

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	No.
	)	
v.	)	
	)	
EDUARDO TREVINO,	)	Violations: Title 21, United
aka, "Aldo,"	)	States Code, Sections 841(a)(1),
SALVADOR ESTRADA,	)	843(b), and 846, and Title 18,
aka, "Socio,"	)	United States Code, Sections
MIGUEL ARREDONDO,	)	1952, 1956(h), and 2
aka, "El Tio,"	)	
JUAN AGUIRRE,	)	<b><u>INDICTMENT</u></b>
VICENTE CASARES,	)	
aka "El Cantante," and	)	
AURELIANO MONTOYA-PENA,	)	
aka, "Jesse Montoya"	)	

**COUNT ONE**

THE SPECIAL SEPTEMBER 2011 GRAND JURY charges:

Beginning no later than in or about February 2010, and continuing until in or about January 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere:

EDUARDO TREVINO, aka, "Aldo,"  
SALVADOR ESTRADA, aka, "Socio,"  
MIGUEL ARREDONDO, aka, "Tio,"  
JUAN AGUIRRE,  
VICENTE CASARES, aka, "El Cantante," and  
AURELIANO MONTOYA-PENA, aka, "Jesse Montoya,"

defendants herein, did conspire with each other, Individual A, and others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II

Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

## COUNT TWO

THE SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

1. At times material to this indictment:

a. Laredo, Texas was a city in the United States located at the United States-Mexico border, on the north bank of the Rio Grande.

b. Nuevo Laredo was a city in Mexico, in the Mexican state of Tamaulipas, located at the United States-Mexico border, on the south bank of the Rio Grande.

2. Beginning no later than in or about February 2010, and continuing until in or about September 2010, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere:

EDUARDO TREVINO, aka, "Aldo,"  
SALVADOR ESTRADA, aka, "Socio,"  
MIGUEL ARREDONDO, aka, "Tio,"  
JUAN AGUIRRE, and  
VICENTE CASARES, aka, "El Cantante,"

defendants herein, did conspire with each other, Individual A, and others known and unknown to the Grand Jury, to transmit and transfer, and cause to be transmitted and transferred, funds from a place in the United States to or through a place outside the United States, with the intent to promote the carrying on of the specified unlawful activity, namely, the felonious importation, receipt, concealment, buying, selling, and otherwise dealing in controlled substances, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

3. It was part of the conspiracy that EDUARDO TREVINO directed a money transportation network for Los Zetas, a Mexican drug cartel (hereinafter, “Zetas DTO”). EDUARDO TREVINO was based primarily in Nuevo Laredo.

4. It was further part of the conspiracy that Individual A coordinated the transportation of money for the Zetas DTO from places such as Chicago, Illinois, to Laredo, Texas, and then from Laredo, Texas, to Mexico. Individual A was based primarily in Laredo, Texas.

5. It was further part of the conspiracy that, at the direction of the Zetas DTO, SALVADOR ESTRADA collected, processed, and concealed cash from the sale of drugs (“narcotics proceeds”) so that the narcotics proceeds could be transported by truck drivers from the Chicago, Illinois area to locations such as Laredo, Texas, knowing that the narcotics proceeds would thereafter be transported to the Zetas DTO in Mexico.

6. It was further part of the conspiracy that SALVADOR ESTRADA identified and maintained safe houses where narcotics proceeds were secretly collected, processed, packaged, and concealed, such as 1241 South Wenonah Avenue, Berwyn, Illinois (the “Berwyn Stash House”) and 3800 West 24<sup>th</sup> Street, Chicago, Illinois (the “24<sup>th</sup> Street Stash House”).

7. It was further part of the conspiracy that MIGUEL ARREDONDO and VICENTE CASARES transported bulk quantities of narcotics proceeds from the Chicago, Illinois area to locations in Texas, knowing that the narcotics proceeds would thereafter be transported to the Zetas DTO in Mexico.

8. It was further part of the conspiracy that JUAN AGUIRRE worked with SALVADOR ESTRADA, MIGUEL ARREDONDO, and VICENTE CASARES, among others, to coordinate the delivery of narcotics proceeds to truck drivers, including, but not limited to, MIGUEL ARREDONDO and VICENTE CASARES, who transported the narcotics proceeds from the Chicago, Illinois area, knowing that the narcotics proceeds would thereafter be transported to the Zetas DTO in Mexico.

