

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DIEGO PINEDA SANCHEZ,  
a/k/a "Botas," "Boots,"  
CARLOS PARRA-PEDROZA,  
a/k/a "Walter," "Walt Disney," "Willy," "Don  
Walt," "Ary,"  
JOSE ABEL MENDOZA-PARRA,  
a/k/a "Robin,"  
MARIA LOERA ALVARADO,  
a/k/a "Samys@m"  
ERNESTO RUIZ-RAMIREZ,  
MARIO HERRERA,  
ANTHONY LEIVA,  
TEODOCIO CARO,  
LUIS REYNA-TELLEZ,  
HECTOR CHAVEZ CUEVAS,  
JUAN CARLOS NUNEZ GALVEZ,  
JOSE SANANTONIO,  
PEDRO SAUCEDO-PALOMINOS,  
OMAR LOPEZ-CABRERA,  
VIRGIL DURBIN,  
VALENTIN RODRIGUEZ,  
ALMA LORENA ORTIZ DE ROSAS VERA,  
CASMIRO ISAIAS-PADILLA,  
EFREN MOTA,  
FELIX LEMUS-GUEVARA,  
PEDRO URQUIZA-OSORIO,  
LUIS ARMANDO ACOSTA VIZCARRA,  
OSCAR MONTES-LAMAS,  
JOEL ESTRADA,  
HARRANAH SAMORI,  
GABRIEL SALCEDO,  
TOMAS SALGADO REYNA,  
OSCAR ACOSTA,  
FEDERICO BARRERA-PEREZ,  
EMMANUEL DIAZ,  
JOSE HERNANDEZ OCHOA, and  
ALFONSO NEVAREZ

CASE NUMBER:  
UNDER SEAL

**15CR 61**

**MAGISTRATE JUDGE MARTIN**

**RECEIVED**

FEB - 9 2015

THOMAS G BRUTON  
CLERK, U S DISTRICT COURT

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Beginning in or about August 2011, and continuing until at least in or about September 2014, in the Northern District of Illinois, and elsewhere, the defendants, together with others known and unknown, violated:

*Code Section*

Title 18, United States Code, Section 1956(h)

*Offense Description*

conspiring to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, namely, the delivery of quantities of United States currency to third parties, which transactions involved the proceeds of specified unlawful activity, namely the felonious buying and selling and otherwise dealing in a controlled substance, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

\_\_\_\_\_  
Jill N. Dennewitz  
Special Agent,  
Homeland Security Investigations (HSI)

Sworn to before me and signed in my presence.

Date: February 9, 2015

*Daniel G. Martin*

\_\_\_\_\_  
*Judge's signature*

City and state: Chicago, Illinois

Daniel G. Martin, U.S. Magistrate Judge  
*Printed name and Title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

ss

AFFIDAVIT

I, Jill N. Dennewitz, being duly sworn, state as follows:

1. I am a Special Agent of the United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI"), and have been so employed since approximately May 2005. I am currently assigned to the Homeland Security Investigations Office of the Special Agent in Charge, Chicago, Illinois, and my responsibilities include the investigation of money laundering and narcotics trafficking offenses. I am currently assigned to a Public Safety Unit in which investigative efforts are focused on violent street gang members committing various crimes including narcotics and firearms trafficking and money laundering. I have worked on investigations targeting drug traffickers and money launderers whose organizations are based in Mexico and who operate throughout the United States. Prior to working in the Public Safety Unit, I was assigned to a Narcotics Smuggling Group for six years. I have worked on numerous investigations targeting drug traffickers and money launderers whose organizations are based in Mexico, Central America, and South America, who operate throughout the United States. I have received training related to smuggling contraband, including drugs, into the United States. This training included methods of investigation related to international and domestic drug trafficking and money laundering.

2. I am the co-case agent on a joint HSI and Internal Revenue Service investigation involving DIEGO PINEDA SANCHEZ, CARLOS PARRA-PEDROZA, and others. As co-case agent, among other things, I have sworn out affidavits supporting applications to intercept wire and electronic communications in this investigation, have monitored wire and electronic communications pursuant to court orders, have conducted surveillance as part of the investigation, and have interviewed subjects.

3. This affidavit is submitted in support of a criminal complaint alleging that DIEGO PIENDA SANCHEZ, CARLOS PARRA-PEDROZA, JOSE ABEL MENDOZA-PARRA, MARIA LOERA ALVARADO, ERNESTO RUIZ-RAMIREZ, MARIO HERRERA, ANTHONY LEIVA, TEODOCIO CARO, LUIS REYNATELLEZ, HECTOR CHAVEZ CUEVAS, JUAN CARLOS NUNEZ GALVEZ, JOSE SANANTONIO, PEDRO SAUCEDO-PALOMINOS, OMAR LOPEZ-CABRERA, VIRGIL DURBIN, VALENTIN RODRIGUEZ, ALMA LORENA ORTIZ DE ROSAS VERA, CASMIRO ISAIAS-PADILLA, EFREN MOTA, FELIX LEMUS-GUEVARA, PEDRO URQUIZA-OSORIO, LUIS ARMANDO ACOSTA VIZCARRA, OSCAR MONTES-LAMAS, JOEL ESTRADA, HARRANAH SAMORI, GABRIEL SALCEDO, TOMAS SALGADO REYNA, OSCAR ACOSTA, FEDERICO BARRERA-PEREZ, EMMANUEL DIAZ, JOSE HERNANDEZ OCHOA, and ALFONSO NEVAREZ, have violated Title 18, United States Code, Section 1956(h) (conspiring to commit concealment money laundering). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of

a criminal complaint charging these individuals with money laundering, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

4. This affidavit is based on: (a) my personal participation in this investigation; (b) information provided by other federal, state, and local law enforcement officers; (c) surveillance conducted by HSI agents and other law enforcement officers; (d) analyses of toll records, pen register and trap and trace data, and subscriber information; (e) information derived from consensually-recorded telephone conversations and Blackberry Messenger Messages ("BBMs"); (f) review of conversations intercepted pursuant to court orders; (g) emails obtained through the execution of court-authorized search warrants; (h) Federal Express records; (i) my training and experience and the training and experience of other law enforcement agents with whom I have spoken; (j) laboratory analysis reports; (k) commercial database records; (l) criminal history records maintained by the Illinois State Police ("ISP") and the National Crime Information Center ("NCIC"); (m) records of the Illinois Secretary of State ("SOS"); and (n) information provided by cooperating sources and other individuals.

#### **BACKGROUND OF THE INVESTIGATION**

5. This complaint is based on an investigation conducted by HSI and IRS into money laundering and related criminal activities involving DIEGO PINEDA SANCHEZ, CARLOS PARRA-PEDROZA, and others.

6. The information supporting probable cause set forth below includes:
- a. Information derived from consensually-recorded telephone conversations between a confidential source ("CI-2") and DIEGO PINEDA SANCHEZ, CARLOS PARRA-PEDROZA, and their co-conspirators;
  - b. Information derived from consensually captured<sup>1</sup> BBM exchanges between CI-2 and CARLOS PARRA-PEDROZA, JOSE ABEL MENDOZA-PARRA ("ABEL") and other co-conspirators;
  - c. Information derived from court-authorized interceptions of BBM exchanges over Blackberry devices, including (i) the Blackberry model RIM8520 mobile device used by PINEDA SANCHEZ and permanently assigned Blackberry PIN 233D184B ("Target Device 6"); (ii) the Blackberry model RIM8520 mobile device used by PINEDA-SANCHEZ and permanently assigned Blackberry PIN 26F13A1B ("Target Device 7"); and (iii) the Blackberry model STL100-3/Z10 mobile device used by MARIA LOERA ALVARADO (a/k/a "Samys@m") and permanently assigned Blackberry PIN 2AC18671 ("Target Device 9");<sup>2</sup>
  - e. Law enforcement's controlled collection and seizure of over \$4.5 million in narcotics proceeds from multiple individuals, as directed by PINEDA SANCHEZ, PARRA-PEDROZA, ABEL, and others;

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<sup>1</sup> Agents furnished CI-2 with a Blackberry device and Blackberry PIN for exclusive use in this investigation. Agents consensually captured BBM messages that CI-2 sent and received over that device by video recording the messages after they were exchanged.

<sup>2</sup> The BBM summaries in this Affidavit that include a "Session" number refer to BBMs that were intercepted pursuant to one of the above-referenced court orders.

d. Narcotics seizures by law enforcement, including, among others, the seizure of (i) approximately 33 kilograms of cocaine on or about September 30, 2011; (ii) approximately 325 pounds of marijuana on September 12, 2013; and (iii) approximately 8.3 kilograms of cocaine on February 24, 2014.

## ROLES OF THE DEFENDANTS

### I. The Parra-Pedroza MLO

7. HSI is conducting an investigation of DIEGO PINEDA SANCHEZ, CARLOS PARRA-PEDROZA,<sup>3</sup> and others involved in laundering over \$100 million in narcotics proceeds since at least August 2011. The investigation has revealed that DIEGO PINEDA SANCHEZ and PARRA-PEDROZA are high-ranking and Mexican-based members of this money laundering organization (“Parra-Pedroza MLO”). Through this investigation, agents have learned that PINEDA SANCHEZ is responsible for directing PARRA-PEDROZA to arrange for U.S.-based members of the Parra-Pedroza MLO – including CI-2 – to collect narcotics proceeds from multiple money couriers and drug traffickers; to use those proceeds to purchase scrap and fine gold at jewelry stores and businesses located in the Chicagoland area; and to ship the gold via FedEx to cash for gold companies, including a Florida-based refinery (“Refinery A”) and a Los Angeles based jewelry store (“Refinery B”). The investigation has further revealed that, after Refinery A received the gold from

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<sup>3</sup> On December 11, 2014, DIEGO PINEDA SANCHEZ and CARLOS PARRA-PEDROZA were charged by indictment in the Northern District of Illinois with multiple counts of concealment money laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), in Case No. 14 CR 533. Those charges are related to the conduct discussed herein.

the U.S.-based members of the Parra-Pedroza MLO, the company sent payments for that gold to PARRA-PEDROZA in Mexico.

8. PINEDA SANCHEZ negotiated agreements to launder narcotics proceeds with numerous Mexican based drug traffickers and money launderers, including Individual N, Individual I, Individual O, and Individual L.

9. PINEDA SANCHEZ, PARRA-PEDROZA, JOSE ABEL MENDOZA-PARRA, MARIA LOERA ALVARADO, and others directed a confidential informant ("CI-2"), two undercover agents ("UCA-1" and "UCA-2"), Individual CC, Individual DD, and others to collect narcotics proceeds for the purposes of laundering the money from numerous individuals, including ERNESTO RUIZ-RAMIREZ, MARIO HERRERA, ANTHONY LEIVA, TEODOCIO CARO, LUIS REYNA-TELLEZ, HECTOR CHAVEZ CUEVAS, JUAN CARLOS NUNEZ GALVEZ, JOSE SANANTONIO, PEDRO SAUCEDO-PALOMINOS, OMAR LOPEZ-CABRERA, VIRGIL DURBIN, VALENTIN RODRIGUEZ, ALMA LORENA ORTIZ DE ROSAS VERA, CASMIRO ISAIAS-PADILLA, EFREN MOTA, FELIX LEMUS-GUEVARA, PEDRO URQUIZA-OSORIO, LUIS ARMANDO ACOSTA VIZCARRA, OSCAR MONTES-LAMAS, JOEL ESTRADA, HARRANAH SAMORI, GABRIEL SALCEDO, TOMAS SALGADO REYNA, OSCAR ACOSTA, FEDERICO BARRERA-PEREZ, EMMANUEL DIAZ, JOSE HERNANDEZ OCHOA, and ALFONSO NEVAREZ.

10. Between on or about August 2011 and September 2014, the Parra-Pedroza MLO laundered, or attempted to launder, over \$100 million in narcotics



proceeds through the purchase of gold and transmission of money from the United States to Mexico.

## II. The Defendants

11. The following is a brief summary of the roles played by the defendants:

a. DIEGO PINEDA SANCHEZ (a/k/a "Botas"; "Boots"). PINEDA SANCHEZ is a Mexican-based money launderer and a leader of the Parra-Pedroza MLO. Among other things, PINEDA SANCHEZ negotiated agreements with Mexican cartel members and drug traffickers to launder narcotics proceeds from various locations in the United States to Mexico (*see* ¶¶ 76(q)-(r), 90-105, 205-33, 352-405, 458-526); arranged for co-conspirators to collect and deliver proceeds from the sale of narcotics to CI-2 (*see* ¶¶ 37-49, 90-105, 205-33, 244-54, 278-89, 322-33, 353-405, 458-526); directed CI-2 to collect narcotics proceeds from money couriers, to use that money to purchase gold, and to mail that gold to Refinery A, which in turn would transmit payment for the gold to MLO members in Mexico (*see* ¶¶ 17, 106-16); and directed CI-2 to obtain a new cellular telephone because Mexican drug traffickers were concerned about CI-2's connection to a recent seizure of narcotics proceeds by law enforcement (*see* ¶¶ 353-60).

b. CARLOS PARRA-PEDROZA (a/k/a "Willy," "Walt Disney," "Walter," "Don Walt," "Ary"). PARRA-PEDROZA is a Mexican-based money launderer and another leader of the Parra-Pedroza MLO. Among other things, after PINEDA SANCHEZ and others negotiated money laundering contracts with Mexican cartel members and drug traffickers, PARRA-PEDROZA arranged for

U.S.-based members of the Parra-Pedroza MLO to deliver narcotics proceeds to CI-2, UCA-1, and other U.S.-based members of the Parra-Pedroza MLO (*see passim*); directed CI-2 and other U.S.-based members of the Parra-Pedroza MLO to collect narcotics proceeds, to use that money to purchase gold, and to mail that gold to Refinery A (*see passim*); negotiated with Refinery A and CI-2 to set prices for gold purchased with narcotics proceeds (*see passim*); directed Refinery A to transmit payment for the gold to himself and other MLO members in Mexico (*see ¶¶ 41, 75(c)-(f), 104, 352*); provided CI-2 and other U.S.-based members of the Parra-Pedroza MLO code names in order to communicate with each other (*see passim*); provided prepaid and preaddressed shipping labels to CI-2 and UCA-1 for purposes of shipping gold (*see ¶¶ 18, 33-34, 101-02, 115, 129*); directed CI-2 and UCA-1 to wire transfer narcotics proceeds to designated bank accounts (*see ¶¶ 406-25, 436-48, 458-85, 517-26, 550-62*); and recruited CI-2 and others to join the Parra-Pedroza MLO (*see ¶¶ 13, 15-16*).

c. JOSE ABEL MENDOZA-PARRA ("ABEL"). ABEL is a Mexican-based money launderer. Among other things, after PINEDA SANCHEZ and others negotiated money laundering contracts with Mexican cartel members and drug traffickers, ABEL arranged for U.S.-based members of the Parra-Pedroza MLO to deliver narcotics proceeds to CI-2 and UCA-1 (*see ¶¶ 133-310*); directed CI-2 to collect narcotics proceeds, to use that money to purchase gold, and to mail that gold to Refinery A (*see ¶¶ 133-310*); negotiated with Refinery A and CI-2 to set prices for gold purchased with narcotics proceeds (*see ¶¶ 167, 180, 192, 203-02, 254, 264*);

provided prepaid and preaddressed shipping labels to CI-2 and UCA-1 for purposes of shipping gold (see ¶¶ 139-40, 274-75); and provided CI-2 and other U.S.-based members of the Parra-Pedroza MLO code names in order to communicate with each other (see ¶¶ 168, 194, 206, 220, 234, 244, 255, 267, 278).

d. MARIA LOERA ALVARADO (a/k/a "Samys@m"). LOERA ALVARADO is a Mexico-based supervisor of the Parra-Pedroza MLO. LOERA ALVARADO, among other things, worked with PINEDA SANCHEZ, and directed others, to coordinate the collection and laundering of \$132,000 in narcotics proceeds from EFREN MOTA on August 5, 2014. See ¶¶ 486-516. In addition, LOERA ALVARADO arranged for three separate deliveries of a total of approximately \$170,000 to three different individuals in Los Angeles – namely, approximately \$90,000 and \$30,000 on May 2, 2014, and approximately \$53,700 on August 18, 2014 – all of which was subsequently seized by law enforcement.

e. ERNESTO RUIZ-RAMIREZ. RUIZ delivered narcotics proceeds to CI-2 on two occasions for purposes of concealing the nature, location, source, ownership, and control of the money, namely approximately \$50,020 on December 10, 2013 (see ¶¶ 244-54), and \$107,280 on January 17, 2014 (see ¶¶ 290-310). In addition, RUIZ arranged for JOSE SANANTONIO to deliver approximately \$100,000 to UCA-1 on August 26, 2014, and to store approximately \$122,000 on the

same day, all for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 538-49.<sup>4</sup>

f. MARIO HERRERA. HERRERA delivered approximately \$100,220 in narcotics proceeds to CI-2 on September 13, 2013 (see ¶¶ 157-67), and attempted with PEDRO SAUCEDO-PALOMINOS to deliver approximately \$173,133 in narcotics proceeds to CI-2 on November 7, 2013 (see ¶¶ 234-43), all for purposes of concealing the nature, location, source, ownership, and control of the money.

g. ANTHONY LEIVA. LEIVA attempted to deliver approximately \$290,704 in narcotics proceeds to CI-2 on September 11, 2013, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 133-56.

h. TEODOCIO CARO. CARO arranged for Individual Q to deliver approximately \$98,999 in narcotics proceeds to CI-2 on June 11, 2013 (see ¶¶ 60-74), and personally delivered approximately \$283,740 in narcotics proceeds to CI-2 on June 25, 2013 (see ¶¶ 78-89), all for purposes of concealing the nature, location, source, ownership, and control of the money.

i. LUIS REYNA-TELLEZ. REYNA-TELLEZ delivered approximately \$143,980 in narcotics proceeds to UCA-1 on July 25, 2014 (see

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<sup>4</sup> Contemporaneous with the filing of this affidavit, the government has also filed an affidavit in support of a criminal complaint alleging that ERNESTO RUIZ and SAMUEL MATA conspired with each other and others to possess with the intent to distribute and distribute approximately 8.3 kilograms of cocaine. Law enforcement seized this cocaine on or about February 24, 2014, from an individual who was transporting the cocaine on behalf of RUIZ and MATA.

¶¶ 458-85), and attempted to deliver to UCA-1 approximately \$210,960 in narcotics proceeds on August 14, 2014 (see ¶¶ 527-37), all for purposes of concealing the nature, location, source, ownership, and control of the money.

j. HECTOR CHAVEZ CUEVAS. CUEVAS delivered approximately \$200,780 in narcotics proceeds to CI-2 on July 24, 2013, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 117-32.

k. JUAN CARLOS NUNEZ GALVEZ. NUNEZ GALVEZ delivered narcotics proceeds to CI-2 and UCA-1 on two occasions for purposes of concealing the nature, location, source, ownership, and control of the money, namely approximately \$20,000 on December 12, 2013 (see ¶¶ 255-66), and approximately \$62,350 on July 16, 2014 (see ¶¶ 436-48). In addition, NUNEZ GALVEZ attempted to deliver at least \$100,000 in narcotics proceeds to UCA-1 on July 23, 2014. See ¶¶ 449-57.

l. JOSE SANANTONIO. SANANTONIO attempted to deliver approximately \$100,000 to UCA-1 on August 26, 2014, and intended to deliver approximately \$122,000 to another individual, as directed by RUIZ, all for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 538-51.

m. PEDRO SAUCEDO-PALOMINOS. SAUCEDO arranged for FELIX LEMUS-GUEVARA to deliver approximately \$120,000 in narcotics proceeds to CI-2 on September 27, 2013 (see ¶¶ 181-92), and attempted with MARIO

HERRERA to deliver approximately \$173,133 in narcotics proceeds to CI-2 on November 7, 2013, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 234-43.

n. OMAR LOPEZ-CABRERA. LOPEZ-CABRERA delivered approximately \$150,000 in narcotics proceeds to CI-2 on January 22, 2014, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 311-21.

o. VIRGIL DURBIN. DURBIN delivered approximately \$140,000 in narcotics proceeds to UCA-1 on August 28, 2014, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 551-63.

p. VALENTIN RODRIGUEZ. RODRIGUEZ delivered narcotics proceeds to CI-2 on two occasions for purposes of concealing the nature, location, source, ownership, and control of the money, namely approximately \$110,000 on June 5, 2013 (see ¶¶ 37-49), and \$30,010 on June 10, 2013 (see ¶¶ 50-59).

q. ALMA LORENA ORTIZ DE ROSAS VERA. ORTIZ delivered approximately \$80,000 in narcotics proceeds to UCA-1 on June 25, 2014 (see ¶¶ 412-25), and attempted to deliver another approximately \$59,452 in narcotics proceeds to UCA-1 later the same day (see ¶¶ 426-35), all for purposes of concealing the nature, location, source, ownership, and control of the money.

r. CASMIRO ISAIAS-PADILLA. ISAIAS delivered approximately \$139,470 in narcotics proceeds to CI-2 on July 10, 2013, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 90-105.

s. EFREN MOTA. MOTA delivered approximately \$132,000 in narcotics proceeds to an undercover agent ("UCA-2") on August 5, 2014, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 486-516.

t. FELIX LEMUS-GUEVARA. GUEVARA delivered approximately \$120,000 in narcotics proceeds to CI-2 on September 27, 2013, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 181-92.

u. PEDRO URQUIZA-OSORIO. URQUIZA-OSORIO delivered approximately \$50,000 in narcotics proceeds to CI-2 on September 20, 2013, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 168-80.

v. LUIS ARMANDO ACOSTA VIZCARRA. VIZCARRA delivered approximately \$89,980 in narcotics proceeds to CI-2 on October 11, 2013, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 193-204.

w. OSCAR MONTES-LAMAS. MONTES-LAMAS delivered approximately \$66,990 in narcotics proceeds to CI-2 on January 14, 2014, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 278-89.

x. JOEL ESTRADA. ESTRADA delivered approximately \$62,000 in narcotics proceeds to CI-2 on January 13, 2013, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 267-77.

y. HARRANAH SAMORI. SAMORI delivered approximately \$59,960 in narcotics proceeds to CI-2 on February 27, 2014, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 334-49.

z. GABRIEL SALCEDO. SALCEDO attempted to deliver approximately \$110,000 in narcotics proceeds to CI-2 on January 22, 2013, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 311-14, 322-33.

aa. TOMAS SALGADO REYNA. SALGADO attempted to deliver approximately \$100,075 in narcotics proceeds to CI-2 on October 24, 2013, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 205-33.

bb. OSCAR ACOSTA. ACOSTA delivered approximately \$100,020 in narcotics proceeds to CI-2 on March 31, 2013, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 353-60, 387-405.

cc. FEDERICO BARRERA-PEREZ. BARRERA-PEREZ delivered approximately \$100,000 in narcotics proceeds to UCA-1 on August 8, 2014, for



purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 517-26.

dd. EMMANUEL DIAZ. DIAZ delivered approximately \$37,220 in narcotics proceeds to CI-2 on March 27, 2013, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 353-75, 381-86.

ee. JOSE HERNANDEZ OCHOA. OCHOA delivered approximately \$29,990 in narcotics proceeds to CI-2 on July 16, 2013, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 106-16.

ff. ALFONSO NEVAREZ. NEVAREZ delivered approximately \$10,280 in narcotics proceeds to CI-2 on March 26, 2014, for purposes of concealing the nature, location, source, ownership, and control of the money. See ¶¶ 353-86.

#### **BACKGROUND OF MONEY LAUNDERING AND DRUG TRAFFICKING ORGANIZATIONS**

12. Through training, experience, law enforcement training publications about money laundering methods, and from my conversations with confidential sources and other law enforcement officers who have expertise in such matters, I am familiar with the methods by which drug traffickers utilize the purchase of gold to launder drug proceeds. For example, I know that:

a. There are numerous money laundering and drug trafficking organizations operating in the country of Mexico. Examples of some of these organizations include the Sinaloa Cartel, La Familia Cartel, Knights Templar Cartel, Juarez Cartel, the Gulf Cartel, and New Generations. As a general rule, these Mexico-based organizations purchase South American processed cocaine

which is transshipped through Mexico and smuggled into the United States. These organizations also grow, cultivate, cook and process heroin, methamphetamine, and marijuana in Mexico and subsequently smuggle the controlled substances into the United States for resale. The sale of these controlled substances generates substantial cash proceeds for these drug and money laundering organizations, which cash represents the cost of goods sold and illegal profits.

b. After the sale of controlled substances, the proceeds from the sales must be collected, counted, packaged and delivered in some fashion to the Mexican-based drug trafficking organizations ("DTOs"). At times, these funds are transported or transferred in one way or another to Mexico. This can occur through a variety of techniques.

c. Typically, DTOs smuggle drug proceeds in bulk from the United States to Mexico. However, because bulk smuggling is often considered more risky due in part to seizures of drug proceeds at border areas, more sophisticated DTOs rely on more complex money laundering schemes. Those schemes include trade based money laundering mechanisms as well as trading in precious metals, such as gold.

d. DTOs use different money laundering cells in the United States to facilitate laundering their drug proceeds. These cells perform different functions, including money pickup operations, bulk cash smuggling operations, and operations involving the purchase of goods, such as gold.

e. The basic money laundering process has three steps. The first step occurs when the DTO arranges to deposit or drop off the drug proceeds in the United States. At this stage, launderers sometimes insert the drug proceeds, or "dirty money," into a legitimate financial institution in the form of cash bank deposits. This method, however, risks detection because depositing large amounts of cash requires banks to report transactions to law enforcement. Therefore, some money laundering schemes avoid using financial institutions.

f. One of the most common money laundering practices for DTOs that wish to avoid depositing into a financial institution is to direct drug traffickers and money couriers to deliver drug proceeds to money launderers in what is referred to as a "money pickup." In a typical money pickup, the DTO-associated broker arranges for a U.S.-based co-conspirator to meet an individual in possession of a large quantity of narcotics proceeds. To arrange the meeting, the money broker typically provides the U.S.-based conspirator a telephone number to call, and a code phrase to say to the individual who answers the telephone call. The code phrase is a means for those who are exchanging the narcotics proceeds to confirm that both parties are executing a previously agreed upon money contract between the money broker and the DTO.

g. The second step in the process is referred to as layering. For those DTOs who use the formal banking system, they send the drug proceeds through various financial transactions to change the form of the money in order to make it difficult to trace its origin. Layering may consist of several bank-to-bank

transfers, wire transfers between different accounts in different names in different countries, and making deposits and withdrawals to continually vary the amount of money in the accounts. For those DTOs that avoid the formal banking system, layering involves changing the form of the currency of the drug proceeds by using the currency to purchase high-value items, such as gold and diamonds.

h. The final step is the integration stage, when the now-laundered money re-enters the mainstream economy and appears as though it originated from a legal transaction, such as the purchase or importation of gold. This step may involve a final bank transfer into the account of a business in which the launderer "invests" the profits from the sale of gold bought during the layering stage or the purchase of an overvalued item from a company owned by the launderer.

i. Further, I know that the use of trade-based money laundering has become increasingly popular with DTOs due in part to the new restrictions introduced in 2010 by the Mexican government to limit the use of U.S. dollars in the country.

j. Finally, I also know that members of DTOs employ various trade-based laundering techniques to transport drug proceeds gained in the United States across the border to Mexico. For example, DTOs have executed wire transfers to Mexico-based companies that are disguised as payment for importing commodities, such as gold, but that are actually drug proceeds. Some DTOs prefer to purchase commodities, such as textiles, toys, or scrap gold in the United States

with U.S. dollars derived from drug sales, and then either export the commodities into Mexico to resell them for Mexican pesos, or, sell scrap gold in the United States to companies that import gold from Mexico. This form of trade-based money laundering explains the inconsistency between the amount of imported gold and the money wired from the United States to the Mexico-based gold export companies.

### FACTS SUPPORTING PROBABLE CAUSE

#### I. CI-2's Cooperation with Law Enforcement and Information about the Parra-Pedroza MLO

13. On April 26, 2013, agents approached a member of the Parra-Pedroza MLO (who subsequently became a cooperating informant, hereinafter "CI-2") and informed this individual that he/she was the target of a money laundering investigation. CI-2 thereafter provided agents with detailed information admitting his/her involvement in the Parra-Pedroza MLO.<sup>5</sup> According to CI-2:

a. CI-2 had laundered narcotics proceeds for a man named "DIEGO" (who, as discussed below, was subsequently identified as PINEDA SANCHEZ), PARRA-PEDROZA, and other members of the Parra-Pedroza MLO between approximately August 2011 and October 2012. PARRA-PEDROZA owns

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<sup>5</sup> CI-2 has agreed to cooperate with law enforcement in an effort to receive consideration in charging and sentencing decisions that will be made in connection with CI-2's case. CI-2 has been advised that he/she will be charged for his/her criminal conduct in this case. To date, HSI has paid CI-2 approximately \$50,000 to cover living expenses while he/she is working at the direction of law enforcement. The information provided by CI-2 has been independently corroborated by physical surveillance, wire communications intercepted pursuant to court order, and consensual recordings made by CI-2 after he/she began cooperating.

the Mexico based jewelry store De Mexico British Metal, and is a member of the Sinaloa Cartel.

b. At PARRA-PEDROZA's direction, CI-2 received narcotics proceeds ranging from \$20,000 to \$1.2 million from various narcotics traffickers and money couriers, used the proceeds to purchase scrap gold, and then shipped the scrap gold via FedEx to Refinery A. On several occasions, individuals from whom CI-2 collected large cash proceeds advised CI-2 that the money was proceeds of narcotics transactions. CI-2 was typically paid one to two percent of the amount laundered or delivered in exchange for assisting drug traffickers with laundering drug proceeds.

c. Beginning in August 2011 and continuing to October 2012, CI-2 obtained millions of dollars of drug proceeds from drug traffickers and money couriers in Illinois, Indiana, Ohio, Kentucky, Georgia, and North Carolina at PARRA-PEDROZA's direction.

d. Prior to obtaining drug proceeds from drug traffickers and money couriers, CI-2 typically received a BBM from PARRA-PEDROZA, advising CI-2 how much money he/she was to collect. CI-2 would then receive phone calls from various unidentified drug traffickers and money couriers who used different cellular telephone numbers. The unidentified drug traffickers and money couriers would then arrange to meet CI-2 at a specific time and location so that CI-2 could obtain the drug proceeds to launder. Once CI-2 picked up and counted the drug proceeds, CI-2 contacted PARRA-PEDROZA with a final count of the money. CI-2

and others then used the narcotics proceeds to purchase scrap gold, and CI-2 shipped the gold to Refinery A using pre-addressed shipping labels that PARRA-PEDROZA provided via e-mail. PARRA-PEDROZA directed CI-2 and others to ship that gold to Refinery A under fictitious company names, including "Shopping Silver" and "Shopping S," and many of the pre-addressed shipping labels that PARRA-PEDROZA provided listed Shopping Silver as the shipper.<sup>6</sup>

e. In 2012, PINEDA SANCHEZ and PARRA-PEDROZA traveled from Mexico to Chicago, by way of Los Angeles, California to meet with CI-2. PARRA-PEDROZA introduced PINEDA SANCHEZ to CI-2 as "Diego" and said that PINEDA SANCHEZ was his "partner." During this meeting PINEDA SANCHEZ and PARRA-PEDROZA inspected the store front where CI-2 met with money couriers and collected narcotics proceeds prior to purchasing gold. During this visit, PINEDA SANCHEZ and PARRA-PEDROZA (a) complained that CI-2 was always losing money; (2) asked CI-2 to use the narcotics proceeds to buy fine gold instead of scrap (CI-2 advised them he could not); (3) asked CI-2 to refine the gold himself (CI-2 advised them it was too difficult); and (4) instructed CI-2 to keep a sample of the gold that CI-2 sent to Refinery A and to get someone independent to test it to see if Refinery A was cheating them in its valuation of the gold.

