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

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CASE UNSEALED PER ORDER OF COURT

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

April 2018 Grand Jury

19CR3255 BTM

UNITED STATES OF AMERICA,
Plaintiff,

v.

VICTOR GONZALEZ (1),
SUSAN CHRISTINE LEYVA (2),
aka Susan Christine Gonzalez,
aka Christy Gonzalez,
JOSE "JOE" ANTHONY DIAZ (3),
MERCEDES GONZALES (4),
aka Mercy Diaz,
ARNOLDO BUGARIN (5),
AZUCENA TORRES (6),
aka Susana Bugarin,
SERGIO PARTIDA (7),
ANA KAREN ROBLES ORTIZ (8),
aka Karen Partida,
JOSE "CHITO" MORALES (9),
JOSE DEMARA FLORES (10),
aka Joe Flores,
JOSE GAYTAN (11),
SONIA MURILLO (12),

Defendants.

Case No.

I N D I C T M E N T

Title 18, U.S.C., Sec. 371 -
Conspiracy; Title 18, U.S.C.,
Sec. 1589 - Forced Labor;
Title 18, U.S.C., Sec. 1592 -
Document Servitude; Title 7,
U.S.C., Sec. 2024(b) - Benefits
Fraud; Title 18, U.S.C.,
Secs. 981(a)(1)(C) and 1594;
Title 28, U.S.C., Sec. 2461(c),
and Title 7, U.S.C., Sec. 2024 -
Criminal Forfeiture

The grand jury charges:

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cc: Pretrial

INTRODUCTORY ALLEGATIONS

At all times relevant to this indictment:

1. Imperial Valley Ministries ("IVM") was a ministry founded in the 1970's. Its first church opened in El Centro, California in approximately 1992. IVM literature advertised its members as "Missionaries to the Drug Addicts" who provide "Restoration Homes," "Christian Live-in," and "No Charge Homes for Men and Women with Drug[-]Related Problems."

2. IVM was not a non-profit organization and did not have tax-exempt status pursuant to Section 501(c)(3) of the Internal Revenue Code.

3. IVM's mission statement provided that their target is "the drug addict," their goal is "to restore drug addicts and their families," and their vision is "to plant Restoration Churches in the inner cities."

4. IVM had established approximately 30 affiliate Restoration Churches nationwide, including Los Angeles, California; Santa Ana, California; San Jose, California; Las Vegas, Nevada; Phoenix, Arizona; Tucson, Arizona; Oklahoma City, Oklahoma; St. Louis, Missouri; Kansas City, Missouri; Columbus, Ohio; Cincinnati, Ohio; Louisville, Kentucky; Memphis, Tennessee; and Charlotte, North Carolina.

5. IVM owned the property that includes its church and main office, located at 427 Broadway, El Centro, California ("IVM Church"). IVM also owns and operates a women's group home, located at 463 West Hamilton Avenue, El Centro, California ("Hamilton Location"); a men's group home, located at 2041 Low Road, El Centro, California ("Men's Ranch"); a home located at 205 Lopez Court, Calexico, California ("Calexico Location"); the residence of defendants VICTOR GONZALEZ and SUSAN CHRISTINE LEYVA, aka Susan Christine Gonzalez, aka Christy

1 Gonzalez, located at 1810 Smoketree Drive, El Centro, California
2 ("Smoketree Location"); and the residence located at 1765 Hamilton
3 Avenue, El Centro, California. In addition, IVM rented a home located
4 at 1022 Euclid Avenue, El Centro, California ("Euclid Location"), and a
5 home located at 517 Jefferson Avenue, Chula Vista, California ("Chula
6 Vista Location").

7 6. From at least July 1, 2014 through at least December 13, 2017,
8 doors at the Hamilton Location were locked with deadbolts and only IVM
9 members had access to keys to unlock the doors from the inside.

10 7. From at least January 1, 2015 through at least December 14,
11 2017, doors at the Euclid Location were locked with deadbolts and only
12 IVM members had access to keys to unlock the doors from the inside.

13 8. From at least August 1, 2017 through at least May 22, 2018,
14 doors at the Men's Ranch were locked with deadbolts and only IVM members
15 had access to keys to unlock the front door from the inside.

16 9. IVM consisted of members at its various locations, including
17 pastors and their wives, home directors, counselors, team leaders, and
18 elders ("IVM members"). IVM also includes participants who live at one
19 of IVM's group homes and are subject to its program rules ("IVM
20 participants").

21 10. Defendants VICTOR GONZALEZ, a pastor, and SUSAN CHRISTINE
22 LEYVA, aka Susan Christine Gonzalez, aka Christy Gonzalez, were a married
23 couple and lived at the Smoketree Location.

24 11. Defendants JOSE "JOE" ANTHONY DIAZ and MERCEDES GONZALES,
25 aka Mercy Diaz, a married couple, were IVM members who resided at the
26 IVM Church from on or about June 1, 2012 to on or about July 31, 2013.
27 They were IVM members living at the Calexico Location from on or about
28 July 31, 2013 to on or about July 31, 2014. They were home directors

1 living at the Hamilton Location on or about July 31, 2014 to on or about
2 June 1, 2015. They were IVM members living at the Smoketree Location
3 from on or about June 1, 2015 to on or about December 31, 2015. They
4 were home directors living at the Hamilton Location from on or about
5 December 31, 2015 to on or about July 31, 2016. They were IVM members
6 living in various locations from on or about July 31, 2016 to on or
7 about January 1, 2018. They were IVM members living at the Calexico
8 Location from on or about January 1, 2018 through on or about May 1,
9 2018.

10 12. Defendants ARNOLDO BUGARIN and AZUCENA TORRES, aka Susana
11 Bugarin, a married couple, were home directors and lived at the Men's
12 Ranch from on or about May 1, 2016 to on or about April 1, 2018, and
13 were home directors and lived at the Hamilton Location from on or about
14 April 1, 2018 until at least July 28, 2018.

15 13. Defendants SERGIO PARTIDA and ANA KAREN ROBLES ORTIZ,
16 aka Karen Partida, a married couple, were home directors and lived at
17 the Hamilton Location from on or about August 1, 2016 to on or about
18 March 31, 2018, and were home directors and lived at the Men's Ranch
19 from on or about March 31, 2018 until at least July 28, 2018.

20 14. Defendant JOSE "CHITO" MORALES was a counselor and lived at
21 the Men's Ranch from on or about March 1, 2018 until at least July 28,
22 2018.