9. It was further part of the conspiracy that at various times between approximately April 22, 2010, and July 12, 2010, SALVADOR ESTRADA, MIGUEL ARREDONDO, JUAN AGUIRRE, and VICENTE CASARES, at the direction of the Zetas DTO, including, but not limited to, EDUARDO TREVINO and Individual A, possessed and concealed narcotics proceeds, intending to cause the narcotics proceeds to be delivered to the Zetas DTO in Mexico, including, but not limited to, the following:

a. On or about April 27, 2010, SALVADOR ESTRADA and JUAN AGUIRRE possessed narcotics proceeds packaged in approximately 47 bundles, and caused the narcotics proceeds to be delivered to an individual believed to be a courier working on behalf of the Zetas DTO.

b. On or about April 29, 2010, SALVADOR ESTRADA possessed narcotics proceeds packaged in approximately 66 bundles and totaling approximately \$2,000,010, and caused the narcotics proceeds to be delivered to an individual believed to be a courier working on behalf of the Zetas DTO.

c. On or about April 30, 2010, SALVADOR ESTRADA possessed narcotics proceeds totaling approximately \$9,428,950 at the 24<sup>th</sup> Street Stash House.

d. On or about May 27, 2010, VICENTE CASARES possessed narcotics proceeds totaling approximately \$999,310, and delivered the narcotics proceeds to members of the Zetas DTO in Laredo, Texas, to be delivered to Mexico.

e. On or about June 3, 2010, MIGUEL ARREDONDO and JUAN AGUIRRE caused narcotics proceeds packaged in approximately 61 bundles to be delivered to a truck driver working for the Zetas DTO, to be delivered to Mexico.

f. On or about June 30, 2010, MIGUEL ARREDONDO and JUAN AGUIRRE possessed narcotics proceeds packaged in approximately 71 bundles, which ARREDONDO delivered to Texas.

g. On or about July 12, 2010, VICENTE CASARES possessed narcotics proceeds, which CASARES was to deliver to Texas.

10. It was further part of the conspiracy that defendants used cellular telephones to communicate with each other and others regarding the status, means, and methods of the conspiracy.

11. It was further part of the conspiracy that the defendants concealed and hid and caused to be concealed and hidden the purposes and the acts done in furtherance of the conspiracy, and used coded language, counter-surveillance, and other means to avoid detection and apprehension by law enforcement authorities.

All in violation of Title 18, United States Code, Sections 1956(h) and 2.

**COUNT THREE**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about April 24, 2010, at approximately 12:18 p.m., in the Northern District of Illinois, and elsewhere,

EDUARDO TREVINO, aka, "Aldo,"

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT FOUR**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about April 24, 2010, at approximately 2:54 p.m., in the Northern District of Illinois, and elsewhere,

EDUARDO TREVINO, aka, "Aldo,"

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).



**COUNT FIVE**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about April 27, 2010, at approximately 10:45 a.m., in the Northern District of Illinois, and elsewhere,

SALVADOR ESTRADA, aka, "Socio,"

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT SIX**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about April 27, 2010, at approximately 11:45 a.m., in the Northern District of Illinois, and elsewhere,

JUAN AGUIRRE,

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT SEVEN**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about April 29, 2010, at approximately 9:45 a.m., in the Northern District of Illinois, and elsewhere,

SALVADOR ESTRADA, aka, "Socio,"

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT EIGHT**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about April 30, 2010, at approximately 1:59 p.m., in the Northern District of Illinois, and elsewhere,

SALVADOR ESTRADA, aka, "Socio,"

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT NINE**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about May 26, 2010, at approximately 7:33 p.m., in the Northern District of Illinois, and elsewhere,

VICENTE CASARES, aka, "El Cantante,"

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT TEN**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about May 27, 2010, in the Northern District of Illinois, Eastern Division,  
and elsewhere,

VICENTE CASARES, aka, "El Cantante," and  
EDUARDO TREVINO, aka, "Aldo,"

defendants herein, did travel in interstate commerce between the Northern District of Illinois and Texas, with intent to distribute the proceeds of an unlawful activity, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, in violation of Title 21, United States Code, Section 846, as charged in Count One of this Indictment, and thereafter did perform and attempt to perform an act to distribute the proceeds of that unlawful activity;

In violation of Title 18, United States Code, Sections 1952 and 2.

**COUNT ELEVEN**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about June 3, 2010, at approximately 8:08 p.m., in the Northern District of Illinois, and elsewhere,

MIGUEL ARREDONDO, aka, "Tio,"

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT TWELVE**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about June 30, 2010, in the Northern District of Illinois, Eastern Division,  
and elsewhere,

MIGUEL ARREDONDO, aka, "Tio" and  
JUAN AGUIRRE,

defendants herein, did travel in interstate commerce between the Northern District of Illinois and Texas, with intent to distribute the proceeds of an unlawful activity, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, in violation of Title 21, United States Code, Section 846, as charged in Count One of this Indictment, and thereafter did perform and attempt to perform an act to distribute the proceeds of that unlawful activity;

In violation of Title 18, United States Code, Sections 1952 and 2.



