

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

RONALDO GALINDO LOPEZ-

ESCOBAR, a.k.a. "Tio Roni,"

JOHN DOE, a.k.a. "Chikis," a.k.a.

"Chiquis," a.k.a. "Enano," a.k.a.

"Chicken,"

ELVIS BERSAI LOPEZ-AMBROSIO,

a.k.a. "Pepe,"

WHISKEY HANS LOPEZ-AMBROSIO,

a.k.a. "Hands,"

KAREN STEFANY HERNANDEZ-

VANEGAS,

JUMILCA SANDIVEL HERNANDEZ-

PEREZ,

ELI ADONIS ESTEBAN-LOPEZ, and

WENRY GABRIEL GOMEZ-LOPEZ,

Defendants.

CRIMINAL NO. 24-951 KG

Count 1: 8 U.S.C. § 1324(a)(1)(A)(v)(I):

Conspiracy to Transport and Harbor

Illegal Aliens;

Count 2: 18 U.S.C. § 1956(h):

Conspiracy to Launder Money.

INDICTMENT

The Grand Jury charges:

Count 1

From on or about March 13, 2020, and continuing to on or about April 7, 2023, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni," JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken," ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe," WHISKEY HANS LOPEZ-AMBROSIO, a.k.a. "Hands," KAREN STEFANY HERNANDEZ-VANEGAS, JUMILCA SANDIVEL HERNANDEZ-PEREZ, ELI**

ADONIS ESTEBAN-LOPEZ, and **WENRY GABRIEL GOMEZ-LOPEZ**, unlawfully, knowingly and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit an offense defined in 8 U.S.C. §§ 1324(a)(1)(A)(ii) and (iii), specifically, transporting and harboring illegal aliens.

Manner and Means

The manner and means by which the defendants, **RONALDO GALINDO LOPEZ-ESCOBAR**, a.k.a. “Tio Roni,” **JOHN DOE**, a.k.a. “Chikis,” a.k.a. “Chiquis,” a.k.a. “Enano,” a.k.a. “Chicken,” **ELVIS BERSAI LOPEZ-AMBROSIO**, a.k.a. “Pepe,” **WHISKEY HANS LOPEZ-AMBROSIO**, a.k.a. “Hands,” **KAREN STEFANY HERNANDEZ-VANEGAS**, **JUMILCA SANDIVEL HERNANDEZ-PEREZ**, **ELI ADONIS ESTEBAN-LOPEZ**, and **WENRY GABRIEL GOMEZ-LOPEZ**, sought to accomplish the objectives of the conspiracy included, among other things, the following:

1. It was part of the conspiracy that beginning on an unknown date no later than 2020, **RONALDO GALINDO LOPEZ-ESCOBAR**, a.k.a. “Tio Roni,” organized and led a transnational criminal organization with associates in Guatemala, Mexico, and the United States (collectively, the “Lopez Crime Family,” hereinafter referred to as, “LCF”).

2. It was further part of the conspiracy that co-conspirators of **RONALDO GALINDO LOPEZ-ESCOBAR**, a.k.a. “Tio Roni,” coordinated with and facilitated the smuggling of Central Americans through Mexico and into the United States in Southern New Mexico and elsewhere.

3. It was further part of the conspiracy that **ELVIS BERSAI LOPEZ-AMBROSIO**, a.k.a. “Pepe,” and **WHISKEY HANS LOPEZ-AMBROSIO**, a.k.a. “Hands,”

coordinated with Mexican human smugglers, including **JUMILCA SANDIVEL HERNANDEZ-PEREZ** and **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** to cross undocumented aliens from Guatemala through Mexico, and into the United States through Southern New Mexico.

4. It was further part of the conspiracy that upon smuggling undocumented aliens into the United States through Southern New Mexico, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** and **WHISKEY HANS LOPEZ-AMBROSIO, a.k.a. "Hands,"** would oversee and direct a network of mid-level smugglers including **ELI ADONIS ESTEBAN-LOPEZ** and **WENRY GABRIEL GOMEZ-LOPEZ**, who assisted in carrying out the day-to-day operations of the LCF human smuggling business, including the crossing, transportation, and harboring of undocumented aliens.

