

ORDERED UNSEALED on 07/7/2025 s/ andreasan

SEALED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

May 2025 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ISAAC JIMENEZ,

Defendant.

Case No. '25 CR2648 JLS

I N D I C T M E N T

Title 18, U.S.C., Sec. 371 - Conspiracy to Bring in Certain Aliens; Title 8, U.S.C., Sec. 1324(a)(2)(B)(ii) - Bringing in Aliens Without Presentation for Financial Gain; Title 18, U.S.C., Sec. 2 - Aiding and Abetting; Title 18, U.S.C., Secs. 982(a)(1) and 982(a)(6), Title 8, U.S.C., Sec. 1324(b), and Title 28, U.S.C., Sec. 2461(c) - Criminal Forfeiture

The grand jury charges:

At all times relevant to this Indictment:

INTRODUCTION

1. Defendant ISAAC JIMENEZ was a resident of Escondido, California.

2. Ramon De Jesus Gonzalez Valdovinos was an alien and a citizen of Mexico with no legal right to enter or remain in the United States legally.

3. C.G.C. was an alien and a citizen of Mexico with no legal right to enter or remain in the United States legally.

1 4. V.A.E. was an alien and a citizen of Mexico with no legal
2 right to enter or remain in the United States legally.

3 Count 1

4 (Conspiracy to Bring in Certain Aliens)

5 [18 U.S.C. § 371]

6 5. Paragraphs 1 through 4 are re-alleged and incorporated herein.

7 6. Beginning on a date unknown to the grand jury and continuing
8 up to and including December 7, 2024, within the Southern District of
9 California, and elsewhere, defendant ISAAC JIMENEZ, with the intent to
10 violate the immigration laws of the United States, did knowingly and
11 intentionally conspire with other persons known and unknown to the grand
12 jury, to commit the following offense against the United States:

13 a. to bring undocumented aliens, namely Ramon De Jesus
14 Gonzalez Valdovinos, C.G.C., and V.A.E., to the United States for
15 financial gain, knowing and in reckless disregard of the fact that said
16 aliens had not received prior official authorization to come to, enter
17 and reside in the United States, in violation of Title 8, United States
18 Code, Section 1324(a)(2)(B)(ii).

19 MANNER AND MEANS

20 7. The object of the conspiracy was carried out, and was to be
21 carried out, in substance in the following manner:

22 8. Members of the conspiracy, including defendant JIMENEZ, would
23 arrange for undocumented aliens with no legal right to enter or remain
24 in the United States legally to be smuggled from Mexico into the United
25 States for commercial and private financial gain.

26 9. Members of the conspiracy, including defendant JIMENEZ, would
27 collect payment from aliens and/or their family members as payment for
28 the alien to be smuggled into the United States from Mexico.

1 10. Members of the conspiracy would smuggle aliens with no legal
2 right to enter or remain in the United States legally into the United
3 States from Mexico.

4 OVERT ACTS

5 11. In furtherance of the conspiracy, and to accomplish its
6 object, defendant JIMENEZ, together with others known and unknown to the
7 grand jury, on or about the dates set forth below, committed and caused
8 to be committed various overt acts, within the Southern District of
9 California and elsewhere, including but not limited to the following:

10 12. Overt Act No. 1: On June 20, 2024, defendant JIMENEZ directed
11 Ramon de Jesus Gonzalez Valdovinos to be brought to a certain location
12 in Tijuana, Mexico to be smuggled into the United States, after which
13 Ramon was smuggled by defendant's co-conspirators on foot into the United
14 States via a location known as "Eagles Nest," an area between San Diego,
15 California and Tijuana, Mexico.

16 13. Overt Act No. 2: Defendant JIMENEZ accepted payment for his
17 role in the June 2024 smuggling event (involving Ramon de Jesus Gonzalez
18 Valdovinos) via wire transfer from Ramon de Jesus Gonzalez Valdovinos
19 and/or his family members.

20 14. Overt Act No. 3: On September 13, 2024, members of the
21 conspiracy demanded a ransom of \$15,000 to be paid by the wife and family
22 members of C.G.C., who was being held against his will, in exchange for
23 completing the smuggling event and releasing him.

24 15. Overt Act No. 4: On September 13, 2024, defendant JIMENEZ,
25 in Santa Ana, California, received approximately \$8,000 as payment from
26 the wife of C.G.C. to smuggle C.G.C. into the United States from Mexico.