**COUNT THIRTEEN**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about June 30, 2010, at approximately 12:37 p.m., in the Northern District of Illinois, and elsewhere,

MIGUEL ARREDONDO, aka, "Tio" and  
JUAN AGUIRRE,

defendants herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute and distribute a controlled substance as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

**COUNT FOURTEEN**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about December 18, 2010, at Chicago, in the Northern District of Illinois,  
Eastern Division,

EDUARDO TREVINO, aka, "Aldo," and  
AURELIANO MONTOYA-PENA, aka, "Jesse Montoya"

defendants herein, did knowingly and intentionally possess with intent to distribute  
a controlled substance, namely, 5 kilograms or more of a mixture and substance  
containing a detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18,  
United States Code, Section 2.

## **FORFEITURE ALLEGATION ONE**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further alleges:

1. The allegations of Counts One, Three through Nine, Eleven, Thirteen, and Fourteen of this indictment are realleged and incorporated herein by reference for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to the provisions of Title 21, United States Code, Section 853(a)(1) and (2).

2. As a result of their violations of Title 21, United States Code, Sections 846 and 843(b), as alleged in the foregoing indictment,

EDUARDO TREVINO, aka, "Aldo,"  
SALVADOR ESTRADA, aka, "Socio,"  
MIGUEL ARREDONDO, aka, "Tio,"  
JUAN AGUIRRE,  
VICENTE CASARES, aka, "El Cantante," and  
AURELIANO MONTOYA-PENA, aka, "Jesse Montoya,"

defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2): any and all property constituting and derived from, any proceeds they obtained, directly and indirectly, as a result of the violations of Title 21, United States Code, Sections 846, 843(b), and 841(a)(1); and any and all of property used, or intended to be used, in any manner or part, to commit and facilitate the commission of the violations of Title 21, United States Code, Sections 846, 843(b), and 841(a)(1).

3. The interests of the defendants subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853 include, but are not limited to,

approximately \$13,000,000 in United States currency, as well as the following specific property:

- a. \$9,428,950 in United States currency seized on or about April 30, 2010;
- b. \$2,000,010 in United States currency seized on or about April 30, 2010;
- c. \$999,310 in United States currency seized on or about May 27, 2010; and
- d. \$24,415 in United States currency, one Mosberg 100 ATR .308 rifle bearing serial number BA169615, and one Colt .22 semi-automatic handgun bearing serial number PH15806, seized on or about December 18, 2010.

4. If any of the property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), as a result of any act or omission of the defendants:

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

it is the intent of the United States to seek forfeiture of substitute property belonging to defendants under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1);

All pursuant to Title 21, United States Code, Section 853.

## **FORFEITURE ALLEGATION TWO**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further alleges:

1. The allegation of Count Two is realleged and incorporated by reference as if fully restated herein for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to Title 18, United States Code, Section 982.

2. As a result of his violations of Title 18, United States Code, Section 1956(h), as alleged in the foregoing indictment,

EDUARDO TREVINO, aka, "Aldo,"  
SALVADOR ESTRADA, aka, "Socio,"  
MIGUEL ARREDONDO, aka, "Tio,"  
JUAN AGUIRRE, and  
VICENTE CASARES, aka, "El Cantante,"

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all right, title, and interest he may have in any property, real and personal, involved in the offense, and traceable to the property involved in the offense.

3. The interests of the defendant subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 982, include, but are not limited to, approximately \$13,000,000 in United States Currency, as well as the following specific property:

- a. \$9,428,950 in United States Currency seized on or about April 30, 2010;
- b. \$2,000,010 in United States Currency seized on or about April 30, 2010; and

- c. \$999,310 in United States Currency seized on or about May 27, 2010.

4. If any of the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 982, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p) as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Section 982.

### **FORFEITURE ALLEGATION THREE**

THE SPECIAL SEPTEMBER 2011 GRAND JURY further alleges:

1. The allegations of Counts Ten and Twelve are realleged and incorporated by reference as if fully restated herein for the purpose of alleging that certain property is subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. As a result of their violations of Title 18, United States Code, Section 1952, as alleged in the foregoing indictment,

EDUARDO TREVINO, aka, "Aldo,"  
MIGUEL ARREDONDO, aka, "Tio,"  
JUAN AGUIRRE, and  
VICENTE CASARES, aka, "El Cantante,"

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section, 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all right, title and interest in property, real and personal, which constitutes and is derived from proceeds traceable to the charged offenses.

3. If any of the property subject to forfeiture and described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property, under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

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

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY