

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America

v.

Luis Emmanuel Escalona-Marrero

Case No.

8:25-cr-360-TRB-AAS

SEALED

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) Luis Emmanuel Escalona-Marrero,

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment ☒ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Conspiracy to Commit Alien Smuggling for Financial Gain, in violation of 8 U.S.C. §§ 1324(a)(1)(A)(v)(I) 1324(a)(1)(B)(i).

Conspiracy to Launder Monetary Instruments, in violation of 18 U.S.C. § 1956(h).

Date: 8-28-25


Issuing officer's signature

City and state: Tampa, FL

ELIZABETH WARREN, Clerk, United States District Court

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: Luis Emmanuel Escalona-Marrero

Known aliases: _____

Last known residence: 8626 Bonaire Bay Ln Apt. 104 Tampa, FL 33614

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: 07/20/1994

Social Security number: 688-67-5810

Height: _____ Weight: _____

Sex: Male Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT ☒ SUPERSEDING ☒ SEALED

Name of District Court, and/or Judge/Magistrate Location (City)
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

OFFENSE CHARGED

Case Number: 8:25-cr-00360-TPB-AAS

Conspiracy to Commit Alien
Smuggling for Financial Gain;
Conspiracy to Launder
Monetary Instruments

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

Defendant - U.S. vs. Luis Emmanuel Escalona-Marrero

a/k/a (if applicable)

If multi-defendant case, Lead Defendant: Lazaro Alain Cabrera-Rodriguez

Address 8626 Bonaire Bay Ln Apt. 104
Tampa, FL 33614

Birth Date 7/20/1994 (Optional unless a juvenile)

☒ Male ☐ Female ☒ Alien, Citizenship: Cuba

SSN: 688-67-5810 FBI No. Cédula No.

Place of Offense

U.S.C. Citation

Hillsborough County

8 U.S.C. §§ 1324(a)(1)(A)(v)(I)
1324(a)(1)(B)(i); 18 U.S.C. § 1956(h)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Laura Andersen, SA, HSI, 850-418-8684, laura.m.andersen@hsi.dhs.gov

☐ person is awaiting trial in another Federal or State Court, give name of court:

☐ this person/proceeding is transferred from another district per FRCrP
☐ 20 ☐ 21 or ☐ 40. Show District:

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

DOCKET NO.

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under >

MAGISTRATE CASE NO.

Name and Office of Person
Furnishing information on This Form

Gregory W. Kehoe ☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Atty.:

Courtney H. Derry

Legal Asst. D.Cajas 813-274-6126

DATE OF
ARREST >

Or... if arresting Agency & Warrant were not Federal

DATE TRANSFERRED

TO U.S. CUSTODY
JUL 27 2025 PM 3:53
FILED - USDC - FLMD - TPA

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

METHOD OF SERVICE:

RECOMMENDED BOND:

COURTROOM REQUIREMENTS:

Will there be a defendant or witness in custody?

Warrant

Detention

☐ Yes ☒ No

Statutes:

Counts:

Penalty Provisions:

Maximum Penalty:

8 U.S.C. §§ 1324(a)(1)(A)(v)(I)
1324(a)(1)(B)(i)

One

8 U.S.C. §§ 1324(a)(1)(A)(iv) and 1324(a)(1)(B)
(i)

10 years imprisonment / \$250K fine / 3 years of SR / \$100. special assessment fee

18 U.S.C. § 1956(h)

Nine

18 U.S.C. § 1956(h)

20 years imprisonment / \$250K fine / 3 years of SR / \$100. special assessment fee

Related Cases:

Def. Counsel:

OCDET Case: ☐ Yes ☒ NoGang Member: ☐ Yes ☒ No If Yes, gang affiliation:
☐ (AP) Appointed
☐ (FD) Federal Public Defender
☐ (PS) Pro Se
☐ (RE) Retained
☒ (TB) To be Appointed
Start Date:

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:25-cr-00360-TPB-AAS

LAZARO ALAIN CABRERA-RODRIGUEZ,
YUNIEL LIMA-SANTOS,
LIANNYS YAISELYS VEGA-PEREZ a/k/a "Lia,"
MARIANNY LUCIA LOPEZ-TORRES,
FRANDY ARAGON-DIAZ,
ERIK VENTURA-CASTRO,
MIGUEL ALEJANDRO MARTINEZ VASCONCELOS,
WALBIS POZO-DUTEL,
EMANUEL MARTINEZ GONZALEZ,
LUIS EMMANUEL ESCALONA-MARRERO,
LAYRA LIBERTAD TRETO SANTOS, and
GISLEIVY PERALTA CONSUEGRA a/k/a "GG"

SEALED

AUG 27 2025 PM 3:51
FILED - USDC - FLMD - TPA

SEALED

ORDER

The Motion to Seal Indictment and Related Documents filed by the United States is hereby GRANTED, and the Clerk of Court is so directed.

The Clerk is further directed to seal the Indictment in this cause except when necessary to provide certified copies of the Indictment to the United States Attorney's Office;

It is further ordered that upon verbal request from the United States Attorney's Office that the United States Marshals Service is to release a certified copy of the arrest warrant to the case agent or other appropriate law enforcement and/or to the United States Attorney's Office without further order of the Court. It is further ordered that the United States Marshals Service or other appropriate law

enforcement agency may enter the arrest warrant into the National Crime Information Center (NCIC) database or other appropriate law enforcement database without further order of the Court.

It is further ordered that the United States may disclose the existence of the Indictment in any search and seizure warrants to be executed in conjunction with the arrest of the defendant(s).

The Clerk is further ordered to unseal all documents relating to the Indictment without any further Order of the Court when any named defendant is taken into custody.

DONE AND ORDERED at Tampa, Florida, this 27th day of August, 2025.



HONORABLE AMANDA ARNOLD SANSONE
United States Magistrate Judge

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

CASE NO. 8:25-cr-00360-TPB-AAS

v.

LAZARO ALAIN CABRERA-RODRIGUEZ,
YUNIEL LIMA-SANTOS,
LIANNYS YAISELYS VEGA-PEREZ a/k/a "Lia,"
MARIANNY LUCIA LOPEZ-TORRES,
FRANDY ARAGON-DIAZ,
ERIK VENTURA-CASTRO,
MIGUEL ALEJANDRO MARTINEZ VASCONCELOS,
WALBIS POZO-DUTEL,
EMANUEL MARTINEZ GONZALEZ,
LUIS EMMANUEL ESCALONA-MARRERO,
LAYRA LIBERTAD TRETO SANTOS, and
GISLEIVY PERALTA CONSUEGRA a/k/a "GG"

8 U.S.C. §§ 1324(a)(1)(A)(v)(I)
and 1324(a)(1)(B)(i)
(Conspiracy to Commit
Alien Smuggling for Financial
Gain)

8 U.S.C. § 1324 (a)(2)(B)(ii) and
18 U.S.C. § 2
(Alien Smuggling for
Financial Gain/Aiding
and Abetting)

18 U.S.C. §§ 371 and
1546(a)
(Conspiracy to Defraud
the United States,
Commit Asylum Fraud)

18 U.S.C. § 1956(h)
(Conspiracy to Launder
Monetary Instruments)

SUPERSEDING INDICTMENT

The Grand Jury charges:

AUG 27 2025 PM 3:52
FILED - USDC - FLND - TPA

COUNT ONE

(Conspiracy to Commit Alien Smuggling for Financial Gain)

The Conspiracy

1. Between on or about January 1, 2021, and continuing through June 27, 2025, in the Middle District of Florida, and elsewhere, the defendants,