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<sup>6</sup> Prior to his/her cooperation, agents observed CI-2 drop off numerous packages at Fed Ex stores, addressed to Refinery A from, among other names, Shopping Silver. According to Fed Ex records, an individual named "Rodolfo Lopez" (which CI-2 advised was an alias used by CI-2 and his/her associates) shipped approximately 707 boxes to Refinery A between August 2011 and October 2012 (prior to his/her cooperation), almost always identifying the shipping company as "Shopping S."

f. During their visit in Spring 2012, PINEDA SANCHEZ told PARRA-PEDROZA that they had \$1 million in drug proceeds in Atlanta that were ready to be laundered. PINEDA SANCHEZ and PARRA-PEDROZA also discussed giving CI-2 \$500,000 to launder in Chicago through the purchase of scrap gold, and another \$500,000 for an individual in Los Angeles to launder in the same manner. PINEDA SANCHEZ and PARRA-PEDROZA made and took several calls during their visit in which they discussed moving money from one place to another.

g. Sometime during the summer of 2012, at PARRA-PEDROZA's direction, CI-2 collected a bag filled with drug proceeds from an unknown narcotics trafficker. As CI-2 began counting the money in the bag, he/she observed that the bag also contained one plastic bag filled with a white powdery substance that appeared to be cocaine. CI-2 refused to transport the substance that he/she believed to be cocaine, and gave the plastic bag back to the unknown drug trafficker. CI-2 also identified Herasmo Herrera as a man who had previously delivered narcotics proceeds to CI-2, and stated that Herasmo Herrera met with CI-2 only when Individual Y had narcotics proceeds to deliver.<sup>7</sup>

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<sup>7</sup> On or about September 29, 2011 – prior to CI-2's cooperation with law enforcement – surveillance observed CI-2 meet with Herasmo Herrera at the location where CI-2 used to meet with couriers to collect narcotics proceeds. Following this meeting, law enforcement performed a traffic stop of Herasmo Herrera, and in the course of this stop, discovered approximately four kilograms of cocaine in the vehicle. Law enforcement subsequently obtained a state search warrant to search Herasmo Herrera's residence, and in the course of that search, found approximately 24 kilograms of cocaine. Law enforcement also found a ledger documenting an inventory of approximately 51 kilograms of cocaine, of which approximately 20 kilograms had previously been sold. Herasmo Herrera was subsequently charged and convicted in the Circuit Court of DuPage County, Illinois, of the manufacture/delivery of cocaine, and sentenced to 16 years' imprisonment.



h. Between approximately August 2011 and October 2012, CI-2 laundered approximately \$23 million in narcotics proceeds through the purchase and shipment of scrap gold, all at the direction of PARRA-PEDROZA and his associates. CI-2 stopped working for PINEDA SANCHEZ and PARRA-PEDROZA in October 2012.

14. Soon after he began cooperating with law enforcement, CI-2 resumed working for PINEDA SANCHEZ and PARRA-PEDROZA at the direction of agents. Since the beginning of CI-2's cooperation in April 2013, and at HSI's direction, CI-2 has obtained, or arranged to obtain, drug proceeds from thirty-eight different money couriers on forty-eight separate occasions for the purpose of laundering the proceeds in an undercover operation. Prior to receiving drug proceeds from the drug traffickers and money couriers, PARRA-PEDROZA or one of his associates contacted CI-2 using a combination of voice calls, BBMs, and e-mail messages to arrange for CI-2 to pick up the proceeds, purchase gold, and ship the gold via FedEx to Refinery A. Intercepted electronic communications show that PINEDA SANCHEZ instructed PARRA-PEDROZA to arrange for several of those money-pick-ups conducted by CI-2. Unless otherwise indicated, the BBMs between CI-2 and others were viewed by agents with CI-2's consent.

## II. PARRA-PEDROZA Asks CI-2 to Resume Laundering Narcotics Proceeds (May 2013).

15. On or about May 16, 2013, CI-2 had a consensually recorded telephone call with PARRA-PEDROZA,<sup>8</sup> who was using telephone number (508) 545-3027 ("Parra-Pedroza Phone 1").<sup>9</sup> According to CI-2, PARRA-PEDROZA and CI-2 had not

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<sup>8</sup> Agents identified PARRA-PEDROZA and PARRA-PEDROZA's voice, and identified PARRA-PEDROZA as the user of a Blackberry device assigned BBM PIN: 26249D82 ("MLO Device 1") and Parra-Pedroza Phones 1 through 12, as follows: On or about June 3, 2013, CI-2 had a consensually recorded call with a man whose voice he identified as PARRA-PEDROZA based on numerous prior interactions. During this call, CI-2 gave PARRA-PEDROZA his/her Blackberry PIN so that PARRA-PEDROZA could contact CI-2 on CI-2's Blackberry device. CI-2's Blackberry device and PIN were furnished by agents for exclusive use in this investigation. According to CI-2, PARRA-PEDROZA is the only person to whom CI-2 has given his Blackberry PIN. PARRA-PEDROZA told CI-2 during this June 3 call that he had sent an invitation to CI-2's Blackberry device that would allow the two individuals to communicate with each other over BBMs. After this call, CI-2 received a BBM invitation from MLO Device 1 and CI-2 began communicating with PARRA-PEDROZA over that device until September 6, 2013. In addition, between June 14, 2013, and June 19, 2013, CI-2 exchanged numerous BBMs with the user of MLO Device 1. During these conversations, the individual using MLO Device 1, whom agents and CI-2 believed to be PARRA-PEDROZA, arranged to meet CI-2 in person in Las Vegas, Nevada, on Thursday, June 20, 2013, for the purpose of discussing CI-2's efforts in furtherance of the Parra-Pedroza MLO. On or about June 20, 2013, CI-2 exchanged a series of messages with PARRA-PEDROZA, who was using MLO Device 1. This exchange was not recorded, but it was made in the presence of law enforcement. During this exchange, CI-2 and the individual using MLO Device 1 arranged to meet later that day at the Las Vegas Premium Outlets mall located at 875 South Grand Central Parkway in Las Vegas, Nevada. Agents conducting surveillance subsequently observed CI-2 meet with a man and a woman at that outlet mall at the designated time. Agents who observed this meeting reviewed a photograph of "Carlos Parra-Pedroza" obtained from a Law Enforcement Database, and positively identified PARRA-PEDROZA as the man CI-2 met with at the Las Vegas Premium Outlets and as the user of MLO Device 1. In addition, based on prior in-person meetings that occurred prior to CI-2's cooperation with law enforcement, CI-2 identified the man whom he met on June 20 as PARRA-PEDROZA. Prior to the June 20 meeting, agents outfitted CI-2 with a concealed audio recording device. Agents have compared the audio recording of PARRA-PEDROZA's voice from this June 20, 2013, meeting (and from a subsequent meeting on March 13, 2014) to the recording of the voice of the man using Parra-Pedroza Phones 1 through 12 and, based on that comparison, concluded that PARRA-PEDROZA is the user of Parra-Pedroza Phones 1 through 12.

<sup>9</sup> Some of the consensually recorded conversations (hereinafter "recorded conversations") have been summarized in this Affidavit. The language that is quoted from the recorded conversations throughout this Affidavit is based upon a preliminary review of

spoken since October 2012, when CI-2 had stopped working for PARRA-PEDROZA.

During this call:

a. PARRA-PEDROZA stated, "What a miracle!" CI-2 stated, "Well, you get lost." PARRA-PEDROZA replied, "No way, well, you turned both phones off [CI-2 disconnected two phones that PARRA-PEDROZA had previously used to contact CI-2]." CI-2 stated, "Well, yeah, when I went to go get them connected. They didn't want to connect them, man. I mean the same number. . . . I don't know how to call you anymore."

b. PARRA-PEDROZA stated, "Yeah, no, man, we [PINEDA SANCHEZ and PARRA-PEDROZA] are already here. What's up? What is there to do?" CI-2 responded, "No, well, we are ready [to collect and launder narcotics proceeds for the Parra-Pedroza MLO]. Is there something to do or not?" PARRA-PEDROZA stated, "Fuck! They are working my ass off. . . . They [PINEDA-SANCHEZ, money laundering associates, and narcotics traffickers] call me daily to see if it's [money laundering] going to happen, if it's going to happen, if it's going to happen."

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the recorded conversations, and not on final transcripts of the recorded conversations. The times listed for the recorded conversations are approximate. The summaries do not include all statements or topics covered during the course of the recorded conversations. At various points in the Affidavit I have included in brackets my interpretation of words and phrases used in the recorded conversations. My interpretations are based on information received from CI-2, the contents and context of the recorded conversations, events occurring before and after the conversations, my knowledge of the investigation as a whole, my experience and training, and the experience and training of other law enforcement agents in this investigation. Some of the recorded conversations contained herein are in the Spanish language. For these conversations, I have relied on draft – not final – English translations of conversations in Spanish done by HSI agents and/or interpreters contracted by HSI.

c. CI-2 stated, "How are you going to do it? I have a guy that, that just has the fine one [gold]." PARRA-PEDROZA responded, "Oh! Those are good." CI-2 stated, "Okay, but he also wants his cut." PARRA-PEDROZA asked, "How much?" CI-2 responded, "Well, he also wants two [percent]." PARRA-PEDROZA asked, "Two? . . . Wow." CI-2 stated, "But he guarantees that he will get me the fine stuff [fine gold, 24 karat], the fine stuff." PARRA-PEDROZA stated, "Well, um, but it's [a two percent fee is] a lot, man. . . . The thing is that it is a lot."

d. CI-2 asked, "What is the most that you would give me for the fine stuff [fine gold]? . . . Getting you just fine stuff. The thing is, look, with the thing with the pieces [scrap gold], it won't come out if it's dirty [scrap gold has impurities that diminish the value to refiners, like Refinery A]. It's the truth, it's the truth, it's the truth." PARRA-PEDROZA responded, "Yeah, no, it's, it's fucked up that way. But, well . . . . How much, how much you are going to buy the fine on? . . . At what price?" CI-2 responded, "At spot [current market value of gold]." PARRA-PEDROZA stated, "Spot. The thing is there, we are putting one percent there [Refinery A takes a one percent fee]. . . . In other words, you are selling it to me at three percent over [the current market value] because the refinery [Refinery A] buys it from me at one under [under the current market value]." CI-2 stated, "[H]ow much would be the most? So I can talk to him [CI-2's putative gold supplier] tomorrow." PARRA-PEDROZA responded, "Well, offer him one [percent]."

e. CI-2 stated, "Okay and what about me [CI-2's payment for laundering money for the Parra-Pedroza MLO]?" PARRA-PEDROZA asked, "Well,

what about another one [percent]?" . . . It's [gold purchased with narcotics proceeds is] going to be all fine stuff?" CI-2 responded, "It's not going to be enough. It's not going to be enough. One and one is not enough." PARRA-PEDROZA asked, "How much do you want? One and one is two [percent]. How much, how much does it come out to? . . . How much, how much, how much or, or just two [percent], and just offer him one [percent]. You are going to come out clean. You are not going to, you are not going to do anything [CI-2 will no longer have to go store-to-store to purchase scrap gold]." CI-2 stated, "Well, no, but I also have to make some moves [CI-2 will have to collect narcotics proceeds from drug traffickers and money couriers]." PARRA-PEDROZA said, "So then put two [percent for CI-2] and one for him [CI-2's putative gold supplier]. My total is going to be four [percent in fees] because the refinery [Refinery A] takes one from me."

f. CI-2 stated, "Okay, okay, and then there's something else. How should we do it with the cousins [drug traffickers and money couriers who deliver narcotics proceeds to CI-2]? . . . Uh, the problem is the cousins. How should we do it?" PARRA-PEDROZA asked, "Why? You can't receive them [collect narcotics proceeds from them]? . . . I think that we are going to have to find a way. In other words, for you to see them today in, I don't know, at a place." CI-2 stated, "Well, the problem, I could pick them [narcotics proceeds] up on the street. The problem is that they won't turn out exact [drug traffickers and money couriers may deliver less money than promised if CI-2 collects the narcotics proceeds in public spaces because CI-2 would not have any way to count the money before the drug traffickers and

money couriers leave]. That is the problem." PARRA-PEDROZA stated, "No, but they are just going to be, they are just going to be, they are just going to be small ones [small amounts of narcotics proceeds]. Alright, they are going to be all fifty [deliveries of \$50,000] more or less. I think we are going to start with fifty, fifty, fifty, and fifty. Then, um, I will try to find a way to, to, to take care of that thing somehow."

g. CI-2 stated, "So, that's the problem. Then, just, they can give it [narcotics proceeds] to me later and they say they will give me fifty pesos [\$50,000] and they only end up giving me forty-nine [\$49,000]." PARRA-PEDROZA stated, "Yeah, uh, um, what are we going to do? What are we going to do? Alright, . . . well, let me, let me see how I, I organize that so that it's also one day you see them here, one day you see them over there, and another day you will see them somewhere else."

h. CI-2 stated, "The other thing, the other thing is uh, well, I need an advance to, to open up the office [money to set up a place where CI-2 can collect the narcotics proceeds]. About ten [\$10,000], fifteen pesos [\$15,000]. Well, I would need to get the place first, a week or two weeks, while I look for the place. I'll look for the place in a week or two weeks. And then I would need to provide the deposit for the house, the deposit a month's rent, a month for the deposit, and buy stuff to measure [money counter], and buy all the shit. Otherwise, how am I going to work right now?" PARRA-PEDROZA stated, "Yeah, well, not even that, you know, because it's [the narcotics proceeds delivered] almost going to be for fifty [\$50,000]."

i. CI-2 stated, "No, it's not going to be enough [CI-2 wants to receive more than \$50,000 in narcotics proceeds at a time]." PARRA-PEDROZA laughed and stated, "No, but they [narcotics traffickers in Mexico] don't want to give any more [than \$50,000 in narcotics proceeds at a time]. The thing is, they will give me whatever I want. But I have to pay them here right, right before they arrive here with you [PARRA-PEDROZA will have to give Mexican drug traffickers their narcotics proceeds before CI-2 even receives the money]. . . . So fifty [\$50,000] daily, daily, daily. . . . They are going to open up [increase the amounts of narcotics proceeds delivered] on their own. They will begin to trust [PARRA-PEDROZA and CI-2] on their own. Later they are going to tell me, 'Look, I'm going to bring you a hundred [\$100,000], man.' On their own, I already know that."

j. CI-2 stated, "I'll go and get you the phone number for these guys [drug traffickers] and to see if, if, if you send me that, ten [\$10,000] or fifteen pesos [\$15,000] to get everything." PARRA-PEDROZA stated, "Alright, that's fine." CI-2 stated, "And I won't start moving [picking up narcotics proceeds and buying gold] until I get that [\$10,000 to \$15,000] because I don't have anything to start moving with." PARRA-PEDROZA stated, "Alright." CI-2 stated, "Call me on Saturday either way, so I can tell you about this guy [CI-2's gold supplier]. We'll see what we agree on with this, with this guy. . . . So then three [percent], three right? . . . Two and one [a two percent fee for CI-2 and a one percent fee for CI-2's gold supplier]?" PARRA-PEDROZA stated, "Yeah, yeah. . . . Two and one." PARRA-PEDROZA and CI-2 then agreed to talk again later.

16. Based on subsequent consensually-recorded conversations between PARRA-PEDROZA and CI-2, subsequent controlled collections of proceeds from various individuals by CI-2 at the direction of PINEDA SANCHEZ and PARRA-PEDROZA, my knowledge of this investigation as a whole, and my training and experience as a Special Agent, I believe that, during the aforementioned conversation, PARRA-PEDROZA (a) expressed surprise at hearing from CI-2 because it had been several months since the two had last spoken to each other; (b) stated that he and PINEDA SANCHEZ continued to launder narcotics proceeds for Mexican drug traffickers on a regular basis; (c) asked CI-2 to resume buying gold for the Parra-Pedroza MLO with narcotics proceeds; (d) accepted CI-2's proposal to use the narcotics proceeds to purchase fine gold, rather than scrap; (e) advised that Refinery A kept one percent of the current market value of the gold that members of the Parra-Pedroza MLO shipped to the company on the PARRA-PEDROZA's behalf; (f) agreed to pay CI-2 and CI-2's putative fine gold supplier two percent and one percent, respectively, of the current market value of the fine gold for their work on behalf of the Parra-Pedroza MLO; (g) discussed concerns about drug traffickers and money couriers shorting CI-2 on their money deliveries if CI-2 was forced to collect the money in a public place where CI-2 could not immediately count the money; and (h) explained that CI-2 would begin with daily collections of \$50,000 in narcotics proceeds and that the amount of the collections would increase over time as the drug traffickers began to trust CI-2.



### III. PINEDA SANCHEZ Calls CI-2 to Discuss the Money Laundering Operation (May 23, 2013).

17. On or about May 23, 2013, at approximately 10:40 a.m., CI-2 received a call from PINEDA SANCHEZ,<sup>10</sup> who was using telephone number (508) 545-3022 ("Pineda Sanchez Phone 1"). This call was not recorded, but it was verified by toll records for CI-2's phone. According to CI-2, during this call:

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<sup>10</sup> Agents identified PINEDA SANCHEZ and PINEDA SANCHEZ's voice, and identified PINEDA SANCHEZ as the user of Target Devices 6 and 7 and Pineda Sanchez Phone 1, as follows: According to CI-2, prior to his/her cooperation with law enforcement, CI-2 met with an individual known to CI-2 as "Diego" in 2012, when PARRA-PEDROZA and Diego traveled to Chicago, by way of Los Angeles, to discuss the PARRA-PEDROZA MLO with CI-2. According to Customs and Border Patrol records, on August 7, 2012, PINEDA SANCHEZ and PARRA-PEDROZA entered the United States at Los Angeles on the same flight from Guadalajara, Mexico, and on August 11, 2012, departed the United States from Chicago Midway airport on the same flight to Mexico. CI-2 recognized the voice of the user of Pineda Sanchez Phone 1 as the same "Diego" that he met in 2012. On March 26, 2014, agents showed CI-2 a photograph of PINEDA SANCHEZ that was taken when PINEDA entered the United States in August of 2012. CI-2 identified PINEDA as the individual who accompanied PARRA-PEDROZA to Chicago. On July 12, 2013, CI-2 had a consensually recorded telephone call with telephone number 52 (333) 902-9794. During that conversation, CI-2 recognized the voice to be same as "Diego," with who he/she met in Chicago. According to Blackberry Subscriber Records, telephone number 52 (333) 902-9794, is assigned Blackberry PIN 233D184B (Target Device 6). During an in-person meet in March 2014 in Las Vegas, Nevada between CI-2 and PARRA-PEDROZA, PARRA-PEDROZA told CI-2 that they also refer to PINEDA as "BOTAS," which in Spanish means "boots." On March 25, 2014, agents intercepted incoming Blackberry Messages over PIN: 233D184B (Target Device 6) bearing the screen name: "Boot.s" from MARIA LOERA ALVARADO, who was using Target Device 9, during which LOERA ALVARADO referred to Boot.s as "Diego." Based on the above information agents believe PINEDA SANCHEZ to be the user of Blackberry Pin: 233D184B (Target Device 6). On March 27, 2014 [TD6 Session ##33874- 910], PINEDA SANCHEZ, who was using Target Device 6, exchanged a series of Blackberry messages with LOERA-ALVARADO, who was using Target Device 9. During the exchange, PINEDA SANCHEZ stated, "It's because I'm [PINEDA] going to delete [stop using] this one [Target Device 6]. . . . Once you accept [BBM invitation from Target Device 7], I can delete you [delete Target Device 9 from Target Device 6]. . . . My new [Blackberry] pin is 26F13A1B [Target Device 7]." Target Device 7 bears the screen name "Botas" and "Boots," and the user of Target Device 7 was referred and responded to the name "Diego" in numerous messages.

a. PINEDA SANCHEZ referred to himself as "Carlos' partner." During this call, PINEDA SANCHEZ stated that PARRA-PEDROZA was out of town and asked if CI-2 was ready to start working, meaning resume purchasing gold with narcotics proceeds. PINEDA SANCHEZ and CI-2 discussed the risks involved when CI-2 picked up money from couriers on the street and how couriers in the past often brought less money than what PINEDA SANCHEZ and PARRA-PEDROZA expected. PINEDA SANCHEZ assured CI-2 that CI-2 would not be held responsible for these shortfalls if CI-2 picked money up off the street, but suggested that CI-2 find a place where the couriers could deliver the money so that CI-2 could count it in their presence.

b. PINEDA SANCHEZ also asked CI-2 about the gold stores that CI-2 used to buy scrap gold from. CI-2 told PINEDA SANCHEZ that he/she never had a problem with the gold stores, and that CI-2's problems were always with the money couriers. CI-2 told PINEDA SANCHEZ that CI-2 would not be buying scrap gold anymore and that CI-2 had a friend who could get fine gold bars. PINEDA SANCHEZ stated that he liked the idea of dealing with fine gold. PINEDA SANCHEZ said that he and PARRA-PEDROZA were waiting for money and that they would soon be sending CI-2 to pick up \$50,000 a day for a few days. PINEDA SANCHEZ told CI-2 that he or PARRA-PEDROZA would call CI-2 again soon.

**IV. PARRA-PEDROZA Directs CI-2 to Collect and Launder Approximately \$53,475 in Narcotics Proceeds (June 2, 2013).**

18. On or about May 21, 2013, CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using telephone number (508) 545-3026 ("Parra-

Pedroza Phone 2"). During the call, CI-2 stated, "I need to make an email. I need to make an email and everything, man. And grab the computer and everything to send you [an email address] where you are going to send mine [prepaid Fed Ex labels that CI-2 can use to ship gold purchased with narcotics proceeds to Refinery A]." PARRA-PEDROZA stated, "Listen, make an email that has to do with gold. So, I can send it directly to the refinery [Refinery A]. . . . I mean, just make one that says, I don't know, 'Gold Illinois.' And I will send it [CI-2's email address] directly to the refinery, so they can see mine [PARRA-PEDROZA's email address, which would serve to vouch for CI-2] directly." CI-2 stated, "Okay, well, that's what I tell you. Let me start working on the email. I'll start working on everything. I'll grab a computer. I'll get everything, so I can be ready." PARRA-PEDROZA stated, "Yeah, look for a name, a name similar to, to gold [create an email name with the word "gold" in it]."

19. On or about May 31, 2013, at approximately 6:05 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 1. During this call:

a. PARRA-PEDROZA asked, "Listen, tomorrow we have to go [collect narcotics proceeds]. . . . It's going to be, where the, Indiana." CI-2 asked, I can't do it Monday [June 3, 2013]?" PARRA-PEDROZA responded, "Oh, no, no. It's only fifty pesos [\$50,000]. . . . What about Sunday [June 2, 2013]? . . . Uh, is Indiana far? . . . Let me, let me tell them [Mexican drug traffickers] that on Monday [CI-2 will receive the narcotic proceeds]."

b. CI-2 stated, "On Monday, he [UM 5285, the money courier] should tell me, or he should tell you where he is at. . . . He's not that far. . . . Early on Monday. . . . I hope I have enough time to move [to meet with the money courier to receive the narcotics proceeds]." PARRA-PEDROZA stated, "Yeah, this way we'll see if that same [day], we'll send off a package [of gold to Refinery A], don't you think?" PARRA-PEDROZA and CI-2 agreed to speak again later.

20. On or about May 31, 2013, at approximately 6:10 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using telephone number (508) 545-3029 ("Parra-Pedroza Phone 3"). During this call, CI-2 asked, "Well, hey, where to [pickup narcotics proceeds]?" PARRA-PEDROZA responded, "Listen, uh, well, uh, it is Indianapolis."

21. On or about May 31, 2013, at approximately 6:19 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using telephone number (508) 545-3023 ("Parra-Pedroza Phone 4"). During this call, PARRA-PEDROZA stated, "I told them [money courier] to call you after eight [p.m.] today, so you guys can come to an agreement. But that yeah, Sunday [June 2, 2013] is fine [to receive the narcotics proceeds]."

22. On or about May 31, 2013, at approximately 6:22 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 4. During this call, PARRA-PEDROZA stated, "[T]hey [UM 5285, the money courier] are going to ask you for Daniel [code name that money courier will use to ensure CI-2's trustworthiness]. You are Daniel now." CI-2 responded, "Okay."

23. On or about June 1, 2013, at approximately 9:50 a.m., CI-2 had a consensually recorded call with an unidentified man ("UM 5285"), who was using UM 5285 Phone 1. This call was not recorded, but it was verified by toll records from CI-2's phone. According to CI-2, during this call, UM 5285 asked for "Daniel" and CI-2 stated that he/she could not talk at the moment but would call UM 5285 back shortly.

24. On or about June 1, 2013, at approximately 9:51 a.m., CI-2 had a consensually recorded call with UM 5285, who was using UM 5285 Phone 1. During this call:

a. UM 5285 stated, "They [UM 5285's associate in Mexico] told me the cable. . . . Did they [PARRA-PEDROZA], did they tell you that I was going to deliver some postcards [narcotics proceeds] to you?" CI-2 replied, "Uh, yeah, but, they [PARRA-PEDROZA] told me for tomorrow." UM 5285 stated, "Oh, okay. Just so were on the same page."

b. CI-2 asked, "[W]here is it going to be [the delivery of the narcotics proceeds]?" UM 5285 responded, "[W]ell, I'm over here towards, over here towards the chicken [Kentucky]. Towards Kentucky." CI-2 stated, "Oh, they [PARRA-PEDROZA] had told me that it [the meeting] was over here by, the cousin said that it was over here by Indianapolis." UM 5285 stated, "If you want, let me ask my dad [UM 5285's boss in Mexico] what the deal is and then I will call you. And if you want to ask him [PARRA-PEDROZA] too, go ahead and ask him." UM 5285 and CI-2 agreed to talk again later.

25. On or about June 1, 2013, at approximately 1:06 p.m., CI-2 had a consensually recorded call with UM 5285, who was using UM 5285 Phone 1. During this call, UM 5285 stated, "It is going to be like you think. We are going to have to meet with the, with the Indian girl [Indianapolis]. . . . In the, in the big city [Indianapolis], halfway [between Chicago and Kentucky]." UM 5285 and CI-2 then agreed to meet the next day and to talk again later.

26. On or about June 2, 2013, between approximately 11:10 a.m. and 1:57 p.m., CI-2 had a series of consensually recorded calls with UM 5285, who was using UM 5285 Phone. During these calls, UM 5285 and CI-2 agreed to meet each other at an exit immediately off Interstate 65 in Indianapolis. During an unrecorded call made after CS-1 arrived in Indianapolis, according to CI-2, UM 5285 and CI-2 arranged to meet at approximately 3:30 p.m. in the parking lot of a Wal-Mart Supercenter located at 4545 Lafayette Road in Indianapolis.

27. On or about June 2, 2013, at approximately 3:27 p.m., CI-2 met with UM 5285 at the Wal-Mart Supercenter parking lot located at 4545 Lafayette Road in Indianapolis. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, and found none. CI-2 traveled under constant surveillance from a staging location to the meeting. During this meeting, surveillance observed an unidentified male carrying a white FedEx shipping package in his hand meet and talk with CI-2. The unidentified male entered the backseat of CI-2's vehicle with the white FedEx shipping package and then exited CI-2's vehicle empty handed.

The unidentified male then walked to his vehicle retrieved a small, black pocketbook and returned to the backseat of CI-2's vehicle. According to CI-2, the unidentified man placed additional money onto the white shipping package that he had earlier placed on the floor of the vehicle.

28. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved a white shipping package and cash totaling approximately \$53,475 from CI-2's vehicle. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

29. On or about June 2, 2013, at approximately 8:14 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using telephone number (508) 545-3025 ("Parra-Pedroza Phone 5"). During this call, PARRA-PEDROZA asked, "Oh, you haven't verified it [counted the narcotics proceeds delivered by UM 5285] yet?" CI-2 responded, "No, I rushed over here and I arrived, it's secured over there. Everything [narcotics proceeds] is at the house. I'm already, I'm already here."

30. At approximately 10:30 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using telephone number (333) 146-1711 ("Parra-Pedroza Phone 6"). During the call, PARRA-PEDROZA asked, "How much [money] was it?" CI-2 responded, "Five, three, four, seventy-five [\$53,475]." PARRA-PEDROZA confirmed, "Hold on. Five, three, four, seven, five [\$53,475]."

31. On June 3, 2013, at approximately 11:22 a.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using telephone number (508) 545-3021 ("Parra-Pedroza Phone 7"). During this call:

a. PARRA-PEDROZA asked, "I was just going to ask you to send that [gold]. Let's see if we can try to send it today, don't you think?" CI-2 responded, "I think so. As long as, as long as I get everything. I already called this guy [CI-2's putative gold supplier] and he said he would let me know later if he could deliver [the gold] to me today." PARRA-PEDROZA responded, "Alright."

b. CI-2 stated, "The other cousin [VALENTIN RODRIGUEZ, a different drug trafficker/money courier with whom PARRA-PEDROZA had put CI-2 in contact, see below] already called me. The other cousin already called me, too. Okay, and I already agreed to meet the one from around here later. Well, I told him I would call him later to see, so we could agree on something and see what happens." PARRA-PEDROZA responded, "I'm saying, we should, we should get yesterday's [gold purchased with narcotics proceeds from UM 5285] out first [shipped to Refinery A], so it [narcotics proceeds] doesn't pile up on us." CI-2 stated, "Okay, so that it doesn't pile up. Okay, so then call me later so, better yet, I also have to create an email so I can send it to you and you can send me the guides [prepaid FedEx labels]." PARRA-PEDROZA stated, "Alright, that's fine."

32. On June 3, 2013, at approximately 1:09 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using telephone number (508) 545-3020 ("Parra-Pedroza Phone 8"). During this call, PARRA-PEDROZA asked, "Will



you be able to send the package [FedEx Box containing the gold]?" CI-2 responded, "Let me see if I am able to pay, uh, that guy [CI-2's gold supplier] hasn't let me know if he will bring me that [gold] today or not." PARRA-PEDROZA stated, "Alright, help me out, help me out so we can start [laundering money] well."