23 15. Defendant JOSE DEMARA FLORES, aka Joe Flores, was a counselor
24 and lived at the Men's Ranch from on or about May 1, 2018 until at least
25 July 28, 2018.

26 16. Defendants JOSE GAYTAN and SONIA MURILLO were home directors
27 at the Euclid Location from on or about October 1, 2017 to on or about
28

1 May 1, 2018, and were home directors at the Chula Vista Location from
2 on or about May 1, 2018 until at least June 13, 2018.

3 17. The following persons were IVM participants who resided at IVM
4 group homes: "J.D.S.," "J.B.," "Z.C.," "P.P." (a juvenile through
5 September 2, 2017), "C.H.," "R.L.," "T.M.," "M.A.M.," "A.R.C.," "V.M.,"
6 "J.H.C.," "V.S.," "H.S.," "J.D.," "J.Q.M.," "J.R.D.," "R.C.J.," "V.J.,"
7 "A.B.," "M.W.," "O.R.R.," "G.O.H.," "S.L.P.," "J.C.," "A.L.," "O.M.G.,"
8 "M.A.," "G.A.T.," "J.M.," "F.B.," and "D.W."

9 18. IVM members checked in IVM participants at the IVM group homes,
10 which included requiring IVM participants to sign "sign-in sheets" upon
11 entry into IVM.

12 19. IVM sign-in sheets included an agreement that IVM participants
13 adhere to IVM's 29 Rules, which included the following:

14 a. "You can't leave the house unless accompanied by someone
15 and with the permission from the director -- never by yourself."

16 b. "For the first 30 days, there will be no communication
17 with the family, unless it is at the church (even if husband/wife are
18 in another home)."

19 c. "Any I.D.'s, money, personal items, or important papers
20 are to be turned over to the director."

21 d. "Any information needed is to be gotten from your
22 counselor."

23 e. "You are not to discuss things of the world."

24 f. "If receiving any income, 10% will go to tithes, 30% to
25 the home (this monies [sic] will be given to the church general fund)
26 and the rest will be put away for you by director (no money should be
27 on your person)."

28

1 g. "You can't go to the front yard, unless told so by the
2 counselor."

3 h. "The only thing that is to be read is the Holy Bible."

4 i. "If any of the above rules are broken there will be
5 discipline."

6 j. "None of the above rules apply to the pastor or his
7 family."

8 20. The United States Department of Agriculture ("USDA") Food and
9 Nutrition Service ("FNS") operated the Supplemental Nutrition Assistance
10 Program ("SNAP") through the Food Stamp Program. The Food Stamp Program
11 was implemented by Congress in order to safeguard the health and well-
12 being of the Nation's population by raising levels of nutrition among
13 low-income households by augmenting the food purchasing power of low-
14 income families.

15 21. USDA-FNS delegated authority to individual states to determine
16 eligibility and to certify individual SNAP recipients who qualified for
17 the program. Persons in need, who wished to obtain SNAP benefits, applied
18 with the appropriate state agency.

19 22. Within the Southern District of California, the Food Stamp
20 Program has been replaced by an Electronic Benefits Transaction ("EBT")
21 system obtained through the CalFresh Program. Approved applicants
22 received an EBT card, similar to a bank debit card, linked to a SNAP
23 account. The EBT cards possessed a magnetic strip containing
24 electronically encoded information regarding the particular recipient
25 and the dollar amount of benefits awarded. When an EBT card was
26 presented to a retailer to pay for eligible food items, the retailer
27 deducted funds from the available SNAP benefits either by manually
28 entering the account information or by swiping the EBT card through an

1 electronic card reader at the store. A personal identification number
2 ("PIN") must be entered in the device's PIN pad to complete the
3 transaction.

4 23. SNAP benefits recipients agreed to the requirements and
5 limitations of the program on the application for benefits, including
6 Food Stamp Regulations that require certain beneficiaries to work (see
7 7 U.S.C.A. §§ 2015(d)(1)(A), (o)(2)), and only permit SNAP benefits for
8 eligible persons or households (see 7 U.S.C.A. §§ 2012(m)(1)(B)(4),
9 2014(a)). Consistent with the Food Stamp Regulations, CalFresh Rights
10 and Responsibilities required its beneficiaries to look for, get, and
11 keep a job, and the CalFresh Program Rules and Penalties advised
12 beneficiaries that intentional program violations may include using EBT
13 cards that belong to someone else, letting someone else use the
14 beneficiary's EBT card, or giving away CalFresh benefits or EBT cards.

15 24. Defendant VICTOR GONZALEZ applied for SNAP benefits on
16 September 2, 2008, and signed under penalty of perjury that he had read,
17 understood, and agreed to the CalFresh Program Rights, and read and
18 understood the CalFresh Responsibilities and Program Rules.

19 25. Defendant SUSAN CHRISTINE LEYVA, aka Susan Christine Gonzalez,
20 aka Christy Gonzalez, applied for SNAP benefits on May 20, 2010, and
21 signed under penalty of perjury that she had read, understood, and agreed
22 to the CalFresh Program Rights, and read and understood the CalFresh
23 Responsibilities and Program Rules.

24 26. Defendant JOSE "JOE" ANTHONY DIAZ applied for SNAP benefits
25 on December 8, 2011, and signed under penalty of perjury that he had
26 read, understood, and agreed to the CalFresh Program Rights, and read
27 and understood the CalFresh Responsibilities and Program Rules.

28

1 27. Defendant MERCEDES GONZALES, aka Mercy Diaz, applied for SNAP
2 benefits on December 8, 2011, and signed under penalty of perjury that
3 she had read, understood, and agreed to the CalFresh Program Rights, and
4 read and understood the CalFresh Responsibilities and Program Rules.

5 28. Defendant ARNOLDO BUGARIN applied for SNAP benefits on
6 February 2, 2012, and signed under penalty of perjury that he had read,
7 understood, and agreed to the CalFresh Program Rights, and read and
8 understood the CalFresh Responsibilities and Program Rules.

9 29. Defendant AZUCENA TORRES, aka Susana Bugarin, applied for SNAP
10 benefits on February 2, 2012, and signed under penalty of perjury that
11 she had read, understood, and agreed to the CalFresh Program Rights, and
12 read and understood the CalFresh Responsibilities and Program Rules.

13 30. Defendant SERGIO PARTIDA applied for SNAP benefits on
14 January 1, 2016, and signed under penalty of perjury that he had read,
15 understood, and agreed to the CalFresh Program Rights, and read and
16 understood the CalFresh Responsibilities and Program Rules.

