

FILED

18 NOV -8 AM 4:00

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

1
2 I hereby attest and certify on 11/8/18
3 That the foregoing document is a full, true and correct
4 copy of the original on file in my office and in my legal
5 custody.

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

BY:

aw DEPUTY

6 By *[Signature]* Deputy

7
8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 June 2017 Grand Jury

11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 v.

14 MANUEL REYNOSO GARCIA (1),
15 HUMBERTO RUIZ BERNADAC (6),
16 LUIS FERNANDO FIGUEROA (8),
17 Defendants.

Case No. 17CR2203-WQH

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

Title 18, U.S.C., Sec. 1956(h) -
Money Laundering Conspiracy;
Title 18, U.S.C., Sec. 371 -
Conspiracy; Title 18, U.S.C.,
Sec. 1960(a) - Operation of
Unlicensed Money Transmitting
Business; Title 18, U.S.C.,
Sec. 1956(a)(2)(A) - Money
Laundering; Title 18, U.S.C.,
Sec. 2 - Aiding and Abetting;
Title 18, U.S.C., Secs. 981(a)(1)(C)
and 982(a)(1), and Title 28, U.S.C.,
Sec. 2461(c) - Criminal Forfeiture

21 The Grand Jury charges:

22 INTRODUCTORY ALLEGATIONS

23 At all times material to this Indictment:

24 1. Co-conspirator 1 (CC-1) was a courier who, on behalf of
25 defendant MANUEL REYNOSO GARCIA, and others known and unknown to the
26 Grand Jury, received large sums of currency from third parties,
27 transported and deposited the currency into domestic financial banking
28 institutions, and wire transferred the funds to Mexico.

1 control, manage, supervise, direct, and own at least part of a money
2 transmitting business affecting interstate and foreign commerce, to wit,
3 an international money receipt, deposit, and transmission business,
4 which failed to comply with the money transmitting business registration
5 requirements set forth in Title 31, United States Code, Section 5330,
6 and the regulations promulgated thereunder; all in violation of
7 Title 18, United States Code, Section 1960(a), and Title 18, United
8 States Code, Section 2.

9 OVERT ACTS

10 6. In furtherance of the conspiracy and to accomplish its
11 objects, defendants MANUEL REYNOSO GARCIA, HUMBERTO RUIZ BERNADAC, and
12 LUIS FERNANDO FIGUEROA, together and with others known and unknown to
13 the Grand Jury, committed and caused others to commit, among others, the
14 following overt acts within the Southern District of California and
15 elsewhere:

16 a. On or about August 19, 2014, HUMBERTO RUIZ BERNADAC
17 deposited approximately \$50,000 in United States currency
18 into a domestic financial bank account controlled by
19 defendants MANUEL REYNOSO GARCIA and HUMBERTO RUIZ
20 BERNADAC, and others.

21 b. On or about August 20, 2014, HUMBERTO RUIZ BERNADAC wire
22 transferred approximately \$50,000 in United States
23 currency to a Mexican financial bank account controlled
24 by defendant MANUEL REYNOSO GARCIA and others.

25 c. On December 1, 2015, defendant LUIS FERNANDO FIGUEROA and
26 others known and unknown to the Grand Jury, wire
27 transferred approximately \$47,300 in United States
28

1 currency to a Mexican financial bank account controlled
2 by defendant MANUEL REYNOSO GARCIA and others.

3 d. Between July 2, 2016, and July 14, 2016, defendants
4 MANUEL REYNOSO GARCIA and others known and unknown to the
5 Grand Jury, caused CC-1 to deposit approximately \$538,545
6 in United States currency into domestic financial bank
7 accounts controlled by defendant MANUEL REYNOSO GARCIA
8 and others.

9 e. Between July 2, 2016, and July 14, 2016, defendant MANUEL
10 REYNOSO GARCIA and others known and unknown to the Grand
11 Jury, caused CC-1 and others to wire transfer
12 approximately \$450,575 in United States currency to
13 Mexican financial bank accounts controlled by defendant
14 MANUEL REYNOSO GARCIA and others.

