



UNITED STATES DISTRICT COURT

for the

Central District of California

United States of America

v.

LESLIE BRIANA MATLA and
JUAN CARLOS MONTOYA SANCHEZ,

Defendants

Case No. **2:20-mj-01908**

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Beginning on a date unknown and continuing through or about April 22, 2020, in the county of Los Angeles, in the Central District of California, and elsewhere the defendants violated:

Code Section

18 U.S.C. § 1956(h)

Offense Description

Money Laundering Conspiracy

This criminal complaint is based on these facts:

Please see attached affidavit.

Continued on the attached sheet.

Complainant's signature

CARA A. SAMMARTINO, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: April 29, 2020

Alicia G. Rosenberg

Judge's signature

City and state: Los Angeles, California

HON. ALICIA G. ROSENBERG,
United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Cara A. Sammartino, being duly sworn and under oath, hereby depose and say:

I. INTRODUCTION

1. I am a Special Agent ("SA") of the Federal Bureau of Investigation ("FBI") assigned to the West Covina Resident Agency as a SA since 2016. I received my initial training and instruction to become a Special Agent during 21 weeks at the FBI Academy located in Quantico, Virginia. There I received training concerning violations of the United States criminal statutes. After initial training, I was assigned to the Los Angeles Division of the FBI and worked from the West Covina, California office on the International Violent Crime and Major Offenders squad. I was assigned a variety of criminal cases, which included kidnappings for ransom, hostage takings, fugitives, crimes against children and bank robberies. I have worked with and consulted numerous law enforcement officers experienced in kidnappings for ransom, homicide, criminal gangs, fugitives and violent crime. As an FBI SA, I have led and/or participated in multiple investigations involving kidnappings for ransom, hostage taking, money laundering, wire fraud, extortion and fugitives.

II. PURPOSE OF AFFIDAVIT

2. This affidavit is made in support of a criminal complaint against, and arrest warrant for, LESLIE BRIANA MATLA ("MATLA") and JUAN CARLOS MONTOYA SANCHEZ ("SANCHEZ"), for violation of 18 U.S.C. § 1956(h) (Money Laundering Conspiracy).

3. The information set forth in this affidavit is based upon my participation in the investigation, encompassing my personal knowledge, observations, training and experience, as well as information obtained from my review of investigative reports, and interviews and debriefings with other participating law enforcement. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

III. SUMMARY OF PROBABLE CAUSE

4. Law enforcement is investigating three kidnappings for ransom. All three incidents appear to be linked based on a common modus operandi, to include common locations used, common phone numbers used to place calls, and similar ransom demands.

5. As described further below, law enforcement believes that SANCHEZ and MATLA, who are in a romantic relationship, were involved in all three instances by either picking up or receiving ransom proceeds from kidnap-victim's family members. First, MATLA's border crossing patterns show her crossing from Mexico into the United States and then back into Mexico, consistent with her traveling to the ransom pickup locations. Second, in the first kidnapping incident, video footage places MATLA in the exact location, namely, a women's bathroom in a McDonalds restaurant, where ransom money was left. Third,

MATLA's physical description, as a young pregnant female, is consistent with the description of the female who was used to pick up the ransom proceeds. Fourth, SANCHEZ received wire transfers from two of the kidnapping victims. Fifth, in the third kidnapping incident set forth herein, MATLA traveled into Mexico in a white vehicle, consistent with the vehicle description provided to one of the victim's family members, who was at a ransom drop location, looking to make a ransom payment. Sixth, in the third kidnapping incident set forth herein, two family members of one of the victim identified MATLA's photograph as an individual they spoke with in arranging to make ransom payments. These two family members also identified SANCHEZ as another individual they spoke with in arranging ransom payments.

IV. STATEMENT OF PROBABLE CAUSE

A. Kidnapping and Murder of Salvador Acosta Medina

1. Kidnapping and Murder

6. On March 28, 2020, the FBI received a report of a kidnapping for ransom from the Baja Anti-Kidnapping Unit ("AKU") in Mexico. AKU informed the FBI that on approximately March 27, 2020, Salvador Acosta Medina ("Medina"), a U.S. Citizen residing in San Diego, California, was kidnapped for ransom in Tijuana, Mexico. Medina's wife, M.E.N., reported the kidnapping to the AKU. M.E.N. used iCloud.com to track Medina's U.S. cellular telephone's last known location. As of March 28, 2020, Medina's cellular telephone was showing a location known as the Hotel "Aqua" in Tijuana, Mexico.