17 31. Defendant ANA KAREN ROBLES ORTIZ, aka Karen Partida, applied
18 for SNAP benefits on October 1, 2012, and signed under penalty of perjury
19 that she had read, understood, and agreed to the CalFresh Program Rights,
20 and read and understood the CalFresh Responsibilities and Program Rules.

21 32. Defendant JOSE "CHITO" MORALES applied for SNAP benefits on
22 February 22, 2018, and signed under penalty of perjury that he had read,
23 understood, and agreed to the CalFresh Program Rights, and read and
24 understood the CalFresh Responsibilities and Program Rules.

25 33. Defendant JOSE DEMARA FLORES, aka Joe Flores, applied for SNAP
26 benefits on February 8, 2014, and signed under penalty of perjury that
27 he had read, understood, and agreed to the CalFresh Program Rights, and
28 read and understood the CalFresh Responsibilities and Program Rules.

1 34. Defendant JOSE GAYTAN applied for SNAP benefits on November 9,
2 2015, and signed under penalty of perjury that he had read, understood,
3 and agreed to the CalFresh Program Rights, and read and understood the
4 CalFresh Responsibilities and Program Rules. He was denied benefits
5 because he was not a United States Citizen.

6 35. Defendant SONIA MURILLO applied for SNAP benefits on
7 November 9, 2015, and signed under penalty of perjury that she had read,
8 understood, and agreed to the CalFresh Program Rights, and read and
9 understood the CalFresh Responsibilities and Program Rules. She was
10 denied benefits because she was not a United States Citizen.

11 Count 1

12 [18 U.S.C. § 371 - CONSPIRACY]

13 36. The Introductory Allegations contained in paragraphs 1 through
14 35 of this Indictment are realleged and incorporated as if set forth
15 fully herein.

16 37. From on or about May 1, 2013, to at least July 28, 2018, within
17 the Southern District of California and elsewhere, defendants VICTOR
18 GONZALEZ, SUSAN CHRISTINE LEYVA, aka Susan Christine Gonzalez,
19 aka Christy Gonzalez, JOSE "JOE" ANTHONY DIAZ, MERCEDES GONZALES,
20 aka Mercy Diaz, ARNOLDO BUGARIN, AZUCENA TORRES, aka Susana Bugarin,
21 SERGIO PARTIDA, ANA KAREN ROBLES ORTIZ, aka Karen Partida, JOSE "CHITO"
22 MORALES, JOSE DEMARA FLORES, aka Joe Flores, JOSE GAYTAN, and SONIA
23 MURILLO, did conspire together and with each other, and others known and
24 unknown to the grand jury, to commit one or more of the following
25 offenses against the United States:

26 a. Forced Labor, that is, to knowingly obtain the labor or
27 services of a person by means of any scheme, plan, or pattern intended
28 to cause the person to believe that, if that person did not perform such

1 labor or services, that person or another person would suffer serious
2 harm, including psychological, financial, or reputational harm, that is
3 sufficiently serious, under all the surrounding circumstances, to compel
4 a reasonable person of the same background and in the same circumstances
5 to perform or to continue performing labor or services in order to avoid
6 incurring that harm, in violation of Title 18, United States Code,
7 Section 1589;

8 b. Document Servitude, that is, to knowingly confiscate or
9 possesses any actual or purported passport or other immigration
10 document, or any other actual or purported government identification
11 document, of another person in the course of a violation of Section 1589
12 or 1590, with intent to violate Section 1589 or 1590, to prevent or
13 restrict, or to attempt to prevent or restrict, without lawful authority,
14 the person's liberty to move or travel, in order to maintain the labor
15 or services of that person, when the person is or has been a victim of
16 a severe form of trafficking in persons, as defined in Section 103 of
17 the Trafficking Victims Protection Act of 2000, in violation of Title 18,
18 United States Code, Section 1592;

19 c. Benefits Fraud, that is, to knowingly use, transfer,
20 acquire, or possess benefits in any manner contrary to Chapter 51 of
21 the Food Stamp Regulations, if such benefits are of a value of \$100 or
22 more, in violation of Title 7, United States Code, Sections 2024(b);

23 MANNER AND MEANS OF THE CONSPIRACY

24 38. It was part of the scheme that Defendants knowingly benefitted
25 financially from a venture that required IVM participants to obtain
26 panhandling proceeds through a scheme, plan, and pattern intended to
27 cause IVM participants to believe that if they did not panhandle on
28 behalf of IVM they would suffer serious psychological, financial, or

1 reputational harm. The Defendants participated in the venture knowing
2 or in reckless disregard of the fact that it had engaged in obtaining
3 the IVM participants' labor by such means (18 U.S.C. § 1589).

4 39. It was further part of the scheme that Defendants knowingly
5 recruited, transported, and harbored IVM participants for labor and
6 services in violation of the Forced Labor statute (18 U.S.C. § 1590).

7 40. It was further part of the scheme that Defendants knowingly
8 confiscated and possessed government identification documents belonging
9 to IVM participants in order to prevent IVM participants from leaving
10 IVM and to maintain the IVM participants' labor in violation of the
11 Forced Labor statute (18 U.S.C. § 1592).

12 41. It was further part of the scheme that Defendants knowingly
13 used, transferred, acquired, and possessed SNAP benefits by requiring
14 IVM participants to surrender their EBT cards to provide SNAP benefits
15 to ineligible persons (7 U.S.C. § 2024(b)).

16 42. It was further part of the scheme that Defendants knowingly
17 used, transferred, acquired, and possessed SNAP benefits by instructing
18 IVM participants to obtain or continue receiving SNAP benefits but not
19 to seek or accept outside employment (7 U.S.C. § 2024(b)).

20 OVERT ACTS

21 43. In furtherance of said conspiracy and to effect and accomplish
22 the objects thereof, the following overt acts, among others, were
23 committed within the Southern District of California, and elsewhere:

24 a. Between or about May 1, 2013 and June 30, 2016, defendant
25 VICTOR GONZALEZ instructed IVM members to keep IVM participants from
26 leaving IVM because IVM needed money.

27 b. Between or about May 1, 2013 and at least July 28, 2018,
28 defendants VICTOR GONZALEZ, SUSAN CHRISTINE LEYVA, aka Susan Christine

1 Gonzalez, aka Christy Gonzalez, JOSE "JOE" ANTHONY DIAZ, MERCEDES
2 GONZALES, aka Mercy Diaz, SERGIO PARTIDA, ANA KAREN ROBLES ORTIZ,
3 aka Karen Partida, and IVM members under their direction, induced IVM
4 participants' consent to surrender SNAP benefits for the benefit of IVM
5 through the wrongful use of actual or threatened fear of economic loss.