5. It was further part of the conspiracy that **KAREN STEFANY HERNANDEZ-VANEGAS, ELI ADONIS ESTEBAN-LOPEZ,** and **WENRY GABRIEL GOMEZ-LOPEZ** received deposits and made payments to co-conspirators through peer-to-peer money transfer applications that were derived from the LCF's human smuggling activity, constituted payments for the costs of the day-to-day operation of the LCF's human smuggling business, and were conducted on behalf of the leadership of the LCF.

Overt Acts

In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the District of New Mexico, and elsewhere:

Overt Act One

In November 2020, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to purchase a house in Deming, New Mexico so that it could be used as an alien smuggling stash house (the "Premises").

Overt Act Two

On or about November 4, 2020, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to enter into a real estate contract with the sellers of the Premises.

Overt Act Three

On or about November 4, 2020, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** authorized Co-Conspirator 1 to transmit to the sellers a \$15,000 down payment on the Premises.

Overt Act Four

On or about December 31, 2020, **WHISKEY HANS LOPEZ-AMBROSIO, a.k.a. "Hands,"** received a \$200 Zelle deposit from Co-Conspirator 2, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Five

On or about January 19, 2021, **WENRY GABRIEL GOMEZ-LOPEZ** sent Co-Conspirator 1 a \$600 Zelle deposit, intended to be paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Six

On or about July 9, 2021, **WENRY GABRIEL GOMEZ-LOPEZ** sent Co-Conspirator 1 a \$500 Zelle deposit, intended to be paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Seven

On or about September 3, 2021, **WENRY GABRIEL GOMEZ-LOPEZ** received a \$500 Zelle deposit from Co-Conspirator 2, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Eight

On or about October 28, 2021, **WENRY GABRIEL GOMEZ-LOPEZ** received a \$500 Zelle deposit from Co-Conspirator 3, intended to be paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Nine

On or about January 10, 2022, **ELI ADONIS ESTEBAN-LOPEZ** received a \$1,000 Zelle deposit from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Ten

On or about January 11, 2022, **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** utilized a nominee to receive a \$1,500 Zelle deposit from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted proceeds owed to **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** for assisting in crossing undocumented aliens from Mexico into the United States for the LCF.

Overt Act Eleven

On or about January 12, 2022, **ELI ADONIS ESTEBAN-LOPEZ** received a \$800 Zelle deposit from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Twelve

On or about January 31, 2022, **ELI ADONIS ESTEBAN-LOPEZ** received a \$475 Zelle deposit from Co-Conspirator 2, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Thirteen

On or about February 4, 2022, **ELI ADONIS ESTEBAN-LOPEZ** received a \$500 Zelle deposit from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Fourteen

On or about February 22, 2022, **ELI ADONIS ESTEBAN-LOPEZ** received a \$3,500 Zelle deposit from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Fifteen

On or about February 22, 2022, **ELI ADONIS ESTEBAN-LOPEZ**, received a \$1,100 Zelle deposit from Co-Conspirator 2, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Sixteen

On or about March 15, 2022, **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** utilized a nominee to receive a \$1,500 Zelle deposit from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that

constituted proceeds owed to **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** for assisting in crossing undocumented aliens from Mexico into the United States for the LCF.

Overt Act Seventeen

On or about March 30, 2022, **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** utilized a nominee to receive three Zelle deposits totaling \$3,000 from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted proceeds owed to **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** for assisting in crossing undocumented aliens from Mexico into the United States for the LCF.

Overt Act Eighteen

On or about April 2, 2022, **JUMILCA SANDIVEL HERNANDEZ-PEREZ** received a \$1,500 VIAMERICAS money wire from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Nineteen

On or about April 18, 2022, **ELI ADONIS ESTEBAN-LOPEZ** received a \$500 Zelle deposit from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Twenty

On or about April 19, 2022, **ELI ADONIS ESTEBAN-LOPEZ** received a \$600 Zelle deposit from Co-Conspirator 2, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Twenty-One

On or about April 22, 2022, **ELI ADONIS ESTEBAN-LOPEZ** received a \$530 Zelle deposit from Co-Conspirator 2, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Twenty-Two

On or about April 26, 2022, **ELI ADONIS ESTEBAN-LOPEZ** received a \$600 Zelle deposit from Co-Conspirator 2, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Twenty-Three

On or about April 27, 2022, **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** utilized a nominee to receive a \$500 Zelle deposit from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted proceeds owed to **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** for assisting in crossing undocumented aliens from Mexico into the United States for the LCF.