27 16. Overt Act No. 5: On September 14, 2024, defendant JIMENEZ,
28 in Tustin, California, received approximately \$7,000 from the wife of

1 C.G.C. as additional payment to smuggle C.G.C. into the United States
2 from Mexico.

3 17. Overt Act No. 6: On September 14, 2024, defendant JIMENEZ
4 transported the \$15,000 he had received from the wife of C.G.C. from
5 the United States to Mexico via the San Ysidro, California Port of Entry.

6 18. Overt Act No. 7: In or about December 2024, defendant JIMENEZ
7 negotiated with Ramon de Jesus Gonzalez Valdovinos to have V.A.E.
8 smuggled into the United States from Mexico on or about December 5,
9 2024, for a smuggling fee of \$7,000.

10 19. Overt Act No. 8: On December 5, 2024, defendant JIMENEZ
11 directed V.A.E. to a pick-up location in Tijuana, Mexico and explained
12 that she needed to use the code name "Samuel" when she was picked up to
13 confirm the smuggling arrangement.

14 20. Overt Act No. 9: On December 5, 2024, two members of the
15 conspiracy arrived at the pre-arranged pick-up location and picked up
16 V.A.E., after which she was held against her will, and additional payment
17 demands were made upon V.A.E.'s family members in exchange for completing
18 the smuggling event and releasing her.

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

20 Count 2

21 **(Bringing in Aliens without Presentation for Financial Gain)**

22 [8 U.S.C. § 1324(a)(2)(B)(ii) & 18 U.S.C. § 2]

23 21. On or about June 20, 2024, within the Southern District of
24 California, defendant ISAAC JIMENEZ, knowing and in reckless disregard
25 of the fact that an alien, namely, Ramon de Jesus Gonzalez Valdovinos,
26 had not received prior official authorization to come to, enter and
27 reside in the United States, did bring into the United States said alien
28 for the purpose of commercial advantage and private financial gain; in

1 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and
2 Title 18, United States Code, Section 2.

3 **FORFEITURE ALLEGATIONS**

4 1. The allegations contained in Counts 1 and 2 are realleged and
5 incorporated herein for purposes of seeking forfeiture to the
6 United States of America pursuant to Title 18, United States Code,
7 Sections 982(a)(1) and 982(a)(6), Title 8, United States Code,
8 Section 1324(b), and Title 28, United States Code, Section 2461(c).

9 2. Upon conviction of one and more of the offenses alleged in
10 Counts 1 and 2, and pursuant to Title 18, United States Code,
11 Section 982(a)(6), Title 8, United States Code, Section 1324(b), and
12 Title 28, United States Code, Section 2461(c), defendant ISAAC JIMENEZ,
13 shall forfeit to the United States all rights, title and interest in
14 any conveyance used in the commission of the offenses, any property,
15 real and personal, that constitutes and is derived from and is traceable
16 to the proceeds obtained directly and indirectly from the commission of
17 the offenses, and any property used to facilitate and intended to be
18 used to facilitate the commission of the offenses.

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

- 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;

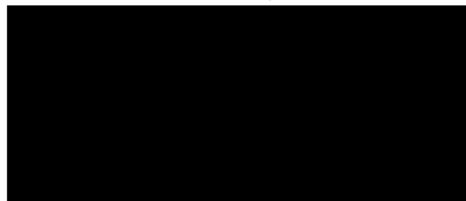
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1 it is the intent of the United States, pursuant to Title 18, United
2 States Code, Section 982(b), to seek forfeiture of any other property
3 of the defendant up to the value of the said property listed above as
4 being subject to forfeiture.

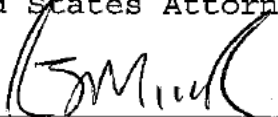
5 All pursuant to Title 18, United States Code, Sections 982(a)(1) and
6 982(a)(6), Title 8, United States Code, Section 1324(b), and Title 28,
7 United States Code, Section 2462(c).

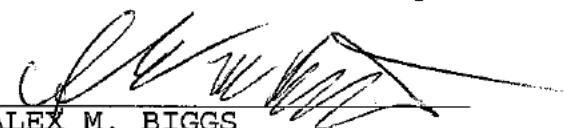
8 DATED: July 2, 2025.

9 A TRUE BILL:



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11
12 ADAM GORDON
United States Attorney

13
14 By: 
ROBERT J. MILLER
Assistant U.S. Attorney

15
16
17 By: 
ALEX M. BIGGS
Special Asst. U.S. Attorney