6 c. Between or about May 1, 2013 and at least July 28, 2018,
7 defendants VICTOR GONZALEZ, JOSE "JOE" ANTHONY DIAZ, and MERCEDES
8 GONZALES, aka Mercy Diaz, and IVM members under their direction, refused
9 to return EBT cards to IVM participants who requested to leave IVM unless
10 specifically requested by the participant.

11 d. Between or about May 1, 2013 and at least July 28, 2018,
12 IVM members, upon the direction of defendants VICTOR GONZALEZ, JOSE
13 "JOE" ANTHONY DIAZ, and MERCEDES GONZALES, aka Mercy Diaz, told IVM
14 participants who requested to leave IVM that they must wait for a home
15 director to return in order to receive their personal belongings in
16 order to compel them to remain at IVM.

17 e. Between or about May 1, 2013 and June 13, 2018, defendants
18 VICTOR GONZALEZ and SUSAN CHRISTINE LEYVA, aka Susan Christine Gonzalez,
19 aka Christy Gonzalez, acquired, possessed, used, and transferred EBT
20 cards belonging to IVM participants for the benefit of ineligible
21 persons.

22 f. Between or about May 1, 2013 and May 22, 2018, defendant
23 VICTOR GONZALEZ, and IVM members under his direction, determined
24 fundraising teams and dispatched IVM participants to panhandle for the
25 benefit of IVM.

26 g. Between or about May 1, 2013 and at least July 28, 2018,
27 defendant VICTOR GONZALEZ, SUSAN CHRISTINE LEYVA, aka Susan Christine
28

1 Gonzalez, aka Christy Gonzalez, and IVM members under their direction,
2 collected panhandling proceeds from IVM participants.

3 h. Between or about July 1, 2013 and May 22, 2018, defendant
4 VICTOR GONZALEZ, or an IVM member under his direction, drove F.B. to an
5 ATM to withdraw Supplemental Social Income benefits from his account and
6 confiscated the funds.

7 i. Between or about July 1, 2014 and May 22, 2018, defendants
8 JOSE "JOE" ANTHONY DIAZ and MERCEDES GONZALES, aka Mercy Diaz, possessed
9 and used EBT cards belonging to IVM participants for the benefit of
10 ineligible persons.

11 j. Between or about July 1, 2014 and July 30, 2016,
12 defendants JOSE "JOE" ANTHONY DIAZ and MERCEDES GONZALES, aka Mercy
13 Diaz, compelled IVM participants to remain at the Hamilton Location by
14 saying their children would be taken away if they left IVM.

15 k. Between or about July 1, 2016 and June 13, 2018,
16 defendants VICTOR GONZALEZ, SUSAN CHRISTINE LEYVA, aka Susan Christine
17 Gonzalez, aka Christy Gonzalez, SERGIO PARTIDA, and IVM members under
18 their direction, acquired, possessed, used, and transferred EBT cards
19 belonging to IVM participants upon instructing IVM participants not to
20 seek or accept employment outside of IVM.

21 l. Between or about July 1, 2016 and June 13, 2018,
22 defendants VICTOR GONZALEZ, SUSAN CHRISTINE LEYVA, aka Susan Christine
23 Gonzalez, aka Christy Gonzalez, and IVM members under their direction,
24 acquired EBT cards belonging to IVM participants upon the false
25 representation that only a maximum of 40% of the SNAP benefits would be
26 used monthly.

27 m. Between or about July 1, 2016 and May 22, 2018, IVM
28 members, upon the direction of defendants VICTOR GONZALEZ, JOSE "JOE"

1 ANTHONY DIAZ, and MERCEDES GONZALES, aka Mercy Diaz, traveled from
2 El Centro, California to locations in California, Arizona, Nevada, and
3 Texas to recruit new IVM participants.

4 n. Between or about August 1, 2016 and June 13, 2018, IVM
5 members, upon the consultation and direction of defendants VICTOR
6 GONZALEZ, JOSE "JOE" ANTHONY DIAZ, MERCEDES GONZALES, aka Mercy Diaz,
7 SERGIO PARTIDA, and ANA KAREN ROBLES ORTIZ, aka Karen Partida, punished
8 IVM participants for breaking IVM rules.

9 o. On or about August 10, 2016 and August 19, 2016,
10 defendants MERCEDES GONZALES, aka Mercy Diaz, and ANA KAREN ROBLES ORTIZ,
11 aka Karen Partida, or IVM members under their direction, recruited J.D.S.
12 by falsely representing she would be returned home to Texas if she did
13 not like IVM.

14 p. Between or about August 12, 2016 and August 19, 2016,
15 defendants MERCEDES GONZALES, aka Mercy Diaz, and ANA KAREN ROBLES ORTIZ,
16 aka Karen Partida, or IVM members under their direction, denied a request
17 from J.D.S. to leave the Hamilton Location.

18 q. Between or about August 12, 2016 and October 1, 2016,
19 defendants MERCEDES GONZALES, aka Mercy Diaz, and ANA KAREN ROBLES ORTIZ,
20 aka Karen Partida, or IVM members under their direction, physically
21 restrained J.D.S. from leaving in an IVM vehicle.

22 r. Between or about August 12, 2016 and October 1, 2016,
23 defendants MERCEDES GONZALES, aka Mercy Diaz, and ANA KAREN ROBLES ORTIZ,
24 aka Karen Partida, or IVM members under their direction, refused an IVM
25 participant's request to seek medical attention for a prolapsed uterus.

26 s. Between or about August 12, 2016 and October 1, 2016,
27 defendants MERCEDES GONZALES, aka Mercy Diaz, and ANA KAREN ROBLES ORTIZ,
28

1 aka Karen Partida, or IVM members under the direction, punished an IVM
2 participant for breaking an IVM rule by denying food for one day.

3 t. On or about October 1, 2016, defendant ANA KAREN ROBLES
4 ORTIZ, aka Karen Partida, refused to return a government identification
5 card belonging to J.D.S. when she left the Hamilton Location, which
6 caused J.D.S. to return on or about June 6, 2017.

7 u. On or about October 1, 2016, defendants MERCEDES
8 GONZALES, aka Mercy Diaz, and ANA KAREN ROBLES ORTIZ, aka Karen Partida,
9 refused to provide to J.D.S. transportation home from El Centro,
10 California to Laredo, Texas when she left the Hamilton Location.