Overt Act Twenty-Four

On or about April 27, 2022, **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** utilized a nominee to receive a \$2,000 Zelle deposit from Co-Conspirator 2, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted proceeds owed to **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** for assisting in crossing undocumented aliens from Mexico into the United States for the LCF.

Overt Act Twenty-Five

On or about April 29, 2022, **ELI ADONIS ESTEBAN-LOPEZ** received a \$500 Zelle deposit from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Twenty-Six

On or about June 3, 2022, **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** utilized a nominee to receive two Zelle deposits totaling \$3,500 from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted proceeds owed to **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** for assisting in crossing undocumented aliens from Mexico into the United States for the LCF.

Overt Act Twenty-Seven

On or about June 5, 2022, **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** utilized a nominee to receive two Zelle deposits totaling \$2,000 from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted proceeds owed to **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** for assisting in crossing undocumented aliens from Mexico into the United States for the LCF.

Overt Act Twenty-Eight

On or about July 22, 2022, Co-Conspirator 3 received a \$130 Zelle deposit from **KAREN STEFANY HERNANDEZ-VANEGAS,** intended to be paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Twenty-Nine

On or about August 8, 2022, **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** utilized a nominee to receive a \$3,500 Zelle deposit from Co-Conspirator 2, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted proceeds owed to **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** for assisting in crossing undocumented aliens from Mexico into the United States for the LCF.

Overt Act Thirty

On or about August 9, 2022, **WHISKEY HANS LOPEZ-AMBROSIO, a.k.a. "Hands,"** received a \$730 Zelle deposit from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Thirty-One

On or about August 14, 2022, **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** utilized a nominee to receive two Zelle deposits totaling \$3,000 from Co-Conspirator 3, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted proceeds owed to **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** for assisting in crossing undocumented aliens from Mexico into the United States for the LCF.

Overt Act Thirty-Two

On or about August 22, 2022, **ELI ADONIS ESTEBAN-LOPEZ** received a \$1,500 Zelle deposit from Co-Conspirator 2, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Thirty-Three

On or about September 9, 2022, **KAREN STEFANY HERNANDEZ-VANEGAS** received a \$700 Zelle deposit from Co-Conspirator 2, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Thirty-Four

On or about September 9, 2022, **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** utilized a nominee to receive a \$700 Zelle deposit from Co-Conspirator 2, on behalf of **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted proceeds owed to **JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken,"** for assisting in crossing undocumented aliens from Mexico into the United States for the LCF.

Overt Act Thirty-Five

On or about September 12, 2022, **ELI ADONIS ESTEBAN-LOPEZ** sent Co-Conspirator 3 a \$500 Zelle deposit, intended to be paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Thirty-Six

On or about September 12, 2022, **WENRY GABRIEL GOMEZ-LOPEZ** sent Co-Conspirator 3 a \$2,500 Zelle deposit, intended to be paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** that constituted operational expenses for the LCF's alien smuggling business.

Overt Act Thirty-Seven

On or about April 6, 2023, **WHISKEY HANS LOPEZ-AMBROSIO, a.k.a. "Hands,"** instructed Co-Conspirator 4 to pick up a group of undocumented aliens in New Mexico and transport the group in exchange for money.

Overt Act Thirty-Eight

On or about April 6, 2023, at the instruction of **WHISKEY HANS LOPEZ-AMBROSIO, a.k.a. "Hands,"** Co-Conspirator 4 picked up a group of undocumented aliens in New Mexico and transported them until Co-Conspirator 4 was apprehended by law enforcement agents.

Overt Act Thirty-Nine

On or about April 7, 2023, **WHISKEY HANS LOPEZ-AMBROSIO, a.k.a. "Hands,"** instructed Co-Conspirator 5 to pick up a group of undocumented aliens in New Mexico and transport the group in exchange for money.

Overt Act Forty

On or about April 7, 2023, at the instruction of **WHISKEY HANS LOPEZ-AMBROSIO, a.k.a. "Hands,"** Co-Conspirator 5 picked up a group of undocumented aliens and transported the group through New Mexico until Co-Conspirator 5 was apprehended by law enforcement agents.