33. On or about June 4, 2013, agents gave CI-2 an undercover email address that was created and controlled by agents and included the name "Chicago Gold" ("UC Email Address"). The UC Email Address is monitored by agents. CI-2 does not have access to the UC Email Address. Agents directed CI-2 to give UC Email Address to PARRA-PEDROZA. Later that day, CI-2 sent the UC Email Address to PARRA-PEDROZA in a BBM message. This message was not recorded, but the CI sent it in the presence of law enforcement.

34. On or about June 4, 2013, at approximately 1:25 p.m., the UC Email Account received an email from email account Cheabelito\_mp@hotmail.com ("Abel Email Account 1"), which is subscribed to JOSE ABEL MENDOZA-PARRA ("ABEL").<sup>11</sup> This email was entitled, "Fwd: RV: [Refinery A] – FedEx Labels &

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<sup>11</sup> Agents identified JOSE ABEL MENDOZA-PARRA as follows: According to subscriber records, Abel Email Account 1 is registered to "Jose Abel Mendoza" in Jalisco, Mexico. As discussed below, this June 4, 2013, email forwarded an email from Refinery A that had previously been sent to joseabel@britishmetal.com.mx ("Abel Email Account 2") which is registered to "Jose Abel" and includes in its address the name "joseabel" and the name of Parra-Pedroza's business ("britishmetal"). On or about September 6, 2013, PARRA-PEDROZA sent CI-2 a BBM message over MLO Device 1, advising CI-2 that he planned to give MLO Device 1 to his nephew, ABEL. PARRA-PEDROZA stated, "I'm not going to have my cell [MLO Device 1], it's going to be with my nephew. . . . But he knows how to close [coordinate money laundering shipments] and everything." According to CI-2, prior to his/her cooperation with law enforcement, CI-2 had worked with PARRA-PEDROZA's nephew named "Abel" to conduct the money laundering conduct scheme when PARRA-PEDROZA was unavailable. On or about September 9, 2013, CI-2 sent a BBM message to MLO Device 1, asking, "Is this Willy [PARRA-PEDROZA]?" When the user of

Packing List.” Prior to reaching the UC Email Account, this email had been forwarded to two other email accounts, including carlos140280@hotmail.com (“Parra-Pedroza Email Account 1”)<sup>12</sup> and joseabel@britishmetal.com.mx (“Abel Email Account 2”). The email included two attachments, including ten prepaid FedEx labels addressed to Refinery A and a Refinery A shipping form called a packing list. The body of the email stated, “We were requested by phone for a FedEx labels. We have it attached in this e mail along with a [Refinery A] packing list . . . . Thank you for choosing [Refinery A]!”

35. On or about June 4, 2013, CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 1. During this call, CI-2 stated, “Whatever [gold] arrives [in Chicago from CI-2’s gold supplier] is what will arrive over there [Refinery A]. And I already told this guy [CI-2’s gold supplier], as soon I close [agree upon the market value of the gold with the gold supplier], I will call over there [Mexico] and close [agree upon the current market value of the gold with PARRA-PEDROZA]. . . . I don’t want to take a chance [on losing any money

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MLO Device 1 responded, “No,” CI-2 stated, “Abel.” In response, the user of MLO Device 1 responded, “Call me Robin hahaha. Better.” In a U.S. Visa application for a trip to the United States in December 2004, ABEL listed Individual R as his cousin. In March 2014, surveillance observed PARRA-PEDROZA and Individual R meet with CI-2 in Las Vegas. During this meeting, PARRA-PEDROZA introduced Individual R to CI-2 as his niece. Accordingly, agents determined that ABEL is PARRA-PEDROZA’s nephew. In addition, during a September 2014 interview with agents, PARRA-PEDROZA identified a photograph from ABEL’s Facebook page as his nephew “Abel” and stated that ABEL worked with him to launder narcotics proceeds. Agents compared that Facebook page photo to the photograph of ABEL in his December 2004 Visa application, and determined that the photos depicted the same man.

<sup>12</sup> Parra-Pedroza Email Account 1 is registered to “Carlos Alberto Parra-Pedroza” in Jalisco, Mexico

due to a decline in the value of gold]. . . . I already closed [agreed upon the market value of the gold] with him [CI-2's gold supplier] right now. But yesterday, I couldn't close [agree upon the current market value of the gold with PARRA-PEDROZA]. When I closed, I said, 'I already closed with him [CI-2's gold supplier] at four, thirteen right now. At a thousand four hundred thirteen [set the current fair market value of the gold at \$1,413 per ounce of 24 Karat gold]. . . . I lost [money] over there [in purchasing gold at a higher price than what Refinery A would buy it]. But I said, 'Well, it's the first day [purchasing gold].' But then for next time, I'll tell you, as soon as I close with him [CI-2's gold supplier], I have to, I mean, as soon as I receive [purchase the gold with narcotics proceeds], I'll close with him [CI-2's gold supplier] and I'll close with you"<sup>13</sup> PARRA-PEDROZA asked, "We won't be able to deliver [the gold to Refinery A] until the day after [the gold was purchased]? . . . Let me see if it [market value of gold] will go up a little tomorrow. I'm keeping an eye on it [market value on gold] either way."

36. On or about June 5, 2013, using one of the shipping labels forwarded in the June 4 email, agents sent to Refinery A approximately 808.6 grams of 24-Karat gold, which agents had purchased with approximately \$37,642 of the proceeds obtained from UM 5285. Agents also enclosed in this shipment the Refinery A

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<sup>13</sup> According to CI-2, soon after CI-2 began working for PARRA-PEDROZA – and prior to CI-2's cooperation with law enforcement – PARRA-PEDROZA instructed CI-2 that each time he/she purchased gold, CI-2 was to contact PARRA-PEDROZA or one of his associates and let that person know the amount and price of the gold that CI-2 purchased, so that PARRA-PEDROZA or one of his associates could record it. This was called "closing." According to CI-2, PARRA-PEDROZA told CI-2 that he/she needed to close with him by providing a specific value for the gold based on current market prices, and that once CI-2 gave him that closing value, he would contact Refinery A to lock in to that same market rate.

packing list that had been attached to the June 4 email. The packing list identified the shipping company as "Chicago Gold" and described the contents of the box as 808.6 grams of 24-karat gold. According to FedEx records, this shipment arrived at Refinery A on June 6, 2013.

**V. PINEDA SANCHEZ and PARRA-PEDROZA Direct CI-2 to Collect and Launder Approximately \$110,000 in Narcotics Proceeds from RODRIGUEZ (June 5, 2013).**

37. On or about June 2, 2013, at approximately 10:30 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 6. During the call, PARRA-PEDROZA stated, "Yeah, I'll call you early tomorrow. They [another money courier] want to take you some [deliver narcotics proceeds] tomorrow from that same place where you are at [Chicago]. . . . They are going to call you and tell you that it's on behalf of Botas [PINEDA SANCHEZ]." CI-2 replied, "Okay."

38. On or about June 3, 2013, at approximately 7:58 a.m., CI-2 had a call with VALENTIN RODRIGUEZ, who was using telephone number (630) 697-5298 ("Rodriguez Phone 1").<sup>14</sup> This call was not recorded, but it was verified by toll

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<sup>14</sup> Agents identified RODRIGUEZ and RODRIGUEZ's voice as follows: As discussed below, between June 3 and 5, 2013, CI-2 had numerous consensually recorded calls with the user of Rodriguez Phone 1. During these calls, the user of Rodriguez Phone 1 arranged to meet CI-2 in person at the Home Depot located at a Home Depot located at 12000 S. Cicero Avenue in Alsip, Illinois, at approximately 11:34 a.m. on June 5, 2013, for the purpose of delivering narcotics cash proceeds. Similarly, the user of telephone number (630) 865-7710 ("Rodriguez Phone 2") arranged in a series of unrecorded calls to meet CI-2 for the same reason at the same Home Depot at approximately 5:19 p.m. on June 10, 2013. CI-2 recognized the voice of the user of Rodriguez Phone 2 to be the same man with whom he met on June 5 and 10, 2013. Following these phone calls, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance of both meetings subsequently viewed a February 18, 2010, CPD arrest

records. According to CI-2, during the call, RODRIGUEZ told CI-2 that he had "100 tickets [\$100,000]" for CI-2 and that the "tickets" belonged to "Botas [PINEDA SANCHEZ]." RODRIGUEZ stated that he was told to give CI-2 "50 tickets [\$50,000] today" and "another 50 tickets [\$50,000] on Tuesday [June 4, 2013]." RODRIGUEZ and CI-2 agreed that it made more sense to only meet once. RODRIGUEZ told CI-2 that he was located near the intersection of 167th Street and Interstate 57 and preferred to meet around that area. CI-2 and RODRIGUEZ agreed to speak again later.

39. On or about June 3, 2013, at approximately 2:47 p.m., CI-2 had a consensually recorded call with RODRIGUEZ, who was using Rodriguez Phone 1. During the call, CI-2 stated, "I'm going to go over by [meet] you on Wednesday. You are going to give me the hundred tickets [\$100,000] or how many?" RODRIGUEZ responded, "Well, yeah, that's what I was . . . ." CI-2 stated, "Yeah, so we can avoid the bag, the bag for fifty, fifty [an initial delivery for \$50,000 and then a second delivery for \$50,000]. Then you just report that, and you report the hundred [tell associates in Mexico that CI-2 collected \$100,000]." RODRIGUEZ responded, "Okay." RODRIGUEZ and CI-2 then agreed to talk again later.

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photograph of "Valentin Rodriguez," and positively identified RODRIGUEZ as the individual who delivered narcotics proceeds to CI-2 on June 5, and again on June 10, 2013. In addition, prior to the June 5 and June 10 meetings, agents outfitted CI-2 with a concealed audio recording device, which captured RODRIGUEZ's voice. After reviewing the recordings of the June 5 and 10 meetings, agents compared the voice of the man with whom CI-2 met to the voice of the man who was Rodriguez Phone 1, in numerous, consensually recorded calls with CI-2, and determined that RODRIGUEZ was the user of Rodriguez Phone 1.

40. On or about June 4, 2013, at approximately 2:42 p.m., CI-2 had a consensually recorded call with RODRIGUEZ, who was using Rodriguez Phone 1. During the call, CI-2 stated, "Hey, Primo. I'll give you a call tomorrow when I'm on my way to go pick up the tickets [narcotics proceeds]." RODRIGUEZ responded, "All right. That's fine." CI-2 stated, "Around eleven [11:00 a.m.], twelve [12:00 p.m.], we will meet close to your ranch [RODRIGUEZ's home]. Okay?" RODRIGUEZ responded, "Alright."

41. On or about June 4, 2013, at approximately 6:15 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 1. During the call, PARRA-PEDROZA asked, "Well, they [Refinery A] are going to pay me on Friday [June 7, 2013]. But then tomorrow [collection of narcotics proceeds from RODRIGUEZ] is a sure thing, right?" CI-2 replied, "Yeah, tomorrow is a sure thing. I'll go and meet with the other primo [RODRIGUEZ] tomorrow. And then on, what is it? Tomorrow is Wednesday. I'll set you up again on Friday [send more gold to Refinery A on Friday June 7, 2013]." PARRA-PEDROZA stated, "Right now they [RODRIGUEZ and associates] are going to bring us a hundred, a hundred and fifty [between \$100,000 and \$150,000], I think."

42. On or about June 5, 2013, at approximately 10:02 a.m., CI-2 had a consensually recorded call with RODRIGUEZ, who was using Rodriguez Phone 1. During this calls, CI-2 stated, "I'll be there in about an hour. . . . When I'm close, I'll give you a call from where I'm at, when I am close." RODRIGUEZ said, "Sounds good, sounds good."

43. On or about June 5, 2013, between approximately 11:10 a.m. and 11:34 a.m., CI-2 had a series of calls with RODRIGUEZ, who was using Rodriguez Phone 1. CI-2's half of the conversations were monitored by agents and recorded. During these calls, CI-2 and RODRIGUEZ agreed to meet at approximately 11:34 a.m. in the parking lot of a Home Depot located at 12000 S. Cicero Avenue in Alsip.

44. On or about June 5, 2013, at approximately 11:34 a.m., CI-2 and RODRIGUEZ met in the parking lot of the Home Depot located at 12000 S. Cicero Avenue in Alsip. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, finding only \$98. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance agents also video recorded the meeting. Surveillance observed RODRIGUEZ arrive in Rodriguez Vehicle 1, park next to CI-2's vehicle, exit his car, retrieve a Modelo beer box from his car, and hand the box to CI-2, who placed the box into the back of his/her vehicle. During this meeting:

a. RODRIGUEZ stated, "What a miracle! You do remember me [from a prior delivery of narcotics proceeds, prior to CI-2's cooperation], right?" CI-2 responded, "Yeah. If I would have known [it was someone with whom CI-2 had previously met], I would have told you to go over there [CI-2's former office]. But you don't want me to go to the office." RODRIGUEZ asked, "Are you still at the same place [office]?" CI-2 stated, "No, somewhere else."

b. RODRIGUEZ stated, "Well, they told me that something had happened there [at CI-2's office]. Is it true?" CI-2 responded, "That's why we moved over there." RODRIGUEZ stated, "Yeah, you need to be calm [discrete, to avoid the attention of law enforcement]. Do you want us to go into the store [Home Depot] for a bit [to avoid the detection of law enforcement]?" CI-2 responded, "No, this is fine here. People keep taking stuff up. That's why I parked here." RODRIGUEZ stated, "That's good, that's good."

c. CI-2 asked, "They didn't tell you who's it was [the owner of the narcotics proceeds]? They had told me it was from Botas [PINEDA SANCHEZ]." RODRIGUEZ responded, "Botas? He [RODRIGUEZ's associate] didn't tell me. You're Daniel [CI-2's codename, provided by PARRA-PEDROZA], right?" CI-2 responded, "Yeah." RODRIGUEZ stated, "Yeah, no, no, the thing is, they just told me to call you Daniel. The good thing is that we already know each other." CI-2 responded, "Yeah. That's the good thing. Then when you see each other there's more trust."

d. RODRIGUEZ stated, "Look, you know what we are going to do? Let's go to the Seven-Eleven [a nearby convenience store, to hand over the narcotics proceeds]." CI-2 responded, "Just give it [narcotics proceeds] to me here right away. I have to leave already." RODRIGUEZ stated, "There's an asshole [law enforcement agent] there." CI-2 asked, "Where?" RODRIGUEZ replied, "The one in the black car. He's just looking over here. Look, let's go there. We'll buy the beers there



[deliver the narcotics proceeds]. Or let's at least go to the gym [a nearby L.A. Fitness]. So they don't see us." CI-2 stated, "Just give it to me here. Don't worry."

e. CI-2 asked, "There are a hundred pesos [\$100,000] in here, right?" RODRIGUEZ responded, "Yeah. Yeah, a hundred and ten [\$110,000]." CI-2 stated, "A hundred and ten [\$110,000]?" RODRIGUEZ responded, "Yeah." CI-2 stated, "Okay. You set it up well [the money is well hidden inside the beer box]. You can't see it in that thing." RODRIGUEZ responded, "Yeah, no, it's a twenty-four pack [24-pack Modelo beer box]."

45. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved a Modelo beer box containing approximately \$110,000 in cash from CI-2's vehicle. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

46. On or about June 5, 2013, between approximately 11:58 a.m. and 12:00 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using BBM PIN: 26249D82 ("MLO Device 1"). Following this exchange, agents reviewed the exchange and documented several of the messages. During this exchange, CI-2 stated, "I just fixed the primo [CI-2 received narcotics proceeds from RODRIGUEZ]." PARRA-PEDROZA asked, "How much [money was delivered]?" CI-2 replied, "Its 110 pesos [\$110,000], not yet verified [not yet counted by CI-2]."

47. On or about June 5, 2013, between approximately 1:05 p.m. and 2:12 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using

MLO Device 1. Following this exchange, agents reviewed the exchange and documented several of the messages. During this exchange, PARRA-PEDROZA asked, "And the verification [money count of narcotics proceeds delivered by RODRIGUEZ]?" CI-2 responded, "I will go [count] in a while, send the metal first [mail to Refinery A gold purchased with the narcotics proceeds that CI-2 collected from UM 5285 on June 2, 2013] and then verify." PARRA-PEDROZA responded, "OK." CI-2 stated, "I sent the mail [gold to Refinery A] and will verify. Will call you when I'm done."

48. On or about June 5, 2013, between approximately 2:48 p.m. and 3:47 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. Following this exchange, agents reviewed the exchange and documented several of the messages. During this exchange, CI-2 stated, "Put me down for 110 [the final money count of the proceeds delivered by RODRIGUEZ is \$110,000]." PARRA-PEDROZA responded, "OK." CI-2 stated, "Close 2,340 of the fine at 1404 [CI-2 purchased 2,340 grams of 24 Karat gold at the current fair market value of \$1,404 per ounce, using narcotics proceeds collected from RODRIGUEZ]." PARRA-PEDROZA responded, "OK." CI-2 stated, "I will send todays [gold purchased from RODRIGUEZ's proceeds] to you on Friday [June 7, 2013]." PARRA-PEDROZA responded, "OK."

49. On or about June 7, 2013, using two of the shipping labels provided by PARRA-PEDROZA, agents sent to Refinery A approximately 2,342 grams of 24-Karat gold, which agents had purchased with approximately \$107,826.49 of the

proceeds obtained from RODRIGUEZ. Agents also enclosed in this shipment a Refinery A packing list that identified the shipping company as "Chicago Gold" and described the contents of the boxes as containing a total of 2,342 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on or about June 10, 2013.

**VI. PARRA-PEDROZA Directs CI-2 to Collect and Launder Approximately \$30,010 in Narcotics Proceeds from RODRIGUEZ (June 10, 2013).**

50. On or about June 5, 2013, at approximately 8:11 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 1. During the call, PARRA-PEDROZA asked, "Can you do me a favor tomorrow and pick up fifty [\$50,000 in narcotics proceeds]? They [RODRIGUEZ and associates] were already committed [made arrangements to deliver more money] and, then we told them that Monday [June 10, 2013] would be better." CI-2 responded, "Okay, let me see what I will be able to do tomorrow because, you know, I have to go pick that [\$110,000 collected from RODRIGUEZ] up and deliver that to him [CI-2's putative gold supplier], otherwise I am not going to be able to finish [purchase the gold with the \$110,000]. And I just don't want to fall behind." PARRA-PEDROZA stated, "I mean, even if you don't move them [ship the gold to Refinery A] tomorrow. I mean, maybe you can wait to move them [ship the gold] until Friday."

51. On or about June 5, 2013, at approximately 10:22 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza

Phone 4. During the call, PARRA-PEDROZA asked, "So then what [can you receive the delivery of narcotics proceeds]?" CI-2 stated, "The thing is I am in a rush and I have to do some things tomorrow. And the thing is that I don't have a place [secure location] to put the tickets [narcotics proceeds]." PARRA-PEDROZA responded, "It's just fifty pesos [\$50,000]. The thing is that since he [RODRIGUEZ] committed, I mean, since we said, 'We're already working [laundering proceeds],' the guy [RODRIGUEZ] moved them [\$50,000] from somewhere else. . . . Then we told him that it [the pick-up] was going to be on Monday [June 10, 2013] and he said, 'No, I already moved, man. I'm already here.'" CI-2 stated, "I don't know if I'll be able to make it [collect RODRIGUEZ's \$50,000] tomorrow."

52. On or about June 9, 2013, between approximately 1:13 p.m. and 1:21 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. Following this exchange, agents reviewed the exchange and documented several of the messages. During this exchange, PARRA-PEDROZA stated, "The primos [RODRIGUEZ and associates] stayed in Chicas [Chicago] in order to deliver to you tomorrow." CI-2 responded, "OK."

53. On or about June 9, 2013, at approximately 9:45 p.m., CI-2 had a call with RODRIGUEZ, who was using Rodriguez Phone 2. This call was not recorded, but it was verified by toll records. According to CI-2, during the call, RODRIGUEZ asked to meet with CI-2 at the "tool place [Home Depot where they had previously met on June 5, 2013]." CI-2 and RODRIGUEZ agreed to meet each other on

Monday, June 10, 2013, because RODRIGUEZ had \$30,000 in narcotics proceeds to deliver to CI-2 and was leaving town on Tuesday, June 11, 2013.

54. On or about June 10, 2013, between approximately 12:40 p.m. and 4:51 p.m., CI-2 had a series of calls with RODRIGUEZ, who was using Rodriguez Phone 2. These calls were not recorded, but they were verified by toll records. According to CI-2, during these calls, RODRIGUEZ and CI-2 agreed to meet at the same Home Depot at approximately 5:19 p.m. that day.

55. On or about June 10, 2013, at approximately 5:19 p.m., CI-2 and RODRIGUEZ met in the parking lot of the Home Depot located at 12000 S. Cicero Avenue in Alsip. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, with negative results. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance agents video recorded the meeting. Surveillance observed RODRIGUEZ arrive in Rodriguez Vehicle 1, park next to CI-2's vehicle, exit his car, retrieve a gift bag with a "Bat Man" logo from his car, and hand the bag to CI-2, who placed the bag into the back of his/her vehicle. During this meeting:

a. CI-2 stated, "I wanted to ask you, since you work on cars, do you have any compartments [hidden compartments, or "traps," installed inside vehicles used to store narcotics and narcotics proceeds]?" RODRIGUEZ responded, "No, man. I used to have a guy before, but he left. Yeah, no, there used to be a guy before who used to hook it up [install the trap] for us, but he left to Mexico and that

was it." CI-2 stated, "I also had a guy who used to do them for me, but I lost track of him." RODRIGUEZ stated, "Yeah, it's hard. No one wants to do that [install traps]. No one wants to. It's not easy. But damn, they're so necessary."

b. CI-2 asked, "Thirty bucks [\$30,000], right?" RODRIGUEZ responded, "Thirty [\$30,000]."

56. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved from CI-2's vehicle a gift bag with a "Bat Man" logo containing approximately \$30,010 in cash. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

57. On or about June 10, 2013, between approximately 5:37 p.m. and 7:00 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. Following this exchange, agents reviewed the exchange and documented several of the messages. During this exchange, PARRA-PEDROZA asked, "And the 30 [the delivery of \$30,000 from RODRIGUEZ]?" CI-2 stated, "I'm verifying [counting the money]. Put me down for 30,010." PARRA-PEDROZA responded, "OK."

58. On or about June 11, 2013, between approximately 1:10 p.m. and 1:11 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. Following this exchange, agents reviewed the exchange and documented several of the messages. During this exchange, CI-2 stated, "Close 622

of the fine at 1378 [CI-2 purchased 622 grams of 24 Karat gold at the current fair market value of \$1,378 per ounce, using narcotics proceeds collected from RODRIGUEZ on June 10, 2013].” PARRA-PEDROZA replied, “OK.”

59. On or about June 13, 2013, using a shipping label provided by PARRA-PEDROZA, agents sent to Refinery A approximately 622.07 grams of 24-Karat gold, which agents had purchased with approximately \$28,159.80 of the proceeds obtained from RODRIGUEZ. Agents also enclosed in this shipment a Refinery A packing list that identified the shipping company as “Chicago Gold” and described the contents of the box as containing a total of 622.07 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on or about June 14, 2013.

**VII. PARRA-PEDROZA Directs CI-2 to Collect and Launder Approximately \$98,999 in Narcotics Proceeds from CARO and Individual Q (June 11, 2013).**

60. On or about June 6, 2013, at approximately 2:55 p.m., CI-2 had a consensually recorded call with TEODOCIO CARO,<sup>15</sup> who was using telephone

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<sup>15</sup> Agents identified TEODOCIO CARO and CARO’s voice as follows: As discussed below, between June 6 and 25, 2013, CI-2 had several consensually recorded call with the man who was using Caro Phone 1. During several of these calls, the man using Caro Phone 1 arranged to meet CI-2 in person at Home Depot located at 12000 S. Cicero Avenue in Alsip, Illinois, at approximately 1:30 p.m. on June 25, 2013, for the purpose of delivering narcotics cash proceeds. Following those phone calls, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed an Illinois State Driver’s License photograph of “Teodocio Caro,” and positively identified CARO as the individual who delivered narcotics proceeds to CI-2 on June 25, 2013. CARO arrived at the June 25 meeting in a car that was, according to SOS records, registered to “Teodocio Caro.” In addition, prior to this June 25 meeting, agents outfitted CI-2 with a concealed audio recording device, which captured CARO’s voice. After reviewing the recording of the June 25 meeting, agents compared the voice of the man with whom CI-2 met to the voice of the man who was using Caro Phone 1 in

number (773) 715-2419 ("Caro Phone 1"). During this call, CARO stated, "They told me to pick up a title for the truck, the dark one [deliver narcotics proceeds]." CI-2 asked, "Where are you, primo?" CARO responded, "Here in West Chicago . . . By the eighty-eight [Interstate 88], towards Aurora." CI-2 stated, "Can you wait until Monday [June 10, 2013]?" CARO stated, "No, well, that's what they [CARO's associates in Mexico] told me. I can wait two, three days, you know?" CI-2 asked, "Did they tell you how many tickets [amount of narcotics proceeds that will be delivered]?" CARO replied, "Yeah, it's a little more than a hundred [over \$100,000]."

61. On or about June 10, 2013, at approximately 1:02 p.m., CI-2 had an unrecorded call with CARO, who was using Caro Phone 1. This call was verified by toll records. According to CI-2, during this call, CI-2 agreed to meet an associate of CARO (Individual Q) in the area of 59th and Main Street in West Chicago on June 11, 2013 at around 4:00 p.m.

62. On or about June 10, 2013, between approximately 5:38 p.m. and 5:39 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. Following this exchange, agents reviewed the exchange and documented several of the messages. During this exchange, PARRA-PEDROZA asked, "And the 107 [the delivery of \$107,000 arranged by CARO]?" CI-2 responded, "Tomorrow evening."

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numerous, consensually recorded calls with CI-2, and determined that CARO was the user of Caro Phone 1.



63. On or about June 11, 2013, at approximately 12:08 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 4. During this call, PARRA-PEDROZA asked, "Hey, can you call him [CARO] and set up a meeting [to receive narcotics proceeds]? It's because he has things to do even if you do it [meet] at five [5:00 p.m.], but that way he [CARO] can move and do his stuff." CI-2 replied, "Okay, let me call him right now in about ten, fifteen minutes."

64. On or about June 11, 2013, at approximately 12:37 p.m., CI-2 had a consensually recorded call with CARO, who was using Caro Phone 1. During this call, CI-2 stated, "I'll be there around four [4:00 p.m.], right where you told me [area of 59th and Main Street in West Chicago]." CARO replied, "Look, primo, so I won't make you wait there too long, come at about, it would have to be around six [6:00 p.m.] . . . . The guy [Individual Q] is going to be there at that time. The thing is he [Individual Q] works and gets out at that time." CI-2 asked, "Damn, he can't make it at five [5:00 p.m.]? . . . Call him [Individual Q] and tell him because I won't make it at six. It's because I have to take my relative the invitation [take the money to the putative gold supplier] so he can go to the dance [sell gold] and I won't be able to take it [purchase gold] at six." CARO stated, "Hold on, let me check."

65. On or about June 11, 2013, at approximately 12:42 p.m., CI-2 had a consensually recorded call with CARO, who was using Caro Phone 1. During this call, CI-2 stated, "I'll see him [Individual Q] around five-thirty [5:30 p.m.] or six [6:00 p.m.], okay?" CARO stated, "All right, primo. We'll leave it like that." CI-2

stated, "When I'm around there, around where you said [location of the meeting], I'll give you a call. Okay? And he [Individual Q] can come by me." CARO responded, "Alright."

66. On or about June 11, 2013, between approximately 5:50 p.m. and 6:15 p.m., CI-2 had a series of unrecorded calls with CARO, who was using Caro Phone 1. These calls were verified by toll records. According to CI-2, during these calls, CI-2 advised CARO that he/she was waiting in the parking lot of the Menard's located at 220 W. North Avenue in West Chicago and explained where Individual Q could find CI-2.

67. Moments after the last call, CI-2 and Individual Q met in the parking lot of the Menard's located at 220 W. North Avenue in West Chicago. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device, but due to a technical malfunction, the audio recording device did not record the meeting. Agents also searched CI-2 and his/her vehicle for large amounts of money and contraband, finding only \$29. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance agents also video recorded the meeting. Surveillance observed Individual Q arrive in a vehicle, park next to CI-2's vehicle, exit his car, retrieve a detergent box wrapped inside a clear plastic Wal-Mart shopping bag from his vehicle, and hand the bag to CI-2, who placed the bag into the back of his/her vehicle. According to CI-2, during this meeting, Individual Q stated, "Here is the soap to wash the dishes," and confirmed that he was delivering \$107,520.

68. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved from CI-2's vehicle a detergent box wrapped inside a clear plastic Wal-Mart shopping bag containing approximately \$98,999 in cash. The money consisted of a large number of one and five dollar bills. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

69. On or about June 11, 2013, after agents had counted the money delivered by Individual Q, CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. According to CI-2, CI-2 advised PARRA-PEDROZA that the amount of narcotics proceeds delivered by Individual Q was \$98,999 not \$107,520.

70. On or about June 12, 2013, CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. According to CI-2, during this exchange, CI-2 advised PARRA-PEDROZA that he/she had purchased 54.15 ounces of gold with a portion of the money that CI-2 collected from Individual Q, and PARRA-PEDROZA agreed to a purchase price of \$1,392 per ounce.

71. On or about June 13, 2013, CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. According to CI-2, during this exchange, CI-2 advised PARRA-PEDROZA that he/she had purchased 14 ounces of gold with the balance of the money that CI-2 collected from Individual Q, and PARRA-PEDROZA agreed to a purchase price of \$1,384 per ounce.

72. On or about June 17, 2013, using two shipping labels provided by PARRA-PEDROZA, agents sent to Refinery A approximately 54.15 ounces of 24-Karat gold, which agents had purchased with approximately \$76,942.21 of the proceeds obtained from Individual Q. Agents also enclosed in this shipment a Refinery A packing list that identified the shipping company as "Chicago Gold" and described the contents of the boxes as containing a total of 1,684.28 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on or about June 18, 2013.

73. On or about June 18, 2013, using a shipping label provided by PARRA-PEDROZA, agents sent to Refinery A approximately 14 ounces of 24-Karat gold, which agents had purchased with approximately \$19,826.41 of the proceeds obtained from Individual Q. Agents also enclosed in this shipment a Refinery A packing list that identified the shipping company as "Chicago Gold" and described the contents of the boxes as containing a total of 435.45 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on or about June 19, 2013.

74. On or about June 18, 2013, between approximately 4:12 p.m. and 7:08 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "I just sent you the rest [remaining 14 ounces of gold]." PARRA-PEDROZA asked, "How much?" CI-2 replied, "The 20 [the value of the gold shipment was approximately \$20,000] that I was going to deposit [into the bank account]." PARRA-PEDROZA responded, "OK."