11 v. On or about August 1, 2017, IVM members under the
12 direction of defendants MERCEDES GONZALES, aka Mercy Diaz, and ANA KAREN
13 ROBLES ORTIZ, aka Karen Partida, recruited J.B. by falsely promising she
14 would be transferred to an affiliate church in Brownsville, Texas after
15 30 days if she elected to leave IVM.

16 w. On or about August 1, 2017, IVM members under the
17 direction of defendant ANA KAREN ROBLES ORTIZ, aka Karen Partida,
18 recruited J.B. by promising she would receive medical care for her
19 pregnancy.

20 x. Between or about August 1, 2017 and August 14, 2017,
21 defendant ANA KAREN ROBLES ORTIZ, aka Karen Partida, or IVM members
22 under her direction, refused J.B.'s request to contact her grandfather
23 by telephone.

24 y. Between or about August 1, 2017 and August 14, 2017,
25 defendant SUSAN CHRISTINE LEYVA, aka Susan Christine Gonzalez,
26 aka Christy Gonzalez, refused an IVM participant's request for access
27 to SNAP benefits.

28

1 z. Between or about August 1, 2017 and August 14, 2017,
2 defendant ANA KAREN ROBLES ORTIZ, aka Karen Partida, punished an IVM
3 participant for talking about their family or the outside world.

4 aa. Between or about August 1, 2017 and August 14, 2017,
5 defendant ANA KAREN ROBLES ORTIZ, aka Karen Partida, instructed her
6 daughter to tell J.B. that J.B. would only obtain custody of her child
7 if she remained at IVM, in order to compel J.B. to remain at IVM.

8 bb. Between or about August 1, 2017 and August 14, 2017,
9 defendants VICTOR GONZALEZ, SUSAN CHRISTINE LEYVA, aka Susan Christine
10 Gonzalez, aka Christy Gonzalez, and ANA KAREN ROBLES ORTIZ, aka Karen
11 Partida, falsely told J.B. that Z.C. wanted to remain at IVM, in order
12 to compel J.B. to remain at IVM.

13 cc. Between or about August 1, 2017 and August 14, 2017, an
14 IVM member under the direction of defendant ANA KAREN ROBLES ORTIZ,
15 aka Karen Partida, possessed, used, and transferred SNAP benefits for
16 the benefit of ineligible persons.

17 dd. Between or about August 1, 2017 and August 14, 2017,
18 defendants JOSE "JOE" ANTHONY DIAZ and SERGIO PARTIDA, or an IVM member
19 under their direction, locked all doors at the Men's Ranch to compel
20 Z.C. to remain.

21 ee. Between or about August 1, 2017 and August 14, 2017,
22 defendants JOSE "JOE" ANTHONY DIAZ and SERGIO PARTIDA, or an IVM member
23 under their direction, falsely represented to Z.C. that J.B., his
24 fiancée, no longer loved him and did not want to be with him, and told
25 him that only God loved him, all in order to compel him to remain with
26 IVM.

1 ff. On or about August 30, 2017, defendant ANA KAREN ROBLES
2 ORTIZ (aka Karen Partida) checked in P.P., a juvenile, at the Hamilton
3 Location and refused her request to contact her father by telephone.

4 gg. Between or about August 30, 2017 and September 2, 2017,
5 defendants MERCEDES GONZALES, aka Mercy Diaz, and ANA KAREN ROBLES ORTIZ,
6 aka Karen Partida, or IVM members under their direction, denied a request
7 from P.P., a juvenile, to leave the Hamilton Location and held her
8 against her will.

9 hh. Between or about September 1, 2017 and October 12, 2017,
10 defendants JOSE "JOE" ANTHONY DIAZ, SERGIO PARTIDA, and JOSE DEMARA
11 FLORES, aka Joe Flores, or an IVM member under their direction, refused
12 a request from C.H. for transportation from the Men's Ranch back home
13 to San Diego.

14 ii. Between or about October 1, 2017 and October 24, 2017,
15 defendants JOSE "JOE" ANTHONY DIAZ, SERGIO PARTIDA, and JOSE DEMARA
16 FLORES, aka Joe Flores, or an IVM member under their direction,
17 instructed R.L. that he was not permitted to seek employment while he
18 was an IVM participant.

19 jj. Between or about October 1, 2017 and October 26, 2017,
20 defendants JOSE "JOE" ANTHONY DIAZ, SERGIO PARTIDA, and JOSE DEMARA
21 FLORES, aka Joe Flores, or an IVM member under their direction, refused
22 a request from T.M. for transportation from the Men's Ranch back home
23 to San Diego.

24 kk. Between or about October 1, 2017 and July 31, 2018,
25 defendants VICTOR GONZALEZ, SUSAN CHRISTINE LEYVA, aka Susan Christine
26 Gonzalez, aka Christy Gonzalez, SERGIO PARTIDA, and ANA ANA KAREN ROBLES
27 ORTIZ, aka Karen Partida, and IVM members under their direction, acquired
28 SNAP benefits exceeding 40% per month from M.A.M. despite the

1 representation that only a maximum of 40% of the SNAP benefits would be
2 used monthly.

3 11. On or about November 15, 2017, defendant ANA KAREN ROBLES
4 ORTIZ, aka Karen Partida, checked in A.R.C. at the Hamilton Location and
5 confiscated her California driver's license, bank card, and Social
6 Security card.

7 mm. Between or about November 15, 2017 and December 13, 2017,
8 defendant ANA KAREN ROBLES ORTIZ, aka Karen Partida, denied requests
9 from A.R.C. to leave the Hamilton Location.

10 nn. Between or about November 15, 2017 and December 13, 2017,
11 defendant ANA KAREN ROBLES ORTIZ, aka Karen Partida, required A.R.C. to
12 panhandle and surrender all proceeds.

13 oo. On or about November 15, 2017, an IVM member under the
14 direction of defendant ANA KAREN ROBLES ORTIZ, aka Karen Partida, checked
15 in V.M. at the Hamilton Location.

16 pp. On or about December 13, 2017, IVM members under the
17 direction of defendant ANA KAREN ROBLES ORTIZ, aka Karen Partida, denied
18 requests from A.R.C. and V.M. to leave the Hamilton Location.

19 qq. On or about December 13, 2017, IVM members under the
20 direction of defendant ANA KAREN ROBLES ORTIZ, aka Karen Partida, refused
21 to return A.R.C.'s California driver's license when she left the Hamilton
22 Location.