LAZARO ALAIN CABRERA-RODRIGUEZ,

YUNIEL LIMA-SANTOS,
LIANNYS YAISELYS VEGA-PEREZ a/k/a "Lia,"
MARIANNY LUCIA LOPEZ-TORRES,
FRANDY ARAGON-DIAZ,
ERIK VENTURA-CASTRO,
MIGUEL ALEJANDRO MARTINEZ VASCONCELOS,
WALBIS POZO-DUTEL,
EMANUEL MARTINEZ GONZALEZ,
LUIS EMMANUEL ESCALONA-MARRERO, and
LAYRA LIBERTAD TRETO SANTOS,

did knowingly and willfully conspire with each other and other persons, both known and unknown to the Grand Jury, to encourage and induce an alien to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence is and will be in violation of law, for the purpose of commercial advantage and private financial gain, contrary to the provisions of 8 U.S.C. §§ 1324(a)(1)(A)(iv) and 1324(a)(1)(B)(i).

Manner and Means of the Conspiracy

2. It was part of the conspiracy that the defendants and their coconspirators were an Alien Smuggling Organization (ASO) that advertised on social media that Cuban nationals could obtain Electronic System for Travel Authorization (ESTA) visa waivers based on European citizenship. The ASO would assist the aliens in preparing and filing fraudulent ESTA applications, affirmatively stating that the applicants had not been present and/or residing in Cuba since March 1, 2011.

3. It was further part of the conspiracy that the ASO operated multiple social media accounts and other electronic messaging platforms to solicit Cuban

nationals and other aliens to use the ASO's smuggling services to attempt to illegally enter the United States.

4. It was further part of the conspiracy that the ASO would offer commissions and bonuses to co-conspirators and other smugglers who recruited aliens for the ASO.

5. It was further part of the conspiracy that the ASO utilized different routes of travel to conceal the aliens' Cuban citizenship and departure from Cuba.

6. It was further part of the conspiracy that the defendants charged aliens between \$1,500 USD and \$40,000 USD for their smuggling services.

7. It was further part of the conspiracy that the ASO would often coach aliens on what to say to United States' immigration officers, including:

- (a) instructing the aliens to claim they were tourists;
- (b) instructing the aliens to hide, conceal, or not bring their Cuban passports through a United States port of entry; and
- (c) instructing the aliens to "lay low," or words to that effect, for a period of time before acknowledging their Cuban citizenship and applying for immigration benefits to remain in the United States, including asylum.

8. It was further part of the conspiracy that the ASO possessed and used digital ledgers containing thousands of alien names assigned to co-conspirator smugglers. The ledgers contained dates of travel, money owed, airlines used, and smuggling routes. The list of aliens included unaccompanied minors.

9. It was further part of the conspiracy that members of the ASO would purchase flights through third-party countries for aliens before said aliens attempted entry into the United States on fraudulent ESTA visa waivers or across the United States southern border with Mexico at a place other than a designated port of entry.

10. It was further part of the conspiracy that members of the ASO often utilized electronic payment platforms such as Zelle, as well as cash, to obtain payment for smuggling services.

11. It was further part of the conspiracy that members of the ASO also operated a fraudulent immigration benefits business, ASESORIA Y SERVICIOS MIGRATORIOS LLC (Immigration Consulting and Services LLC), hereinafter ASESORIA. The defendants, through ASESORIA, employed employees during the course of the conspiracy to prepare, draft, and submit fraudulent asylum applications, immigrant visas, lawful permanent residence applications and other immigration benefits, in return for a fee.

Acts in Furtherance of the Conspiracy

12. In furtherance of the conspiracy, and to effectuate the objects thereof, the defendants and their coconspirators committed the following overt acts, among others, in the Middle District of Florida and elsewhere:

a. Between on or about August 1, 2022, and continuing through on or about August 1, 2024, the defendants submitted over 400 ESTA application payments to U.S. Customs and Border Protection (CBP).

b. On or about October 10, 2024, defendant LAZARO ALAIN CABRERA-RODRIGUEZ posted a video promoting the ASO's work to the WhatsApp group, "TRÁMITE DE ESTA Y VISA DE TURISMO A USA PARA CIUDADANOS ESPAÑOLES" (Processing of ESTA and tourist Visas to the USA for Spanish citizens). The promotional video depicted a cellular photo album displaying the dates of May 2023 through October 2024, being scrolled through. The album depicts dozens of images of Spanish passports, flight tickets, clients at airports, promotional flyers, and ESTAs.

c. During the course of the conspiracy, over \$7,000,000 USD in Zelle payments were deposited into financial accounts associated with the defendants.