**VIII. PARRA-PEDROZA and CI-2 Meet to Discuss PARRA-PEDROZA's Money Laundering Operation (June 20, 2013).**

75. On June 14, 2013, between approximately 7:02 p.m., and 7:30 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device

1. During this exchange:

a. PARRA-PEDROZA stated, "That's not how we're going to do it [the extended amount of time that CI-2 took to purchase gold with narcotics proceeds from various individuals to date and send it to Refinery A was unacceptable]. They're [PINEDA SANCHEZ and the drug traffickers] going to send us to hell [stop using PARRA-PEDROZA for laundering money]. . . . Don't you have another option? To buy [gold]? . . . It's that now they're [drug traffickers and MLO members] telling us to tell the truth if it [PARRA-PEDROZA's money laundering services] was worth a damn again. . . . And if I tell them [drug traffickers and MLO members] we always pay them on Tuesday that it's not going to be until Wednesday they'll truly kill me [PARRA-PEDROZA must provide the drug traffickers with the laundered money on the day PARRA-PEDROZA promises]."

b. CI-2 responded, "This one [CI-2's gold supplier] is fine. I only need a little time to learn all of the movement [process of purchasing the gold], it's that with a single year of elementary [purchasing fine gold is complicated for a man of CI-2's educational background] it's not easy." PARRA-PEDROZA stated, "The bad thing is that these guys [drug traffickers and MLO members] don't even know the word school, only know how to shoot."

c. PARRA-PEDROZA and CI-2 made arrangements to meet each other in Las Vegas, Nevada on June 20, 2013.

76. On or about June 20, 2013, PARRA-PEDROZA and CI-2 met at a shopping mall in Las Vegas, Nevada. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance observed CI-2 meet with PARRA-PEDROZA in the food court of the mall. During this meeting:

a. CI-2 stated. "Look, this [method of buying fine gold] is better [unintelligible ("U/I")]. The longer the better. I just need . . . for you to have them [money couriers] well organized so we can work well. That's what you need to do. . . . The thing is, they [money couriers] don't trust and I don't trust either, so, uh, I don't want to pick up [narcotics proceeds] from them every day . . . . I don't want to have anything [narcotics proceeds] on me. The way I receive it [narcotics proceeds], I have to take it over there and get rid of it [CI-2 takes the narcotics proceeds to the gold vendor to buy gold immediately after he receives the money, so he/she does not have to store narcotics proceeds]." PARRA-PEDROZA asked, "So you take it [narcotics proceeds] and right there and then you get rid of it [purchase gold]?" CI-2 responded, "Right there and then, I verify [count] it and let's go because I don't want to have anything [narcotics proceeds] stored there [at CI-2's residence] just in case [law enforcement raids CI-2's residence]."

b. PARRA-PEDROZA stated, "The problem is they [drug traffickers and MLO members] are very alert. . . . I was talking to him [PINEDA

SANCHEZ] right now. He [PINEDA SANCHEZ] told me, 'We need [CI-2] to tell us exactly, exactly the date and time [that CI-2 will meet with and collect narcotics proceeds from money couriers]. . . . Okay, how many days do we need [to coordinate the delivery of narcotics proceeds and purchase of gold.].'" CI-2 responded, "I need, let's say two days [notice], for them [drug traffickers/money couriers] to deliver [narcotics proceeds] to me in two days, two days, for example, they can deliver to me Monday and Wednesday, that way you get it [laundered money] on time over there [in Mexico] . . . ."

c. PARRA-PEDROZA stated, "Yes, Wednesday, Thursday, it [gold purchased with narcotics proceeds] would arrive [at Refinery A] on Friday and I don't get paid [by Refinery A] on Saturday. They [Refinery A] don't pay me until Monday. . . . Can it be Monday and Tuesday [to receive narcotics proceeds from money couriers]? . . . [W]e got a few days . . . . Two, three days to, um, to pay them [Mexico-based drug traffickers]. Uh, they gave it [money laundering contract] to us and we're barely, um, we're still making payments [sending money that should have been completely laundered already]. They [Mexico-based drug traffickers] almost killed us [PARRA-PEDROZA and PINEDA SANCHEZ]. The thing is we didn't, yesterday, they were about to [U/I] fucking beating [for the delay in delivering laundered money to cartel drug traffickers]. [Mexico-based drug traffickers said] 'Tell me, did you drop it [allow law enforcement to seize narcotics proceeds] again? You'll see what we'll [cartel drug traffickers] do but don't be telling me [the laundered money will arrive] tomorrow, tomorrow, tomorrow. If you dropped it [lost

narcotics proceeds to law enforcement] again, tell me.” CI-2 stated, “No, we’re fine. We’re working [collecting narcotic proceeds], and everything is fine.”

d. Later in the conversation, PARRA-PEDROZA stated, “But they [drug traffickers] don’t want to give more than fifty [\$50,000 money laundering contracts]. It’s because, at the beginning, they didn’t want to give anything and then they wanted us [Parra-Pedroza MLO] to pay them [once the drug traffickers were willing to give PARRA-PEDROZA money laundering contracts, they wanted PARRA-PEDROZA to pay them the money before the narcotics proceeds were even delivered to CI-2 in the United States]. . . . We [PINEDA SANCHEZ and PARRA-PEDROZA] asked them to give us two, three days [to launder the money]. They [drug traffickers] take them [deliver the narcotics proceeds to CI-2] and we go all these days [took too long to launder the money through Refinery A]. No, I couldn’t take it anymore.”

e. CI-2 stated, “So I prefer to do the fine one [purchase fine gold with narcotics proceeds] or send you, I have a friend [CI-2’s gold supplier] who says I can send you the money via cable [bank wire transfers] over there [Mexico] but I don’t know how that works. That’s something I don’t understand. I don’t understand that.” PARRA-PEDROZA stated, “Because the law [banking law in Mexico] is going to get really hard over here in Mexico. There’s going to pass a really tough law in July [2013] regarding that [making it easier for law enforcement to detect bank wire transfers from the United States to Mexico]. . . . It’s because if he [CI-2’s gold supplier], he might be able to send [wire] it to me but if I don’t have a



way of sending [the laundered money to] the uncle [Mexican based drug traffickers] . . . .”

f. PARRA-PEDROZA stated, “[I]f they bring me the money and I’ll [U/I] it fell [gets seized by law enforcement]. The thing is, they [Refinery A] have an office in Mexico [as well as Florida]. . . . They [Refinery A] say I sold them [gold] in Mexico and since the payment comes from over there [Refinery A Mexican-based office] . . . . They [Refinery A] sold it [the gold] to me in Mexico, but the money is sent from here [Refinery A falsifies paperwork to make it look like PARRA-PEDROZA sold gold to the company’s Mexico-based office to justify the payments the company sends PARRA-PEDROZA in Mexico for the gold shipments that Refinery A receives from U.S.-based members of the MLO, such as CI-2].”

g. CI-2 asked, “[H]ow do they [PINEDA SANCHEZ and Mexican drug traffickers] take them [get narcotics proceeds to Mexico] right now? They have to send a car over there [to Mexico] right?” PARRA-PEDROZA responded, “Yeah. . . . Yeah, that’s why they [drug traffickers/money couriers] only take the twenties [deliver \$20 dollar bills to CI-2] sometimes, because they take the big ones [larger denomination bills] in the car, in the compartment [drug traffickers use hidden compartments in cars to smuggle narcotics proceeds into Mexico].” CI-2 asked, “So that’s what he [PINEDA SANCHEZ or Mexican drug trafficker] does right now, sends the car over there [smuggles narcotics proceeds into Mexico in cars]?” PARRA-PEDROZA responded, “Yes, yes, yes.”

h. CI-2 asked, "So what do they [Mexican drug traffickers] do with all the paper [laundered narcotics proceeds]?" PARRA-PEDROZA responded, "Down there [in Mexico]? . . . Look, we've [PINEDA SANCHEZ and PARRA-PEDROZA] had pesos, Mexican pesos, we couldn't find dollars [U.S. dollars] and the thing is, [PARRA-PEDROZA asks drug traffickers to] 'Take pesos.' [Drug traffickers respond] 'No, I gave you dollars. I want dollars [drug traffickers did want to be paid in U.S. dollars, not Mexican pesos]. . . . We give them [U.S. dollars] to them [Mexican drug traffickers] and they go sell them [U.S. dollars] a lot cheaper than we [PINEDA SANCHEZ and PARRA-PEDROZA] bought them. . . . At the end they [Mexican drug traffickers] have to receive pesos [for their laundered narcotics proceeds]."

i. CI-2 stated, "We're talking about big things. What are they [Mexican drug traffickers] going to do with all that [laundered narcotics proceeds] over there [in Mexico]? It's not like put it away [save the money]?" PARRA-PEDROZA stated, "Mexico is just a stop [for the narcotics proceeds]." CI-2 asked, "All the way over there [Mexico]?" PARRA-PEDROZA responded, "More south [Colombia]. They've asked me if I'll take it south [launder the narcotics proceeds from Mexico to Colombia]. . . . It's just that if I start to operate the companies south of Mexico [in Colombia], they're going to fail [the money laundering scheme would not succeed between Mexico and Colombia]. . . . There's a lot of operations [business transactions] between United States and Mexico . . . ."

j. CI-2 stated, “[T]he reason why I’m scared is because [if the narcotics proceeds get seized by law enforcement], then they’re [Mexican drug traffickers] going to cut our balls off without it being our fault.” PARRA-PEDROZA stated, “Yeah that’s true. . . . And they’re good at beating everyone up. . . . And they’re good at saying, ‘It was you.’” CI-2 stated, “If it wasn’t you, oh well. And that’s why we have to be careful with that fucking shit [narcotics proceeds]. We have to be careful because of that, because they think bad about you and whether it’s our fault or not, they’re going to get us. That way, they [Mexican drug traffickers] get one of them [a money courier who becomes familiar with CI-2], that guy already knows me, I already know him. ‘Okay, we’ll meet [to collect narcotics proceeds] at so and so place.” PARRA-PEDROZA stated, “Alright.” CI-2 stated, “I don’t want to store anything [narcotics proceeds] right now. I don’t want to store anything just in case anything happens [law enforcement raids CI-2’s residence]. There’s nothing [no narcotics proceeds at CI-2’s residence].”

k. PARRA-PEDROZA asked, “They [law enforcement] didn’t get you the second time [referring to a prior arrest of Individual B, one of CI-2’s associates, prior to CI-2’s cooperation with law enforcement]?”<sup>16</sup> CI-2 responded, “No, just them [Individual B and Individual C, who was also working for the Parra-Pedroza MLO].” PARRA-PEDROZA asked, “Then why did they [Individual B] get caught [by law enforcement] so fast? . . . One week [Individual B had been working

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<sup>16</sup> On or about October 19, 2012, law enforcement confronted Individual B about his involvement in a money laundering organization. At the direction of agents, CI-2 made up a story about how Individual B had been caught by law enforcement so that PARRA-PEDROZA would not suspect CI-2 of working with law enforcement.

for PARRA-PEDROZA for only one week before he was confronted by law enforcement]?" CI-2 responded, "That's the problem, they [law enforcement] were already on the one from this one [gold] store, from a store that would buy, that would buy dirty [accept narcotics proceeds in the sale of gold] and that's why they [law enforcement] followed the idiot [Individual B]. That's why they [law enforcement] were on him [Individual B], because of the guy from the store. That's why they [law enforcement] haven't found out [about PARRA-PEDROZA or the MLO] over here on this side [United States], because he [Individual B] didn't have anything [that would tie him to PARRA-PEDROZA or the Mexican-based drug traffickers] from over here and the one from the store is the one they [law enforcement] were on [investigating] and the thing is they [Individual B and Individual C] would go and buy scrap [gold] from him [the gold store that law enforcement was investigating] every day and that's why they [law enforcement] followed him [Individual B]."

1. CI-2 stated, "I was going to call you a while ago, but I thought, 'How am I going to call him? How can I fucking locate him?' . . . And I thought about coming down here, over here [CI-2 considered going to Mexico to reconnect with PARRA-PEDROZA], but then I said, I'll get there and he's going to say, 'What the fuck is he bringing?' You know, I'm not just going to show up like that." PARRA-PEDROZA stated, "Yeah, yeah, no. And since, and since everyone [Mexican drug traffickers and MLO members], um, found out about everything [law enforcement's encounter with CI-2, Individual B, and Individual C in September

and October 2012<sup>17</sup>]. ‘What happened with the guy [Individual B]?’ You know, ‘What happened up there [Individual B’s arrest in Chicago]?’ They [Mexican drug traffickers] found out [about Individual B’s encounter with law enforcement]. They’re [Mexican drug traffickers] going to see you [in Mexico] and say, ‘No [Mexican drug traffickers would refuse to work with CI-2 because of CI-2’s and Individual B’s prior encounters with law enforcement].’”

m. PARRA-PEDROZA stated, “They [PINEDA SANCHEZ and Mexican drug traffickers] asked me to look for you.” CI-2 stated, “Yeah, I said, ‘I feel like trying him [calling PARRA-PEDROZA].’ But then I said, ‘No, I’m going to wait until more time passes by because then he’s going to say, ‘Well, what does this guy want to know about me [CI-2 was concerned that PARRA-PEDROZA would be suspicious of CI-2 if CI-2 tried to reconnect with him out of the blue]?’” PARRA-PEDROZA stated, “No, no.” CI-2 stated, “Everything was fine, the thing is we [CI-2, Individual B, Individual C, and PARRA-PEDROZA] were all paranoid [because of recent encounters with law enforcement]. Well, we get scared.” PARRA-PEDROZA responded, “Well, yeah.” CI-2 stated, “We were just scared.”

n. CI-2 stated, “I said, ‘I should call him [PARRA-PEDROZA], it’s been a while [since CI-2 was encountered by law enforcement], seven, eight months already passed.” PARRA-PEDROZA stated, “No, well, I was calling you [to resume their money laundering operation].” CI-2 stated, “I should call this guy [PARRA-

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<sup>17</sup> Prior to CI-2’s cooperation with law enforcement, in September 2012, law enforcement seized approximately \$176,000 from CI-2 during a traffic stop, as CI-2 returned to Chicago after collecting the money from an individual in Kentucky. According to CI-2, CI-2 had told PARRA-PEDROZA about the seizure at the time it happened.

PEDROZA], I should go look for him down there [in Mexico]. I said, 'If I go over there and he's upset at me, he's not going to let me come back [CI-2 was afraid that PARRA-PEDROZA would have CI-2 kidnapped or killed if CI-2 went to Mexico and found that PARRA-PEDROZA was upset with CI-2 for falling out of touch].'" PARRA-PEDROZA stated, "No." CI-2 stated, "What if I get there [Mexico], [and PARRA-PEDROZA says], 'He's already here, don't let him go.'" PARRA-PEDROZA stated, "He's here." CI-2 laughed and stated, "I get scared."

o. PARRA-PEDROZA stated, "The thing is we [PINEDA SANCHEZ and PARRA-PEDROZA] had to get a lot of stuff situated down there [arrangements had to be made in Mexico once CI-2 resumed laundering money for PARRA-PEDROZA]. Yeah, we had to get a lot of things situated down there because it wasn't going to, I mean, [U/I]. And it's worse now because they got pissed off again [Mexican drug traffickers were unhappy with CI-2's delay in getting money down to Mexico]. . . . Right now, right now, right now, I have to go make them happy again, tell them, 'Look, I already saw them [CI-2], everything is fine. There were some problems [law enforcement's prior encounters with CI-2, Individual B, and Individual C]. We already took care of that [confirmed that law enforcement is not investigating CI-2].' We'll see if they [Mexican drug traffickers] don't send me to hell [stop using PARRA-PEDROZA to launder narcotics proceeds].'" CI-2 responded, "No, they have to work [drug traffickers need to have their narcotic proceeds laundered].'" PARRA-PEDROZA stated, "No, they need it [money laundering service]."

p. Later in the conversation, PARRA-PEDROZA stated, "Yeah, that's why I haven't wanted to go over there [Chicago]. You know how it got really hot [law enforcement began investigating members of the Parra-Pedroza MLO]. They've [law enforcement] got [Individual D, a member of the Parra-Pedroza MLO] on a short leash. . . . She came about three or four times and all four times they've [law enforcement] held her up [when she entered the United States] for an hour or two and question, after question, after question. That last time she arrived [in the United States] and when she was about to leave [the United States], they [law enforcement] pulled her out of the plane. . . . And they [law enforcement] started to ask her, this and that. The officer started to get comfortable . . . [and asked] 'What did you come [to the United States] for?' . . . They got her and they're on to her [law enforcement is investigating Individual D]. The last three times she came [into the United States], they stopped her. . . . She's paranoid. She's scared to come. I had to invite her last time just so, they [law enforcement] wouldn't suspect."

q. PARRA-PEDROZA stated, "There's two, there's two representatives [PARRA-PEDROZA launders narcotics proceeds for two individuals, PINEDA SANCHEZ and Individual K]. I don't know them. There's one before me, they're [PINEDA-SANCHEZ and Individual K] the ones that talk to [the Mexican drug traffickers] . . . one of them [PINEDA-SANCHEZ or Individual K] does talk to the owner and other one with [Individual G]." CI-2 asked, "The one [member] that used to be before [Individual K], is he still with you [provide you with money laundering contracts]?" PARRA-PEDROZA answered, "[Individual K] and Botas

[PINEDA-SANCHEZ], the one that went [traveled to Chicago with PARRA-PEDROZA to meet with CI-2 in Spring 2012], the skinny one. That's Botas [PINEDA-SANCHEZ] and you don't know [Individual K]."

r. PARRA-PEDROZA stated, "They're [PINEDA-SANCHEZ and Individual K] the same ones from before, I mean, they're the same contacts [PINEDA-SANCHEZ and Individual K receive money laundering contracts from the same Mexican drug traffickers] but I don't know them [the drug traffickers]. I mean there's some ahead of me and one of them [PINEDA-SANCHEZ], [Individual K] is the one that does know him [Individual G] and Botas [PINEDA-SANCHEZ] has a middle man, so, um, I will have to talk to them [PINEDA-SANCHEZ and Individual K] so they can push him forward and I think I would have to get with one, one day and the other one the other day [PARRA-PEDROZA will arrange for money couriers working with PINEDA-SANCHEZ to deliver to CI-2 on one day, and couriers working with Individual K to deliver to CI-2 on another day]. Botas [PINEDA SANCHEZ] needs to deliver on Monday and [Individual K] on Tuesday. Like I told you, they'll see how they'll do it."

s. PARRA-PEDROZA stated, "That's why we [PARRA-PEDROZA and CI-2] were working on the down low [secretly, to avoid detection by law enforcement], because if another one thousand pesos [\$1 million in narcotics proceeds] come and something bad happens [money seized by law enforcement after the Parra-Pedroza MLO agrees to launder it]. No, no I don't even think they're [Mexican drug traffickers] going to ask us [to launder narcotics proceeds] anymore."



They're probably just going to arrive and, you hand everything back. Houses, cars [when law enforcement seizes narcotics proceeds, Mexican drug traffickers take the personal possessions of the person responsible for losing their money]." CI-2 asked, "They took everything [PARRA-PEDROZA's possessions, after one of his people lost over \$1 million in June 2012]?" PARRA-PEDROZA responded, "Yeah, even while business [money laundering operations] was going on. . . . I haven't been able to pay them off. . . . [I]t was a year exactly [June 2012] when it fell [law enforcement seized \$1 million from a member of the Parra-Pedroza MLO]. . . . It fell. . . . [A] woman came and brought them [the narcotics proceeds] down [to Mexico]. They caught it here [law enforcement seized the narcotics proceeds in the United States]. . . . She said they [law enforcement] stopped her and she was on her way [to Mexico] when the officer came back and said, 'I'm going to send you back [deport her to Mexico].' I think she must have been so scared she was pale."

t. CI-2 stated, "Tell them [Mexican drug traffickers] we don't want them, 'We don't want you to be bullshitting if they trip [law enforcement seizes narcotics proceeds from U.S.-based money couriers]. This is how it is. . . . If they're doing bad [being investigated by law enforcement], they're the ones doing bad, not anyone else [CI-2]." PARRA-PEDROZA responded, "There's one [money courier] that supposedly they had taken away what he had [law enforcement seized narcotics or narcotics proceeds] and at the end he [money courier] did agree [that he was responsible for losing the Mexican drug traffickers' drugs or money]. I think they even cut his fingers off [to get the courier to confess]. Even I would've agreed."

77. Based on previous and subsequent consensually-recorded conversations between PARRA-PEDROZA and CI-2, controlled collections of proceeds from various individuals by CI-2 at the direction of PARRA-PEDROZA, my knowledge of this investigation as a whole, and my training and experience as a Special Agent, I believe that, during the aforementioned conversation, PARRA-PEDROZA:

(a) expressed his and PINEDA SANCHEZ's concerns over the time it was taking CI-2 to ship the gold that CI-2 purchased with narcotics proceeds to Refinery A;

(b) explained that the Mexican drug traffickers threaten and administer physical violence against, and take the personal possessions of, individuals whom they deem responsible for losing their drug money;

(c) rejected CI-2's offer to wire narcotics proceeds to him in Mexico because he was concerned about pending changes in Mexican law that would make it easier for law enforcement to detect the true nature of the wired funds;

(d) explained that, after Refinery A received the gold shipments from CI-2, the company sends payments for that gold to PARRA-PEDROZA in Mexico;

(e) explained that Refinery A falsifies paperwork to make it appear that PARRA-PEDROZA sold gold to the company's Mexico-based office to justify the payments the company sends to PARRA-PEDROZA in Mexico for gold shipments it receives from CI-2 or other U.S.-based members of the Parra-Pedroza MLO;

(f) explained that the PINEDA SANCHEZ and Mexican drug traffickers use hidden compartments in cars to smuggle narcotics proceeds into Mexico;

(g) advised that Mexican drug traffickers ask PINEDA SANCHEZ and PARRA-PEDROZA to give them their laundered narcotics proceeds in U.S. dollars, rather than Mexican pesos, so that the traffickers can earn even more money when converting the U.S. dollars to pesos themselves;

(h) stated that Mexican drug traffickers have asked PARRA-PEDROZA to assist them in laundering narcotics proceeds from Mexico to Columbia;

(i) discussed his and CI-2's mutual concern about reconnecting with each other and resuming their money laundering operation following law enforcement's known encounters with CI-2, Individual B, and Individual C in Fall 2012; and

(j) explained that he launders narcotics proceeds for two different individuals, PINEDA SANCHEZ and Individual K, and that, going forward, he would arrange for money couriers working with PINEDA-SANCHEZ to deliver to CI-2 on one day, and couriers working with Individual K to deliver to CI-2 on another day.

**IX. PARRA-PEDROZA Directs CI-2 to Collect and Launder Approximately \$283,740 in Narcotics Proceeds from CARO (June 25, 2013).**

78. On or about June 12, 2013, at approximately 8:57 p.m. – and prior to CI-2's June 20, 2013, meeting with PARRA-PEDROZA – CI-2 exchanged a series of

BBMs with PARRA-PEDROZA, who was using MLO Device 1. Following this exchange, agents reviewed the exchange and documented several of the messages. During this exchange, PARRA-PEDROZA stated, "7737152419. Primo [call Caro Phone 1 to coordinate collection of narcotics proceeds]." CI-2 responded, "That was the one that gave me all the change [referring to the unusually large number of \$1 and \$5 bills that Individual Q delivered on June 11, 2013]. Tell him no more change. Tell him." PARRA-PEDROZA responded, "OK."

79. On or about June 12, 2013, at approximately 9:43 p.m., CI-2 had a consensually recorded call with CARO, who was using Caro Phone 1. During this call, CARO stated, "What's up, primo? They told me to call you so I can see you [deliver more narcotics proceeds] around nine [9:00 a.m.]." CARO and CI-2 agreed to speak again later.

80. On or about June 16, 2013, at approximately 8:47 p.m., CI-2 had a consensually recorded call with CARO, who was using Caro Phone 1. During this call, CI-2 asked, "What time will you be ready [to meet] tomorrow? Is it going to be at the same place [the location of the June 11 pick-up] or somewhere else?" CARO responded, "I'll let you know. . . . Yeah, let me call over there [to Mexico]." CI-2 stated, "Okay, then give them [CARO's associates in Mexico] a call and call me and tell me where to go, and I'll give you a call when I'm around there."

81. On or about June 17, 2013, at approximately 2:03 p.m., CI-2 had a consensually recorded call with CARO, who was using Caro Phone 1. During this call, CI-2 asked, "Are you ready or not?" CARO replied, "They [CARO's associates

in Mexico] haven't said anything over there." CI-2 stated, "Oh, okay. Call the man [CARO's associate] and see what he says, okay?" CARO responded, "Alright."

82. On or about June 17, 2013, between approximately 2:05 p.m. and 2:19 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "The primo [CARO] says they haven't advised him from over there [Mexico]. Call them [CARO's associates in Mexico] and see what they say." PARRA-PEDROZA replied, "I already told them but they want payment [PARRA-PEDROZA still owes CARO's associates the money from Individual Q's delivery of \$98,999 on June 11, 2013]."<sup>18</sup>

83. On or about June 24, 2013, at approximately 1:49 p.m., CI-2 had a consensually recorded call with CARO, who was using Caro Phone 1. During this call, CARO stated, "Take the five-seven [Interstate 57] and get off on a hundred and fifty-nine [159th Street] east and I'll meet you there [to deliver narcotics proceeds]." CI-2 stated, "No, the other day I went and met with one [money courier] around, they fixed my car [delivered narcotics proceeds] by the Home Depot. It's not the same one [same drug trafficker/money courier]?" CARO responded, "No, no, uh, at the Home Depot? No, no. You come this way." CI-2 stated, "I'm going to go close by, not all the way up there. . . . Did they tell you how many miles [total amount of narcotics proceeds to be delivered]?" CARO responded, "Uh, about two hundred miles [\$200,000]."

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<sup>18</sup> At the time of this call, agents had yet to ship the gold purchased with the money delivered by Individual Q on June 11, 2013. See ¶¶ 67-72, *supra*. Soon after this exchange, PARRA-PEDROZA and CI-2 met in Las Vegas to discuss, among other things, CI-2's delay in shipping gold. See ¶ 75-77, *supra*.

84. On or about June 25, 2013, between approximately 12:11 p.m. and 1:24 p.m., CI-2 had a series of consensually recorded call with CARO, who was using Caro Phone 1. During these calls, CARO and CI-2 arranged to meet each other in the parking lot of a Home Depot located near the intersection of 120th Street and Cicero Avenue in Alsip, Illinois, at approximately 1:24 p.m. that day. During the last of these calls at approximately 1:24 p.m., CARO asked, "You're the one in the red truck?" CI-2 responded, "Yes." CARO stated, "There's a [suspicious] car in front." CI-2 stated, "Just move to the side. It's [the suspicious car] one of the ones that work here [a Home Depot employee vehicle]. Just go to the side. Just come to the side."

85. On or about June 25, 2013, at approximately 1:24 p.m., CI-2 and CARO met in the parking lot of the Home Depot located at 12000 S. Cicero Avenue in Alsip. Prior to this meeting, agents outfitted CI-2 with a concealed audio and video recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, with negative results. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance observed CARO arrive in a car registered in his name, park next to CI-2's vehicle, exit his car, retrieve a blue Coleman cooler from his car, and hand the cooler to CI-2, who placed the cooler into the back of his/her vehicle. During this meeting:

a. CARO asked, "So that one [suspicious person/vehicle] that is in front are the ones that work here [employees at Home Depot]?" CI-2 responded,

"Yes, they're the ones that work here. I was going to move later, but no, they're the ones that work here."

b. CI-2 asked, "How much?" CARO responded, "It's two-eighty [\$280,000]." CI-2 asked, "Two-eighty?" CARO responded, "Yes, sir." CI-2 asked, "Does it [narcotics proceeds] come well measured [fully counted]?" CARO stated, "Bill for bill [this delivery is correctly counted] primo." CI-2 continued, "Because the other [the June 11, 2014, narcotics proceeds delivery by Individual Q], that same one that I picked up in . . . ." CARO stated, "West Chicago." CI-2 continued, ". . . that I picked up in West Chicago [the Individual Q delivery], came up real short." CARO stated, "That's fucked up." CI-2 stated, "He gave me ninety-eight [\$98,000], ninety-nine [\$99,000], almost ninety-nine. He was one dollar short to make ninety-nine [\$98,999]." CARO stated, "I already told you [this delivery is correctly counted]." CI-2 stated, "Yes. He [Individual Q] was short one dollar for ninety-nine [\$98,999]." CARO stated, "Well, okay primo, I counted that [today's delivery] myself last night. That's what I did all fuckin night." CI-2 responded, "Okay..."

86. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved a blue Coleman cooler containing approximately \$283,740 in cash from CI-2's vehicle. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

87. On or about June 25, 2013, at approximately 5:00 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. According to CI-2, during this exchange, CI-2 provided PARRA-PEDROZA with the final count of the money picked up from CARO.

88. On or about June 27, 2013, using six of the shipping labels provided by PARRA-PEDROZA, agents sent to Refinery A approximately 6,622 grams of 24-Karat gold, which agents had purchased with approximately \$277,892.37 of the proceeds obtained from CARO. Agents also enclosed in this shipment a Refinery A packing list that identified the shipping company as "Chicago Gold" and described the contents of the boxes as containing a total of 6,622 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on or about June 28, 2013.

89. On or about July 1, 2013, between approximately 2:43 p.m. and 5:06 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "Close at 1260 [CI-2 purchased gold at the current fair market value of \$1,260 per ounce]." PARRA-PEDROZA replied, "OK." CI-2 stated, "6622.05 is what I sent you that day [CI-2 purchased 6,622 grams of 24 Karat gold at the current fair market value of \$1,260 per ounce, using narcotics proceeds collected from CARO on June 25, 2013]." PARRA-PEDROZA asked, "The 280 [confirming that CI-2 is referring to the \$283,740 that CI-2 received from CARO]?" CI-2 responded, "Yes."



**X. PINEDA SANCHEZ and PARRA-PEDROZA Direct CI-2 to Collect and Launder Approximately \$139,470 in Narcotics Proceeds from ISAIAS (July 10, 2013).**

90. On or about July 9, 2013, at approximately 12:06 p.m., CI-2 placed a consensually recorded call to CASMIRO ISAIAS-PADILLA, who was using telephone number (773) 459-4603 ("Isaias Phone 1").<sup>19</sup> This call took place approximately one minute after CI-2 had missed a call from Isaias Phone 1. During this call, ISAIAS stated, "I wanted to talk to Daniel [CI-2's codename, provided by PARRA-PEDROZA], primo, on behalf of [Individual K, codename to vouch for ISAIAS's trustworthiness]." CI-2 responded, "Tell me." ISAIAS asked, "Can I see you, so I can give you some [narcotics proceeds]?" CI-2 asked, "Are you the same one [money courier] I talked to yesterday or are you someone else?" ISAIAS stated, "No, I, it's the first time I've called you, primo." CI-2 and ISAIAS agreed to speak again later.