23 rr. Between or about January 1, 2018 and June 28, 2018,
24 defendants JOSE GAYTAN and SONIA MURILLO required IVM member "R.S." to
25 panhandle on behalf of IVM, confiscated all of her fundraising proceeds,
26 required fasting on Wednesdays, and required another person to accompany
27 her in order to leave the Euclid Location.

28

1 ss. Between or about January 1, 2018 and January 31, 2018,
2 defendants VICTOR GONZALEZ, SUSAN CHRISTINE LEYVA, aka Susan Christine
3 Gonzalez, aka Christy Gonzalez, and IVM members under their direction,
4 acquired SNAP benefits exceeding 40% per month from J.H.C. despite the
5 representation that only a maximum of 40% of the SNAP benefits would be
6 used monthly.

7 tt. On or about January 23, 2018, IVM members under the
8 direction of defendant ANA KAREN ROBLES ORTIZ, aka Karen Partida,
9 recruited V.S. in San Diego by falsely promising they would bring her
10 to a program located only 30 minutes away by vehicle.

11 uu. On or about January 23, 2018, defendant SONIA MURILLO
12 checked in V.S. at the Hamilton Location and confiscated her driver's
13 license.

14 vv. On or about January 23, 2018, defendant ANA KAREN ROBLES
15 ORTIZ, aka Karen Partida, or an IVM member under her direction,
16 confiscated the EBT card of V.S. for the benefit of ineligible persons,
17 represented that a maximum of 40% of her SNAP benefits would be used
18 monthly, and IVM would keep the remainder.

19 ww. On or about January 25, 2018, defendant ANA KAREN ROBLES
20 ORTIZ, aka Karen Partida, or an IVM member under her direction, refused
21 a request from V.S. for transportation from the Hamilton Location back
22 home to San Diego.

23 xx. On or about January 25, 2018, defendants SERGIO PARTIDA,
24 JOSE "JOE" ANTHONY DIAZ, or an IVM member under their direction, expelled
25 H.S. from the Men's Ranch when he refused to panhandle on behalf of IVM.

26 yy. Between or about February 1, 2018 and March 10, 2018,
27 defendants JOSE "JOE" ANTHONY DIAZ, SERGIO PARTIDA, and JOSE DEMARA
28 FLORES, aka Joe Flores, or an IVM member under their direction, refused

1 a request from J.D. for transportation from the Men's Ranch back home
2 to San Diego.

3 zz. Between or about February 1, 2018 and May 22, 2018,
4 defendants JOSE GAYTAN and SONIA MURILLO possessed and used EBT cards
5 belonging to IVM participants for the benefit of ineligible persons.

6 aaa. Between or about February 1, 2018 and July 31, 2018,
7 defendants VICTOR GONZALEZ, SUSAN CHRISTINE LEYVA, aka Susan Christine
8 Gonzalez, aka Christy Gonzalez, and IVM members under their direction,
9 acquired SNAP benefits exceeding 40% per month from J.Q.M. despite the
10 representation that only a maximum of 40% of the SNAP benefits would be
11 used monthly.

12 bbb. Between or about February 1, 2018 and July 31, 2018,
13 defendants VICTOR GONZALEZ, SUSAN CHRISTINE LEYVA, aka Susan Christine
14 Gonzalez, aka Christy Gonzalez, and IVM members under their direction,
15 acquired SNAP benefits exceeding 40% per month from J.R.D. despite the
16 representation that only a maximum of 40% of the SNAP benefits would be
17 used monthly.

18 ccc. On or about February 9, 2018, defendants ARNOLDO BUGARIN
19 and SERGIO PARTIDA checked in R.C.J. at an IVM location and confiscated
20 his California driver's license.

21 ddd. Between or about February 22, 2018 and March 10, 2018,
22 defendants ARNOLDO BUGARIN and AZUCENA TORRES, aka Susana Bugarin, or
23 an IVM member under their direction, required mandatory fasting on
24 Wednesdays and Sundays at the Hamilton Location.

25 eee. Between or about February 22, 2018 and March 10, 2018,
26 defendants ARNOLDO BUGARIN and AZUCENA TORRES, aka Susana Bugarin, or
27 an IVM member under their direction, falsely promised they would provide
28

1 V.J. with transportation back home to Texas the following week in order
2 to compel her to remain at the Hamilton Location.

3 fff. Between or about February 22, 2018 and March 10, 2018,
4 defendants VICTOR GONZALEZ, JOSE "JOE" ANTHONY DIAZ, SERGIO PARTIDA, and
5 JOSE DEMARA FLORES, aka Joe Flores, or an IVM member under their
6 direction, falsely represented to A.B. that V.J., his girlfriend, did
7 not want to leave IVM in order to compel him to remain with IVM.

8 ggg. Between or about February 22, 2018 and March 10, 2018,
9 defendants ARNOLDO BUGARIN and AZUCENA TORRES, aka Susana Bugarin, or
10 an IVM member under their direction, falsely told V.J. that A.B., her
11 boyfriend, did not want to leave IVM, in order to compel V.J. to remain
12 at the Hamilton Location.

13 hhh. Between or about March 1, 2018 and May 27, 2018,
14 defendants JOSE "JOE" ANTHONY DIAZ and JOSE DEMARA FLORES, aka Joe
15 Flores, or an IVM member under their direction, refused an IVM
16 participant's request for access to medical care.

17 iii. On or about March 1, 2018, defendant VICTOR GONZALEZ
18 checked in O.R.R. at the IVM Church and falsely represented O.R.R. would
19 be able to see his family regularly.

20 jjj. Between or about March 1, 2018 and May 22, 2018,
21 defendants SERGIO PARTIDA and JOSE DEMARA FLORES, aka Joe Flores, imposed
22 punishment on O.R.R. for attempting to leave IVM.

23 kkk. Between or about March 1, 2018 and May 22, 2018,
24 defendants SERGIO PARTIDA and JOSE DEMARA FLORES, aka Joe Flores,
25 possessed the naturalization certificate of O.R.R. and refused a request
26 from O.R.R. for its return in order to compel him to remain with IVM.

1 111. Between or about March 1, 2018 and May 22, 2018, defendant
2 JOSE DEMARA FLORES, aka Joe Flores, confiscated and possessed medicine
3 and a bank debit card of F.B.

4 mmm. Between or about March 1, 2018 and May 22, 2018,
5 defendants SERGIO PARTIDA and JOSE "CHITO" MORALES, disciplined IVM
6 members at the Men's Ranch for breaking IVM rules.

7 nnn. On or about March 10, 2018, defendant ARNOLDO BUGARIN
8 refused a request from V.J. to leave the Hamilton Location, and grabbed
9 and held V.J. by the wrists to prevent her from leaving the Hamilton
10 Location.