7. On March 28, 2020, Medina's adult son, R.V., received a phone call from Mexican phone number, +52-664-219-6365 from an unknown male ("HT-1") and Medina. Medina wanted R.V. to pay approximately \$25,000 for Medina's release. Throughout the day on March 28, 2020, R.V. received several phone calls from Mexican phone number +52-664-810-3072 from an unknown male ("HT-2"), giving R.V. directions to make a \$25,000 ransom drop in the United States. At approximately 5:56 p.m. PST on March 28, 2020, under the direction of HT-2, R.V. placed a bag containing approximately \$25,000 inside the women's restroom of the McDonalds located at 727 E. San Ysidro Blvd., San Ysidro, California 92173.

8. On March 29, 2020, at approximately 12:30 p.m. PST, R.V. received a message from Medina's WhatsApp account, +52-1664-708-0087, stating Medina would be released on March 29, 2020.

9. On March 29, 2020, a deceased person was found in Tijuana, Mexico, by Mexican authorities. On March 31, 2020, Medina's family members positively identified the remains as that of Medina.

2. Identification of MATLA as Individual Collecting Ransom Proceeds

10. On March 30, 2020, the FBI received photographs and video from a San Diego Metropolitan Transit System ("SDMTS") employee of closed-circuit television ("CCTV") containing CCTV of the exterior of the McDonalds located at 727 E. San Ysidro Blvd., San Ysidro, California 92173. On or about March 30,

2020, the FBI received interior CCTV of the McDonalds from Miguel Aguirre, Care Merchant Property Managers. The CCTV was dated March 28, 2020. At 5:56 p.m. PST, R.V. is seen in the video making the ransom drop by placing the bag containing the money inside the women's restroom. A lone female, later identified as MATLA, is seen exiting the women's restroom approximately six minutes later at 6:02 p.m. PST, wearing a dark colored backpack.

11. Using CCTV, SDMTS was able to retrace MATLA's steps. MATLA entered into the United States from Tijuana, Mexico on March 28, 2020, alone, at approximately 4:19 p.m. PST, at what is commonly known as the Pedestrian Port of Entry East ("PED EAST"), in San Ysidro, California. MATLA was wearing a white colored sweatshirt-style shirt with a dark colored backpack. Throughout the CCTV, MATLA can be seen talking into an iPhone type of cellphone.

12. MATLA entered the McDonalds at approximately 4:41 p.m. PST. MATLA is seen on the CCTV retrieving what appears to be a coin from her person. MATLA appears to use the coin to enter the token operated women's restroom a few moments later and remains in the restroom until her exit at 6:02 p.m. PST. MATLA is seen returning directly to Mexico on foot, wearing the backpack, after departing from McDonalds.

13. On April 1, 2020, using the still images provided by SDMTS, Customs and Border Protection Agent Monica Williams was able to locate and identify the border crossing records for

MATLA as she crossed on foot from Tijuana, Mexico into the United States on March 28, 2020 at approximately 4:19 p.m. PST.

14. On April 15, 2020, I conducted a search of Western Union records and discovered that on March 28, 2020,¹ at approximately 2:44 p.m. PST, a Western Union transfer was initiated online from an account in Medina's name, in San Diego, California, paid at approximately 3:46 p.m. PST, to a "JUAN CARLOS MONTOYA SANCHEZ" (i.e. SANCHEZ), in Tijuana, Mexico. As described below, SANCHEZ is believed to be the partner or spouse of MATLA.

B. Kidnapping and Murder of Edgar Esteban Guzman

1. Kidnapping and Murder

15. On April 13, 2020, L.G. reported to the FBI her brother, Edgar Esteban Guzman ("Guzman"), a U.S. Citizen residing in Norwalk, California, had been kidnapped while visiting family in Tijuana, Mexico.