15 f. On or about October 22, 2016, LUIS FERNANDO FIGUEROA, and
16 others known and unknown to the Grand Jury, wire
17 transferred approximately \$43,867 in United States
18 currency to a Mexican financial bank account controlled
19 by defendant MANUEL REYNOSO GARCIA and others.

20 g. On or about March 2, 2017, defendant MANUEL REYNOSO
21 GARCIA and others known and unknown to the Grand Jury,
22 caused CC-1 to deliver approximately \$78,439.90 in United
23 States currency to defendant MANUEL REYNOSO GARCIA.

24 All in violation of Title 18, United States Code, Section 371.

25 Count 3

26 [ALL DEFENDANTS - 18 U.S.C. § 1960(a)]

27 7. Beginning no later than in or around 2014, and continuing up
28 to and including March 2, 2017, within the Southern District of

1 California and elsewhere, defendants MANUEL REYNOSO GARCIA,
2 HUMBERTO RUIZ BERNADAC, and LUIS FERNANDO FIGUEROA, and others known and
3 unknown to the Grand Jury, did knowingly conduct, control, manage,
4 supervise, direct, and own at least part of a money transmitting business
5 affecting interstate and foreign commerce, to wit, an international
6 money receipt, deposit, and transmission business, which failed to
7 comply with the money transmitting business registration requirements
8 set forth in Title 31, United States Code, Section 5330, and the
9 regulations prescribed thereunder; all in violation of Title 18, United
10 States Code, Section 1960(a), and Title 18, United States Code,
11 Section 2.

12 Count 4

13 [18 U.S.C. § 1956(a)(2)(A)]

14 8. On or about August 20, 2014, within the Southern District of
15 California and elsewhere, defendant HUMBERTO RUIZ BERNADAC and others
16 known and unknown to the Grand Jury, did knowingly transfer and transmit
17 funds, that is, approximately \$50,000 in United States currency, from a
18 place in the United States, to a place outside the United States, that
19 is, Mexico, with the intent to promote the carrying on of specified
20 unlawful activity, that is, knowingly to conduct, control, manage,
21 supervise, direct, and own at least part of a money transmitting business
22 affecting interstate and foreign commerce, to wit, an international
23 money receipt, deposit, and transmission business, which failed to
24 comply with the money transmitting business registration requirements
25 set forth in Title 31, United States Code, Section 5330, and the
26 regulations prescribed thereunder in violation of Title 18,
27 United States Code, Section 1960; all in violation of Title 18, United

28 //

1 States Code, Section 1956(a)(2)(A), and Title 18, United States Code,
2 Section 2.

3 Count 5

4 [18 U.S.C. § 1956(a)(2)(A)]

5 9. On or about April 30, 2015, within the Southern District of
6 California and elsewhere, defendant MANUEL REYNOSO GARCIA and others
7 known and unknown to the Grand Jury, did knowingly transfer and transmit
8 funds, that is, approximately \$49,865 in United States currency, from a
9 place in the United States, that is, San Diego, California, to a place
10 outside the United States, that is, Mexico, with the intent to promote
11 the carrying on of specified unlawful activity, that is, knowingly to
12 conduct, control, manage, supervise, direct, and own at least part of a
13 money transmitting business affecting interstate and foreign commerce,
14 to wit, an international money receipt, deposit, and transmission
15 business, which failed to comply with the money transmitting business
16 registration requirements set forth in Title 31, United States Code,
17 Section 5330, and the regulations prescribed thereunder in violation of
18 Title 18, United States Code, Section 1960; all in violation of Title 18,
19 United States Code, Section 1956(a)(2)(A), and Title 18, United States
20 Code, Section 2.