91. On or about July 9, 2013, at approximately 12:14 p.m., CI-2 had a consensually recorded call with ISAIAS, who was using Isaias Phone 1. During the

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<sup>19</sup> Agents identified ISAIAS as follows: As discussed below, on or about July 9 & 10, 2013, CI-2 had several consensually recorded calls with the user of Isaias Phone 1. During these calls, the user of this phone arranged to meet CI-2 in person at the Wal-Mart located at 7050 S. Cicero Avenue, Chicago, Illinois, for the purpose of delivering narcotics cash proceeds, on July 10, 2013, at approximately 5:03 p.m. Following these calls, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. As discussed below, agents conducting surveillance subsequently viewed a Wisconsin driver's license photograph of "Casimiro Isaias-Padilla," and positively identified ISAIAS as the individual who delivered narcotics proceeds to CI-2 on July 10, 2013. In addition, prior to this July 10th meeting, agents outfitted CI-2 with a concealed audio recording device, which captured ISAIAS's voice. After reviewing the recording of the July 10th meeting, agents compared the voice of the man with whom CI-2 met to the voice of the man who was using Isaias Phone 1, in numerous, consensually recorded calls with CI-2, and determined that ISAIAS was the user of Isaias Phone 1.

call, CI-2 asked, "Yeah, how many miles are on the car you want us to fix for you?" ISAIAS responded, "Oh, I think, I think it was a hundred-fifty [\$150,000], primo." CI-2 stated, "Let me report it over there [call PARRA-PEDROZA] first because they already filled it up [CI-2 is already in possession of a large amount of narcotics proceeds] over here and I have to check, because I don't have enough room in the garage for another car. So let me call over there and I'll call you back."

92. On or about July 9, 2013, between approximately 1:09 p.m. and 1:13 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. Following this exchange, agents reviewed this exchange and documented several of the messages. During this exchange, PARRA-PEDROZA stated, "Tomorrow they are going to give you 140 [\$140,000]. The one [ISAIAS] that you [CI-2] told that you had a lot on your hands." CI-2 responded, "OK."

93. On or about July 9, 2013, at approximately 1:25 p.m., CI-2 had a consensually recorded call with ISAIAS, who was using Isaias Phone 1. During this call, CI-2 asked, "Where are you, more or less, so I can come by? They told me not until tomorrow, or the day after, but I need to call you. Just tell me and I'll come by." ISAIAS responded, "Okay, right there by Archer and Kedzie. . . . [I]f you want it can be today, but I can't right now, I'm busy. Let's see, I'll be ready by four, thirty [4:30 p.m.]." CI-2 stated, "Okay, then let me give you a call because these guys [PARRA-PEDROZA] are driving me crazy over there. Okay, I'll give you a call tomorrow and I'll let you know where we can meet around there." ISAIAS replied, "All right, okay, that's fine."

94. On or about July 9, 2013, between approximately 3:40 p.m. and 3:42 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA asked, "What did you agree to with them [ISAIAS and a second money courier]?" CI-2 responded, "Tomorrow I'll see them. First the 200 [\$200,000] and later the 140 [\$140,000 from ISAIAS]." PARRA-PEDROZA stated, "OK."

95. On or about July 10, 2013, between approximately 12:47 p.m. and 2:35 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA asked, "What's up?" CI-2 replied, "Nothing, the one of 140 [ISAIAS] has time until 4:30 [can meet to deliver narcotics proceeds before 4:30 p.m.]." PARRA-PEDROZA asked, "But are they set?" CI-2 replied, "Yes." PARRA-PEDROZA stated, "Hey the 140 one, make his appointment close, not too far, so you won't risk it [meet ISAIAS in close proximity to CI-2's office to minimize the risk of being stopped by law enforcement]."

96. On or about July 10, 2013, between approximately 4:23 p.m. and 5:03 p.m., CI-2 had a series of consensually recorded calls with ISAIAS, who was using Isaias Phone 1. During these calls, ISAIAS and CI-2 arranged to meet in the parking lot of a Walmart located near the intersection of 72nd Street and Cicero Avenue in Chicago at approximately 5:03 p.m.

97. On or about July 10, 2013, at approximately 5:03 p.m., CI-2 and ISAIAS met in the parking lot of the Walmart located at 7050 S. Cicero Avenue in Chicago, Illinois. Prior to this meeting, agents outfitted CI-2 with a concealed audio

recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, finding none. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance agents videotaped this meeting and observed ISAIAS arrive in a car, park next to CI-2's vehicle, exit his car, retrieve a tan "Justin Boots" cooler bag, and place the cooler into the back of CI-2's vehicle.

During this meeting:

a. ISAIAS asked, "Is everything alright or what [is it safe to hand off the narcotics proceeds at this location]?" CI-2 responded, "Get out [of the vehicle] so that they [law enforcement] don't look at us, like we're making an exchange real quick. Grab the bag slowly and drop it over here, on the back [inside CI-2 vehicle] here. Put it over here. It's all nicely packed [organized and counted], right?" ISAIAS responded, "Yes."

b. CI-2 asked, "Everything, there are a hundred forty [\$140,000], right? Well measured [carefully counted]?" ISAIAS responded, "A hundred forty [\$140,000]." CI-2 stated, "Yes, because, when you don't measure it well [deliver the agreed upon amount] then you have to go to the office [accompany CI-2 to his/her office] and I have to verify them there [count the money together]." ISAIAS responded, "Yes."

98. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved from CI-2's vehicle a tan "Justin Boots" cooler bag containing approximately \$139,470 in cash. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to

detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

99. On or about July 10, 2013, between approximately 5:53 p.m. and 6:28 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "I am on my way back." PARRA-PEDROZA asked, "OK. All good?" CI-2 responded, "Yes." PARRA-PEDROZA asked, "How much did they sing for [deliver]?" CI-2 responded, "140.0 [\$140,000]."

100. On or about July 10, 2013, between approximately 8:19 p.m. and 9:13 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA asked, "OK. What's up?" CI-2 responded, "That's what I am doing. Verifying [counting the money]." PARRA-PEDROZA stated, "OK." CI-2 stated, "505 short." PARRA-PEDROZA asked, "No. How much are the tickets [how much money was delivered]?" CI-2 responded, "139495 [\$139,495, which was the amount that agents had counted prior to an official money count]." PARRA-PEDROZA asked, "But the size [denomination of the bills delivered] is ok? There isn't any garbage [small bills such as \$1 and \$5 bills]?" CI-2 responded, "Little this one." PARRA-PEDROZA stated, "If it [gold] all comes tomorrow, Diego [PINEDA-SANCHEZ] will sell." CI-2 responded, "Yes."

101. On July 12, 2013, between approximately 9:49 a.m. and 10:32 a.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "Send me the guides [Fed Ex labels pre-addressed to Refinery A] so I can get away early." PARRA PEDROZA responded,

"OK. I already requested them." CI-2 stated, "Let me know when you send them."

PARRA PEDROZA stated, "Yes. What is your mail? Yes. They're gone."

102. On or about July 12, 2013, at 10:31 a.m., the UC Email Account received an email from Parra-Pedroza Email Account 1. This email was entitled, "Fwd: [Refinery A] FedEx Shipping Label." The email included two attachments, including ten prepaid FedEx labels addressed to Refinery A and a Refinery A packing list.

103. Between about July 12, 2013 and about July 15, 2013, using three of the shipping labels provided by PARRA-PEDROZA, agents sent to Refinery A approximately 3,248 grams of 24-Karat gold, which agents had purchased with approximately \$137,033 of the proceeds obtained from ISAIAS. Agents also enclosed in these shipments a Refinery A packing list that identified the shipping company as "Chicago Gold" and described the contents of the boxes as containing a total of approximately 3,248 grams of 24-Karat gold. According to FedEx records, these shipments arrived at Refinery A between about July 15, 2013 and about July 16, 2013.

104. On or about July 15, 2013, between approximately 11:19 a.m. and 11:42 a.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange:

a. PARRA-PEDROZA asked, "How much [gold] did you send? Just a kilo [1000 grams]. They [narcotics traffickers associated with ISAIAS] are going to choke me." CI-2 responded, "More than one [CI-2 purchased more than one

kilogram of gold with the ISAIAS money], later I will send you the rest.” PARRA-PEDROZA stated, “Why didn’t you tell me? I committed myself. When you talk to me, you need to tell me the truth. Everything, alright? You lie to me, I relay the lies and I’m the one who gets it.” CI-2 responded, “Yes, I brought everything [all of the gold], but this guy [CI-2’s putative gold supplier] is clueless, I’m telling you what he’s telling me.”

b. PARRA-PEDROZA stated, “Tell him, we are going to get in trouble.” CI-2 responded, “La refi [CI-2’s putative gold supplier], it’s easy for him to say tomorrow because he thinks the metal [gold] goes directly to you [to PARRA-PEDROZA in Mexico], doesn’t know it goes all the way over there [to Refinery A in Florida].” PARRA-PEDROZA stated, “No problem if it’s late at least a day. It’s when they lie, I would have problems.” CI-2 stated, “OK. I will be careful so it won’t happen again.”

c. PARRA-PEDROZA stated, “Later I’m going to face them [narcotics traffickers associated with ISAIAS] and tell them that it was a lie that everything [all of the gold] is being sent. Arrive tomorrow. How much was sent exactly?” CI-2 responded, “Let me check my book, will let you know. 1062 [1,062 grams of gold].”

105. On or about July 16, 2013, between approximately 8:24 a.m. and 12:02 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA asked, “Already sent the rest [balance of the gold purchased with narcotics proceeds from ISAIAS]?” CI-2

replied, "I already sent it [a second FedEx shipment containing approximately 2,186 grams of gold sent to Refinery A on or about July 15, 2013]. Close 3,248.76 of fine for \$1,293 [CI-2 purchased 3,248.76 grams of 24 Karat gold at the current fair market value of \$1,293 per ounce, using narcotics proceeds collected from ISAIAS]." PARRA-PEDROZA responded, "OK."

**XI. PINEDA SANCHEZ and PARRA-PEDROZA Instruct CI-2 to Collect and Launder Narcotics Proceeds from OCHOA (July 16, 2013).**

106. On or about July 10, 2013, at approximately 1:25 p.m., CI-2 had a consensually recorded call with JOSE HERNANDEZ OCHOA, who was using Ochoa Phone 1.<sup>20</sup> During this call, OCHOA stated, "I'm talking to Daniel, right?" CI-2 responded, "Okay, yes, I'm Daniel [to vouch for CI-2's trustworthiness]." OCHOA stated, "Yeah, I'm calling on behalf of Roberto [code name to vouch for OCHOA's trustworthiness], sir."

107. On or about July 10, 2013, at approximately 1:27 p.m., CI-2 had a consensually recorded call with OCHOA, who was using Ochoa Phone 1. During the call, OCHOA said, "If you [CI-2] want, I can free up so can see you [meet to deliver

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<sup>20</sup> Agents identified OCHOA as follows: As discussed below, on or about July 16, 2013, CI-2 had a consensually recorded call with the man who was using Ochoa Phone 1. During this call, the man using Ochoa Phone 1 arranged to meet CI-2 in person at the Portillo's at the intersection of Roosevelt Road and Des Plaines Avenue on July 16, 2013, at approximately 1:10 p.m., for the purpose of delivering narcotics cash proceeds. Following this phone call, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed an Oregon State Driver's License photograph of "Jose Hernandez Ochoa," and positively identified OCHOA as the individual who delivered narcotics proceeds to CI-2 on July 16, 2013. In addition, prior to this July 16 meeting, agents outfitted CI-2 with a concealed audio recording device, which captured OCHOA's voice. After reviewing the recording of the July 16 meeting, agents compared the voice of the man with whom CI-2 met to the voice of the man who was using Ochoa Phone 1 in numerous, consensually recorded calls with CI-2, and determined that OCHOA was the user of Ochoa Phone 1.



narcotics proceeds].” CI-2 asked, “Okay, uh, are you the one with uh, two tickets [\$2,000]?” OCHOA responded, “Yeah, one, one with, with, with thirty pesos [\$30,000].”

108. On or about July 11, 2013, between approximately 10:09 a.m. and 12:24 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange:

a. CI-2 stated, “I never answered the one who called me; he is one of the little ones [a money courier with a small amount of narcotics proceeds].” PARRA-PEDROZA stated, “It’s 150 [\$150,000].” CI-2 stated, “Yesterday [July 10, 2013] he [OCHOA] told me 30 [\$30,000].” PARRA-PEDROZA stated, “It’s now 150 [\$150,000], it’s urgent to me, help me out.” CI-2 stated, “I called, it is 30 [\$30,000].” PARRA-PEDROZA responded, “It is another one [a different money courier who would deliver \$150,000 in narcotics cash proceeds]; let me tell them to redial [call CI-2 again].” CI-2 stated, “He [OCHOA] is the only one who has called.”

b. PARRA-PEDROZA asked, “How are you going?” CI-2 responded, “Making the metal order [purchasing gold with narcotics proceeds].” PARRA-PEDROZA asked, “And has the one [a different courier of narcotics cash proceeds] for the 100 [\$100,000] called you?” CI-2 responded, “No he [\$100,000 money courier] has not called just the one [OCHOA] for the 30 [\$30,000].”

109. On or about July 12, 2013, at approximately 1:28 p.m., CI-2 had a consensually recorded call with PINEDA SANCHEZ, who was using Target Device 6. During this call:

a. PINEDA SANCHEZ stated, "Listen, this is Carlos' [PARRA-PEDROZA's] associate, from this side over here [Mexico]. . . . They [OCHOA] have been calling you . . . to see if you can check their car [collect narcotics proceeds], but that you haven't been able to meet with them [OCHOA]." CI-2 responded, "It's because they [OCHOA] have some small ones, a thirty [\$30,000 of narcotics proceeds] and that's the only one [OCHOA] that has call me. The one that had thirty dollars [\$30,000], okay?" PINEDA SANCHEZ stated, "Yes. He [OCHOA] wanted to refinance a car for thirty dollars [launder \$30,000]."

b. CI-2 stated, "It's best if they [OCHOA] have it [narcotics proceeds], it's best if he [OCHOA] keeps it and I'll pick it up from him [OCHOA] on Monday [July 15, 2013]." PINEDA SANCHEZ stated, "Listen, the one that has very little [OCHOA], the one that wants the refinance for thirty [launder \$30,000], what do I tell him [OCHOA]?" CI-2 responded, "Well, I don't know what to tell him [OCHOA]. He [OCHOA] already called me like two, three times. Uh, well, Monday [collect narcotics proceeds from OCHOA on July 15, 2013]."

c. CI-2 stated, "You need to tell Carlos [PARRA-PEDROZA] we have to put a person [a middle man] to pick up from the ones that have a little [smaller amounts of narcotics proceeds]. It's because I'm really fucking paranoid with the small ones [couriers who deliver small amounts of narcotics proceeds]. One with fifteen [\$15,000] called me, one with forty [\$40,000], one with thirty [\$30,000], and that one [OCHOA], that one. So, you gotta' fear those. I rather not pick up from those so I won't get into any problems [with law enforcement]." PINEDA

SANCHEZ responded, "Oh, okay but those [OCHOA and other couriers with small amounts of narcotics proceeds] are very secure. It's no problem. . . . Yes, they're, those are confirmed from over here and all [vetted for connections to law enforcement by Mexican members of the MLO]."

d. PINEDA SANCHEZ stated, "Oh, I'm telling you the ones that have very little miles [couriers who deliver small amounts of the narcotics proceeds]. . . . Have them agree on your time and wherever you want [to deliver narcotics proceeds]. . . . You tell them, 'At so and so time and here.'" CI-2 stated, "That's what I tell them [money couriers]. . . . I always tell them, 'Do you have time right now or early tomorrow?' 'Oh, no I can until 3:00 in the afternoon.' And then they report over there [to their Mexican bosses] and say that I send them to hell, that I don't want to pick up [narcotics proceeds] from them." PINEDA SANCHEZ stated, "Yeah, what they're [OCHOA and his bosses] telling us over here is that you're telling them, 'I'll call you later, I'll call you later, I'll call you later.' That's it's been like that since yesterday."

e. PINEDA SANCHEZ stated, "So they [OCHOA and his bosses] just told me, 'Listen, just tell me if you're going to pick it up or not, otherwise I'll go somewhere else [to launder narcotics proceeds].' You know." CI-2 stated, "Yeah and that's what they [OCHOA and his bosses] should say, the truth. That's my word. Why wouldn't I pick it [narcotics proceeds] up if that's how we're paying for lunch [CI-2 receives a percentage of the amount of money he/she launders for PARRA-PEDROZA]. . . . It's not like I'm only going to want one [shipment of

narcotics proceeds]. For me, the more [narcotics proceeds] there is, the better for me. But they [drug traffickers and money couriers] won't accommodate my schedule. Uh, and you see, like that's very little [narcotics proceeds], like the one from here [\$30,000 from OCHOA], it's not worth fucking losing my time with him." PINEDA SANCHEZ stated, "No, of course, to be waiting there. If they [couriers] call you and tell you, 'I have fifteen [\$15,000], come over here.' Wherever you want, you move them [couriers] wherever you want, at the time you want. If they can't, well then, 'No, I [CI-2] can't move.' Right." CI-2 stated, "Okay, well, then I'll do it, like that."

f. PINEDA SANCHEZ stated, "The one that told you right now he has thirty [OCHOA, who had \$30,000 to launder], if you want to call him, tell him, 'Listen, you [OCHOA] go the receipt [narcotics proceeds] bring it over here.' If he doesn't want to [deliver the narcotics proceeds to CI-2], 'That's fine, call me [CI-2] when you [OCHOA] get money [narcotics proceeds]. . . . All the small ones [couriers with small amounts of narcotics proceeds] . . . have to accommodate your schedule and your place."

g. CI-2 stated, "Like right now, I'm sending you [PINEDA SANCHEZ and PARRA-PEDROZA] the mail [gold purchased with narcotics proceeds], so I can't leave this so I can go meet with someone [a courier] who has only thirty pesos [\$30,000], so I need them [couriers] to accommodate to my schedule and not to be calling over there [Mexico], telling you [PINEDA SANCHEZ and PARRA-PEDROZA] I don't want to take care of them [collect narcotics proceeds

for laundering].” PINEDA SANCHEZ said, “Tell them [money couriers], ‘All the way over here.’ [If the drug trafficker and money courier says,] ‘No, I can’t come,’ [then CI-2 should say], ‘Well, good bye, take care.’” CI-2 stated, “Then as soon as they [money couriers] call me, I’m going to tell them, ‘You know what? Come over right now at so and so place.’” PINEDA SANCHEZ stated, “Yeah, that’s better.”

h. PINEDA SANCHEZ asked, “Hey, and you don’t have their [money couriers] phone number so you can call them?” CI-2 responded, “Okay, I have their numbers. Let me call them and tell them to come over here. If they say ‘no,’ then I’ll be like, ‘You know what? They don’t want to come over here.’” PINEDA SANCHEZ stated, “Yeah, if they don’t want to [come to CI-2 as directed], let us [PINEDA SANCHEZ and PARRA-PEDROZA] know.”

i. PINEDA SANCHEZ stated, “See if you can call the one [OCHOA] with the miles [\$30,000].” CI-2 stated, “I’m going to call him right now. Okay, as soon as I pull over, I’ll call him [OCHOA] and see what he tells me. So we can set something up [a time and place for OCHOA to deliver narcotics proceeds].” PINEDA SANCHEZ stated, “Thank you. Talk to you later.”

110. On or about July 16, 2013, between approximately 12:02 p.m. and 1:52 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA wrote, “Pick up the call from the guy [OCHOA] of the 30 [\$30,000]. . . . That same guy [OCHOA] going to bring 200 [\$200,000] tomorrow [to be laundered]. We are in trouble. . . . Are you in contact with him [OCHOA]?” CI-2 stated, “I just contacted him [OCHOA] and told

him I'm en route. These guys are liars, they tell me one thing and tell you something else, I've been ready [to receive the narcotics proceeds] since the morning. I'm on my way back, this primo [OCHOA] just arrived." PARRA-PEDROZA stated, "Ok. With how much [narcotics proceeds from OCHOA]?" CI-2 responded, "30 [\$30,000]."

111. On or about July 16, 2013, at approximately 12:56 p.m., CI-2 had a consensually recorded call with OCHOA, who was using Ochoa Phone 1. During this call, OCHOA and CI-2 agreed to meet at approximately 1:10 p.m. in the parking lot of a restaurant located at 7740 West Roosevelt Road in Forest Park, Illinois.

112. At approximately 1:11 p.m., CI-2 met with OCHOA in a parking lot located at 7740 West Roosevelt Road in Forest Park. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, and found none. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance observed OCHOA exit his vehicle with a black bag and enter the rear passenger side door of CI-2's vehicle. During this meeting:

a. CI-2 stated, "Just throw it [the backpack] in the back of my truck." OCHOA stated, "Let me, the thing is I have a little backpack. Um, um why don't we take a little drive and you can leave me over there and I'll walk back." CI-2 stated, "No, just throw it in the back there. You got it [the money] there [in the backpack]?" OCHOA responded, "Yeah."

b. OCHOA stated, "Yes. Let's go [drive to avoid drawing suspicion] if you want." CI-2 stated, "Okay, just throw it in the back and close it and you can stay behind talking [to avoid drawing suspicion]. . . . Then just throw it in the back of my truck on your own, back there. Yeah, just throw it on the seat and I'll fix it right now [take the narcotics proceeds out]. Yeah, yeah, just leave it like that so it doesn't look too bad." OCHOA asked, "Huh?" CI-2 stated, "Just leave it on the seat, on the floor and I'll fix it later. There's thirty [\$30,000], right?" OCHOA responded, "Yes."

c. CI-2 stated, "They had told me you were going to bring another two [\$200,000] more." OCHOA stated, "I think, they haven't told me. . . . Yeah, they haven't told me yet." CI-2 stated, "Yeah, because I didn't want to come for that [\$30,000], because it's very little. It's very little, so then they told me, 'Go, go, he'll be taking another two pesos [\$200,000] later.'"

d. CI-2 asked, "Do you deal with the money or the other stuff [narcotics]?" OCHOA asked, "Huh?" CI-2 stated, "I only deal with the money." OCHOA stated, "No, well, me too, sometimes I . . . ." CI-2 stated, "You too. Yeah, yeah, that's what . . . ." OCHOA interrupted, "I'm going to open the hood right now [to make their meeting appear less conspicuous]." CI-2 stated, "Go ahead now. . . . Just go, take off right now and I'll head out afterwards, yeah."

113. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents recovered a blue and white plastic bag containing approximately \$29,990 in cash. Agents then transported the money to

the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

114. At approximately 4:11 p.m., CI-2 sent a BBM message to PARRA-PEDROZA, who was using MLO Device 1. CI-2 stated, "I won't be able to make it to the refinery [to purchase gold]. Put me down for 29990 [OCHOA delivered \$29,990 in narcotics proceeds]."

115. Prior to the July 16, 2013, meeting with OCHOA, on or about July 12, 2013, CI-2 received an email from PARRA-PEDROZA, attaching multiple preprinted FedEx "Priority Overnight" shipping labels addressed to Refinery A in Florida and a Refinery A shipping form called a "packing list." On or about July 18, 2013, using the shipping labels previously provided by PARRA-PEDROZA, agents sent to Refinery A via Fed Ex approximately 22 ounces of gold bars, which agents had purchased with approximately \$28,894.80 of the proceeds obtained from OCHOA. Agents also enclosed in this shipment the Refinery A packing list that identified the shipping company as "Chicago Gold" and described the contents of the box as 684.28 grams of 24 karat gold. According to FedEx records, this shipment arrived at Refinery A on July 19, 2013.

116. On or about July 19, 2013, between approximately 12:36 p.m. and 2:32 p.m., CI-2 exchanged BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 wrote, "I just sent you the mail [gold purchased with OCHOA's narcotics proceeds]. Close 684.28 [grams] the fine [gold] for \$1295 [CI-2 arranged for the gold to be sold at \$1,295 per ounce]. Willy [PARRA-PEDROZA],



where are you at? Why don't you answer?" PARRA-PEDROZA replied, "Just arrived."

**XII. PARRA-PEDROZA Directs CI-2 to Collect and Launder Approximately \$200,780 in Narcotics Proceeds from CUEVAS (July 24, 2013).**

117. On or about July 17, 2013, between approximately 9:34 p.m. and 9:41 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, "Primo [HECTOR CHAVEZ CUEVAS<sup>21</sup>] tried to contact you and you didn't answer. Different [courier]."<sup>22</sup> CI-2 responded, "Yes they [CUEVAS] tried to contact me, I thought it was the same person [a money courier who had previously arranged to deliver narcotics proceeds to CI-2]." PARRA-PEDROZA stated, "No someone else. The other [money courier] was caught with no money [encountered by law enforcement], everything is good. Call back [CUEVAS] you didn't answer. . . . For real, contact them, so I could reason over here [arrange the delivery of narcotics proceeds with

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<sup>21</sup> Agents identified HECTOR CHAVEZ CUEVAS as follows: As discussed below, on or about July 24, 2013, CI-2 had a consensually recorded call with the man who was using (815) 295-7588 ("Cuevas Phone 1"). During this call, the man using Cuevas Phone 1 arranged to meet CI-2 in person at the parking lot of a Sam's Club located at 321 South Larkin in Joliet, Illinois on July 16, 2013 at approximately 3:00 p.m., for the purpose of delivering narcotics cash proceeds. Following this phone call, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed an Illinois State Driver's License photograph of "Hector Chavez Cuevas," and positively identified CUEVAS as the individual who delivered narcotics proceeds to CI-2 on July 24, 2013. In addition, prior to this July 24 meeting, agents outfitted CI-2 with a concealed audio recording device, which captured CUEVAS's voice. After reviewing the recording of the July 24 meeting, agents compared the voice of the man with whom CI-2 met to the voice of the man who was using Cuevas Phone 1 in numerous, consensually recorded calls with CI-2, and determined that CHAVEZ CUEVAS was the user of Cuevas Phone 1.

<sup>22</sup> Toll records show that, on July 17, 2013, at approximately 9:28 p.m., CI-2 received two telephone calls from Cuevas Phone 1, which CI-2 did not answer.

Individuals E's Mexican associates]. . . . They [CUEVAS's associates] told me now. Please." CI-2 responded, "Ok. I will contact [CUEVAS]."

118. On or about July 17, 2013, at approximately 9:50 p.m., CI-2 had a consensually recorded call with HECTOR CHAVEZ CUEVAS, who was using Cuevas Phone 1. During the call, CUEVAS stated, "Yes, Daniel [codename that PARRA-PEDROZA provided to vouch for CUEVAS's trustworthiness], on behalf of Raul. He [PARRA-PEDROZA] told me to call you." CI-2 stated, "Okay, uh, do you know how many miles are on the car he wants me to fix [the amount of narcotics proceeds that CUEVAS will deliver]?" CUEVAS responded, "Yes, he told me it was something like a hundred and five [\$105,000]."

119. Between approximately 9:55 p.m. and 9:58 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "Okay. I contacted them [CUEVAS], will be available at 2 afternoon." PARRA-PEDROZA responded, "Okay. Its 200 [\$200,000 that CUEVAS will deliver to CI-2], I think. Did you make arrangements [to receive the narcotics proceeds]." CI-2 stated, "They [CUEVAS] said 100 [\$100,000]." PARRA-PEDROZA responded, "Okay."

120. On July 22, 2013, at approximately 11:23 a.m., CI-2 had a consensually recorded call with CUEVAS, who was using Cuevas Phone 1. During the call, CUEVAS asked, "When will you have a chance to come for [the narcotics proceeds]." CI-2 responded, "I'll go but not until Wednesday [July 24, 2013]. I just

need for them to call me from over there [receive PARRA-PEDROZA's permission to collect the money]."

121. On July 22, 2013, at approximately 1:29 p.m., CI-2 had a consensually recorded call with CUEVAS, who was using Cuevas Phone 1. During the call, CUEVAS stated, "Listen, my friend is asking me if Wednesday is for sure?" CI-2 responded, "Yes, Wednesday [July 24, 2013] for sure." CUEVAS asked, "But you, so you can come over here and fix the car [collect narcotics proceeds]?" CI-2 responded, "I'm going to be fixing cars [collecting other narcotics proceeds] now. . . . So I'll call you on Wednesday. You said your car has a hundred and five miles [\$105,000], right?" CUEVAS responded, "Right, exactly."

122. On July 22, 2013, between approximately 1:33 p.m. and 1:36 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "Okay. I was contacted by a primo [CUEVAS], good for Wednesday [CUEVAS to deliver narcotics proceeds on Wednesday, July 24, 2013]." PARRA-PEDROZA responded, "Let me see from who." CI-2 stated, "Okay. It's for 105 [\$105,000], told me last week which I didn't receive." PARRA-PEDROZA said, "Okay."

123. On July 22, 2013, at approximately 4:09 p.m., CI-2 had a consensually recorded call with CUEVAS, who was using Cuevas Phone 1. During the call, CI-2 asked, "Okay, uh, do you know how many miles you put on the car [the amount of narcotics proceeds CUEVAS will deliver]?" CUEVAS responded, "Something around one hundred and forty [\$140,000]."

124. On or about July 24, 2013, CI-2 had a series of consensually recorded calls with CUEVAS, who was using Cuevas Phone 1. During these calls, CUEVAS and CI-2 arranged to meet each other at approximately 3:00 p.m. in the parking lot of a Sam's Club located at 321 South Larkin in Joliet, Illinois.

125. On July 24, 2013, at approximately 3:00 p.m., CI-2 and CUEVAS met in the parking lot of the Sam's Club located at 321 South Larkin in Joliet. Prior to this meeting, agents outfitted CI-2 with a concealed audio and video recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, and finding only \$67. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance observed CUEVAS park his car next to CI-2's vehicle, exit his car, retrieve a green shopping bag, and place the bag into the back of CI-2's vehicle. During this meeting:

a. CI-2 stated, "Yeah, just take it [narcotics proceeds] out and put it [narcotics proceeds] in the back of my truck and close it [the back hatch of CI-2 vehicle]. . . . Yeah, just leave it [narcotics proceeds] there and close it." CUEVAS stated, "There you go."

b. CI-2 stated, "You said a hundred and forty [\$140,000]?" CUEVAS responded, "No, two hundred [\$200,000]." CI-2 asked, "Two [\$200,000]? Two [\$200,000]?" CUEVAS stated, "It's because they [drug traffickers] barely gave me another yesterday [CUEVAS received an additional amount of narcotics proceeds at the last minute]." CI-2 stated, "Oh, uh-huh. They're [narcotics

proceeds] all sealed [vacuum sealed], well measured, well measured [fully counted]?" CUEVAS stated, "Well measured [fully counted]."

126. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved a green shopping bag containing approximately \$200,780 in cash from CI-2's vehicle. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

127. On July 24, 2013, at approximately 3:38 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "OK. I'm going to the office [going to count the narcotics proceeds received from CUEVAS]." PARRA-PEDROZA asked, "With how much [money]?" CI-2 responded, "200 [\$200,000]."

128. On July 24, 2013, between approximately 8:49 p.m. and 8:59 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "Put me down for 200 [CUEVAS delivered \$200,000]." PARRA-PEDROZA asked, "And the other [delivery of narcotics proceeds] for chikito [code word for a different money courier]? . . . Could you see him in the morning?" CI-2 responded, "See what time I will be able to see the refiner [CI-2's gold supplier, from whom CI-2 will purchase gold with the \$200,000 that CUEVAS delivered]." PARRA-PEDROZA responded, "OK. Let me know later."

