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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	DEPUTY

GLENN B. McCORMICK
Acting United States Attorney
District of Arizona
LISA E. JENNIS
Assistant U.S. Attorney
Two Renaissance Square
40 N. Central Ave., Suite 1800
Phoenix, Arizona 85004
Email: lisa.jennis@usdoj.gov
Telephone: 602-514-7500

JAMES HEPBURN
PATRICK JASPERSE
Trial Attorneys
Department of Justice
Criminal Division
Human Rights and Special Prosecutions Section
1301 New York Ave., NW, 12th Floor
Washington, DC 20530
Email: james.hepburn2@usdoj.gov
Email: patrick.jasperse@usdoj.gov
Telephone: 202-307-2908
Attorneys for Plaintiff

SEALED

CR-21-00701-PHX-SMB (JZB)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

v.

1. Ofelia Hernandez-Salas,
(Counts 1-16)

and

2. Raul Saucedo-Huipio,
(Counts 1-5 and 17-23)

Defendants.

VIO: 8 U.S.C. §§ 1324(a)(1)(A)(i),
(a)(1)(A)(v)(I) and (a)(1)(B)(i)
(Conspiracy to Bring an Alien to the
United States)
Count 1

8 U.S.C. §§ 1324(a)(2)(B)(ii) and 18
U.S.C. § 2
(Bringing an Alien to the United
States and Aiding & Abetting)
Counts 2-23

8 U.S.C. § 1324(b)
18 U.S.C. §§ 981 and 982
21 U.S.C. §§ 853 and 881
28 U.S.C. § 2461(c)
(Forfeiture Allegation)

THE GRAND JURY CHARGES:**Introduction**

1. Beginning in January 2019 and continuing through the date of this indictment, the defendants, OFELIA HERNANDEZ-SALAS and RAUL SAUCEDO-HUIPIO, together with others, participated in a human smuggling organization that unlawfully smuggled individuals (collectively the “aliens”), whose identities are known to the Grand Jury, into the United States. The aliens traveled from and through countries such as Bangladesh, Yemen, Pakistan, Eritrea, India, the United Arab Emirates, Uzbekistan, Russia, Egypt, Brazil, Peru, Ecuador, Colombia, Costa Rica, Nicaragua, Honduras, El Salvador, Guatemala, and Mexico. The aliens were not United States citizens and did not have prior official authorization from the United States government to come to, enter, and reside in the United States. The aliens and their families paid money, as much as tens of thousands of dollars, to individuals in their home countries and along the travel route, to help them travel illegally to the United States.

2. The defendants, OFELIA HERNANDEZ-SALAS and RAUL SAUCEDO-HUIPIO, members of the human smuggling operation, assisted other smugglers by facilitating the travel of aliens from Mexicali, Mexico, to the United States.

3. In exchange for smuggling the aliens into the United States, the defendants, OFELIA HERNANDEZ-SALAS and RAUL SAUCEDO-HUIPIO, along with their co-conspirators, arranged to be paid in Mexico, Central America, South America, Asia, Africa, and elsewhere.

4. The defendants, OFELIA HERNANDEZ-SALAS and RAUL SAUCEDO-HUIPIO, and their co-conspirators, picked up the aliens at a bus station in Mexicali, housed and fed them, and took them to the United States border.

5. The defendants, OFELIA HERNANDEZ-SALAS and RAUL SAUCEDO-HUIPIO, and their co-conspirators, often while armed with weapons such as guns and knives, robbed many of the aliens of money, cell phones, and other personal belongings.

1 6. The defendants, OFELIA HERNANDEZ-SALAS and RAUL SAUCEDO-HUIPIO,
2 and their co-conspirators, aided the unlawful entry of the aliens by directing them where to
3 cross into the United States, providing them with a ladder to climb over the border fence,
4 directing them to a hole to climb under the fence, and providing a plank for them to walk
5 over a waterway. The aliens crossed into the United States before being apprehended by
6 U.S. Border Patrol.

7
8 **COUNT 1**

9 7. Paragraphs 1 through 6 of this indictment are realleged and incorporated as though
10 fully set forth herein.

11 8. Beginning in January 2019 and continuing through the date of this indictment, in the
12 District of Arizona and elsewhere, defendants OFELIA HERNANDEZ-SALAS and RAUL
13 SAUCEDO-HUIPIO, for the purpose of commercial advantage and private financial gain,
14 did knowingly and intentionally combine, conspire, confederate, and agree with each other
15 and others known and unknown to the Grand Jury, knowing that a person is an alien, to bring
16 and attempt to bring to the United States in any manner whatsoever such person at a place
17 other than a designated port of entry or place other than as designated by the Commissioner,
18 regardless of whether such an alien has received prior official authorization to come to, enter,
19 and reside in the United States and regardless of any future official action which may be
20 taken with respect to such alien, in violation of Title 8, United States Code, Sections
21 1324(a)(1)(A)(i) and 1324(a)(1)(B)(i).