All in violation of 8 U.S.C. §§ 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iv), and 1324(a)(1)(B)(i).

COUNTS TWO - SIX
(Alien Smuggling for Financial Gain/ Aiding and Abetting)

Between on or about July 1, 2023, and on or about December 5, 2023, in the Middle District of Florida, and elsewhere, the defendants,

YUNIEL LIMA-SANTOS, and
FRANDY ARAGON-DIAZ,

did knowingly bring, and did aid and abet to bring, in any manner whatsoever, an alien as set forth in Counts 2 through 6 below, to the United States for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such alien had not received prior official authorization to come to,

enter, and reside in the United States regardless of any future official action which may be taken with respect to such aliens:

Count	Dates	Alien's Initials
TWO	July 1, 2023 through August 1, 2023	E.C.C.R.
THREE	July 1, 2023 through August 1, 2023	C.M.H.
FOUR	July 1, 2023 through August 1, 2023	L.S.M.
FIVE	October 1, 2023 through December 5, 2023	C.L.N.
SIX	October 1, 2023 through December 5, 2023	M.L.M.P.

In violation of 8 U.S.C. §§ 1324(a)(2)(B)(ii) and 18 U.S.C. 2.

COUNT SEVEN

(Conspiracy to Defraud the United States, Commit Asylum Fraud)

The Conspiracy

Between on or about January 1, 2021, and continuing through June 27, 2025, in the Middle District of Florida, and elsewhere, the defendants,

YUNIEL LIMA-SANTOS,
LIANNYS YAISELYS VEGA-PEREZ a/k/a "Lia,"
FRANDY ARAGON-DIAZ,
LAYRA LIBERTAD TRETO SANTOS, and
GISLEIVY PERALTA CONSUEGRA a/k/a "GG,"

did knowingly and willfully conspire with each other and other persons, both known and unknown to the Grand Jury, to knowingly make under oath and subscribe as true under penalty of perjury under 28 U.S.C. § 1746, a false statement with respect to a material fact in any application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and knowingly present any

such application, affidavit, and other document which contains any such false statement and fails to contain any reasonable basis in law and fact, contrary to the provisions of 18 U.S.C. § 1546(a).

Background on the Asylum Process

13. United States Citizenship and Immigration Services (USCIS) is a component of the Department of Homeland Security (DHS) and an agency of the executive branch of the United States. USCIS, among other things, was responsible for administering and executing the policies, laws, and regulations by which foreign nationals could apply for lawful status in the United States, including the adjudication of applications for asylum, immigrant visas, lawful permanent residence, and naturalized citizenship.

14. Under United States immigration law, to obtain asylum in the United States, an alien is required to show that he or she is unable or unwilling to return to, and is unable or unwilling to avail himself or herself of the protection of their country of nationality because they have suffered persecution or have a well-founded fear of persecution on account of race, religion, nationality, political opinion, or membership in a particular social group.

15. An alien present in the United States seeking affirmative asylum is required to complete and submit a Form I-589, Application for Asylum and for Withholding of Removal, to USCIS. Form I-589 requires a detailed and specific account of the basis(es) supporting the applicant's claim(s) for asylum. If Form I-589 is prepared by someone other than the applicant or the spouse, parent, or child of the

applicant, such as an attorney or accredited representative, the preparer is required to set forth their name and address on the form. The applicant is required to sign the Form I-589 under penalty of perjury, certifying that the application and any evidence submitted with the application are true and correct. The preparer is required to sign the Form I-589 certifying that the responses within the application are all based on information of which the preparer has knowledge or information provided by the applicant, and acknowledging the preparer's awareness that the knowing placement of false information in the application could subject the preparer to criminal penalties under Title 18, United State Code, Section 1546(a). Part E of Form I-589 also requires that the preparer declare that the preparer submitted the application at the request of the applicant named in Part D of the I-589.