11 ooo. On or about March 10, 2018, defendants ARNOLDO BUGARIN
12 and AZUCENA TORRES, aka Susana Bugarin, or an IVM member under their
13 direction, refused to return personal property to V.J. when she left the
14 Hamilton Location.

15 ppp. On or about March 28, 2018, defendant ARNOLDO BUGARIN
16 transported G.O.H. from a bus station in El Centro, California to the
17 Hamilton Location for her to enter an IVM program.

18 qqq. On or about March 28, 2018, defendants ARNOLDO BUGARIN
19 and AZUCENA TORRES, aka Susana Bugarin, or an IVM member under their
20 direction, confiscated personal property belonging to G.O.H. at the
21 Hamilton Location and instructed her that to receive a toothbrush she
22 had to "earn it."

23 rrr. On or about April 2, 2018, defendant AZUCENA TORRES,
24 aka Susana Bugarin, refused a request from G.O.H. to leave the Hamilton
25 Location and seek medical attention, and cornered G.O.H. inside the
26 Hamilton Location to physically prevent her from leaving.

1 sss. On or about April 30, 2018, defendant SONIA MURILLO
2 arranged for S.L.P. to travel from Chula Vista, California by bus to El
3 Centro, California to enter an IVM program.

4 ttt. On or about May 1, 2018, defendants ARNOLDO BUGARIN and
5 AZUCENA TORRES, aka Susana Bugarin, transported S.L.P. from a bus station
6 in El Centro, California to the Hamilton Location for her to enter an
7 IVM program.

8 uuu. Between or about May 1, 2018 and May 6, 2018, defendant
9 JOSE DEMARA FLORES, aka Joe Flores, checked in J.C. at the Men's Ranch,
10 confiscated his EBT card for the benefit of ineligible persons, and
11 falsely represented that a maximum of 40% of his SNAP benefits would be
12 used monthly.

13 vvv. Between or about May 1, 2018 and May 8, 2018, defendant
14 JOSE "CHITO" MORALES refused requests from J.C. to remain in bed due to
15 illness at the Men's Ranch and not panhandle for the benefit of IVM.

16 www. Between or about May 1, 2018 and May 8, 2018, defendants
17 SERGIO PARTIDA and JOSE "CHITO" MORALES refused a request from J.C. for
18 transportation from the Men's Ranch back home to San Diego.

19 xxx. Between or about May 1, 2018 and May 8, 2018, defendant
20 SERGIO PARTIDA falsely represented to J.C. that he did not possess his
21 EBT card.

22 yyy. Between or about May 8, 2018 and May 13, 2018, defendants
23 ARNOLDO BUGARIN and AZUCENA TORRES, aka Susana Bugarin, refused requests
24 from A.L. to leave the Hamilton Location.

25 zzz. On or about May 14, 2018, an IVM member at the direction
26 of defendants ARNOLDO BUGARIN and AZUCENA TORRES, aka Susana Bugarin,
27 delayed returning personal property to A.L. in order to compel her to
28 remain at the Hamilton Location.

1 aaaa. On or about May 15, 2018, defendant JOSE "CHITO"
2 MORALES checked in O.M.G. at the Men's Ranch and confiscated his mobile
3 telephone.

4 bbbb. On or about May 15, 2018, defendant SERGIO PARTIDA
5 instructed O.M.G. that he would not receive transportation from the
6 Men's Ranch back home to San Diego if he elected to leave IVM.

7 cccc. Between or about May 17, 2018 and May 22, 2018,
8 defendant AZUCENA TORRES, aka Susana Bugarin, refused requests from M.A.
9 to leave the Hamilton Location.

10 dddd. On or about May 18, 2018, an IVM member under the
11 direction of defendants ARNOLDO BUGARIN and AZUCENA TORRES, aka Susana
12 Bugarin, checked in G.A.T. at the Hamilton Location and confiscated her
13 EBT card and PIN for the benefit of ineligible persons.

14 eeee. Between or about May 18, 2018 and May 31, 2018,
15 defendants ARNOLDO BUGARIN and AZUCENA TORRES, aka Susana Bugarin,
16 refused requests from G.A.T. to obtain diabetic medicine and medical
17 supplies from a physician and denied a request for food in response to
18 low blood sugar.

19 ffff. On or about May 21, 2018, defendant SERGIO PARTIDA,
20 checked in J.M. at the Men's Ranch and represented that a maximum of
21 40% of his SNAP benefits would be used monthly.

22 gggg. Between or about May 22, 2018 and June 13, 2018, IVM
23 members, upon the direction of defendant VICTOR GONZALEZ, obtained and
24 possessed the identifications of IVM participants in their respective
25 fundraising teams.

26 hhhh. Between or about May 22, 2018 and June 13, 2018, IVM
27 members, upon the direction of defendant VICTOR GONZALEZ, told IVM
28

1 participants they would not receive rides home from IVM locations if
2 they elected to leave.

3 iiiii. On or about May 24, 2018, defendant JOSE "CHITO"
4 MORALES, and IVM members under his direction, recruited D.W. in
5 Oceanside, California, transported him to the Men's Ranch, and refused
6 his request to contact his mother by telephone.

7 jjjjj. On or about May 29, 2018, defendant JOSE "CHITO"
8 MORALES refused a request from D.W. for a return of his personal
9 belongings in order to leave the Men's Ranch.

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

11 Count 2

12 [18 U.S.C. § 1589 - FORCED LABOR]

13 44. The Introductory Allegations contained in paragraphs 1 through
14 35 of this Indictment are realleged and incorporated as if set forth
15 fully herein.

16 45. From on or about May 1, 2013 to at least July 28, 2018, within
17 the Southern District of California and elsewhere, defendants VICTOR
18 GONZALEZ, SUSAN CHRISTINE LEYVA, aka Susan Christine Gonzalez,
19 aka Christy Gonzalez, JOSE "JOE" ANTHONY DIAZ, MERCEDES GONZALES,
20 aka Mercy Diaz, ARNOLDO BUGARIN, AZUCENA TORRES, aka Susana Bugarin,
21 SERGIO PARTIDA, ANA KAREN ROBLES ORTIZ, aka Karen Partida, JOSE "CHITO"
22 MORALES, and JOSE DEMARA FLORES, aka Joe Flores, did knowingly benefit,
23 financially or by receiving anything of value, from participation in a
24 venture which has engaged in the providing or obtaining of labor or
25 services by means of a scheme, plan, or pattern intended to cause a
26 person to believe that, if that person did not perform such labor or
27 services, that person or another person would suffer serious harm,
28 knowing or in reckless disregard of the fact that the venture has engaged

1 in the providing or obtaining of labor or services by such means; in
2 violation of Title 18, United States Code, Section 1589.