22 All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(i),
23 (a)(1)(A)(v)(I) and (a)(1)(B)(i).

24
25 **COUNTS 2 - 5**

26 9. Paragraphs 1 through 8 of this indictment are realleged and incorporated as though
27 fully set forth herein.
28

10. On or about the dates set forth below, in the District of Arizona and elsewhere, defendants, OFELIA HERNANDEZ-SALAS and RAUL SAUCEDO-HUIPIO, and others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of commercial advantage and private financial gain, did knowingly bring, and attempt to bring, in any manner whatsoever, an alien, as set forth below in Counts Two through Five, to the United States, knowing and in reckless disregard of the fact that said alien had not received prior official authorization to come to, enter, and reside in the United States, regardless of any official action which may later be taken with respect to said alien.

COUNT	ALIEN	DATES
2	FI1	May 7, 2020
3	SU	May 7, 2020
4	MS	May 17, 2020
5	AK	May 19, 2020

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

COUNTS 6 - 16

11. Paragraphs 1 through 10 of this indictment are realleged and incorporated as though fully set forth herein.

12. On or about the dates set forth below, in the District of Arizona and elsewhere, defendant, OFELIA HERNANDEZ-SALAS, and others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of commercial advantage and private financial gain, did knowingly bring, and attempt to bring, in any manner whatsoever, an alien, as set forth below in Counts Six through Sixteen, to the United States, knowing and in reckless disregard of the fact that said alien had not received prior official authorization to come to, enter, and reside in the United States, regardless of any official action which may later be taken with respect to said alien.

COUNT	ALIEN	DATES
6	YA	May 7, 2020
7	YNSAN	May 19, 2020
8	AF	May 19, 2020
9	JMIH	May 19, 2020
10	MH	May 26, 2020
11	FI2	May 26, 2020
12	AH	May 28, 2020
13	MSHS	May 30, 2020
14	BH	May 30, 2020
15	RI	December 9, 2020
16	AR	June 24, 2021

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

COUNTS 17 - 23

13. Paragraphs 1 through 12 of this indictment are realleged and incorporated as though fully set forth herein.

14. On or about the dates set forth below, in the District of Arizona and elsewhere, defendant, RAUL SAUCEDO-HUIPIO, and others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of commercial advantage and private financial gain, did knowingly bring, and attempt to bring, in any manner whatsoever, an alien, as set forth below in Counts Seventeen through Twenty-Three, to the United States, knowing and in reckless disregard of the fact that said alien had not received prior official authorization

to come to, enter, and reside in the United States, regardless of any official action which may later be taken with respect to said alien.

COUNT	ALIEN	DATES
17	AA	July 3, 2020
18	NTB	September 4, 2020
19	HS	June 15, 2021
20	SSD	June 15, 2021
21	MSA	June 20, 2021
22	SA	June 20, 2021
23	MSH	June 24, 2021

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

FORFEITURE ALLEGATION

The Grand Jury realleges and incorporates the allegations of Counts 1 through 23 of this indictment, which are incorporated by reference as though fully set forth herein.

Pursuant to Title 8 U.S.C. Section 1324(b), Title 18, United States Code, Sections 981 and 982, Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), and upon conviction of one or more of the offenses alleged in Counts 1 through 23 of this indictment, the defendant(s) shall forfeit to the United States of America all right, title, and interest in (a) any property constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as the result of the offense, and (b)

1 any property used, or intended to be used, in any manner or part, to commit, or to facilitate
2 the commission of such offense.

3 If any of the above-described forfeitable property, as a result of any act or omission
4 of the defendant(s):

- 5 (1) cannot be located upon the exercise of due diligence,
6 (2) has been transferred or sold to, or deposited with, a third party,
7 (3) has been placed beyond the jurisdiction of the court,
8 (4) has been substantially diminished in value, or
9 (5) has been commingled with other property which cannot be divided without
10 difficulty,

11 it is the intent of the United States to seek forfeiture of any other property of said
12 defendant(s) up to the value of the above-described forfeitable property, pursuant to Title
13 21, United States Code, Section 853(p).

14 All in accordance with Title 8, United States Code, Section 1324(b); Title 18, United
15 States Code, Sections 981 and 982, Title 21, United States Code, Sections 853 and 881,
16 Title 28, United States Code, Section 2461(c), and Rule 32.2, Federal Rules of Criminal
17 Procedure.

18 A TRUE BILL

19
20 S/
21 FOREPERSON OF THE GRAND JURY
22 Date: August 31, 2021

23
24 GLENN McCORMICK
25 Acting United States Attorney
District of Arizona

26 LISA E. JENNIS
27 Assistant U.S. Attorney
28

1 KENNETH A. POLITE, JR.
2 Assistant Attorney General
3 Department of Justice
4 Criminal Division

5 S/
6 JAMES HEPBURN
7 PATRICK JASPERSE
8 Trial Attorneys
9 Criminal Division
10 Human Rights and Special Prosecutions Section
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