ADRIAN ROSETT VELASQUEZ (16),
SHANTAL MACIEL (17),
CESAR ENRIQUE CANTU (18),
NESSIE AIZU (19),
 aka "Nissie Aizu,"
ALEJANDRO CABRERA-HERRERA (20),
 aka "Manuel",
ADRIANA ELIZABETH
 VALENZUELA-GALE (21),
JORGE COVARRUBIAS (22),

Title 18, U.S.C.,
Secs. 1956(h),
1956(a)(1)(B)(i), and
1956(a)(2)(B)(i) - Conspiracy
to Launder Monetary
Instruments; Title 18, U.S.C.,
Sec. 982 - Criminal Forfeiture

1 JOSE G. QUINTANA-ARENAS (23),
2 AXEL GUADALUPE GARCIA (24),
3 FIDEL ALEJANDRO ZAMORANO-BERNAL (25),
4 DERIAN SERVIN-DIAZ (26),
5 ALEX ARTURO ZAMORA (27),
6 RICARDO PRADO (28),
7 aka "Ricardo Prado-Zarate,"
8 ERIK GALAVIZ (29),
9 aka "Erik Dick Galaviz-Castillo,"
10 MANUEL CABRERA-HERRERA (30),
11 RAMIRO XAVIER GAXIOLA-GARCIA (31),
12 RAUL PARTIDA, SR. (32),

Defendants.

13 The grand jury charges:

14 Beginning on a date unknown to the Grand Jury and continuing up to
15 and including April 2021, within the Southern District of California and
16 elsewhere, the defendants ALFREDO ADOLFO IBARRA-VIDAL, RICARDO
17 VALENZUELA-GALE, BRAYAN GIL-HERNANDEZ, DAVID DURAN-RIVERA, GERARDO
18 SILVAS, ANA FABIOLA SALCEDO-SALINAS, JOSE LUIS VARGAS-ESPINOSA, ROBERTO
19 ANZALDO, WENDY CAROLINA VILLEGAS-RIVERA, ALAN ANDRE GARCIA-CASTRO,
20 VALERIE HERNANDEZ, aka "Valerie Jeanette Hernandez", DIANA BRENDA
21 RODRIGUEZ-SANDEZ, SALMA GABRIELA ALBA, CHRISTIAN FERNANDEZ, JULIA
22 VIANNEY SUAZO-QUIRINO, ADRIAN ROSETT VELASQUEZ, SHANTAL MACIEL, CESAR
23 ENRIQUE CANTU, NESSIE AIZU, aka "Nissie Aizu", ALEJANDRO CABRERA-
24 HERRERA, aka "Manuel", ADRIANA ELIZABETH VALENZUELA-GALE, JORGE
25 COVARROBIAS, JOSE G. QUINTANA-ARENAS, AXEL GUADALUPE GARCIA, FIDEL
26 ALEJANDRO ZAMORANO-BERNAL, DERIAN SERVIN-DIAZ, ALEX ARTURO ZAMORA,
27 RICARDO PRADO, aka "Ricardo Prado-Zarate", and ERIK GALAVIZ, aka "Erik
28 Dick Galaviz-Castillo", MANUEL CABRERA-HERRERA, RAMIRO XAVIER GAXIOLA-
GARCIA, RAUL PARTIDA, SR., and others known and unknown to the Grand
Jury, did knowingly and intentionally conspire together and with each
other, and with other persons known and unknown to the Grand Jury,

1 a. to knowingly conduct and attempt to conduct financial
2 transactions affecting interstate and foreign commerce, which
3 transactions involved the proceeds of specified unlawful activity, that
4 is, drug trafficking, knowing that the transactions were designed in
5 whole or in part to conceal and disguise the nature, location, source,
6 ownership, and control of the proceeds of specified unlawful activity,
7 to wit: drug trafficking, and that while conducting and attempting to
8 conduct such financial transactions, knew that the property involved in
9 the financial transactions represented proceeds of some form of unlawful
10 activity, in violation of Title 18, United States Code,
11 Section 1956(a)(1)(B)(i);