129. On July 25, 2013, between approximately 10:25 a.m. and 10:33 a.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange, CI-2 stated, “[T]he guy from the refinery [CI-2’s gold supplier] left, just left me what [gold] he had.” PARRA-PEDROZA asked, “Will give you everything [enough gold to cover the \$200,000 collected from CUEVAS] today?” CI-2 responded, “That’s what I’m doing the paperwork on.” PARRA-PEDROZA asked, “Have guides [enough FedEx labels to ship the \$200,000 worth of gold to Refinery A in Florida]? . . . Will send you just in case [PARRA-PEDROZA will email additional pre-paid FedEx shipping labels addressed to Refinery A].”

130. On July 25, 2013, between approximately 12:25 p.m. and 2:40 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, “I just sent you the guides [FedEx shipping labels to ship the gold]. . . . If everything arrives [enough gold to cover the \$200,000 collected from CUEVAS]?” CI-2 stated, “Till Monday [CI-2 will not be able to ship the gold to Refinery A until Monday [July 29, 2013].” PARRA-PEDROZA acknowledged, “OK.”

131. On or about July 30, 2013, using four of the shipping labels provided by PARRA-PEDROZA, agents sent to Refinery A approximately 4,435.43 grams of 24-Karat gold, which agents had purchased with approximately \$192,465.78 of the proceeds obtained from CUEVAS. Agents also enclosed in this shipment a Refinery A packing list that identified the shipping company as “Chicago Gold” and described the contents of the boxes as containing a total of 4,435.43 grams of 24-Karat gold.

According to FedEx records, this shipment arrived at Refinery A on or about July 31, 2013.

132. On or about August 12, 2013 CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "Last one I send you [four boxes of gold sent to Refinery A on July 30, 2013], close it [set the price of the gold at the fair market value at the time which it was sent]." PARRA-PEDROZA responded, "Okay." CI-2 stated, "1340 [current fair market value of the gold at \$1,340 per ounce of 24 Karat gold]." PARRA-PEDROZA responded, "Okay."

**XIII. ABEL Directs CI-2 to Collect and Launder up to \$290,704 in Narcotics Proceeds from LEIVA (September 11, 2013).**

133. On or about September 9, 2013, between 4:15 p.m. and 4:19 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1.<sup>23</sup> During this exchange, ABEL asked, "Listen, can you do it [collect narcotics proceeds] tomorrow?" CI-2 asked, "How much?" ABEL responded, "150

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<sup>23</sup> As noted above, PARRA-PEDROZA began communicating with CI-2 over MLO Device 1 on or about June 3, 2013. On or about September 6, 2013, PARRA-PEDROZA sent CI-2 a BBM message over MLO Device 1, advising CI-2 that he planned to give MLO Device 1 to his nephew, ABEL. PARRA-PEDROZA stated, "I'm not going to have my cell [MLO Device 1], it's going to be with my nephew. . . . But he knows how to close [coordinate money laundering shipments] and everything." According to CI-2, prior to his/her cooperation with law enforcement, CI-2 had worked with PARRA-PEDROZA's nephew named "Abel" to conduct the money laundering conduct scheme when PARRA-PEDROZA was unavailable. On or about September 9, 2013, CI-2 sent a BBM message to MLO Device 1, asking, "Is this Willy [PARRA-PEDROZA]?" When the user of MLO Device 1 responded, "No," CI-2 stated, "Abel." In response, the user of MLO Device 1 responded, "Call me Robin hahaha. Better." In another BBM message sent on January 21, 2014, PARRA-PEDROZA, who was then using Parra-Pedroza Device 1, referred to MLO Device 1 as "the other pin from Abel."

[\$150,000]. All right, they [drug trafficker] are going to call you right now." CI-2 responded, "Okay."

134. Between 6:05 p.m. and 6:42 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL asked, "Have they [drug trafficker] called you?" CI-2 responded, "No." ABEL asked, "What is the number for the cousins [what telephone number does CI-2 use to coordinate delivery of narcotics proceeds]?" CI-2 responded, "Tell Willy [PARRA-PEDROZA] to give it to you." ABEL stated, "Okay. Does it end in 0423. Or 0015." CI-2 responded, "0423." ABEL stated, "Okay. That yeah, they [drug trafficker] will call you right now."

135. At approximately 7:59 p.m., CI-2 had a consensually recorded call with and unidentified man ("UM 2918"). During this call:

a. UM 2918 stated, "Hello, Daniel [CI-2's codename, provided by PARRA-PEDROZA]?" CI-2 responded, "Yeah." UM 2918 stated, "I'm calling you on behalf of Gerardo. . . . Listen, I called, right now, to try to pitch in to have enough for the rent [deliver narcotics proceeds]. We have to deliver a . . . ." CI-2 asked, "Well, did they say how much we have to pitch in?" UM 2918 responded, "A hundred and fifty [\$150,000]. . . . The only thing is that, um, that we have to go certify the, the, the, the authenticity of the, of the, of the amount [count the narcotics proceeds]. So then um, I think they want to do that. Supposedly that was already taken care of. That possibly there at your office or I don't know where. Do



you know anything about that [UM 2918 wants to count the narcotics with CI-2 so there is no discrepancy]?”

b. CI-2 responded, “No, they didn’t tell me. Because usually uh, I work on stuff on the street [CI-2 does not normally count the money with the couriers].” UM 2918 stated, “Because sometimes, that’s been happening lately. That when, when the deposit is made supposedly some numbers remain in red [discrepancies in reports of the amounts delivered and collected]. So then they want to do that right now, um, to look for a place on behalf of the receiver. So this way it can get certified [counted together] and then you just give a certificate of authenticity, and everyone is happy. But if you are not aware of that, I would like for you to look into it and we can make arrangements. And if you want Wednesday, we can do it on Wednesday. That’s fine. Sounds good to me.”

c. CI-2 stated, “Oh, okay, let me call Ingeniero [ABEL] over there and I’ll tell him to see what he tells me. Okay, and then we’ll see if, I should work on it [collect narcotics proceeds] there at the shop [CI-2’ putative office] or if I should fix it there on the street. Okay. I’ll see what he tells me.”

d. UM 2918 stated, “They said that, that I should call you instead. Because that guy [the money courier, subsequently identified as ANTHONY LEIVA] is, he doesn’t speak Spanish well. He speaks very little.” CI-2 and UM 2918 agreed to speak again later.

136. Between 8:11 p.m. and 8:31 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange:

a. ABEL asked, "Ready? Anything? What did you guys [UM 2918] agree on?" CI-2 responded, "Wednesday [for the collection of narcotics proceeds from LEIVA]." ABEL asked, "It can't be done tomorrow? So that everything [gold purchased with narcotics proceeds from LEIVA and others] will be able to come in [to Refinery A] on Friday. . . . [W]ill everything come on Friday." CI-2 responded, "Yes."

b. ABEL asked, "And the one that called you today [UM 2918] can't be done tomorrow? They just ask me why." CI-2 responded, "I need to talk to Refi [CI-2's putative gold supplier] so he could put some metal [gold] aside for me for Wednesday. And as soon as I receive and verify, I'll take it to Refi." ABEL stated, "Okay. In other words, have them [UM 2918] tell you how much it is [narcotics proceeds they will deliver to CI-2]. And you just let them [gold supplier] know that they have to take it [set aside enough gold to cover the purchase] and that's it?" CI-2 responded, "They [gold supplier] just let me know [when the gold is ready to be purchased and picked up]."

137. On or about September 10, 2013, at approximately 8:55 p.m., CI-2 had a consensually recorded call with UM 2918. During this call, UM 2918 stated, "They were asking me if you had a machine to, to, to review that quickly [a money counter to count the narcotics proceeds in LEIVA's presence]." CI-2 responded,

"Yeah, I do have a secretary [money counter] there, and everything." UM 2918 said, "Okay, so then...if you could make an arrangement with the person [LEIVA] to meet at a place and they can, they can give it [the narcotics proceeds] to you and, and, and you . . . ." CI-2 stated, "Well, I think I'm going to take him to the office. So that [count the narcotics proceeds] in front of him." UM 2918 and CI-2 agreed to speak again later.

138. On or about September 11, 2013, between 9:37 a.m. and 9:43 a.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL asked, "What time is the thing [collection of narcotics proceeds from LEIVA]." CI-2 responded, "Around one [1:00 p.m.]." ABEL asked, "Do you need a guide [pre-paid shipping label addressed to Refinery A]." CI-2 responded, "Yes." ABEL responded, "Okay. Where should I send it to?" CI-2 responded, "Willy, do you have my email [PARRA-PEDROZA should have CI-2's email]." ABEL stated, "Okay. How many guides [shipping labels]?" CI-2 responded, "Ten." ABEL stated, "Okay."

139. On or about September 11, 2013, at approximately 12:28 p.m., the UC Email Account received an email from email address juancortega13@hotmail.com ("Abel Email Account 3"),<sup>24</sup> entitled, "Guia." The email included two attachments,

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<sup>24</sup> Agents identified ABEL as the user of Abel Email Account 3 as follows: Immediately after this September 11 email attaching the shipping labels, ABEL sent CI-2 a BBM stating, "I already sent you the guides." On September 12, 2013, between approximately 12:56 p.m. and 3:41 p.m., ABEL, who was using MLO Device 1, exchanged a series of BBMs with CI-2. During this exchange, ABEL asked CI-2 to send him a document "To Juan C. Ortega's email." CI-2 stated, "Give me the complete email." ABEL responded, "juancortega13@hotmail.com [Abel Email Account 3]." On January 17, 2014, between 6:08 p.m. and 6:17 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-

including ten prepaid FedEx labels addressed to Refinery A and a Refinery A shipping form called a packing list. The body of the email stated, "We were requested by phone for a FedEx labels. We have it attached in this e mail along with a [Refinery A] packing list . . . . If you have any questions of concerns on how to use a label, please give us a call."

140. At approximately 12:28 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL stated, "I already sent you the guides [Refinery A shipping labels]." CI-2 responded, "Okay."

141. On or about September 11, 2013, between approximately 12:47 p.m. and 2:03 p.m., CI-2 had several consensually recorded calls with UM 2918. During these calls, UM 2918 arranged for LEIVA to meet with CI-2 at a Walgreens located near the intersection of "Pulaski and Diversey" in Chicago at approximately 2:08 p.m. During the first of these calls, CI-2 asked, "How should we do it to verify [count the money] for this guy [LEIVA]? . . . He should just follow me, he can come in my car so I can take him to the office, or how should we do it?" UM 2918 stated, "Let me ask him [LEIVA]." CI-2 stated, "Do you want, do you want him to follow me? He can come right behind me. . . . I can tell him [LEIVA], 'Okay, just follow me and let's go to the office' [to count the money together]."

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PEDROXA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA asked, "In the mails that they send you are you [listed as] juan carlos ortega Ortega. . . . Or is it abel." CI-2 responded, "Abel or someone from Florida." PARRA-PEDROZA stated, "It's abel."

142. On September 11, 2013, at approximately 2:08 p.m., CI-2 met with ANTHONY LEIVA<sup>25</sup> in the Walgreens parking lot located at the intersection of Pulaski Avenue and Diversey Avenue in Chicago. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, finding found none. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance observed LEIVA park next to CI-2's vehicle and speak briefly with CI-2.

143. During this meeting, LEIVA and CI-2 spoke in English, consistent with UM 2918's earlier representation that LEIVA did not speak Spanish well. LEIVA stated, "Hey, um I will follow you [to CI-2's office, to count the narcotics proceeds together] okay." CI-2 stated, "Okay, uh, they said 150 [\$150,000] correct." LEIVA responded, "Yeah, yeah, yeah." CI-2 stated, "Okay, before we go, we have to count like one time, okay? If you short, we count two times, okay? That's the most I can count for you." LEIVA stated, "Yeah no worries, let's go." CI-2 stated, "Okay you follow me." LEIVA stated, "I'll follow you." CI-2 and LEIVA then returned to their respective vehicles and left the Walgreens parking lot together.

144. At approximately 2:18 p.m., police working with agents on this investigation performed a traffic stop of CI-2 under the guise of issuing CI-2 a

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<sup>25</sup> Agents identified LEIVA as follows: As discussed below, on September 11, 2013, CI-2 met with, and attempted to obtain narcotics proceeds from, a man who arrived at a designated meeting location. On September 12, 2013, that same individual was pulled over by Chicago Police Department and identified himself as Anthony LEIVA and produced an Illinois driver's license with that same name and photograph.

citation for expired registration. Agents arranged for this traffic stop to allow law enforcement an opportunity to identify and follow LEIVA and to delay his anticipated delivery of narcotics proceeds. During the traffic stop, surveillance observed LEIVA drive around in the area of the traffic stop before departing the area. Agents maintained surveillance of LEIVA.

145. At approximately 2:40 p.m., CI-2 had a consensually recorded call with UM2918. During this call, CI-2 stated, "They [police] stopped me because, I have to change cars. Okay, your, your cousin [LEIVA] is fine and everything, so he doesn't start up with things. . . . One of those traffic things. My thing [registration] was expired, my ticket was expired. . . . I was on the phone and they stopped me, but it was just, it was a routine thing. So that guy [LEIVA] doesn't go to with things." UM 2918 stated, "All right, no . . . so they don't think over there [Mexican associates] that we are acting dumb [drawing law enforcement's attention to the MLO] here." UM 2918 and CI-2 agreed to speak again later.

146. On or about September 11, 2013, at approximately 3:28 p.m., surveillance observed LEIVA park in front of an auto repair shop located at located at 4201 W. Schubert in Chicago. Shortly thereafter, LEIVA retrieved a cardboard box from the rear cargo area of his vehicle. LEIVA then entered the W. Schubert address with the cardboard box. At approximately 3:55 p.m., surveillance observed LEIVA exit the address without the cardboard box and drive to a residence located at 217 E. Medill Ave in Northlake, Illinois ("Leiva Residence 1").

147. Between 3:50 p.m. and 5:33 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange:

a. CI-2 stated, "We weren't able to do it [collect narcotics proceeds from LEIVA] today." ABEL asked, "Why? . . . Everything okay? They already got worried over here [in Mexico]." CI-2 responded, "Everything is fine. My sticker [vehicle registration sticker] was expired that's why they [police] stopped me." ABEL asked, "That's why you couldn't meet with them?" CI-2 stated, "The cousin [LEIVA] was behind me on his way to the office [to count the narcotics proceeds]. And when the law stopped me he [LEIVA] took off." ABEL stated, "Oh, okay. But tomorrow you will [collect the narcotics proceeds from LEIVA]?" CI-2 responded, "Yeah, I already called him [UM2918]."

b. ABEL stated, "Okay. . . . But did they [police] check [search] the car? Or was it just papers [traffic ticket]?" CI-2 responded, "No, nothing. Just a ticket for an expired sticker." ABEL stated, "Oh, okay. I'll check in at 830 and see what's up. . . . Are you okay with everything else? Little light bulbs or something. Stop turning signals." CI-2 responded, "Everything is fine over here." ABEL stated, "I mean, with the car [CI-2 needs to use a car that will give police no excuse to pull him/her over]." CI-2 stated, "Yes, everything is fine. The thing is the squad car made a turn behind me and it went behind me and it stopped me." ABEL stated, "Oh, okay."

148. On September 12, 2013, at approximately 6:42 a.m., surveillance observed LEIVA exit Leiva Residence 1, drive to the auto repair shop at 4201 W. Schubert, and pull his vehicle into the bay area. At approximately 7:16 a.m., surveillance observed LEIVA departed 4201 W. Schubert in his vehicle. Agents continued to maintain constant surveillance of LEIVA.

149. On September 12, 2013, at approximately 7:41 a.m., CI-2 had a consensually recorded call with UM2918. During this call, UM 2918 stated, "They, they told me to cancel on you [Mexican associates instructed UM 2918 not to deliver narcotics proceeds to CI-2]. . . . They told me to cancel on you. Um, if you want, if you want ask, if you want to ask Sordo [UM 2918's boss] . . . so he can also agree. But they told me to cancel." CI-2 stated, "Okay, all right then."

150. According to toll records, between 7:36 a.m. and 7:59 a.m., UM 2918 Phone 1 was in contact with telephone number (224) 251-0218 ("Leiva Phone 1").

151. On September 12, 2013, between 8:02 a.m. and 8:07 a.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, "They [UM 2918] cancelled on me." ABEL asked, "Why?" CI-2 responded, "I don't know, probably because of yesterday [encounter with police]." ABEL stated, "Mmm. Let me tell them. . . . He's going to see if he could send them again."

152. At approximately 8:10 a.m., while agents maintained their surveillance of LEIVA from the W. Schubert address, CPD officers conducted a traffic stop of LEIVA in his vehicle at 10500 S. Indianapolis in Chicago. During the



traffic stop, LEIVA gave officers verbal consent to search his vehicle. During this search, officers found two cardboard boxes which contained a total of \$290,704. The number "150 [\$150,000]" was written on one box and the number "140,690 [\$140,690]" was written on the other box. Agents also found Leiva Phone 1 in LEIVA's possession.

153. Based on my familiarity with this case, including the aforementioned calls and communications between CI-2 and ABEL, UM 2918, and LEIVA, I believe that the \$290,704 in cash seized from LEIVA on September 12, 2013, were all or some of the same narcotics proceeds that LEIVA intended to deliver to CI-2, at the direction of ABEL.

154. Following his traffic stop, and after being advised of his *Miranda* rights, LEIVA agreed to speak with agents without the assistance of counsel. During that interview, LEIVA told agents that he worked for a man whom he knew as "Tio," who paid LEIVA to collect and deliver large quantities of marijuana and narcotics proceeds. LEIVA advised that his associates typically stored approximately 2,000 pounds of marijuana at a time in the garage located at 4201 W. Schubert in Chicago, and LEIVA would parcel out various quantities of the drug as directed by Tio. LEIVA stated that he has picked up five or six loads of marijuana, each load approximately 2000 pounds, over the course of his employment by Tio. LEIVA stated that Tio also instructed him to collect various amounts of money from multiple individuals and, once collected, to deliver the consolidated amounts of money to unknown individuals.

155. LEIVA gave agents verbal consent to search the garage located at 4201 W. Schubert. During this search, agents seized approximately 13 large bundles of a substance that appeared to be marijuana. CPD submitted this substance to its lab for testing, which determined that the recovered substance was approximately 325 pounds of marijuana. LEIVA was released without charges so as not to compromise the ongoing investigation.

156. Between 12:51 p.m., and 1:22 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange:

a. ABEL asked, "What exactly did they [UM2918] tell you in the morning? Or was it yesterday when they [UM 2918] cancelled?" CI-2 responded, "This morning when I told him [UM 2918] I was on my way and he said they [UM 2918's boss] cancelled on him." ABEL asked, "Do you have a picture of the ticket [traffic ticket]. . . . Because these guys [UM 2918's associates] are being assholes. And they don't believe [that police stopped CI-2 for only a traffic violation]. Can you send it [the traffic ticket] to me?" CI-2 responded, "I'll send it [the traffic ticket] to you right now." ABEL stated, "Because they think that they stopped you for something else. . . . That's why with the picture [of the traffic ticket]."

b. CI-2 stated, "They [the police] stopped me for an expired sticker and it was because the cop made a turn right behind me and he was behind me for a while. The light turned yellow, I kept going, and that's when he stopped me." ABEL stated, "Yeah, they already told them [UM 2918's associates]. But they say they

want to see the picture [of the traffic ticket]. You know how they are.” CI-2 responded, “I’m on my way to the office, I’ll send it [the traffic ticket] to you as soon as I get there.” ABEL stated, “All right. Because they [UM 2918’s associates] don’t want to take anymore [deliver narcotics proceeds to CI-2].”

**XIV. ABEL Directs CI-2 to Collect and Launder \$100,220 in Narcotics Proceeds from HERRERA (September 13, 2013).**

157. On or about September 12, 2013, between approximately 3:54 p.m. and 6:02 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, “I already committed to the refinery [putative gold supplier], and he’s fucking bothering me down there about when I’m going.” ABEL stated, “Tomorrow. Can you do [collect] one for 100 [\$100,000] and another one for 80 [\$80,000].” CI-2 responded, “One I can. Have them [money couriers] call me so I can meet with him early. I hope I am able to send it [gold purchased with the narcotics proceeds] to you.” ABEL responded, “Okay.”

158. At approximately 8:46 p.m., CI-2 had a consensually recorded call with MARIO HERRERA, who was using telephone (773) 517-4204 (“Herrera Phone 1”).<sup>26</sup>

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<sup>26</sup> Agents identified MARIO HERRERA and his voice as follows: On or about January 25, 2012 – prior to CI-2’s cooperation with law enforcement – surveillance observed CI-2 meet with a man in a dark gray Dodge Durango and then walk together into the location where CI-2 used to meet with couriers to collect narcotics proceeds. On January 31, 2012, in the course of a traffic stop conducted by Chicago Police Department officers on the same Durango, the driver of the Durango told officers that his name was “Mario Herrera” and produced a Mexican identification card bearing the same name and the driver’s photograph. Agents compared that photograph to the individual they saw on surveillance and determined it was the same individual. After CI-2 began cooperating with law enforcement in April 2013, agents showed CI-2 a photograph of HERRERA and CI-2 identified HERRERA as one of the individuals who had delivered narcotics precedes to him/her at

During this call, HERRERA stated, "Yeah, cousin, they told me to call you on behalf of [Individual K, codename to vouch for trustworthiness]." HERRERA and CI-2 then discussed possible places to meet the next day.

159. At approximately 8:49 p.m., CI-2 had a consensually recorded call with HERRERA, who was using telephone Herrera Phone 1. During this call, CI-2 stated, "They [ABEL] said that the car had a hundred miles [\$100,000 in narcotics proceeds], eighty [\$80,000], or a hundred miles, they told me it had." HERRERA stated, "A little less." CI-2 stated, "Okay, all right then. I'll call you. I'll call you when I'm around there. . . . Yeah, so we can go get something to eat [HERRERA can deliver the narcotics proceeds], so we can have some lunch. Okay?" HERRERA stated, "Alright."

160. On or about September 13, 2013, at approximately 9:41 a.m., CI-2 had a consensually recorded call with HERRERA, who was using telephone Herrera Phone 1. During this call, CI-2 stated, "Yeah, uh, I'll be there [to collect the money]. I didn't understand there if it was the car that had eighty miles [\$80,000] or a

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his/her money laundering location. CI-2 stated that he/she laundered HERRERA's money through the purchase of gold, and that he/she only met with HERRERA when HERRERA had narcotics proceeds to deliver. As discussed below, on September 12 and 13, 2013, CI-2 had several consensually recorded calls with the man who was using Herrera Phone 1. During these calls, the man using Herrera Phone 1 arranged to meet CI-2 at approximately 1:30 p.m. on September 13, 2013, at a Walmart in Chicago, Illinois. Following these calls, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance recognized and positively identified the man who delivered narcotics proceeds to CI-2 on September 13, 2013, as HERRERA. In addition, prior to the September 13 meeting, agents outfitted CI-2 with a concealed audio recording device, which captured HERRERA's voice. After reviewing the recording of the September 13 meeting, agents compared the voice of the man with whom CI-2 met to the voice of the man who was using Herrera Phone 1 in numerous, consensually recorded calls with CI-2, and determined that HERRERA was the user of Herrera Phone 1.

hundred miles [\$100,000]." HERRERA stated, "It's about a hundred [\$100,000]." CI-2 stated, "About a hundred [\$100,000]. Okay, um, I'll be there around twelve [p.m.], around there. When I'm in the area I'll, okay. He said there around fifty-ninth [59th Street] and the, and the polish one [Pulaski Avenue], right?" HERRERA answered, "Uh-huh." HERRERA and CI-2 then agreed to meet at "a big store around there." CI-2 stated, "Okay, I'll give you a call when I'm close by there. Around twelve [p.m.], one [p.m.], so you don't get anxious. Because I'm over here, okay?" HERRERA responded, "No, no, no, no, nothing like that. That's why I'm here . . . to serve you."

161. Between approximately 12:46 p.m. and 1:10 p.m., CI-2 had a series of consensually recorded calls with HERRERA, who was using telephone Herrera Phone 1. During these calls, HERRERA and CI-2 arranged to meet at approximately 1:15 p.m. at a Walmart near the intersection of 71st Street and Cicero Avenue in Chicago.

162. At approximately 1:30 p.m., CI-2 and HERRERA met in the Walmart parking lot located at 7050 South Cicero Avenue, Chicago, Illinois. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, finding none. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance video taped the meeting and observed HERRERA arrive in a Caravan, park next to CI-2's vehicle, hand CI-2 a black plastic bag, which CI-2 in turn placed in his/her vehicle. During this meeting:

a. HERRERA asked, "And you're not with the same over there? . . . You're not in the same [location where HERRERA used to deliver narcotics proceeds to CI-2]." CI-2 responded, "No, they changed us to another place." HERRERA stated, "Yeah?" CI-2 stated, "Yes, they changed us to another place. If I would have known [that HERRERA was someone for whom CI-2 previously laundered money] I would have met with you in another place. Yes." HERRERA replied, "Yes."

b. CI-2 stated, "Yes. Okay, just drop it [narcotics proceeds] in there. . . . How much?" HERRERA responded, "Look, there are forty of two, like the way you know I count them [the way HERRERA delivered money to CI-2 in the past]. . . . And four rolls of five [\$5,000] each." CI-2 stated, "So then there are?" HERRERA responded, "One hundred [\$100,000]. One hundred."

163. Following this meeting, CI-2 drove under constant surveillance to a predetermined meeting location where agents retrieved from CI-2's vehicle a black bag containing approximately \$100,220 in cash. Agents transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

164. Between approximately 1:48 p.m. and 1:52 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL asked, "How's it going." CI-2 responded, "I'm on my way to the office [to count HERRERA's narcotics proceeds]." ABEL asked, "With the things [narcotics proceeds]?" CI-2 responded, "Yes." ABEL asked, "Was it the

one with 100 [\$100,000] or 80 [\$80,000]. . . . Which one?" CI-2 stated, "A hundred [\$100,000]." ABEL stated, "Okay."

165. Between approximately 4:13 p.m. and 4:18 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, "Put me down for 100 [CI-2 confirmed HERRERA delivered \$100,000 in narcotics proceeds]." ABEL responded, "Done. Are you going to be able to send [gold purchased with HERRERA's narcotics proceeds to Refinery A]." CI-2 responded, "No, I just finished verifying [counting], but I'm going to store at the refinery [CI-2's putative gold supplier]." ABEL responded, "Oh, okay."

166. On or about September 17, 2013, using shipping labels provided by ABEL in an email, agents sent to Refinery A approximately 2,199.45 grams of 24-Karat gold, which agents had purchased with approximately \$96,577.08 of the proceeds obtained from HERRERA on September 13, 2013. Agents also enclosed in this shipment a Refinery A packing list that identified the shipping company as "Chicago Gold" and described the contents of the boxes as containing a total of 2,199.45 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on or about September 18, 2013.

167. On or about September 18, 2013, between approximately 1:48 p.m. and 1:52 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, "Close 2200 of the fine one at 1345 [CI-2 purchased 2,200 grams of 24 Karat gold at the current fair market

value of \$1,345 per ounce, using narcotics proceeds collected from HERRERA].” ABEL responded, “At 43 [\$1,343 per ounce]. Willy [PARRA-PEDROZA] says.” CI-2 responded, “Okay.” ABEL stated, “It’s at 41 [\$1,341 per ounce].” CI-2 stated, “Now it’s at 43 [\$1,343 per ounce].” ABEL responded, “Okay. . . . But I already closed it [reach an agreement with Refinery A on the price of the gold]. . . . 2200 [grams of 24 karat gold] at 43 [\$1,343 per ounce].”

**XV. ABEL Directs CI-2 to Collect and Launder \$50,000 in Narcotics Proceeds from URQUIZA-OSORIO (September 20, 2013).**

168. On or about September 18, 2013, between approximately 4:25 p.m. and 9:31 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL stated. “512-424-9323 [Urquiza-Osorio Phone 1] with Flaco’s father on behalf of [Individual K, codenames to vouch for trustworthiness]. That if you can call him [to collect narcotics proceeds].” CI-2 responded, “Okay.”

169. On September 19, 2013, at approximately 11:11 a.m., CI-2 had a consensually recorded call with PEDRO URQUIZA-OSORIO, who was using telephone number (512) 424-9323 (“Urquiza-Osorio Phone 1”).<sup>27</sup> During this call,

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<sup>27</sup> Agents identified PEDRO URQUIZA-OSORIO as follows: As discussed below, between September 19 and 20, 2013, CI-2 had several consensually recorded calls with the man who was using Urquiza-Osorio Phone 1. During these calls, the man using Urquiza-Osorio Phone 1 arranged to meet CI-2 in person at the parking lot of a Jewel store located at 7122 40th Street in Berwyn, Illinois, on September 20, 2013, at approximately 1:20 p.m., for the purpose of delivering narcotics cash proceeds. Following these phone calls, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed a Mexican identification card of “Pedro Urquiza-Osorio,” and positively identified URQUIZA-OSORIO as the individual who delivered narcotics proceeds to CI-2 on September 20, 2013. In addition, as discussed below, following this meeting, agents followed URQUIZA-OSORIO to



CI-2 stated, "They [ABEL] told me to give you a call." URQUIZA OSORIO responded, "Uh, like in how much time will you arrive [to collect narcotics proceeds]?" CI-2 and URQUIZA OSORIO then discussed meeting at a Jewel grocery store located on Harlem Avenue near Interstate 55 in Chicago the following day. CI-2 asked, "Do you know how many miles the car has [how much narcotics proceeds will URQUIZA OSORIO deliver]?" URQUIZA OSORIO responded, "Uh, like two [\$200,000]."

170. On September 19, 2013, at approximately 3:26 p.m., CI-2 had a consensually recorded a call with URQUIZA-OSORIO, who was using Urquiza-Osorio Phone 1. During this call, URQUIZA-OSORIO stated, "I called the man [URQUIZA OSORIO's associate] and he's saying to come by. To come by, if you're not too far away, that because it's a lot of time for me to be around here." CI-2 responded, "Ah, the thing is, do you have to go out or are you going somewhere else? Because I'm somewhere else and if I get it, the problem is that once I get it [narcotics proceeds] that man [ABEL] is going to be like, 'What time are you sending it [mailing gold purchased with narcotics proceeds to Refinery A]? What time are you sending it?'" URQUIZA-OSORIO stated, "It's because, see I'm, I'm at a

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the Presidential Inn located at 3922 Harlem Avenue in Lyons, Illinois, where law enforcement officers approached URQUIZA-OSORIO and asked him for identification. URQUIZA-OSORIO produced a Mexican identification document bearing his photo and the name "Pedro Urquiza-Osorio." In addition, prior to this September 20 meeting, agents outfitted CI-2 with a concealed audio recording device, which captured URQUIZA-OSORIO's voice. After reviewing the recording of the September 20 meeting, agents compared the voice of the man with whom CI-2 met to the voice of the man who was using Urquiza-Osorio Phone 1 in a consensually recorded call with CI-2, and determined that URQUIZA-OSORIO was the user of Urquiza-Osorio Phone 1.

small house that doesn't have a lot of space, cousin. . . . It's because uh, I'm at the small house. You know which ones."