16. Types of documentation commonly submitted in support of an asylum claim could include a written statement, photos, foreign police reports, foreign medical reports, foreign political party membership letters, and other documents in the applicant's native language. If a supporting document is not in the English language, a translation of the document with certification from the translator, is required to accompany the document. The translator of the document is required to certify that the translation was complete and accurate, and that the translator is competent to translate from the foreign language into English.

17. If an applicant is granted asylum, they receive a completed Form I-94 that reflects that USCIS has granted them asylum status. Certain qualifying family members are eligible for derivative asylum status based upon their relationship to the

principal applicant who has obtained asylum status. An applicant with asylum status could apply for, among other things, lawful permanent resident status. Asylum is granted indefinitely.

Manner and Means of the Conspiracy

18. Paragraphs 1 through 17 of this Superseding Indictment are realleged and incorporated as though fully set forth herein.

19. It was further part of the conspiracy that the defendants and their coconspirators defrauded the United States by impeding, impairing, obstructing, and defeating the lawful government functions of the USCIS, an agency of the United States, in administering and executing United States immigration laws and regulations

20. It was further part of the conspiracy that the defendants and their coconspirators were not licensed attorneys and were not accredited representatives authorized to represent applicants in immigration matters before the USCIS. The defendants, through ASESORIA, did not allow clients to review their asylum applications submitted on their behalf prior to filing with USCIS, signed official forms as their clients, and failed to provide their clients' access to the clients' own USCIS electronic account.

21. It was further part of the conspiracy that the defendants and their coconspirators caused the submission of false information to USCIS through fraudulent applications for immigration benefits filed on behalf of foreign nationals that were clients of ASESORIA, the defendants, and the defendant's employees or

beneficiaries of such clients.

22. It was further part of the conspiracy that the defendants and their coconspirators created, and caused employees to create, fictitious background narratives to support clients' applications for asylum.

23. It was further part of the conspiracy that the defendants and their coconspirators created, and caused to be created, fraudulent Form I-589 applications that contained false information, including the applicants' signature.

24. It was further part of the conspiracy that the defendants and their coconspirators would not advise their clients what information was being submitted to USCIS on the Form I-589 and fail to provide clients access to the clients' USCIS accounts.

Acts in Furtherance of the Conspiracy

25. In furtherance of the conspiracy, and to effectuate the objects thereof, the defendants and their coconspirators committed the following overt acts, among others, in the Middle District of Florida and elsewhere:

a. During the course of the conspiracy, the defendants and their coconspirators, through ASESORIA, submitted thousands of Form I-589 asylum applications containing nearly identical boilerplate language, leading to the conclusion that they were fraudulently prepared.

b. On or about July 20, 2022, the defendants and their coconspirators caused a Form I-589 containing false information to be filed with USCIS on behalf of Client M.S.P. The defendants signed Client M.S.P.'s Form I-

589, as Client M.S.P. On or about July 20, 2022, the defendants and their coconspirators prepared and filed Client M.S.P.'s Form I-589 without disclosing to USCIS that the defendants prepared Form I-589. On or about July 20, 2022, the defendants failed to provide Client M.S.P. a copy of M.S.P.'s Form I-589 and Client M.S.P. access to Client M.S.P.'s USCIS online account.

c. On or about September 30, 2022, the defendants and their coconspirators caused a Form I-589 containing false information to be filed with USCIS on behalf of Client J.A.H. The defendants signed Client J.A.H.'s Form I-589, as Client J.A.H. On or about September 30, 2022, the defendants prepared and filed Client J.A.H.'s Form I-589 without disclosing to USCIS that the defendants prepared Form I-589.

d. On or about April 17, 2023, the defendants and their coconspirators caused a Form I-589 containing false information to be filed with USCIS on behalf of Client M.G.C. The defendants signed Client M.G.C.'s Form I-589, as Client M.G.C. On or about April 17, 2023, the defendants prepared and filed Client M.G.C.'s Form I-589 without disclosing to USCIS that the defendants prepared Form I-589.