In violation of 8 U.S.C. § 1324(a)(1)(A)(v)(I).

Count 2

From on or about March 13, 2020, and continuing to on or about August 22, 2022, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni,"** and **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** knowingly combined, conspired, confederated, agreed, and acted

interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit certain offenses defined in 18 U.S.C. §§ 1956 and 1957, as follows:

- a. Conducted and attempted to conduct financial transactions in interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, transporting and harboring illegal aliens as defined in 8 U.S.C. §§ 1324(a)(1)(A)(ii) and (iii), knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i); and
- b. Knowingly engaged, attempted to engage, and caused and aided or abetted others in engaging in monetary transactions by, through, or to a financial institution, affecting interstate commerce, in criminally-derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, transporting and harboring illegal aliens as defined in 8 U.S.C. §§ 1324(a)(1)(A)(ii) and (iii), in violation of 18 U.S.C. § 1957.

Manner and Means

The manner and means by which the defendants, **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni,"** and **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** sought to accomplish the objectives of the conspiracy included, among other things the following:

1. It was part of the conspiracy that that **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** would instruct co-conspirators to open United States bank accounts in order to receive smuggling fees from smuggled aliens on **ELVIS BERSAI LOPEZ-AMBROSIO's, a.k.a. "Pepe,"** behalf in a manner that would be untraceable to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

2. It was further part of the conspiracy that upon receiving the smuggling fees, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** would instruct co-conspirators to withdraw the funds and either: give the funds to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** convert the funds into assets including real estate, or send funds to **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni,"** or his nominees in Guatemala to minimize the traceability of the funds to **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni."**

Overt Acts

In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the District of New Mexico, and elsewhere:

Overt Act One

On or about March 13, 2020, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to wire \$1,518 to **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni,"** that constituted proceeds derived from the LCF's alien smuggling business.

Overt Act Two

On or about September 18, 2020, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to wire \$1,000 to **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni,"** that constituted proceeds derived the LCF's alien smuggling business.

Overt Act Three

On or about November 4, 2020, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** authorized Co-Conspirator 1 to transmit to the sellers a \$15,000 down payment to purchase a house in Deming, New Mexico so that it could be used as an alien smuggling stash house (the "Premises"), which was comprised of proceeds derived from the LCF's alien smuggling business.

Overt Act Four

On or about November 19, 2020, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$1,000 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Five

On or about November 30, 2020, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$2,000 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Six

On or about November 30, 2020, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$1,000 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Seven

On or about December 4, 2020, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$8,000 into Co-Conspirator 3's

account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Eight

On or about January 8, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$3,265 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Nine

On or about January 22, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$1,500 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Ten

On or about February 16, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$2,000 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Eleven

On or about February 26, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$3,200 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Twelve

On or about April 1, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"**

instructed Co-Conspirator 1 to collect two Zelle deposits into Co-Conspirator 1's bank account totaling \$2,500 that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Thirteen

On or about April 12, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$2,400 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Fourteen

On or about April 26, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$2,000 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Fifteen

On or about April 27, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct a counter deposit of \$3,500 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Sixteen

On or about May 3, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to collect a \$1,500 Zelle deposit into Co-Conspirator 3's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Seventeen

On or about May 7, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$3,500 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Eighteen

On or about May 7, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$5,000 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Nineteen

On or about May 10, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$2,200 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Twenty

On or about May 11, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$2,000 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Twenty-One

On or about May 12, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$5,000 from Co-Conspirator

1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Twenty-Two

On or about May 17, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$2,000 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Twenty-Three

On or about May 17, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$2,000 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Twenty-Four

On or about May 17, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct a counter deposit of \$5,000 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Twenty-Five

On or about May 17, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$5,000 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Twenty-Six

On or about May 24, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$2,999 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Twenty-Seven

On or about May 27, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$2,000 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Twenty-Eight

On or about June 1, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$2,500 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Twenty-Nine

On or about June 7, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$7,000 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Thirty

On or about June 15, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct a counter deposit of \$3,000 into Co-Conspirator 1's bank

account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Thirty-One

On or about June 16, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$3,000 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Thirty-Two

On or about June 16, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$1,000 Zelle deposit into account Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Thirty-Three

On or about June 17, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$5,000 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Thirty-Four