16. On approximately April 11, 2020, Guzman was at a family member's house in Tijuana, Mexico when he received a phone call at approximately 3:46 p.m. PST. Call detail records received from AT&T on or about April 13, 2020, indicate the number was from Mexican phone number +52-1664-444-7293. Guzman had a short conversation with the calling person in front of his family member. After he ended the phone call, Guzman told his family member he would be back in a short time. The family member took this to mean Guzman would be back in one or two

¹ As set forth above, law enforcement believes that Medina was kidnapped on March 27, 2020.

hours as he indicated he would be back for dinner that evening. According to the family member, Guzman never returned.

17. On approximately April 12, 2020, Guzman contacted his mother, L.G.-2, from Mexican phone number +52-664-859-1555, and told her he was in trouble and to contact his boss, J.R., and to have J.R. pay \$25,000 for Guzman's release.

18. On the morning of April 13, 2020, L.G.-2 received several phone calls from the hostage takers ("HTs") and Guzman. One digital photograph was sent from Guzman's Facebook Messenger account to L.G.-2, of Guzman with his face badly beaten. Throughout the conversations, the ransom for Guzman was negotiated to an agreed upon amount of \$1,000 as well as Guzman's Chevrolet Camaro, which was parked at L.G.-2's residence in Norwalk, California.

19. At approximately 12:43 p.m. PST on April 13, 2020, Guzman told his mother that a woman was in route to pick up the money and Chevrolet Camaro at the Lowes parking lot located at 14873 Carmenita Rd., Norwalk, California 90650. L.G.-2 received a phone call from Guzman at approximately 1:00 p.m. PST, stating the woman picking up the ransom was waiting at the Lowes parking lot. Guzman described the woman as a "pregnant lady". Ultimately, L.G.-2 did not pay the ransom on April 13, 2020.

20. On April 14, 2020, the AKU found a body believed to be that of Guzman, deceased, in Tijuana, Mexico. On April 14, 2020, a family member in Tijuana, Mexico, positively identified the body of Guzman.

2. Identification of MATLA as the Individual
Collecting the Ransom Payment

21. On April 17, 2020, I reviewed the border crossing records for MATLA and discovered MATLA crossed on foot from Tijuana, Mexico into the United States on April 13, 2020 at approximately 11:17 a.m. PST. MATLA entered the United States at PED EAST, with a minor child.

22. MATLA was seen on SDMTS CCTV wearing a dark red-colored sweatshirt-style zip-up shirt and a dark-colored backpack. Throughout the CCTV, MATLA can be seen talking into an iPhone type of cellphone and getting into an eleven-passenger, white-colored van. The van had the company logo "Saenz Express LLC," with California License Plate, 42655S1.

23. On April 13, 2020, Guzman's sister, L.G., provided the FBI with a digital photograph of a Western Union receipt she was able to access in Guzman's Gmail account. L.G. explained it appeared to be a receipt for a Western Union wire initiated from Guzman's bank account on April 12, 2020 for \$400 sent to "JUAN CARLOS MONTOYA SANCHEZ" (i.e. SANCHEZ).

24. On April 14, 2020, Guzman's sister, L.G., was able to login to Guzman's Google account from the family computer. L.G. was able to review historical location data associated with Guzman's account which showed Guzman's Google account location for April 14, 2020 from 1:20 a.m. PST to 2:52 a.m. PST was Hotel "Aqua" located at Canon del Padre, 22203, Tijuana, B.C., Mexico.

C. Kidnapping of J.N.

1. Kidnapping and Ransom Demand

25. On April 22, 2020, G.V., a resident of Pasadena, California, called the FBI to report the kidnapping for ransom of J.N. in Tijuana, Mexico. G.V. and L.V. were interviewed by the FBI on April 27, 2020 and provided the following information.