e. On or about April 17, 2023, the defendants and their coconspirators caused a Form I-589 containing false information to be filed with USCIS on behalf of Client Y.R.M.C. The defendants signed Client Y.R.M.C.'s Form I-589, as Client Y.R.M.C. On or about April 17, 2023, the defendants prepared and filed Client Y.R.M.C.'s Form I-589 without disclosing to USCIS that the

defendants prepared Form I-589.

f. On or about April 17, 2023, the defendants and their coconspirators caused a Form I-589 containing false information to be filed with USCIS on behalf of Client Y.S.R. The defendants signed Client Y.S.R.'s Form I-589, as Client Y.S.R. On or about April 17, 2023, the defendants prepared and filed Client Y.S.R.'s Form I-589 without disclosing to USCIS that the defendants prepared Form I-589.

g. On or about May 8, 2023, the defendants and their coconspirators caused a Form I-589 containing false information to be filed with USCIS on behalf of Client M.V.G. The defendants signed Client M.V.G.'s Form I-589, as Client M.V.G. On or about May 8, 2023, the defendants prepared and filed Client M.V.G.'s Form I-589 without disclosing to USCIS that the defendants prepared Form I-589. On or about May 8, 2023, the defendants refused to provide Client M.V.G. with a copy of Client M.V.G.'s filed I-589; the defendants told M.V.G. that M.V.G. "did not need a copy," or words to that effect. On or about May 8, 2023, the defendants failed to provide Client M.V.G. access to Client M.V.G.'s USCIS online account.

h. On or about March 25, 2024, the defendants and their coconspirators caused a Form I-589 containing false information to be filed with USCIS on behalf of Client M.R.P., having never met Client M.R.P. in person. On or about March 25, 2024, the defendants told Client M.R.P. that Client M.R.P.'s asylum "story was too long and too personal and needed to be modified," or words

to that effect. On or about March 25, 2024, the defendants and their coconspirators signed Client M.R.P.'s Form I-589, as Client M.R.P. On or about March 25, 2024, the defendants failed to provide Client M.R.P. with a copy of Client M.R.P.'s filed Form I-589.

All in violation of 18 U.S.C. §§ 371 and 1546(a).

COUNT EIGHT
(Conspiracy to Launder Monetary Instruments)

From on or about January 1, 2021, and continuing through June 27, 2025, in the Middle District of Florida, and elsewhere, the defendants,

LAZARO ALAIN CABRERA-RODRIGUEZ,
YUNIEL LIMA-SANTOS,
LIANNYS YAISELYS VEGA-PEREZ a/k/a "Lia,"
ERIK VENTURA-CASTRO, and
MIGUEL ALEJANDRO MARTINEZ VASCONCELOS,

did knowingly and voluntarily conspire with each other and other persons, both known and unknown to the Grand Jury, to commit an offense in violation of 18 U.S.C. § 1956(a)(2)(A), to wit: to transport, transmit, and transfer, and attempt to transport, transmit and transfer a monetary instrument and 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 specified unlawful activity, that is, conspiring to encourage and induce aliens to enter the United States unlawfully, for the purpose of commercial advantage or private financial gain, in violation of 8 U.S.C. §§ 1324(a)(1)(A)(v)(I) and 8 U.S.C. § 1324(a)(2)(B)(i).

All in violation of 18 U.S.C. § 1956(h).