On or about June 29, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$6,500 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Thirty-Five

On or about June 30, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$5,000 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Thirty-Six

On or about July 1, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$3,500 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Thirty-Seven

On or about July 12, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$3,000 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Thirty-Eight

On or about July 13, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct a counter deposit of \$5,800 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Thirty-Nine

On or about July 13, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to wire \$2,018 to a recipient in Guatemala that constituted

smuggling fees for a smuggled alien and intended to be later paid to **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni."**

Overt Act Forty

On or about July 22, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$4,500 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Forty-One

On or about July 26, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$3,000 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Forty-Two

On or about July 28, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$3,300 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Forty-Three

On or about July 30, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$2,500 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Forty-Four

On or about August 11, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$3,000 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Forty-Five

On or about August 13, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$2,500 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Forty-Six

On or about August 24, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$5,500 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Forty-Seven

On or about August 30, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$4,000 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Forty-Eight

On or about August 31, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$3,499 Zelle deposit into Co-Conspirator 1's bank

account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Forty-Nine

On or about August 31, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$1,500 Zelle deposit into account Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Fifty

On or about September 1, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$4,000 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Fifty-One

On or about September 7, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person deposit of \$7,000 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Fifty-Two

On or about September 8, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$6,000 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Fifty-Three

On or about September 10, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe,”** instructed Co-Conspirator 3 to wire \$1,500 to a recipient in Guatemala that constituted smuggling fees for a smuggled alien and intended to be later paid to **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. “Tio Roni.”**

Overt Act Fifty-Four

On or about September 14, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe,”** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$7,000 from Co-Conspirator 1’s bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe.”**

Overt Act Fifty-Five

On or about September 22, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe,”** instructed Co-Conspirator 3 to send two \$1,000 wires to recipients in Guatemala that constituted smuggling fees for a smuggled alien and intended to be later paid to **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. “Tio Roni.”**

Overt Act Fifty-Six

On or about September 30, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe,”** instructed Co-Conspirator 1 to collect a \$2,200 Zelle deposit into Co-Conspirator 1’s bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe.”**

Overt Act Fifty-Seven

On or about September 30, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe,”** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$5,000 from Co-

Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Fifty-Eight

On or about October 4, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$3,500 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Fifty-Nine

On or about October 4, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$3,499 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Sixty

On or about October 4, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$7,000 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Sixty-One

On or about October 5, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$5,000 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Sixty-Two

On or about October 5, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$3,500 Zelle deposit into account Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Sixty-Three

On or about October 12, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$2,700 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Sixty-Four

On or about October 12, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$5,000 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Sixty-Five

On or about October 15, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person deposit of \$5,500 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Sixty-Six

On or about October 26, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$6,000 from Co-Conspirator

1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Sixty-Seven

On or about November 2, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$2,000 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Sixty-Eight

On or about November 2, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$2,000 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Sixty-Nine

On or about November 12, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person deposit of \$13,150 into account #4850 that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Seventy

On or about November 14, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 2 to wire \$500 to a recipient in Guatemala that constituted smuggling fees for a smuggled alien and intended to be later paid to **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni."**

Overt Act Seventy-One

On or about November 18, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe,”** instructed Co-Conspirator 1 to conduct an in-person deposit of \$5,000 into Co-Conspirator 1’s bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe.”**

Overt Act Seventy-Two

On or about November 18, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe,”** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$2,200 into Co-Conspirator 1’s bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe.”**

Overt Act Seventy-Three

On or about December 2, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe,”** instructed Co-Conspirator 1 to conduct an ATM deposit of \$4,000 into Co-Conspirator 1’s bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe.”**

Overt Act Seventy-Four

On or about December 3, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe,”** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$5,000 from Co-Conspirator 1’s bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe.”**

Overt Act Seventy-Five

On or about December 24, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. “Pepe,”** instructed Co-Conspirator 2 to conduct an ATM deposit of \$1,500 into Co-Conspirator

2's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Seventy-Six

On or about December 31, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$3,490 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Seventy-Seven

On or about December 31, 2021, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$2,500 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Seventy-Eight

On or about January 3, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$3,500 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Seventy-Nine

On or about January 3, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct two ATM deposits totaling \$5,900 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Eighty

On or about January 4, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$2,000 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Eighty-One