26. G.V.'s sister, L.V., a resident of Pasadena, California, received a phone call on April 22, 2020 at approximately 10:30 a.m. PST from Mexican phone number +52-663-198-5674, from an unknown male ("HT") stating J.N. was drinking and involved in an accident. J.N. killed a family of four in Tijuana, Mexico and now owed a "fine". The HT demanded approximately \$20,000 for J.N.'s release. L.V. knew the call was a kidnapping for ransom. L.V. was directed by the HT to pay the ransom in cash at 1442 S. Bristol St., Santa Ana, California 92704, at approximately 6:30 p.m. PST. L.V. called G.V., who was shopping at a Costco in Burbank, California at the time. L.V. told G.V. to come home immediately. G.V. knew something was wrong and returned to Pasadena, California, a short time later.

27. Throughout the day, L.V. received numerous calls from the HT, one of which was a "WhatsApp" video call from Mexican phone number, +52-1664-444-7293 (the same phone number that called Guzman prior to his kidnapping, luring him away from his family member's house on April 11, 2020, as described above). During the video call, L.V. observed J.N. in the video. J.N.

appeared beaten about the face. J.N. had one arm bandaged. L.V. was able to record a portion of the video call, without audio, from her phone. During the call, J.N. was telling L.V. he loved her and their children. L.V. believed J.N. was saying goodbye in preparation of being killed by the HT.

28. G.V. left the house in Pasadena at one point during the day to borrow approximately \$14,000 from their sister, C.V. in Los Angeles, California. G.V. had \$5,000 in cash at the house in Pasadena, California. G.V. returned to the house late afternoon in order to help L.V. with negotiations.

29. At one point, G.V. took L.V.'s phone and assisted in negotiating the ransom payment. G.V. offered to deliver the ransom in Tijuana, Mexico. The HT declined, saying to the effect of, "she is already on her way from Tijuana to the United States." G.V. took this to mean the woman picking up the ransom was crossing the border from Mexico into the United States.

30. L.V. reported the kidnapping for ransom to the AKU on April 22, 2020 at approximately 6:30 p.m. PST via telephone. AKU advised they were starting an investigation from Tijuana, Mexico.

31. L.V. was able to negotiate with the HT into accepting \$14,000 as the ransom payment. At approximately 7:15 p.m. PST, the HT called L.V. and informed her the ransom drop location was now going to be in Lynwood, California. The HT described the female that would pick up the ransom as pregnant. The HT sent L.V. a text message at approximately 7:17 p.m. PST from Mexican phone number +52-663-198-5674 with the ransom drop location of

"11245 Long Beach Blvd., Lynwood, California 90262". L.V. discovered later this was a Food 4 Less parking lot.

32. The HT informed L.V. to expect a phone call from the female picking up the ransom. At approximately 7:30 p.m. PST, L.V. received a phone call from Mexican phone number +52-664-852-8990, from a female stating in Spanish she would be at the location at approximately 8:00 p.m. PST. L.V. had not seen the text message with the location of the ransom drop at that point. L.V. asked the female for the address. The female stated, "I've sent it to you already, it's at the Food 4 Less." L.V. noted the female made the statement in Spanish, except stated "Food 4 Less" in English. L.V. believed the female spoke fluent English from the way she said "Food 4 Less". L.V. immediately saved the phone number +52-664-852-8990 to the contact feature on her phone. L.V. utilized the WhatsApp application to see if the number would populate any information in WhatsApp. L.V. was able to see the phone number listed as a "WhatsApp User" and had an associated profile picture of a visibly pregnant female standing with what appeared to be her husband and small child. L.V. saved the WhatsApp profile picture associated with phone number, +52-664-852-8990, to her phone.

33. L.V. initiated a WhatsApp video call to +52-664-852-8990. The call was answered by a young adult Hispanic male. L.V. noted he had dark skin tone, short dark hair that was curly with blonde highlights on the top. The male had some pockmarks on his face that made L.V. believe he abused drugs. The male was in a room with wood plywood walls and a ceiling with open

wood beams. The male placed his finger over the camera of the phone, said to the effect of "one moment" in Spanish, then hung up. L.V. and G.V. immediately recognized the male that answered the WhatsApp video call as the same male that was in the WhatsApp profile photo standing next to the pregnant female.