COUNT NINE
(Conspiracy to Launder Monetary Instruments)

From on or about January 1, 2021, and continuing through June 27, 2025, in the Middle District of Florida, and elsewhere, the defendants,

LAZARO ALAIN CABRERA-RODRIGUEZ,
YUNIEL LIMA-SANTOS,
LIANNYS YAISELYS VEGA-PEREZ a/k/a "Lia,"
FRANDY ARAGON-DIAZ,
LUIS EMMANUEL ESCALONA-MARRERO, and
LAYRA LIBERTAD TRETO SANTOS,

did knowingly and voluntarily conspire with each other and other persons, both known and unknown to the Grand Jury, to commit an offense in violation of 18 U.S.C. § 1956(a)(1)(B)(i), to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, conspiring to encourage and induce aliens to unlawfully enter the United States, for the purpose of commercial advantage or private financial gain, in violation of 8 U.S.C. §§ 1324(a)(1)(A)(v)(I), 1324(a)(2)(B)(i), knowing that the financial transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and knowing while conducting and attempting to conduct such financial transactions, that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

All in violation of 18 U.S.C. § 1956(h).

FORFEITURE

1. The allegations contained in Counts One through Nine are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 8 U.S.C. § 1324(b)(1), 18 U.S.C. §§ 982(a)(1), 982(a)(6), and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 8 U.S.C. § 1324, or a conspiracy to violate section 1324, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(6):

a. Any conveyance, including any vessel, vehicle, or aircraft, used in the commission of the offense;

b. Any property, real or personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of conviction; and

c. Any property, real or personal, used to intended to be used to facilitate the commission of the offense of conviction; and, pursuant to 8 U.S.C. § 1324(b)(1) and 28 U.S.C. § 2461(c), any conveyance, including any vessel, vehicle, or aircraft, that was used in the commission of a violation of subsection (a), the gross proceeds of such violation, and any property traceable to such conveyance or proceeds.

3. Upon conviction of a violation of 18 U.S.C. § 1546, or a conspiracy to violate section 1546, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(6):

a. Any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense;

b. Any property, real or personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; and

c. Any property that is used to facilitate, or is intended to be used to facilitate, the commission of the offense.

4. Upon conviction of a violation of 18 U.S.C. § 1956(h), the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property.

5. The property to be forfeited includes, but is not limited to, an order of forfeiture in the amount of proceeds obtained from and/or involved in the offenses.

6. If any of the property 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 or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b) and 28 U.S.C. § 2461(c).


A TRUE BILL.




Foreperson

GREGORY W. KEHOE
United States Attorney

By:

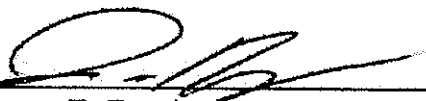

Courtney Derry
Assistant United States Attorney

By:


Michael C. Sinacore
Assistant United States Attorney
Chief, Special Prosecutions Section

MATTHEW R. GALEOTTI
Acting Assistant Attorney General
Criminal Division

By:


Jenna E. Reed
Trial Attorney
Human Rights and Special Prosecutions Section
PA Bar Roll No: 309657

August 25

No. 8:25-cr-00360-TPB-AAS

UNITED STATES DISTRICT COURT

Middle District of Florida

Tampa Division

THE UNITED STATES OF AMERICA

vs.

LAZARO ALAIN CABRERA-RODRIGUEZ,
YUNIEL LIMA-SANTOS,
LIANNYS YAISELYS VEGA-PEREZ a/k/a "Lia,"
MARIANNY LUCIA LOPEZ-TORRES,
FRANDY ARAGON-DIAZ,
ERIK VENTURA-CASTRO,
MIGUEL ALEJANDRO MARTINEZ VASCONCELOS,
WALBIS POZO-DUTEL,
EMANUEL MARTINEZ GONZALEZ,
LUIS EMMANUEL ESCALONA-MARRERO,
LAYRA LIBERTAD TRETO SANTOS, and
GISLEIVY PERALTA CONSUEGRA a/k/a "GG"

SUPERSEDING INDICTMENT

Violations: 8 U.S.C. §§ 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i)
8 U.S.C. § 1324 (a)(2)(B)(ii) and 18 U.S.C. § 2
18 U.S.C. §§ 371 and 1546(a)
18 U.S.C. § 1956(h)

Foreperson

Filed in open court this 27th day

of August, 2025.

K. Nieves

Clerk — Karina
Nieves

Bail \$ _____