On or about January 6, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$1,800 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Eighty-Two

On or about January 8, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct a counter deposit of \$3,250 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Eighty-Three

On or about January 10, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$8,400 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Eighty-Four

On or about January 12, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 2 to collect a \$3,500 Zelle deposit into account Co-Conspirator 2's

bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Eighty-Five

On or about January 18, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$3,500 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Eighty-Six

On or about January 19, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$3,000 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Eighty-Seven

On or about January 26, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to collect a \$3,400 Zelle deposit into Co-Conspirator 3's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Eighty-Eight

On or about January 26, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 2 to collect a \$3,300 Zelle deposit into Co-Conspirator 2's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Eighty-Nine

On or about February 4, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$2,900 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Ninety

On or about February 22, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$5,500 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Ninety-One

On or about February 28, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$2,000 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Ninety-Two

On or about March 2, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to collect a \$1,000 Zelle deposit into Co-Conspirator 3's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Ninety-Three

On or about March 8, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 2 to conduct an ATM deposit of \$1,500 into Co-Conspirator 2's bank

account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Ninety-Four

On or about March 29, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to collect a \$2,500 Zelle deposit into Co-Conspirator 3's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Ninety-Five

On or about March 29, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to collect a \$2,500 Zelle deposit into Co-Conspirator 3's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Ninety-Six

On or about March 29, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 2 to conduct an ATM deposit of \$3,500 into Co-Conspirator 2's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Ninety-Seven

On or about March 30, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$4,000 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Ninety-Eight

On or about March 31, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 2 to conduct an ATM deposit of \$3,500 into Co-Conspirator 2's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act Ninety-Nine

On or about April 1, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an in-person withdrawal of \$3,500 from Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred

On or about April 4, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$20,000 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred One

On or about April 5, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$10,000 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Two

On or about April 7, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct a counter deposit of \$4,000 into Co-Conspirator 1's bank

account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Three

On or about April 11, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$1,000 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Four

On or about April 12, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct a counter deposit of \$4,900 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Five

On or about April 18, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to collect a \$2,500 Zelle deposit into Co-Conspirator 3's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Six

On or about April 22, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$10,000 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Seven

On or about April 22, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to wire \$900 to a recipient in Guatemala that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Eight

On or about May 3, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to wire \$700 to a recipient in Guatemala that constituted smuggling fees for a smuggled alien and intended to be later paid to **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni."**

Overt Act One Hundred Nine

On or about May 6, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 2 to conduct an ATM deposit of \$1,600 into Co-Conspirator 2's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Ten

On or about May 10, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct a counter deposit of \$4,900 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Eleven

On or about May 27, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$6,000 into Co-Conspirator 3's bank

account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Twelve

On or about May 31, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to collect a \$3,000 Zelle deposit into Co-Conspirator 3's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Thirteen

On or about June 1, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to collect a \$3,500 Zelle deposit into Co-Conspirator 3's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Fourteen

On or about June 2, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$3,000 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Fifteen

On or about June 7, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to wire \$2,000 to a recipient in Guatemala that constituted smuggling fees for a smuggled alien and intended to be later paid to **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni."**

Overt Act One Hundred Sixteen

On or about June 14, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$3,500 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Seventeen

On or about June 21, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$4,400 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Eighteen

On or about June 21, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$2,200 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Nineteen

On or about June 21, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM deposit of \$1,000 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Twenty

On or about June 27, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM withdrawal of \$1,000 from Co-Conspirator 1's

bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Twenty-One

On or about June 28, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect a \$1,600 Zelle deposit into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Twenty-Two

On or about July 5, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to conduct an ATM withdrawal of \$1,000 into Co-Conspirator 1's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Twenty-Three

On or about July 22, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$13,000 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Twenty-Four

On or about July 28, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 1 to collect two Zelle deposits totaling \$2,000 into Co-Conspirator 1's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Twenty-Five

On or about July 29, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 2 to collect a \$2,000 Zelle deposit into Co-Conspirator 2's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Twenty-Six

On or about July 29, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 2 to collect a \$2,000 Zelle deposit into Co-Conspirator 2's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Twenty-Seven

On or about August 9, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$12,500 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Twenty-Eight

On or about August 15, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to conduct a counter deposit of \$10,000 into Co-Conspirator 3's bank account that constituted smuggling fees collected from a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Twenty-Nine

