

FILEDUNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

NOV 20 2019

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**MITCHELL R. ELFERS**
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ZAYRA OLIVIA ALVARADO,

Defendant.

CRIMINAL NO. **19-4273 MV**Counts 1-100: 18 U.S.C. § 641: Theft of
Public Money from the United States; 18
U.S.C. § 2: Aiding and Abetting.INDICTMENT

The Grand Jury charges:

Counts 1-100

On or about the dates listed below, in Santa Fe County, in the District of New Mexico, and elsewhere, the defendant, **ZAYRA OLIVIA ALVARADO**, knowingly stole, purloined, and converted to defendant's use and the use of others, items of value to the United States, that being United States currency belonging to the United States Department of the Treasury, with a value in excess of \$1,000:

<u>Count</u>	<u>Date Check Cashed</u>	<u>U.S. Treasury Check No.</u>	<u>Amount</u>
1	February 17, 2015	37212687	\$6,905.49
2	February 17, 2015	37212688	\$5,451.79
3	February 17, 2015	37212691	\$6,580.29
4	February 23, 2015	37803080	\$4,914.00
5	February 23, 2015	37794951	\$7,608.00
6	February 23, 2015	37796067	\$4,862.00
7	February 23, 2015	37209849	\$3,546.15
8	February 23, 2015	38015112	\$6,539.48
9	February 24, 2015	37796275	\$4,788.00

10	February 25, 2015	37795432	\$4,907.00
11	March 9, 2015	38829057	\$5,930.00
12	March 10, 2015	38829059	\$6,054.00
13	March 17, 2015	42063488	\$4,664.00
14	March 17, 2015	40319894	\$7,332.00
15	March 19, 2015	40319891	\$6,033.00
16	March 19, 2015	41002308	\$3,377.00
17	March 19, 2015	42063486	\$4,724.00
18	March 19, 2015	40319892	\$4,929.00
19	March 23, 2015	42060751	\$7,439.00
20	March 23, 2015	41942288	\$7,282.00
21	March 23, 2015	41138597	\$5,851.00
22	March 23, 2015	41942436	\$7,017.00
23	March 23, 2015	41943465	\$5,032.00
24	March 23, 2015	41480287	\$5,946.00
25	March 23, 2015	40208255	\$1,249.90
26	March 23, 2015	40321922	\$4,632.00
27	March 24, 2015	45056270	\$6,631.00
28	March 24, 2015	45057052	\$3,867.00
29	March 24, 2015	45057067	\$1,135.49
30	March 24, 2015	45057070	\$5,485.00
31	March 25, 2015	45056265	\$6,881.00
32	March 25, 2015	43786950	\$5,053.00
33	March 25, 2015	45056269	\$7,597.00
34	March 26, 2015	45183288	\$4,592.00
35	March 27, 2015	45182580	\$3,501.35
36	March 27, 2015	43459002	\$7,496.38
37	March 27, 2015	45183286	\$7,318.00
38	March 27, 2015	42062761	\$4,731.00
39	March 27, 2015	45180329	\$4,953.45
40	March 30, 2015	43456141	\$3,119.00
41	March 30, 2015	43459001	\$2,737.00
42	March 31, 2015	45180045	\$6,106.00

43	March 31, 2015	43456377	\$3,077.00
44	March 31, 2015	42661792	\$6,037.00
45	March 31, 2015	44466921	\$4,558.00
46	March 31, 2015	43458313	\$4,403.00
47	April 1, 2015	43456137	\$5,914.00
48	April 1, 2015	45180047	\$4,648.00
49	April 2, 2015	45180048	\$4,685.00
50	April 14, 2015	45056414	\$4,740.00
51	April 14, 2015	41943296	\$4,016.62
52	April 14, 2015	45057553	\$3,685.00
53	April 14, 2015	46612028	\$3,645.00
54	April 15, 2015	45057551	\$3,572.00
55	April 15, 2015	45055857	\$3,747.00
56	April 16, 2015	43335237	\$3,649.00
57	April 16, 2015	43335238	\$4,822.00
58	April 17, 2015	40207158	\$6,747.00
59	April 17, 2015	45057539	\$5,719.00
60	April 17, 2015	43335245	\$4,913.53
61	April 17, 2015	39227285	\$4,933.00
62	April 17, 2015	45057069	\$5,670.00
63	April 23, 2015	51840801	\$6,196.00
64	April 24, 2015	47983344	\$8,791.00
65	April 24, 2015	50226026	\$4,749.00
66	April 24, 2015	49883005	\$4,510.51
67	April 24, 2015	49883006	\$4,617.00
68	April 27, 2015	47983343	\$9,528.00
69	April 27, 2015	47979751	\$7,702.00
70	April 27, 2015	47983345	\$4,973.00
71	April 27, 2015	47982439	\$5,723.00
72	April 27, 2015	47982443	\$5,117.83
73	April 27, 2015	51531462	\$2,942.00
74	April 28, 2015	51840798	\$4,767.52
75	April 28, 2015	49886574	\$6,141.00

76	April 28, 2015	47983346	\$4,645.38
77	April 28, 2015	47983347	\$8,203.00
78	April 30, 2015	47982442	\$3,142.40
79	April 30, 2015	47980054	\$3,253.00
80	April 30, 2015	51706474	\$8,491.88
81	May 1, 2015	51706475	\$7,738.00
82	May 1, 2015	51706476	\$8,468.00
83	May 26, 2015	56549328	\$6,145.00
84	May 26, 2015	58460976	\$6,129.64
85	May 26, 2015	56549330	\$6,181.00
86	May 26, 2015	58460977	\$6,189.88
87	May 27, 2015	56544875	\$4,471.00
88	May 28, 2015	53591992	\$4,908.17
89	May 28, 2015	58460378	\$2,477.00
90	May 28, 2015	56549329	\$6,158.00
91	May 28, 2015	53591993	\$2,780.00
92	May 28, 2015	58458575	\$3,436.81
93	May 28, 2015	53585072	\$2,516.00
94	June 30, 2015	59761378	\$2,543.00
95	June 30, 2015	60453086	\$2,500.00
96	June 30, 2015	60453087	\$2,516.00
97	June 30, 2015	60808686	\$2,648.00
98	June 30, 2015	60808740	\$2,334.00
99	October 26, 2015	64116582	\$2,015.00
100	October 26, 2015	62814000	\$2,138.00

In violation of 18 U.S.C. § 641, and 18 U.S.C. § 2.

FORFEITURE ALLEGATION

The allegations contained in the Introduction and Counts 1 through 100 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code,

Section 2461(c).

Upon conviction of the offenses in Counts 1 through 100 of this Indictment, the defendant, **ZAYRA OLIVIA ALVARADO**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense(s). The property to be forfeited includes, but is not limited to, the following:

1. PERSONAL JUDGMENT

A sum of money representing property constituting or derived from proceeds traceable to the offenses set forth in Counts 1 through 100.

2. REAL PROPERTY

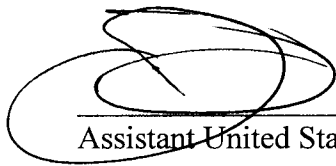
a. The structures or improvements located at 48 Bosquecillo, Santa Fe, New Mexico 87508.

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,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL:



Assistant United States Attorney

/s/ _____
FOREPERSON OF THE GRAND JURY

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