21 Count 6

22 [18 U.S.C. § 1956(a)(2)(A)]

23 10. On or about November 9, 2016, within the Southern District of
24 California and elsewhere, defendants MANUEL REYNOSO GARCIA and others
25 known and unknown to the Grand Jury, did knowingly transfer and transmit
26 funds, that is, approximately \$43,300 in United States currency, from a
27 place in the United States, to a place outside the United States, that
28 is, Mexico, with the intent to promote the carrying on of specified

1 unlawful activity, that is, knowingly to conduct, control, manage,
2 supervise, direct, and own at least part of a money transmitting business
3 affecting interstate and foreign commerce, to wit, an international
4 money receipt, deposit, and transmission business, which failed to
5 comply with the money transmitting business registration requirements
6 set forth in Title 31, United States Code, Section 5330, and the
7 regulations prescribed thereunder in violation of Title 18, United
8 States Code, Section 1960; all in violation of Title 18, United States
9 Code, Section 1956(a)(2)(A), and Title 18, United States Code,
10 Section 2.

11 FORFEITURE ALLEGATIONS

12 11. The allegations set forth in Counts 1 through 6 are realleged
13 herein for purposes of seeking forfeiture to the United States of America
14 pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and
15 982(a)(1), and Title 28, United States Code, Section 2461(c).

16 12. Upon the conviction of one or more of the offenses alleged in
17 Count 1 and Counts 3 through 6 of this Indictment, defendants
18 MANUEL REYNOSO GARCIA, HUMBERTO RUIZ BERNADAC, and LUIS FERNANDO
19 FIGUEROA, shall forfeit to the United States of America pursuant to
20 Title 18, United States Code, Section 982(a)(1) all property, real and
21 personal, involved in the offenses, and any property traceable to such
22 offenses. The property to be forfeited includes, but is not limited to,
23 \$149,275 in United States currency previously seized.

24 13. Upon the conviction of the offense alleged in Count 2 of this
25 Indictment, defendants MANUEL REYNOSO GARCIA, HUMBERTO RUIZ BERNADAC,
26 and LUIS FERNANDO FIGUEROA, shall forfeit to the United States of America
27 pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and
28 Title 28, United States Code, Section 2461(c) any property, real and

1 personal, which constitutes or is derived from proceeds traceable to the
2 violation.

3 14. In the event that any of the property described above, as a
4 result of any act or omission of the defendants:

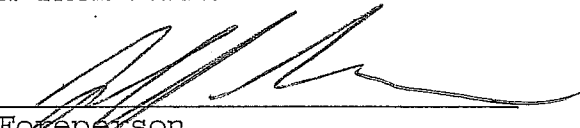
- 5 a. cannot be located upon the exercise of due diligence;
- 6 b. has been transferred or sold to, or deposited with, a
7 third party;
- 8 c. has been placed beyond the jurisdiction of the court;
- 9 d. has been substantially diminished in value; or
- 10 e. has been commingled with other property which cannot be
11 divided without difficulty,

12 the United States of America shall be entitled to forfeit substitute
13 property up to the value of the above described property pursuant to
14 Title 21, United States Code, Section 853(p), as incorporated by
15 Title 18, United States Code, Sections 982(b) and Title 28, United States
16 Code, Section 2461(c).

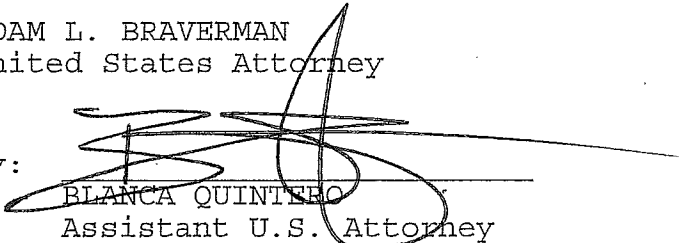
17 All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and
18 982(a)(1); and Title 28, United States Code, Section 2461(c).

19 DATED: November 8, 2018.

20 A TRUE BILL:

21 
22 Foreperson

23 ADAM L. BRAVERMAN
24 United States Attorney

25 By: 
26 BLANCA QUINTERO
27 Assistant U.S. Attorney
28