12 b. to transport, transmit, and transfer a monetary
13 instrument and funds from a place in the United States to and through a
14 place outside the United States, knowing that the monetary instrument
15 and funds involved in the transportation, transmission and transfer
16 represented the proceeds of some form of unlawful activity, that is,
17 drug trafficking, and knowing that such transportation, transmission and
18 transfer was designed in whole and in part to conceal and disguise the
19 nature, the location, the source, the ownership, and the control of the
20 proceeds of specified unlawful activity, in violation of Title 18,
21 United States Code, Section 1956(a)(2)(B)(i).

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

23 **FORFEITURE ALLEGATIONS**

24 1. The allegations contained above are realleged herein for
25 purposes of seeking forfeiture to the United States of America pursuant
26 to the provisions of Title 18, United States Code, Section 982.

27 2. As a result of the commission of the felony offenses alleged
28 above, said violation being punishable by imprisonment for more than one

1 year, and pursuant to Title 18, United States Code, Section 982(a)(1),
2 defendants ALFREDO ADOLFO IBARRA-VIDAL, RICARDO VALENZUELA-GALE, BRAYAN
3 GIL-HERNANDEZ, DAVID DURAN-RIVERA, GERARDO SILVAS, ANA FABIOLA SALCEDO-
4 SALINAS, JOSE LUIS VARGAS-ESPINOSA, ROBERTO ANZALDO, WENDY CAROLINA
5 VILLEGAS-RIVERA, ALAN ANDRE GARCIA-CASTRO, VALERIE HERNANDEZ,
6 aka "Valerie Jeanette Hernandez", DIANA BRENDA RODRIGUEZ-SANDEZ, SALMA
7 GABRIELA ALBA, CHRISTIAN FERNANDEZ, JULIA VIANNEY SUAZO-QUIRINO, ADRIAN
8 ROSETT VELASQUEZ, SHANTAL MACIEL, CESAR ENRIQUE CANTU, NESSIE AIZU, aka
9 "Nissie Aizu", ALEJANDRO CABRERA-HERRERA, aka "Manuel", ADRIANA
10 ELIZABETH VALENZUELA-GALE, JORGE COVARROBIAS, JOSE G. QUINTANA-ARENAS,
11 AXEL GUADALUPE GARCIA, FIDEL ALEJANDRO ZAMORANO-BERNAL, DERIAN SERVIN-
12 DIAZ, ALEX ARTURO ZAMORA, RICARDO PRADO, aka "Ricardo Prado-Zarate",
13 ERIK GALAVIZ, aka "Erik Dick Galaviz-Castillo", MANUEL CABRERA-HERRERA,
14 RAMIRO XAVIER GAXIOLA-GARCIA, and RAUL PARTIDA, SR., shall, upon
15 conviction, forfeit to the United States all rights, title and interest
16 in any and all property involved in such offense, and any property
17 traceable to such property. The property to be forfeited includes, but
18 is not limited to, \$11,386,793 in U.S. currency previously seized.

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

- 21 a. cannot be located upon the exercise of due diligence;
- 22 b. has been transferred or sold to, or deposited with, a
23 third party;
- 24 c. has been placed beyond the jurisdiction of the Court;
- 25 d. has been substantially diminished in value; or
- 26 e. has been commingled with other property which cannot be
27 subdivided without difficulty;

28

1 it is the intent of the United States, pursuant to Title 18, United
2 States Code, Section 982(b)(1) to seek forfeiture of any other property
3 of the defendants up to the value of the said property listed above as
4 being subject to forfeiture.


5 All in violation of Title 18, United States Code, Section 982.

6 DATED: November 18, 2021.

7 A TRUE BILL:

8 
9 _____
Foreperson

10 RANDY S. GROSSMAN.
11 Acting United States Attorney

12 
13 By _____
14 BLANCA QUINTERO
Assistant U.S. Attorney

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