On or about August 15, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to collect a \$3,499 Zelle deposit into Co-Conspirator 3's bank

account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Thirty

On or about August 15, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to collect a \$3,500 Zelle deposit into Co-Conspirator 3's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Thirty-One

On or about August 15, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to collect a \$3,500 Zelle deposit into Co-Conspirator 3's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Thirty-Two

On or about August 22, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to collect a \$3,000 Zelle deposit into Co-Conspirator 3's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

Overt Act One Hundred Thirty-Three

On or about August 22, 2022, **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** instructed Co-Conspirator 3 to collect a \$3,000 Zelle deposit into Co-Conspirator 3's bank account that constituted smuggling fees for a smuggled alien and intended to be later paid to **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe."**

In violation of 18 U.S.C. § 1956(h).

FORFEITURE ALLEGATION

Upon conviction of any offense in violation of 8 U.S.C. § 1324, the defendants, **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni," JOHN DOE, a.k.a. "Chikis," a.k.a. "Chiquis," a.k.a. "Enano," a.k.a. "Chicken," ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe," WHISKEY HANS LOPEZ-AMBROSIO, KAREN STEFANY HERNANDEZ-VANEGAS, ELI ADONIS ESTEBAN-LOPEZ, and WENRY GABRIEL GOMEZ-LOPEZ,** shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(6), any conveyance used in the commission of the offense and any property, real or personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the offense of conviction or that was used to facilitate, or was intended to be used to facilitate, the commission of the offense. The property to be forfeited includes but is not limited to the following:

1. MONEY JUDGMENT

A sum of money representing property involved in the offense set forth in the Count of conviction and any property traceable to such property.

2. PERSONAL PROPERTY

- a. \$520,716 in United States currency,
- b. a 2023 Chevrolet Corvette, bearing California license plate #9JVV265, VIN #1G1YF2D37P5603812,
- c. a gold in color bracelet and earrings,
- d. All funds contained in Bank of America account ending in 6157, associated with **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"**

- e. All funds contained in Bank of America account ending in 7402 associated with
ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"
- f. All funds contained in Wells Fargo account ending in 0870 associated with
ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"
- g. All funds contained in Wells Fargo account ending in 0712 associated with
ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"
- h. All funds contained in Bank of America account ending in 9410 associated with
WHISKEY HANS LOPEZ-AMBROSIO, a.k.a. "Hands,"
- i. All funds contained in Wells Fargo account ending in 7410 associated with
WHISKEY HANS LOPEZ-AMBROSIO, a.k.a. "Hands,"
- j. All funds contained in Bank of America account ending in 1905 associated with
KAREN STEFANY HERNANDEZ-VANEGAS,
- k. All funds contained in Bank of America account ending in 1748 associated with
ELI ADONIS ESTEBAN-LOPEZ,
- l. All funds contained in Bank of America account ending in 1751 **ELI ADONIS
ESTEBAN-LOPEZ,**
- m. All funds contained in Chase Bank account ending in 6556 associated with
WENRY GABRIEL GOMEZ-LOPEZ, and
- n. All funds contained in Chase Bank account ending in 8522 associated with
WENRY GABRIEL GOMEZ-LOPEZ.

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

- 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,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

Upon conviction of any offense in violation of 18 U.S.C. § 1956, the defendants, **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni,"** and **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"** 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. The property to be forfeited includes, but is not limited to, the following:

1. MONEY JUDGMENT

A sum of money representing property involved in the offense set forth in the Count of conviction and any property traceable to such property.

2. PERSONAL PROPERTY

- a. \$520,716 in United States currency,
- b. a 2023 Chevrolet Corvette, bearing California license plate #9JVV265, VIN #1G1YF2D37P5603812,
- c. a Gold in color bracelet and earrings,
- d. All funds contained in Bank of America account ending in 6157, associated with **ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"**

- e. All funds contained in Bank of America account ending in 7402 associated with
ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"
- f. All funds contained in Wells Fargo account ending in 0870 associated with
ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"
- g. All funds contained in Wells Fargo account ending in 0712 associated with
ELVIS BERSAI LOPEZ-AMBROSIO, a.k.a. "Pepe,"

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

- 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,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY


Assistant United States Attorney

MAO