171. On September 20, 2013, at approximately 1:16 p.m., CI-2 placed a consensually recorded telephone call to URQUIZA-OSORIO, who was using Urquiza-Osorio Phone 1. During this call, CI-2 stated, "Hey, cousin. I'm already here where you told me [Jewel parking lot]." URQUIZA-OSORIO responded, "Uh, I'll be right over there. Wait for me a bit. . . . I'll be right there."

172. On September 20, 2013, at approximately 1:20 p.m., CI-2 met with URQUIZA-OSORIO in the parking lot of the Jewel grocery store located at 7122 40th Street in Berwyn. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, finding none. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance observed URQUIZA-OSORIO arrive in the Jewel parking lot on foot and empty handed, shake hands with CI-2, and engage CI-2 in conversation. During this meeting,

a. URQUIZA-OSORIO stated, "Help me lift this [retrieve narcotics proceeds]." CI-2 responded, "No, you need to bring it over here. Put it in a backpack and bring it over here." URQUIZA-OSORIO stated, "It's here, very close." CI-2 stated, "It's because the boss doesn't want me to go over there. These orders are from over there [Mexico]. Because if I get a flat tire, or something doesn't go right [get caught by law enforcement], they reprimand me. Here, I'll wait for you here."

b. URQUIZA-OSORIO stated, "It's [narcotics proceeds] right outside, in there in the parking lot next door. I have it ready for you." CI-2 stated, "Just put it in a bag. I'll wait for you here."

173. At approximately 1:21 p.m., surveillance observed URQUIZA-OSORIO walk away from CI-2 and towards the north end of the parking lot. Surveillance followed URQUIZA-OSORIO and, at approximately 1:25 p.m., observed him arrive at the Presidential Inn located at 3922 Harlem Avenue in Lyons, Illinois. At approximately 1:27 p.m., surveillance observed URQUIZA-OSORIO and Individual U enter a vehicle parked directly behind the Presidential Inn and drive back toward the Jewel parking lot. Individual U entered the vehicle with a small bag in hand.

174. At approximately 1:29 p.m., surveillance observed URQUIZA-OSORIO and Individual U arrive at the Jewel parking lot. URQUIZA-OSORIO exited the car alone, carrying a brown paper grocery bag bearing the Jewel Osco store logo, and approached CI-2's vehicle. CI-2 opened the rear door of his/her vehicle and URQUIZA-OSORIO placed the brown paper bag into CI-2's vehicle. During this meeting:

a. CI-2 stated, "Throw it back there. How much? How much? How much?" URQUIZA-OSORIO responded, "One hundred thirty [\$130,000]." CI-2 stated, "I thought it was two hundred [\$200,000]?" URQUIZA-OSORIO stated,

"No, I was told fifty [\$50,000]." CI-2 stated, "I was told two hundred. Call him [URQUIZA-OSORIO's associate in Mexico]."28

b. URQUIZA-OSORIO stated, "So, it must be somewhere else, because I just had that [\$50,000]. He told me yesterday to deliver them. Maybe you need to pick it up somewhere else. It's fifty, right? It's fifty." CI-2 stated, "Yes." URQUIZA-OSORIO stated, "This little guy makes us look bad. . . . Because he told me fifty." CI-2 responded, "He [ABEL] had told me two hundred." URQUIZA-OSORIO asked, "So you are going to pick up somewhere else?" CI-2 responded, "Maybe."

c. CI-2 asked, "Where are you coming from?" URQUIZA-OSORIO responded, "From Austin, Texas." CI-2 asked, "Are you bringing some [transporting drugs] from over there [Mexico]?" URQUIZA-OSORIO responded, "No, there are some buddies. And we give him, I give him a hand. He is my relative, this guy." CI-2 asked, "At a good price [for the sale of drugs]?" URQUIZA-OSORIO stated, "Well, it [the drugs] was his. Now we are not working. The goal now is to get involved with them to see how it goes, because I know [drug trafficking activity in] Carolina."

d. CI-2 stated, "I just do the paperwork [handle narcotics proceeds]. That's what I do all day long, pick up papers [narcotics proceeds]. I have, uh, two or three clients that have . . . ." URQUIZA-OSORIO asked, "And

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<sup>28</sup> At approximately 1:31 p.m., surveillance observed URQUIZA-OSORIO using his cellular phone. URQUIZA-OSORIO then hung up his phone and re-engaged CI-2 in conversation.

what is the price?" CI-2 responded, "I don't know. Green ones [marijuana] or white ones [cocaine]?" URQUIZA-OSORIO responded, "We can do both [traffic both types of drugs], I think. Look, leave me a card, don't give me names. Because this number we'll get rid of this shortly [discard Urquiza-Osorio Phone 1]. Give me the number [telephone number of the potential drug associate]. And don't put a name on it and I'll put any fucking sign."

e. CI-2 stated, "In a while, I'll call you and I'll give you a number. Later on, you can coordinate with them because, well, all I can tell you is that he [potential drug associate] is trustworthy and I recommend him. I mean, it's not someone who is going to do you wrong." URQUIZA-OSORIO asked, "But how much [price of drugs]?" CI-2 responded, "I don't know what he can get. Here [Chicago area], it is expensive. I've heard it's at twenty-seven, thirty, thirty something [\$27,000-\$30,000 per kilogram of cocaine]." URQUIZA-OSORIO responded, "I think it's more. Thirty-four, thirty-five [\$34,000-35,000 per kilogram of cocaine], I believe."

f. URQUIZA-Osorio stated, "I have talked to him [URQUIZA-OSORIO's associate in Mexico], we have talked and he said, look, he told me to bring you that fifty [\$50,000]. I don't know. We don't have, and he didn't say anything else. I don't have anything else there, but if more comes in, I have your number. I mean, can't do that much, you know it's fucked up." CI-2 stated, "You have to find a place [drug stash house] kind of, because you can't get a house where they [law enforcement] can see you go in and out. A good place is needed."

URQUIZA-OSORIO responded, "Yes, uh, if you know of a place help me, look for a little house."

g. CI-2 stated, "I don't do anything else, and they don't to give me any other, thing [drugs] because they say they don't want things to get mixed up [combining drug trafficking and money laundering]." URQUIZA-OSORIO stated, "Oh, no, they also scold me. You just do it. We'll lay low."

h. CI-2 asked, "And they have good [quality of drugs] over there [in Carolina]?" URQUIZA-OSORIO responded, "Yes. I get like up to forty [\$40,000 per kilogram of cocaine] from there [Carolina], yes." CI-2 asked, "So, if you take twenty [kilograms] over there, you can make it [money]?" URQUIZA-OSORIO responded, "Yes, son of a bitch it's good! Oh, asshole, it's so good. I see that there is more and better [more quantity] over there. Here it's almost out [limited availability of drugs]." CI-2 stated, "Here, the only problem is, to bring it [transport drugs] and it moves [gets distributed] super quickly." URQUIZA-OSORIO asked, "How much the green [price of marijuana]?" CI-2 replied, "four [\$400], four-fifty [\$450], seven [\$700], eight [\$800 per pound]. That's the one they always want to see it and check it out [sample the quality] because, sometimes it comes very tight [compressed packaging], very." URQUIZA-OSORIO stated, "No, no, there's a pure one coming that they call La Paloma [the pigeon] [U/I] short and very beautiful [good quality]."

i. URQUIZA-OSORIO stated, "Maybe I'll bring some Palomitas [samples of marijuana]. We are so desperate. We've been here for a few weeks and . . . ." CI-2 stated, "Nothing? You've finished with the merchandise [sold all the

drugs] and?" URQUIZA-OSORIO responded, "No, [U/I] but we are hoping to stay here . . . ."

175. Following this meeting, surveillance observed URQUIZA-OSORIO return to the Presidential Inn. At approximately 1:42 p.m., surveillance observed URQUIZA-OSORIO, Individual U, and Individual V enter room #231 of the Presidential Inn. At approximately 2:25 p.m., surveillance observed URQUIZA-OSORIO and Individual V depart the Presidential Inn, then return about two hours later. At approximately 8:05 p.m., officers from the Cook County Sheriff's Police Department and the Lyons PD obtained verbal consent from URQUIZA-OSORIO, Individual U, and Individual V, to search the hotel room. During this search, a canine trained to detect the odor of narcotics alerted positive for the presence of narcotics in a suitcase. Officers opened the suitcase and discovered a boot containing five bundles of United States currency, totaling \$50,500. The canine alerted positive to the odor of narcotics on the currency. Officers seized the money.

176. Following the meeting with URQUIZA-OSORIO, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved from CI-2's vehicle a brown paper Jewel Osco bag containing approximately \$50,000 in cash. Agents then transported the money to the Lyons Police Department, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

177. At approximately 5:49 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange,

ABEL asked, "Did you receive them [narcotics proceeds from URQUIZA-OSORIO]?" CI-2 responded, "Yes 50 [\$50,000]." ABEL stated, "All right." CI-2 stated, "Put down 50 [\$50,000 counted] for me."

178. On September 21, 2013, at approximately 4:04 p.m., CI-2 had a consensually recorded call with URQUIZA-OSORIO, who was using Urquiza-Osorio Phone 1. During this call, URQUIZA-OSORIO stated, "Oh, what was I going to tell you? If, if you can lend me like five hundred bucks today, man." CI-2 stated, "Yeah, uh, they called me from over there [Mexico] that, to go see you today." URQUIZA-OSORIO asked, "Did he [ABEL] mention, did he mention anything about the dude from over there [Mexico]? . . . Yes, no, its because, the things over there . . . things got kind of ugly." CI-2 asked, "Oh, shit. How?" URQUIZA-OSORIO stated, "Yes, it was some bad kids around there and they knocked down [law enforcement seized narcotics proceeds from URQUIZA-OSORIO, referring to the \$50,500 seized from URQUIZA-OSORIO's hotel room]." CI-2 replied, "No, no say it's not so. . . . But everything is fine or did they take the things [narcotics proceeds]?" URQUIZA-OSORIO responded, "The things [law enforcement seized the money]. . . . Yes, they left me a paper [forms documenting law enforcement's seizure of the money] to, we want to go and talk to them."

179. On or about September 24, 2013, using two of the shipping labels provided by ABEL, agents sent to Refinery A approximately 1,124.41 grams of 24-Karat gold, which agents had purchased with approximately \$48,841.67 of the proceeds obtained from URQUIZA-OSORIO. Agents also enclosed in this shipment



a Refinery A packing list that identified the shipper as "Chicago Gold" and described the contents of the boxes as containing a total of 1,124.41 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on or about September 25, 2013.

180. On September 25, 2013, between approximately 9:25 a.m., and 10:32 a.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device1. During this exchange, CI-2 stated, "Close me 1124 of the fine one at \$1336 [CI-2 purchased 1,124 grams of 24 Karat gold at the current fair market value of \$1,336 per ounce, using narcotics proceeds collected from URQUIZA-OSORIO]." ABEL responded, "Okay."

**XVI. ABEL Directs CI-2 to Collect and Launder \$120,000 in Narcotics Proceeds from SAUCEDO and GUEVARA (September 27, 2013).**

181. On or about September 24, 2013, at approximately 8:48 p.m., CI-2 had a consensually recorded call with PEDRO SAUCEDO-PALOMINOS,<sup>29</sup> who was using telephone number (773) 628-4325 ("Saucedo Phone 1"). During the call:

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<sup>29</sup> Agents identified PEDRO SAUCEDO-PALOMINOS and his voice as follows: As discussed below, in late-September 2013, CI-2 had several consensually recorded calls with the man who was using Saucedo Phone 1. During these calls, the man using Saucedo Phone 1 arranged for a driver (FELIX GUEVARA) to deliver \$120,000 to CI-2 on September 27, 2013 in Chicago. In addition, between November 6, 2013, and November 7, 2013, CI-2 had multiple consensually recorded calls with a man who was using (773) 459-4705 ("Saucedo Phone 2"). According to CI-2, during these calls, CI-2 recognized the caller's voice using Saucedo Phone 2 as the same individual who used Saucedo Phone 1. During these calls, the man using Saucedo Phone 2 arranged to meet CI-2 in person on November 7, 2013, for the purpose of delivering narcotics cash proceeds. Following a call placed from CI-2 to Saucedo Phone 2, surveillance observed two individuals exit a residence with a suitcase. CPD Officers conducted a traffic stop of the vehicle driven by the individuals surveillance observed with the suitcase. During the traffic stop, the driver of the vehicle presented a Mexico driver's license bearing the name "Pedro Saucedo-Palominos." Officers obtained SAUCEDO's consent to search a cell phone found in his possession and discovered that he was in possession of Saucedo Phone 2. In addition, an agent who had listened to

a. SAUCEDO stated, "I'm calling [on behalf of] . . . [Individual K]." CI-2 stated, "Okay. Go ahead." SAUCEDO stated, "They [Individual K or his associate] told me to meet you about a title for a car [delivering narcotics proceeds]."

b. CI-2 asked, "For when? Is it the cousin with the China [codename of a different drug trafficker] or is it another one?" SAUCEDO responded, "Miguel [a different codename]." CI-2 asked, "Okay, no, I'm asking is it the cousin with the China that I was going to meet with tomorrow [to collect narcotics proceeds, as arranged in a different series of calls] or is it another one?" SAUCEDO responded, "No, I've never . . . ." CI-2 stated, "Oh, okay...the thing is I have another guy tomorrow [another delivery of narcotics proceeds]. For when did they [Individual K or his associates] tell you [to deliver the narcotics proceeds]?" SAUCEDO said, "No, they didn't tell me anything. They just told me to give you a call with paper [to deliver money]."

c. CI-2 asked, "Do you know how many miles the car has [how much money will be delivered]?" SAUCEDO responded, "A hundred and twenty [\$120,000]."

182. On or about September 26, 2013, at approximately 4:18 p.m., CI-2 had a consensually recorded call with SAUCEDO, who was using Saucedo Phone 1. During this call, SAUCEDO and CI-2 made arrangements to meet each other the next day near the intersection of 55th Street and Kedzie. CI-2 stated, "I'll come by

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recorded calls between CI-2 and the user of both Saucedo Phone 1 and Saucedo Phone 2 was present during the traffic stop and, after overhearing SAUCEDO speak, determined that SAUCEDO was the user of Saucedo Phone 1 and Saucedo Phone 2.

there. It will not be exactly there, but I'll go to a good place and I will call you and you can come over right away . . . between twelve [12:00 p.m.] and one [1:00 p.m.], so that you don't get anxious. You can call over there [to SAUCEDO's associates in Mexico] and let them know that we're already set." SAUCEDO responded, "Alright, then. That's fine."

183. On or about September 26, 2013, between approximately 4:57 p.m. and 5:07 p.m., CI-2 exchanged a series of BBMs with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, "120 [\$120,000 in narcotics proceeds] for tomorrow." ABEL responded, "The 120 [\$120,000 from SAUCEDO] says you have postponed 3 times. He wanted today, you unable?" CI-2 stated, "Unable now, but we already agreed for tomorrow, I talked with him already." ABEL responded, "OK."

184. On or about September 27, 2013, between approximately 10:34 a.m. and 10:47 a.m., CI-2 had a series of consensually recorded call with SAUCEDO, who was using Saucedo Phone 1. During these calls, SAUCEDO and CI-2 arranged to meet at approximately 11:10 a.m. in the parking lot of Pete's Fresh Market near the intersection of 47th Street and Kedzie in Chicago.

185. At approximately 11:08 a.m., CI-2 had a consensually recorded call with FELIX LEMUS-GUEVARA,<sup>30</sup> who was using Saucedo Phone 1. During the

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<sup>30</sup> Agents identified FELIX LEMUS-GUEVARA and his voice as follows: Agents compared the voice of the man who used Saucedo Phone 1 in this 11:08 a.m. call to the voice of the man who was using Saucedo Phone 1 in earlier consensually recorded phone calls and determined that the voices were different. During this 11:08 a.m. call – at which time CI-2 was waiting in the parking lot of the Pete's Fresh Market located at 4700 South Kedzie Avenue in Chicago to receive a delivery of narcotics proceeds – the user of Saucedo Phone 1

call, CI-2 said, "Okay. I'm here by the, by where the self-parking lot. I'm in a red car. I'll come out so that you can see me." GUEVARA stated, "Oh okay. I already saw you." CI-2 stated, "Yeah. Come back here." GUEVARA replied, "Okay."

186. On September 27, 2013, at approximately 11:09 a.m., CI-2 and GUEVARA met in the parking lot of the Pete's Fresh Market located at 4700 South Kedzie Avenue in Chicago, Illinois. Prior to this meeting, agents outfitted CI-2 with a concealed audio and video recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, and finding only \$115. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance observed GUEVARA park Guevara Vehicle 1<sup>31</sup> next to CI-2's vehicle, exit the vehicle, retrieve an orange duffel bag, and place the bag into the back of CI-2's vehicle. During this meeting:

a. GUEVARA stated, "I was going to tell you to move, because there's a [suspicious] car over there, the one that's over there to the right. The one

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told CI-2, "I already saw you." Approximately one minute after this phone call, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the time and place previously agreed upon by SAUCEDO. Agents subsequently viewed a State of Georgia driver's license photograph of "Felix I. Lemus-Guevara," and positively identified GUEVARA as the individual who delivered narcotics proceeds to CI-2 on September 27, 2013. In addition, the individual who delivered narcotics proceeds to CI-2 on September 27, 2013, arrived at the meeting in a vehicle registered to "Felix I. Guevare [sic]." On or about October 1, 2013, Indiana State Police conducted a traffic stop on that same vehicle and, during the traffic stop, the driver presented a Georgia driver's license bearing the name "Felix I. Lemus-Guevara." In addition, prior to this September 27 meeting, agents outfitted CI-2 with a concealed audio recording device, which captured GUEVARA's voice. After reviewing the recording of the September 27 meeting, agents compared the voice of the man with whom CI-2 met to the voice of the man who used Saucedo Phone 1 during this 11:08 a.m. call and that GUEVARA was the user of Saucedo Phone 1 at this time.

<sup>31</sup> According to the Illinois Secretary of State Database records, Guevara Vehicle 1 is registered to "Felix I. Guevare" at 6324 S. Whipple Street in Chicago ("Saucedo Residence 1").

over there. There's a guy back there, inside [the suspicious vehicle]."<sup>32</sup> CI-2 asked, "That black one?" GUEVARA stated, "Over there, there's someone inside." CI-2 replied, "Nah, let's just do it here. There won't be a problem." GUEVARA asked, "You don't think so?" CI-2 replied, "Just throw it [the orange duffel bag containing the narcotics proceeds] back here [in the trunk of CI-2's vehicle] and let's talk for a little bit. Throw it [the bag containing the narcotics proceeds] in here really fast. Yeah, the problem is when you do the exchange and leave right away." GUEVARA responded, "Yeah."

b. CI-2 asked, "So, how has the business been?" GUEVARA responded, "It's going, buddy. It's going. We're moving like turtles [business is slow], but we're moving along." CI-2 asked, "How much did they [drug traffickers] say it was?" GUEVARA responded, "To be honest, I don't know." CI-2 stated, "They [drug traffickers] just told you to bring it? Okay." GUEVARA stated, "I think I heard that it [narcotics proceeds] was one-twenty [\$120,000]." CI-2 replied, "Okay."

187. Following this meeting, surveillance followed GUEVARA back to Saucedo Residence 1, where they observed him park in the rear of the residence.

188. Following the meeting with GUEVARA, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved an orange duffel bag containing approximately \$120,000 in cash from CI-2's vehicle. Agents then transported the money to the Lyons Police Department, where a canine

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<sup>32</sup> The video recording of this meeting shows that, at this moment, GUEVARA was looking directly at a covert law enforcement surveillance vehicle parked in the parking lot.

trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

189. On or about September 27, 2013, between approximately 1:58 p.m. and 2:12 p.m., CI-2 exchanged a series of BBMs with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, "Put me down for \$120 [\$120,000 collected from SAUCEDO and GUEVARA]." ABEL replied, "OK."

190. On or about September 27, 2013, between approximately 2:42 p.m. and 2:46 p.m., CI-2 exchanged a series of BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL asked, "Who sent the 120 [\$120,000]? From what number or from who? . . . [O]nce you have the chance, they are asking over here [in Mexico] about the 2 turn in of 120 [\$120,000]." CI-2 responded, "(773) 628-4325 [Saucedo Phone 1] \$120 [\$120,000] this is the number of the other, I already talked with him, till Monday [to receive additional narcotics proceeds from a different individual]."

191. On or about October 2, 2013, using two of the shipping labels provided by ABEL in a September 17, 2013, email, agents sent to Refinery A approximately 2,684.23 grams of 24-Karat gold, which agents had purchased with approximately \$116,719.86 of the proceeds obtained from SAUCEDO and GUEVARA on September 27, 2013. Agents also enclosed in this shipment a Refinery A packing list that identified the shipping company as "Chicago Gold" and described the contents of the boxes as containing a total of 2,684.23 grams of 24-Karat gold.

According to FedEx records, this shipment arrived at Refinery A on or about October 3, 2013.

192. On or about October 7, 2013, between approximately 9:52 a.m. and 10:01 a.m., CI-2 exchanged a series of BBMs with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, "Close me at \$1327. 2684 of the fine [CI-2 purchased 2,684 grams of 24 Karat gold at the current fair market value of \$1,327 per ounce, using narcotics proceeds collected from SAUCEDO and GUEVARA]." ABEL responded, "At 25 [\$1,325]? I have it at 23 [\$1,323, meaning that ABEL was making a counter offer to repay CI-2 at \$1,325 per ounce because the fair market value of gold had dropped \$4 to \$1,323]." CI-2 responded, "Close me at 27 [\$1,327 per ounce of 24 Karat gold] don't want to be going to the computer." ABEL responded, "Hopefully they [Refinery A] won't shit on me. So they wouldn't pay me that way [at the lower market value of \$1,323]."

**XVII. ABEL Directs CI-2 to Collect and Launder Approximately \$89,980 in Narcotics Proceeds from VIZCARRA (October 11, 2013).**

193. On or about October 8, 2013, between approximately 3:13 p.m. and 3:14 p.m., CI-2 exchanged a series of BBMs with ABEL, who was using MLO Device 1. During the exchange, ABEL stated, "I'm going to give you one for 100 [a \$100,000 narcotics proceeds collection] so you can get it today or sometime this week." CI-2 responded, "Ok."

194. On or about October 8, 2013, between 7:21 p.m. and 7:23 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL stated, "708 724 3932 [Vizcarra Phone 1]

from Capi [codename to vouch for trustworthiness]. Let see this one sticks. . . . If it doesn't happen [CI-2 fails to collect the narcotics proceeds], he will quit, haha. brings 100 [\$100,000 in narcotics proceeds to be delivered]. . . . Hopefully you both could agree to see each other tomorrow." CI-2 responded, "Okay, I will contact him."

195. On or about October 8, 2013, at approximately 7:36 P.M., CI-2 had a consensually recorded call with LUIS ARMANDO ACOSTA VIZCARRA ("VIZCARRA"), who was using telephone number (708) 724-3932 ("Vizcarra Phone 1").<sup>33</sup> During the call:

a. CI-2 stated that he/she was told to call him regarding some "tickets [narcotics proceeds]." VIZCARRA stated, "Oh, alright. Where are you located? . . . I'm here in the windy city, close to the small airport [Midway]. . . . On

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<sup>33</sup> Agents identified VIZCARRA and his voice as follows: As discussed below, between October 8 and 11, 2013, CI-2 had several consensually recorded calls with the man who was using Vizcarra Phone 1. During these calls, the man using Vizcarra Phone 1 arranged to meet CI-2 at approximately 12:21 p.m. on October 11, 2013, in the parking lot of a Jewel grocery store located at 7122 40th Street in Berwyn, Illinois. Following these calls, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. The man arrived at this meeting with a woman in Vizcarra Vehicle 1, which, according to SOS and DHS database records, is registered to VIZCARRA's wife. Agents conducting surveillance subsequently viewed a United States Visa photograph of "Luis Armando Acosta Vizcarra," and positively identified VIZCARRA as the individual who delivered narcotics proceeds to CI-2 on October 11, 2013. In addition, on December 13, 2013, officers conducted a traffic stop of Vizcarra Vehicle 1. Agents conducting surveillance of the October 11 meeting subsequently identified the male and female occupants in the car as the same man and woman who met with CI-2 on October 11. During this stop, the male occupant of the vehicle produced a Mexican voter registration card and vehicle registration document identifying him as "Luis Armando Acosta Vizcarra." In addition, prior to the October 11 meeting, agents outfitted CI-2 with a concealed audio recording device, which captured VIZCARRA's voice. After reviewing the recording of the October 11 meeting, agents compared the voice of the man with whom CI-2 met to the voice of the man who was using Vizcarra Phone 1 in numerous, consensually recorded calls with CI-2, and determined that VIZCARRA was the user of Vizcarra Phone 1.



behalf of whom or what [codename]?" CI-2 responded, "I think they said [Individual L], [Individual L]. From Capi. On behalf of Capi [codename provided by ABEL]."

b. CI-2 asked VIZCARRA when he is available to meet and VIZCARRA responded, "Let me check on that. I'm checking out." CI-2 stated, "[T]hat man [ABEL] only wants me to go fix up the car [collect narcotics proceeds] and once it is ready, I don't want to be moving up and down with the car [driving around for an extended period of time with narcotics proceeds]." VIZCARRA responded, "Alright."

c. CI-2 stated, "So then, uh, I'll go over once I am ready. When I can receive one car and another one, and another one [collect narcotics proceeds from several couriers in the area at the same time]. So once I have several cars fixed then I'll leave." VIZCARRA responded, "Okay, man. In fact, I am ready. I'm only waiting for the tickets [narcotics proceeds] that I'm pending [from outstanding drug sales]. But I am ready." CI-2 and VIZCARRA then agreed to speak again later.

196. On or about October 9, 2013, between 4:15 p.m. and 5:53 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL asked, "Already met [with VIZCARRA]? Don't scare us [cause concern that proceeds have been seized by law enforcement]!" CI-2 responded, "No, everything good." ABEL asked, "Already done? What's going on? They are bothering." CI-2 responded, "Until tomorrow." ABEL asked, "Why? Didn't you agree [to meet with VIZCARRA] for today. Let see if the boss really

cares. What's up, I don't know what to tell them." CI-2 responded, "Is that they [VIZCARRA] tell me one thing and tell you another, primo [VIZCARRA] is verifying the tickets [counting the money]." ABEL responded, "Okay with that." CI-2 stated, "If they contact him, you will tell them that it is ready, I just didn't want to go [CI-2 is concerned that VIZCARRA will say that CI-2 is responsible for the delay]." ABEL stated, "Let me see, I will tell them."

197. Between October 9 and 11, 2013, CI-2 had several consensually recorded calls with VIZCARRA, who was using Vizcarra Phone 1. During these calls, VIZCARRA and CI-2 agreed to meet in the parking lot of a Jewel grocery store located near the intersection of "Ogden and Harlem" in Berwyn at approximately 12:21 p.m. on October 11, 2013.

198. On or about October 10, 2013, between 4:51 p.m. and 4:52 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL asked, "What time are you going to see 100 [VIZCARRA delivering \$100,000] and the 37 [another individual delivering \$37,000]." CI-2 responded, "Around 11 [a.m. on October 11]."

199. On or about October 11, 2013, at approximately 12:21 p.m., CI-2 and VIZCARRA met in the parking lot of the Jewel located at 7122 40th Street in Berwyn. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, finding none. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance observed VIZCARRA arrive with a

female passenger in Vizcarra Vehicle 1; park next to CI-2's vehicle; exit his car; speak briefly with CI-2; retrieve a blue Aeropostale bag, gas container, and blue towels from the trunk of his car; and place the blue Aeropostale bag into the rear trunk of CI-2's vehicle while speaking with CI-2. During this meeting:

a. CI-2 stated, "Just throw it [narcotics proceeds] back here and that's it. Do you have it ready or not?" VIZCARRA responded, "Oh, yes, it's just that I'm hiding it [the narcotics proceeds] a little. I'm hiding it a little." CI-2 stated, "Yes, those guys [Mexican associates] were in a hurry [to have CI-2 pick up the money]." VIZCARRA stated, "Yes, they were also bugging me and bugging me." CI-2 stated, "No, he also told me, 'No, go and pick it up.'" VIZCARRA stated, "Me too. [VIZCARRA's associates ask] 'Why haven't you delivered? That's your problem.' [VIZCARRA tells them] 'No, I already spoke to the man and he is busy.' [VIZCARRA's associates ask] 'But he told you he was busy?' [VIZCARRA tells them] 'Yup.' [VIZCARRA's associates ask] 'So what happened? Did he give the ticket already?'"

b. CI-2 stated, "We need to chat like this. We are just chatting so that things don't look so bad [arouse the suspicion of law enforcement who may observe the meeting]." VIZCARRA stated, "Well, it's just that, look at me, with work shoes and all."

c. CI-2 stated, "Well, I just handle the tickets [narcotics proceeds]." VIZCARRA stated, "Yes." CI-2 stated, "That's my job, just the tickets. All day long, all seven days, I just receive the tickets. That's all. I don't get mixed with

everything else [narcotics]. Sometimes they ask me, 'Hey, do you have anything [narcotics]?' I say, 'No, no, no, I don't do that, I just handle the, just the tickets.'" VIZCARRA stated, "I also only do the, the coordination of, well, this guy wants this [delivery of narcotics or narcotics proceeds]." CI-2 asked, "And that's it?" VIZCARRA responded, "Yes. That guy wants that [narcotics or narcotics proceeds] and that's it. And I give it [narcotics or narcotics proceeds] to them and that's it. So, that nothing gets lost. That's my job." CI-2 stated, "And I handle the tickets [narcotics proceeds], that's my job." VIZCARRA stated, "[I] make sure that the material [narcotics or narcotics proceeds] doesn't stray anywhere."

d. CI-2 said, "It's one hundred [\$100,000], right? One hundred." VIZCARRA responded, "No it's ninety [\$90,000] even." CI-2 said, "Ninety even." VIZCARRA stated, "Um, I was reviewing it one more time [counting the narcotics proceeds]. This guy [VIZCARRA's associate] was telling me that these crooked deals [delivery of narcotics proceeds] have to be done the straightest way as possible."

e. VIZCARRA stated, "No, and it was cool here. [U/I] because there are no cameras there." CI-2 stated, "They [other money couriers] throw everything and they want to go [hand off the money and leave right away]. No this is about staying to chat, and then you leave, and they [law enforcement] don't know what happened." VIZCARRA stated, "There's a guy that gives me some tickets [narcotics proceeds]. Son of a bitch told me to meet at a restaurant. And like we are here now, he took it [narcotics proceeds] out of his pocket, and I said, no shit,

'Let's go for a ride in your car and then you can unload [deliver narcotics proceeds].'"