3 Counts 3-6

4 [18 U.S.C. § 1592 - DOCUMENT SERVITUDE]

5 46. The Introductory Allegations contained in paragraphs 1 through
6 35 of this Indictment are realleged and incorporated as if set forth
7 fully herein.

8 47. On or about the dates referenced below, within the Southern
9 District of California and elsewhere, the defendants referenced below,
10 knowingly confiscated or possessed actual or purported passports,
11 immigration documents, or other actual or purported government
12 identification documents, of the persons referenced below, in the course
13 of a violation of Forced Labor (18 U.S.C. § 1589), or with intent to
14 commit Forced Labor (18 U.S.C. § 1589), to prevent or restrict, or to
15 attempt to prevent or restrict, without lawful authority, the respective
16 person's liberty to move or travel, in order to maintain the labor or
17 services of that person, when the person is or has been a victim of
18 Forced Labor (18 U.S.C. § 1589); all in violation of Title 18, United
19 States Code, Section 1592.

Count	Date	Defendant	Victim	Document
3	October 1, 2017	ANA KAREN ROBLES ORTIZ, aka Karen Partida	J.D.S.	Wisconsin state identification
4	November 15, 2017	ANA KAREN ROBLES ORTIZ, aka Karen Partida	A.R.C.	California driver's license
5	November 15, 2017	ANA KAREN ROBLES ORTIZ, aka Karen Partida	A.R.C.	Social Security card
6	Between or about March 1, 2018 and May 22, 2018	SERGIO PARTIDA and JOSE DEMARA FLORES, aka Joe Flores	O.R.R.	Naturalization certificate

Count 7

[7 U.S.C. § 2024(b) - BENEFITS FRAUD]

48. The Introductory Allegations contained in paragraphs 1 through 35 of this Indictment are realleged and incorporated as if set forth fully herein.

49. From on or about May 1, 2013, to at least July 28, 2018, within the Southern District of California and elsewhere, defendants VICTOR GONZALEZ, SUSAN CHRISTINE LEYVA, aka Susan Christine Gonzalez, aka Christy Gonzalez, JOSE "JOE" ANTHONY DIAZ, MERCEDES GONZALES, aka Mercy Diaz, ARNOLDO BUGARIN, AZUCENA TORRES, aka Susana Bugarin, SERGIO PARTIDA, ANA KAREN ROBLES ORTIZ, aka Karen Partida, JOSE "CHITO" MORALES, JOSE DEMARA FLORES, aka Joe Flores, JOSE GAYTAN, and SONIA MURILLO, did knowingly and intentionally transfer, acquire and possess SNAP benefits, valuing \$5,000 or more, in any manner contrary to the governing statute and regulations; in violation of Title 7, United States Code, Section 2024(b).

FORFEITURE ALLEGATIONS

The allegations contained in Counts 1 through 7 above are incorporated herein for purposes of alleging forfeiture to the United States pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and 1594, Title 28, United States Code, Section 2461(c), and Title 7, United States Code, Section 2024.

Upon conviction of one or more of the offenses set forth in Counts 1 through 6, and pursuant to Title 18, United States Code, Section 1594, Defendants VICTOR GONZALEZ, SUSAN CHRISTINE LEYVA (aka Susan Christine Gonzalez, Christy Gonzalez), JOSE "JOE" ANTHONY DIAZ, MERCEDES GONZALES (aka Mercy Diaz), ARNOLDO BUGARIN, AZUCENA TORRES (aka Susana Bugarin), SERGIO PARTIDA, ANA KAREN ROBLES ORTIZ (aka Karen Partida), JOSE "CHITO"

1 MORALES, JOSE DEMARA FLORES (AKA JOE FLORES), JOSE GAYTAN, and SONIA
2 MURILLO, shall forfeit to the United States: all property, real and
3 personal, that was involved in, used in, or intended to be used to commit
4 or to facilitate the commission of the violations and all property
5 traceable to such property; and all property, real and personal,
6 constituting or derived from any proceeds the defendants obtained,
7 directly or indirectly, as a result of the violations and any property
8 traceable to such property.

9 Upon conviction of the offense set forth in Count 7 of the
10 Indictment, and pursuant to 7 U.S.C. § 2024(f), Defendants VICTOR
11 GONZALEZ, SUSAN CHRISTINE LEYVA (aka Susan Christine Gonzalez, Christy
12 Gonzalez), JOSE "JOE" ANTHONY DIAZ, MERCEDES GONZALES (aka Mercy Diaz),
13 ARNOLDO BUGARIN, AZUCENA TORRES (aka Susana Bugarin), SERGIO PARTIDA,
14 ANA KAREN ROBLES ORTIZ (aka Karen Partida), JOSE "CHITO" MORALES, JOSE
15 DEMARA FLORES (aka Joe Flores), JOSE GAYTAN, and SONIA MURILLO shall
16 forfeit to the United States of America: all property, real and personal,
17 used in the transaction and attempted transaction, to commit, or to
18 facilitate the commission of the violation; and all proceeds traceable
19 to the violation.

20 If any of the above-described forfeitable property, as a result of
21 any act or omission of the defendants,

22 (1) cannot be located upon the exercise of due diligence;

23 (2) has been transferred or sold to, or deposited with, a third
24 person;

25 (3) has been placed beyond the jurisdiction of the court;

26 (4) has been substantially diminished in value; or

27 (5) has been commingled with other property which cannot be divided,

28 it is the intent of the United States, pursuant to 28 U.S.C. §

1 2461(c) and 21 U.S.C. § 853(p), to seek forfeiture of any other
2 property of said defendants up to the value of the above-forfeitable
3 property.

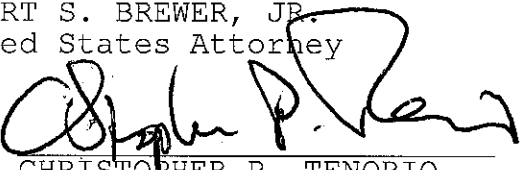
4 DATED: August 23, 2019.

5 A TRUE BILL:

6 
7 _____

Foreperson

8 ROBERT S. BREWER, JR.
9 United States Attorney

10 By: 
11 CHRISTOPHER P. TENORIO
Assistant U.S. Attorney