34. Moments later, at approximately 8:00 p.m. PST, the female picking up the ransom called L.V. via telephone from +52-664-852-8990. The female told L.V. she was at the Food 4 Less and asked where L.V. was. L.V. told the female that L.V. was inside the Food 4 Less, then at the entrance, and then in her car in front of the store. The female described the vehicle she was driving as white and stated she could not see L.V. or L.V.'s car. The female stated to L.V., "You're inside the Food 4 Less? I don't see you." At that point L.V. cut off communication with the female. Ultimately, L.V. did not go to the ransom drop location or make a ransom payment.

35. L.V. also began receiving text messages from an iCloud account; at approximately 7:58pm, L.V. received an iMessage from juanmontoya346@icloud.com, asking L.V. "en donde esta" (where are you). L.V. received a second iMessage at approximately 8:10 p.m. PST from juanmontoya346@icloud.com, asking L.V., "si hay un rite aid aun lado del food 4 less" (is there a Rite aid near the Food 4 Less). L.V. believed the messages were sent by the female that was supposed to pick up the ransom.

2. Rescue of J.N.

36. On April 22, 2020 at approximately 7:41 p.m. PST, the AKU informed FBI BLO SSA Deniz victim J.N. was recovered alive

from the Hotel "Aqua",² located at Canon del Padre, 22203, Tijuana, B.C., Mexico, and nine subjects were arrested at the Hotel Aqua in conjunction with J.N.'s kidnapping. Moments later, L.V. received a video call from the AKU with J.N. present, stating he was safe and rescued.

3. Identification of MATLA as the Individual Sent to Pick Up the Ransom Proceeds

37. On April 22, 2020, I reviewed the border crossing records for MATLA and discovered MATLA crossed into the United States from Tijuana, Mexico on April 22, 2020 at approximately 5:40 p.m. PST. MATLA entered the United States driving a white 2000 Mustang convertible with California License Plate 6NKW882. The driving time from San Ysidro Port of Entry to 11245 Long Beach Blvd., Lynwood, California 90262, was approximately two hours. MATLA was recorded returning to Tijuana, Mexico, at approximately 11:18 p.m. PST on April 22, 2020, in the same white Mustang convertible.

38. On or about April 16, 2020, I accessed the public Facebook account of MATLA with the "vanity name", leslie.briana.7861. The Facebook account shows numerous recent photos of MATLA pregnant and with one other young child. MATLA is in photographs with SANCHEZ who appears to be the father. When I reviewed the California government identification photograph of MATLA, I immediately recognized her as the same individual in the MATLA Facebook account and as the individual

² Notably, this is the same location where victim Guzman's Google account indicated he had been held hostage.

photographed crossing the border during the kidnappings and corresponding ransom collections and attempts.

39. On or about April 16, 2020, I accessed the public Facebook account of SANCHEZ with the "vanity name" juancarlos.montoyasanchez.1. The Facebook account profile photo shows SANCHEZ with MATLA, who appears to be pregnant, with another small child.

40. When I accessed the MATLA Facebook account and the SANCHEZ Facebook account on April 25, 2020, I determined that both accounts were removed following the arrests of nine members of the suspected hostage takers on April 22, 2020 in Tijuana, Baja California, Mexico.

41. On April 27, 2020, L.V. was shown a series of color photos. L.V. positively identified one of the photographs from the Facebook account of MATLA as the same pregnant female depicted in the WhatsApp profile photo associated with phone number +52-664-852-8990. L.V. positively identified one of the photographs from the Facebook account of SANCHEZ as the same male that answered the WhatsApp video call on April 22, 2020 placed by L.V. to +52-664-852-8990.

42. On April 27, 2020, G.V. was shown a series of color photos. G.V. positively identified one of the photographs from the Facebook account of MATLA as the same pregnant female depicted in the WhatsApp profile photo associated with phone number +52-664-852-8990. G.V. positively identified one of the photographs from the Facebook account of SANCHEZ as the same

male that answered the WhatsApp video call on April 22, 2020 placed by L.V. to +52-664-852-8990.

4. Interview with Victim J.N.

43. On April 24, 2020, J.N. was interviewed by the FBI. During the interview, J.N. provided the following information; on approximately April 21, 2020, J.N. drove with a friend, Esteban LNU, to a house in Tijuana, Mexico. The house was near J.N.'s residence and place of business in Tijuana. J.N. was supposed to purchase some canned goods for his taco-shop from an acquaintance known as "Pedro," later identified as OSCAR BAUTISTA VALENCIA ("VALENCIA"). VALENCIA had offered the day before to sell J.N. the canned goods at a discounted price. Due to the COVID-19 restrictions in place in Mexico, J.N.'s regular business inventory was low on food. J.N. agreed.

44. Once at the residence, J.N. backed into the garage. An unknown male ("HT-1") immediately locked the garage door. Another unknown male ("HT-2") was on the other side of the vehicle. A female ("HT-3") came down a set of stairs pointing a gun at J.N. and Esteban. The men yelled at J.N. and Esteban to get out of the vehicle and get down on the ground while HT-3 kept the gun pointed at them. The men had hammers and knives as weapons. J.N. and Esteban complied. They were beaten, their hands and feet were bound and they were blindfolded.

45. J.N. was held hostage until approximately 8:00 p.m. PST the next day, April 22, 2020. Throughout the ordeal J.N. would see approximately nine or ten HTs, both male and female. The HTs shared one handgun that was loaded with approximately

two bullets. J.N.'s acquaintance, VALENCIA, was one of the HTs and would guard J.N. with a gun.

46. For the first several hours of the kidnapping, J.N. and Esteban were tortured with beatings and shocked on their head, neck and feet with a stun-gun type of weapon. The HTs demanded to know if J.N. and Esteban had money to pay a ransom. Esteban told the HTs he was poor, had no family and did not own any property. One of the HTs, later identified as GERMAN GARCIA YERA HERNANDEZ ("YERA"), took Esteban away from the house. YERA returned an hour or two later alone. J.N. never saw Esteban alive after that. YERA claimed to have killed Esteban because he had no money.

47. The next day, on or about April 22, 2020, the HTs forced J.N. to place a call to "his wife, the mother of his children." The HTs told J.N. to tell L.V. he had been drinking and killed a family in a car accident and he had to pay \$20,000. L.V. told J.N. not to worry, she would get the money and pay.

48. At approximately 2:00 p.m. PST, J.N. noticed the HTs became agitated, believing a member of their crew had possibly been captured by the police and was going to reveal their location. J.N. was moved to a nearby hotel. J.N. estimated it was approximately 4:00 p.m. PST when they arrived at the hotel. Once at the hotel, J.N. was made to wear a fake bandage on his arm and place a video call to L.V. to reiterate the need to pay a ransom. YERA instructed J.N. to tell L.V. the ransom was now \$25,000. J.N. tried to negotiate with YERA, saying it was too much. YERA told J.N. to shut up, YERA was the boss, not J.N.

During the video call, J.N. told L.V. he loved her and their children. He was saying goodbye because he knew the HTs were going to kill him no matter if a ransom was paid or not. J.N. had seen their faces and could identify them.

49. J.N. heard YERA say the person in Santa Ana that was supposed to pick up the ransom did not work out so he was sending someone from Tijuana. YERA said it would have to be someone that was a United States citizen with the current COVID-19 restrictions in place. At one point, J.N. heard the HTs mention a "young lady" when discussing the person that was supposed to pick up the ransom money.

50. J.N. heard the HTs negotiating on the phone with L.V. throughout the afternoon and early evening regarding the ransom. J.N. heard the HTs agree to a final amount of \$14,000. J.N. believed approximately one hour passed when he heard a commotion outside. The commotion was the AKU conducting a raid on the hotel room and arresting the HTs. J.N. was saved. The AKU placed a video call with J.N. to L.V., so she would know he was safe.

51. On April 23, 2020, J.N. was interviewed by the AKU and was shown a series of photos. J.N. positively identified one of the photos as that of his friend Esteban. In the photo, Esteban appeared to be deceased, on the ground and bleeding profusely from his head.

V. CONCLUSION

52. Based on the foregoing, there is probable cause to believe that MATLA and SANCHEZ, committed a violation of 18 U.S.C. § 1956(h) (Money Laundering Conspiracy).

~~Cara A. Sammartino~~
~~Special Agent, FBI~~

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this ~~29th~~ day of April_____, 2020.

Alicia L. Rosenberg

United States Magistrate Judge