CI-2 responded, "Yes. No, some people want to do it very carelessly."

200. Following the meeting with VIZCARRA, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved from CI-2's vehicle a blue Aeropostale bag containing approximately \$89,980 in cash. Agents then transported the money to the Lyons Police Department, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

201. At approximately 3:23 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During the exchange, CI-2 stated, "Put me down for 89980 [VIZCARRA delivered \$89,980]." ABEL responded, "Ok."

202. On or about October 14, 2013, between approximately 10:11 a.m. and 10:26 a.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL asked, "Today you sending the 90 [\$90,000 from VIZCARRA]?" CI-2 responded, "I will let you know later, today is a holiday." ABEL stated, "Ok." CI-2 stated, "Close 2093.26 for 1282" [CI-2 purchased 2,093.26 grams of gold at \$1,282 per ounce, using narcotics proceeds collected from VIZCARRA]." ABEL responded, "Yes it's a holiday, will be unable to close [set an agreed price with Refinery A]." CI-2 stated, "Ok, tomorrow I will contact you to see how it is."

203. On or about October 17, 2013, at approximately 1:37 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During the exchange, ABEL stated, "Need to know when it [gold purchased with money from VIZCARRA] will be sent so I won't hold on the close. The most 3 days." CI-2 responded, "I'm on my way to the mail." ABEL responded, "Ok. 1320 [the price for the gold purchased with money from VIZCARRA is set at current fair market value of \$1,320 per ounce]. . . . How much? 2063 [grams (incorrectly confirming what CI-2 previously reported as 2,093 grams)]?" CI-2 responded, "Yes." ABEL stated, "Ok."

204. On or about October 17, 2013, using two of the shipping labels provided by ABEL, agents sent to Refinery A approximately 2,093.29 grams of 24-Karat gold, which agents had purchased with approximately \$86,965.17 of the proceeds obtained from VIZCARRA. Agents also enclosed in this shipment a Refinery A packing list that identified the shipper as "Chicago Gold" and described the contents of the boxes as containing a total of 2,093.29 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on or about October 18, 2013.

**XVIII. PINEDA SANCHEZ and ABEL Coordinate the Delivery and Laundering of Narcotics Proceeds from Individual N and SALGADO (October 24, 2013).**

205. On or about October 22, 2013, beginning at approximately 12:29 p.m. [ND1 Session #3598108], Individual N, who was using Individual N Device 1,<sup>34</sup>

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<sup>34</sup> As part of a separate and independent investigation conducted by the DEA, on or about October 17, 2013, Chief Judge Ruben Castillo authorized the initial interception of

exchanged a series of BBMs with PINEDA-SANCHEZ, who was using Target Device 6. During this exchange:

a. Individual N wrote, "Dude, I have some [narcotics proceeds] in chica [Chicago] now. So, when you can, you can put aside [laundry] at least one hundred [\$100,000]." PINEDA-SANCHEZ responded, "Let me see if I can fulfill your payment [laundry] here [Mexico] for one hundred [\$100,000]. Hold on." Individual N stated, "Okay."

b. PINEDA-SANCHEZ wrote, "I am told they already have the pesos, they are just looking for the dlls [dollars]. But I can fulfill [laundry] it for you. Will you pass me a [telephone] number [of the drug trafficker in Chicago with the \$100,000]." Individual N responded, "You pass me a [telephone] number [of the individual who will collect the money]."

206. Between 12:41 p.m. and 12:43 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL said, "There is another of 100 [\$100,000] already there [in Chicago]. . . . Could you [collect the narcotics proceeds]. . . . [PINEDA-SANCHEZ] Said it's ready. . . . Wants to know if possible for today, if not he'll [Individual N] go with someone else." CI-2 replied, "I'm ready, all I need to be contacted." ABEL replied, "Okay, from Chato [code word to vouch for courier's trustworthiness]." CI-2 replied, "Okay."

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electronic communications over a Blackberry device assigned Blackberry PIN 27C9D601 and believed to be utilized by Individual N (hereinafter, "Individual N Device 1"). The BBM summaries in this Affidavit from intercepted communications over Individual N Device 1 are identified by the prefix "ND 1," followed by the pertinent session numbers.

207. On or about October 22, 2013, beginning at approximately 12:46 p.m. [ND1 Session #3598115], Individual N, who was using Individual N Device 1, exchanged a series of BBMs with PINEDA-SANCHEZ, who was using Target Device 6. During this exchange, PINEDA-SANCHEZ gave Individual N stated, "Six, three, zero, seven, zero, two, nine, two, three, five [630-702-9235, CI-2's phone number], on behalf of chato [code word that courier should use to vouch for trustworthiness]. He [CI-2] is not busy now. If you call him [CI-2] he will take care of you [collect and launder the \$100,000] right way." Individual N asked, "How much are you going to charge me [to launder these narcotics proceeds]." PINEDA-SANCHEZ responded, "Eight point five espejo [8.5% of the laundered proceeds]." Individual N responded, "All set. I already passed along the information [CI-2's phone number], they will call [CI-2] shortly."

208. On or about October 22, 2013, beginning at approximately 12:47 p.m. [ND1 Session #3598117], Individual N, who was using Individual N Device 1, sent a BBM message to Individual EE, who was using Individual EE Device 1. During this exchange, Individual N stated, "Six, three, zero, seven, zero, two, nine, two, three, five [630-702-9235, CI-2's phone number] on behalf of Chato. Deliver the one hundred [\$100,000] here, please. He's not busy right now, so if you call him right away, he will take care of you now."

209. Between 1:43 p.m. and 1:45 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During the exchange ABEL asked, "Have you been contacted?" CI-2 responded, "No, those



primos are liars." ABEL stated, "They [PINEDA SANCHEZ] were going to pass the number [CI-2's phone number to an individual subsequently identified as TOMAS SALGADO REYNA, as discussed below]. Let me check."

210. At approximately 4:38 p.m., CI-2 received a call from SALGADO, who was using Salgado Phone 1.<sup>35</sup> Due to technical difficulties, this call was not recorded, but it was verified through toll records. According to CI-2, during this call, SALGADO stated that he was calling "on behalf of Chato" and indicated that he had approximately \$100,000 to deliver to CI-2. SALGADO also stated that he was in the area of Harlem Avenue and Irving Park Road in Chicago.

211. Between 4:46 p.m. and 4:54 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, "I already talked with chato [SALGADO]." ABEL asked,

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<sup>35</sup> Agents identified SALGADO and his voice as follows: As discussed below, between October 22 and 24, 2013, CI-2 had multiple calls with a man who was using Salgado Phones 1 and 2. Several of the calls over Salgado Phone 2 were consensually recorded. Due to technical problems, the calls over Salgado Phone 1 were not recorded, but CI-2 recognized the voice of the user of Salgado Phone 1 to be the same man who used Salgado Phone 2. During these calls, the man using Salgado Phones 1 and 2 arranged to meet with CI-2 in person at 2:30 p.m. on October 24, 2013, at a Walgreens located at 2828 North Harlem Avenue in Elmwood Park, Illinois, for the purpose of delivering narcotics cash proceeds. Around the designated time of the meeting, agents conducting surveillance observed a male in a vehicle parked in the Walgreens parking lot. Agents then instructed CI-2 to place a call in the presence of agents to Salgado Phone 2. At the same time as CI-2's call, surveillance observed the man in the Walgreens parking lot answer a cellular telephone. At approximately 2:46 p.m., officers of the Chicago Police Department conducted a traffic stop on the man that agents observed in the Walgreen's parking lot. During the traffic stop, the occupant of the car produced a Mexican Voter Registration Card, bearing his photograph and the name "Tomas Salgado Reyna." Agents who listened to the recordings of the user of Salgado Phone 2 were present during this stop, and recognized SALGADO's voice as the user of Salgado Phone 2. Officers also obtained the occupant's consent to search a cell phone found in his possession and discovered that he was in possession of Salgado Phone 2. Based on the foregoing, agents determined that SALGADO was the user of Salgado Phones 1 and 2.

"Will you see him today?" CI-2 responded, "Robin [ABEL] yes, doesn't live next to my house; chato [SALGADO] is about 2 hours from where I'm at." ABEL asked, "For when will you meet [with SALGADO]. Everything they [PINEDA-SANCHEZ] tell me, I will tell you. Nothing from me. It's just for information. I already know that they [PINEDA-SANCHEZ] will ask me." CI-2 responded, "I already know, I'm feeling desperate cause they tell me one thing and over there they say me, I told chato [SALGADO] to come over here and he said that he doesn't have a car." ABEL said, "For when he tell you [when will SALGADO deliver the narcotics proceeds]." CI-2 replied, "For tomorrow, wants me to go over there."

212. On October 23, 2013, at approximately 11:09 a.m., CI-2 had a consensually recorded call with SALGADO, who was using Salgado Phone 2. During this call, CI-2 asked, "Oh, you changed your number [no longer using Salgado Phone 1]?" SALGADO responded, "Oh, it broke. It fell into the water last night."

213. Between 11:38 a.m., and 11:42 a.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange:

a. CI-2 stated, "Doesn't answer me, what's going on? Something is wrong go check? . . . Just contact me, change the number [CI-2 wants SALGADO to change his number and call CI-2 from a clean phone]." ABEL stated, "Okay. Which." CI-2 responded, "Chato [SALGADO]."

b. ABEL stated, "Okay. You were to meet with Chato [SALGADO]?" CI-2 stated, "No, haven't told us anything, because Friday I saw that he changed phone [CI-2 was suspicious of the fact that SALGADO called from two different phones]." ABEL stated, "They ask of Chato. There is no problem with changing [phones] every time. They are talking with him with good. If something was wrong they won't have answered him [Individual N has vetted SALGADO, so CI-2 can trust him]." CI-2 said, "I will see him Friday, I trust what you tell me but we need to be careful [of strangers who may be cooperating with law enforcement]."

214. On or about October 23, 2013, beginning at approximately 12:01 p.m., [ND1 Session #3598895], Individual N, who was using Individual N Device 1, exchanged a series of BBMs with PINEDA SANCHEZ, who was using Target Device 6. During this exchange, PINEDA-SANCHEZ stated, "My buddy [ABEL] told me to have them [SALGADO] call [CI-2] from another number and say it is ruben [a new code name to vouch for trustworthiness]. To NOT say that it is on behalf of chato." Individual N responded, "Okay. My buddy is going to let me freaking have it. Give me the information [CI-2's phone number] again just as it is. Let me see what I can do."

215. Between 12:04 p.m. and 12:10 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During the exchange, ABEL stated, "They [PINEDA-SANCHEZ] ask what the difference between today and Friday [for collecting narcotics proceeds from SALGADO]. If it's all bad now it will be bad on Friday [if SALGADO is being tailed by law

enforcement today, he will likely be tailed by law enforcement on Friday as well]. This is all coming from the boss [Individual N] not us [PINEDA SANCHEZ or ABEL]. . . . So I should tell him [SALGADO] to call you? Or what." CI-2 stated, "Give me 10 minutes to talk with the refiner [coordinate with CI-2's putative gold supplier]."

216. On or about October 23, 2013, beginning at approximately 12:22 p.m. [ND1 Session #3598929], Individual N, who was using Individual N Device 1, exchanged a series of BBMs with an individual using the screen name "[Individual EE]," who was using Individual EE Device 1. During this exchange, Individual N stated, "Look tell your guy [SALGADO] to call from a new number and tell him to say that he is Ruben and not Chato [new code word to vouch for SALGADO's trustworthiness] and he will see that he is the same one. Or should we wait until Friday?" Individual EE stated, "Yes they [SALGADO] should call [CI-2] now."

217. On or about October 23, 2013, beginning at approximately 12:24 p.m. [ND1 Session #3598934], Individual N, who was using Individual N Device 1, exchanged a series of BBMs with PINEDA-SANCHEZ, who was using Target Device 6. During this exchange:

a. PINEDA-SANCHEZ stated, "Six, three, zero, seven, zero, two, nine, two, three, five [CI-2's phone number: 630-702-9235], ask for Daniel on behalf of Ruben [code word for trustworthiness]." Individual N asked, "It's the same number, isn't?" PINEDA-SANCHEZ responded, "From my guy [CI-2] it is the same [telephone number]. The one changing the number was your guy [SALGADO],

supposedly and that's why he [CI-2] got spook [PINEDA-SANCHEZ understood that CI-2 was hesitant to conduct the transaction because SALGADO contacted CI-2 from two different phone numbers to coordinate the delivery of the narcotics proceeds]." Individual N stated, "Yeah, but that's bullshit."

b. PINEDA-SANCHEZ stated, "I know, they [ABEL] already scolded him [CI-2] over here. They told him [CI-2] that if he [SALGADO] has a tail [law enforcement conducting surveillance] today, most likely he will have a tail on Friday [the day that CI-2 wants to collect the \$100,000 in narcotics proceeds from SALGADO] as well, to stop the bullshit. The guy [CI-2] was like, all right, but it's better to check first [CI-2 delayed receiving the narcotics proceeds from SALGADO until Friday to verify his trustworthiness]."

218. On or about October 23, 2013, at approximately 12:26 p.m., CI -2 had a consensually recorded call with SALGADO, who was using Salgado Phone 2. During this call, SALGADO stated, "Listen, I'm calling on behalf of Ruben." CI-2 stated, "Go ahead, tell me, cousin." SALGADO stated, "Uh, to see if you can pick up [narcotics proceeds], cousin." CI-2 stated, "I'll call you back."

219. At approximately 12:27 p.m., CI-2 had a consensually recorded call with SALGADO, who was using Salgado Phone 2. During this call, CI-2 asked, "Aren't you the one who called me a while ago?" SALGADO responded, "Yes, on behalf of Ruben." CI-2 stated, "Oh, okay. Uh, do you have time tomorrow?" SALGADO responded, "I do, but they [Individual N] had said today." CI-2 said,

"Okay, let me talk to them [PINEDA SANCHEZ and ABEL]." SALGADO and CI-2 then agreed to speak again later.

220. Between 12:24 p.m., and 12:43 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During the exchange, ABEL asked, "If not did you find another guy for the 100 [\$100,000] of Ruben [code name for SALGADO]." CI-2 responded, "I already talk [to SALGADO], pickup both [SALGADO and a different money courier<sup>36</sup>] tomorrow both." ABEL asked, "What two?" CI-2 said, "Ruben [SALGADO] and juan [code name for the other money courier]." ABEL asked, "But are you sure [pickups will take place]? 100 percent." CI-2 responded, "Yes, 100 percent."

221. On October 24, 2013, between 11:19 a.m. and 1:42 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, "I'm on my way to see Ruben [pickup the narcotics proceeds from SALGADO]." ABEL stated, "Okay. What's up, how many tickets [how much money did CI-2 receive from the other money courier, whom CI-2 met with earlier that day]." CI-2 responded, "I haven't verified yet, I came directly to see Ruben [SALGADO] and I'm almost there with him." ABEL stated, "Okay."

222. At approximately 2:06 p.m., in the presence of law enforcement, CI-2 made a call to SALGADO, who was using Salgado Phone 2. Due to a technical

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<sup>36</sup> On October 24, 2013, at the direction of ABEL and as part of his cooperation with law enforcement, CI-2 collected approximately \$50,000 from another money courier, which was laundered through the purchase of gold.

malfuction, this call was not recorded. During the call, CI-2 told SALGADO that they would meet at the Walgreens parking lot located at the corner of Harlem Avenue and Diversey Avenue in Elmwood Park, Illinois. According to CI-2, SALGADO stated that he would be there in approximately 15 to 20 minutes.

223. At approximately 2:10 p.m., agents established surveillance of the Walgreens parking lot located at 2828 North Harlem Avenue in Elmwood Park. At approximately 2:36 p.m., surveillance observed a beige colored Dodge Caravan drive into and park in the Walgreens parking lot.

224. At approximately 2:36 p.m., in the presence of law enforcement, CI-2 received a call from SALGADO, who was using Salgado Phone 2. Due to a technical malfunction, this call was not recorded. At the time of this call, surveillance observed the driver of the Dodge Caravan, who was later identified as SALGADO, talking on his phone. During the call, according to CI-2, SALGADO said that he was in the Walgreens parking lot.

225. At approximately 2:38 p.m., in the presence of law enforcement, CI-2 called to SALGADO, who was using Salgado Phone 2. Due to a technical malfunction, this call was not recorded. At the time of this call, surveillance observed SALGADO talking on his phone inside the Dodge Caravan. During the call, CI-2 told SALGADO to move to the intersection of Harlem Avenue and North Avenue.

226. At approximately 2:39 p.m., surveillance observed SALGADO drive the Dodge Caravan out of the Walgreens parking lot and turn south onto Harlem Avenue. Agents maintained continuous surveillance of the Dodge Caravan.

227. At approximately 2:46 p.m., Chicago Police Department officers conducted a traffic stop of the Dodge Caravan near 1630 North Harlem in Elmwood Park. During the stop, SALGADO gave officers verbal consent to search the vehicle. During the search, law enforcement officers discovered a shoebox containing \$100,075 in cash. Officers also obtained SALGADO's consent to search a cell phone found in his possession and discovered that he was in possession of Salgado Phone 2. SALGADO advised law enforcement officers that a stranger had given him Salgado Phone 2 and the Dodge Caravan, instructed him to answer the phone when it rang, and to follow instructions given during the calls. SALGADO further advised that someone called him on Salgado Phone 2, directed him at first to drive to the Walgreens on Harlem, and later directed him to move from the Walgreens to North Avenue and Harlem where he was ultimately stopped by the police.

228. On or about October 24, 2013, beginning at approximately 2:51 p.m. [ND1 Session #3602935], Individual N, who was using Individual N Device 1, exchanged a series of BBMs with PINEDA-SANCHEZ, who was using Target Device 6. During this exchange, Individual N stated, "Dude, what happen with the one hundred [\$100,000 that CI-2 was to collect]?" PINEDA-SANCHEZ responded, "They [CI-2 and SALGADO] were going a while ago to the meeting. Let me see."



PINEDA-SANCHEZ later stated, "Dude. The appointment was half hour ago and they [CI-2] are calling and nothing [SALGADO is not answering]. That he [SALGADO] turn the cell [phone] off. Please check, okay. Because they [CI-2] want to leave [cancel the pickup] from over here."

229. Between 2:53 p.m. and 3:02 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During the exchange, CI-2 stated, "This primo [SALGADO] doesn't answer, he said he was on his way about thirty minutes ago and he hasn't arrived." ABEL stated, "Let me check." CI-2 said, "Okay, I'm going to go back turning off the phone now." ABEL stated, "Okay."

230. Beginning at approximately 3:05 p.m. [ND1 Session #3602936], Individual N, who was using Individual N Device 1, exchanged a series of BBMs with PINEDA-SANCHEZ, who was using Target Device 6. During this exchange, Individual N stated, "Tell them [CI-2] that they [SALGADO] don't answer the cell [phone] when they [SALGADO] are driving and not to start their shit." PINEDA-SANCHEZ responded, "Okay. Dude, they [CI-2] dialed and it rang. And know he turned it [cell phone] off. He [CI-2] is going to wait fifteen to twenty minutes. If not he [CI-2] is going to move and if he [SALGADO] dial [calls CI-2] later we will check." Individual N stated, "Ok." PINEDA-SANCHEZ stated, "Hey, they [CI-2] are telling me that they do have urgency for us to deliver [\$100,000]. Ha ha ha because someone [the gold refinery] is waiting for it [\$100,000]. Can you find it [\$100,000] with your friend [SALGADO]?"

231. Beginning at approximately 3:35 p.m. [ND1 Session #3602943], Individual N, who was using Individual N Device 1, exchanged a series of BBMs with PINEDA-SANCHEZ, who was using Target Device 6. During this exchange, PINEDA-SANCHEZ asked, "What is he [SALGADO] saying?" Individual N responded, "Dude, tell him [CI-2] to move is the only thing I could do until they [SALGADO] answer so that I can tell them [SALGADO] not to be fucking around."

232. Beginning at approximately 3:35 p.m. [ND1 Session #3602945], Individual N, who was using Individual N Device 1, exchanged a series of BBMs with PINEDA-SANCHEZ, who was using Target Device 6. During this exchange, PINEDA-SANCHEZ stated, "Buddy, nothing right." Individual N stated, "No buddy, I think they did turn the screw [SALGADO got arrested by law enforcement with the \$100,000]. But don't say anything, buddy." PINEDA-SANCHEZ stated, "Ok."

233. Between 4:36 p.m. and 4:52 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, "Continues not to answer I already call him and nothing." ABEL stated, "Okay, that you change the number [CI-2 has to get a new telephone number], that he doesn't even answer the boss [Individual N]." CI-2 stated, "Okay." ABEL stated, "Just in case he is suspicious [SALGADO got arrested by law enforcement]." CI-2 stated, "Okay I'm going to turn it [phone] off." ABEL stated, "Let's see if you can get a new one, to keep taking for us when will you have it [the new cell phone]." CI-2 responded, "In a while after I'm done I'll ask for one

[phone] just let me. . . . I'm on my way to the Refi [CI-2's gold supplier] to leave that [\$50,000 received from the other money courier earlier in the day]."

**XIX. ABEL Directs CI-2 to Collect and Launder \$173,133 in Narcotics Proceeds from SAUCEDO and HERRERA (November 7, 2013).**

234. On or about November 5, 2013, between approximately 1:27 p.m. and 1:28 p.m., CI-2 exchanged a series of BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL stated, "773 459 4705 [Saucedo Phone 2] from Pedro from [Individual K]. . . . [B]etter for [collecting narcotics proceeds] tomorrow, so Thursday could turn in [send gold] and Thursday see someone else [receive narcotics proceeds from a different money courier]. . . . Contact [Saucedo Phone 2] to meet up tomorrow." CI-2 responded, "OK."

235. On or about November 5, 2013 at approximately 5:01 p.m., CI-2 had a call with SAUCEDO, who was using Saucedo Phone 2. This call was not recorded, but it was verified by toll records. According to CI-2, during the conversation, SAUCEDO identified himself as "Pedro" and said he had a car with "160 miles [\$160,000]" that he wanted to deliver to CI-2 on behalf of "[Individual K]." CI-2 said that when he/she told SAUCEDO that they could meet tomorrow (November 6, 2013), SAUCEDO suggested that they meet near 47th Street and Kedzie Avenue. SAUCEDO stated that he had previously sent a driver (GUEVARA) to deliver narcotics proceeds to CI-2 at this same location – a Pete's Fresh Market. See ¶¶ 181-92, *supra*.

236. On or about November 6, 2013 at approximately 12:56 p.m., CI-2 had a consensually recorded call with SAUCEDO, who was using Saucedo Phone 2.

During the call, CI-2 asked, “[Y]ou’re ready [to deliver narcotics proceeds] for tomorrow, right?” SAUCEDO responded, “Yes.” CI-2 asked, “[I]f later on I have an opportunity, would you be able to [deliver today] or do you want to wait until tomorrow?” SAUCEDO stated, “No, it can be done today.” CI-2 stated, “Okay. I’m over here with a guy who I was going to fix his car [receive narcotics proceeds from a different money courier], but he’s not answering [CI-2’s telephone calls]. So then, if he’s not ready then I’ll go to you unless he comes through, then I would not go to you until tomorrow. I’ll call you later on or tomorrow when I’m on my way.”

237. On or about November 7, 2013, at approximately 12:04 p.m., CI-2 had a consensually recorded call with SAUCEDO, who was using Saucedo Phone 2. During the call, SAUCEDO and CI-2 made arrangements to meet about 20 to 30 minutes later.

238. At approximately 12:28 p.m., surveillance observed SAUCEDO and MARIO HERRERA exit Saucedo Residence 1 with a red suitcase. Surveillance observed SAUCEDO and HERRERA walk to the garage behind the residence with the red suitcase, then observed Saucedo Vehicle 1<sup>37</sup> exit the garage.

239. On or about November 7, 2013, at approximately 12:35 p.m., Chicago Police Department Officers conducted a traffic stop on Saucedo Vehicle 1, which was driven by SAUCEDO, for failure to stop at a stop sign. HERRERA was also in the car. During the stop, SAUCEDO and HERRERA gave verbal consent to search Saucedo Vehicle 1. During this search, officers discovered a red suitcase.

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<sup>37</sup> According to Illinois Secretary of State Database records, Saucedo Vehicle 1 is registered to “Pedro Saucedo” at Saucedo Residence 1.

SAUCEDO and HERRERA claimed that the suitcase was not theirs, and gave officers consent to search the suitcase. Officers then found and seized 34 vacuum sealed bundles of cash, totaling approximately \$170,000, inside a red suitcase.

240. Following this traffic stop, law enforcement officers met with Individual W at Saucedo Residence 1. During this meeting, Individual W advised that she resided at Saucedo Residence 1 with SAUCEDO. Individual W gave law enforcement verbal and written consent to search the residence. During this search, officers found and seized an approximately \$3,133 in cash and a vacuum bag sealer machine.

241. Following the seizures, agents transported the red suitcase containing vacuum sealed bundles of cash to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics. An official count of the seized currency totaled \$173,133.

242. On or about November 7, 2013, between approximately 1:22 p.m. and 2:01 p.m., CI-2 exchanged a series of BBMs with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, "Nothing [the delivery did not take place], he [SAUCEDO] did not answer." ABEL stated, "That the good one [SAUCEDO] is busy. He [SAUCEDO's associate] said he [SAUCEDO] would call you shortly. Keep insisting [continue to call SAUCEDO] in the meantime." CI-2 responded, "OK." Later, ABEL asked, "Nothing?" CI-2 responded, "Nothing."

243. Based on my familiarity with this case, including the aforementioned calls and communications between CI-2 and ABEL and SAUCEDO, I believe that

the \$173,133 in cash seized from SAUCEDO and HERRERA on November 7, 2013, were the same narcotics proceeds that SAUCEDO intended to deliver to CI-2, at the direction of ABEL.

**XX. PINEDA SANCHEZ and ABEL Direct CI-2 to Collect and Launder \$50,020 in Narcotics Proceeds from RUIZ (December 10, 2013).**

244. On or about December 9, 2013, between approximately 12:24 p.m. and 12:33 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During the exchange, ABEL stated, "50 [\$50,000] on behalf of Botas [PINEDA SANCHEZ]. That they are ready [to deliver the narcotics proceeds], lets see if it could be done today." CI-2 responded, "Okay. Tell him [the courier, later identified as ERNESTO RUIZ-RAMIREZ] just to call me."

245. On or about December 9, 2013, at approximately 12:46 p.m., the CI had a consensually recorded a call with ERNESTO RUIZ-RAMIREZ, who was using phone number (779) 875-4257 ("Ruiz Phone 1").<sup>38</sup> During this call, RUIZ asked, "Am I speaking with Daniel [CI-2's codename provided by PARRA-PEDROZA]?"

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<sup>38</sup> Agents identified ERNESTO RUIZ-RAMIREZ and his voice as follows: As discussed below, on December 9 and 10, 2013, CI-2 had several consensually recorded calls with the man who was using Ruiz Phone 1. During these calls, the man using Ruiz Phone 1 arranged to meet CI-2 at approximately 10:36 a.m. on December 10, 2013, at a Life Time Fitness gym in Romeoville, Illinois. Following these calls, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed an Illinois State Driver's License photograph of "Ernesto Ruiz-Ramirez," and positively identified RUIZ as the individual who delivered narcotics proceeds to CI-2 on December 10, 2013 and, as discussed below, January 17, 2014. In addition, prior to the December 10 and January 17 meetings, agents outfitted CI-2 with a concealed audio recording device, which captured RUIZ's voice. After reviewing the recording of the December 10 and January 17 meetings, agents compared the voice of the man with whom CI-2 met to the voice of the man who was using Ruiz Phone 1 and telephone number (815) 666-0630 ("Ruiz Phone 2") in numerous, consensually recorded calls with CI-2, and determined that RUIZ was the user of Ruiz Phone 1 and Ruiz Phone 2.

CI-2 responded, "Tell me." After discussing plans to meet, CI-2 stated, "Then I'll let them [ABEL] know over there because they told me that it [narcotics proceeds delivery] was for Botas [PINEDA SANCHEZ]. 50 Botas [\$50,000 for PINEDA SANCHEZ]." RUIZ responded, "Alright." CI-2 stated, "If they call you from over there [drug associates in Mexico], tell them that it's late already and that it [the money delivery] has to be tomorrow." RUIZ responded, "Don't worry, don't worry. We'll say that."

246. Between approximately 3:33 p.m. and 3:37 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During the exchange ABEL said, "That he [RUIZ] is call you. The cousin from Botas [RUIZ on behalf of PINEDA SANCHEZ]. That they scolded him [RUIZ] because he asked you to do it tomorrow." CI-2 responded, "What do you want me to tell him [RUIZ]? It's late already." ABEL stated, "Well, but you have until 5 [5:00 p.m.], don't you? Would you mind holding on to it [storing the narcotics proceeds]?" CI-2 stated, "Let me call him [RUIZ] and see what he tells me." ABEL stated, "Okay."

247. On or about December 9, 2013, at approximately 3:37 p.m., CI-2 had a consensually recorded call with RUIZ, who was using Ruiz Phone 1. During this call, RUIZ stated, "They called [drug associates] from over there [Mexico]." CI-2 responded, "Yeah, they told me that [to do the pickup that day] too, but it is too late. . . . It's not good to be moving around at night. It's tough at night. Things can only go bad [draw the attention of law enforcement], only to avoid a reprimand [from

Mexican associates upset by the delay]." RUIZ and CI-2 agreed to meet the next day.

248. On or about December 10, 2013, between approximately 8:01 a.m. and 10:36 a.m., CI-2 had a series of consensually recorded calls with RUIZ, who was using Ruiz Phone 1. During these calls, RUIZ and CI-2 agreed to meet at an "exercise place [Life Time Fitness]" in Romeoville at approximately 10:37 a.m.

249. On December 10, 2013, at approximately 10:37 a.m., CI-2 and RUIZ met in the parking lot of Lifetime Fitness located at 1220 Lakeview Drive in Romeoville. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, finding only \$58. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance, including surveillance video and photos, observed RUIZ arrive at the meeting in a rental car, pull an "American Eagle Outfitters" brown paper bag out of the trunk, pull a hoodie over his head, place the bag in CI-2's trunk, and speak with CI-2. RUIZ's face is captured on the surveillance video and photos.

250. During this meeting, RUIZ stated, "It's fifty [\$50,000], okay?" CI-2 asked, "Fifty [\$50,000] even?" RUIZ responded, "Even." CI-2 asked, "Okay, from Botas [PINEDA SANCHEZ], right? From Botas, because otherwise they [U/I]. And then another and another." RUIZ stated, "They [\$50,000 narcotics proceeds] are from Botas."



251. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved from CI-2's vehicle an American Eagle bag containing approximately \$50,020 in cash. Agents then transported the money to HSI Chicago field office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

252. Between 3:19 p.m. and 4:29 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During the exchange, ABEL asked, "How much was it from the other thing [how much money did CI-2 receive from RUIZ]. That if you could confirm the other thing [report how much money RUIZ delivered to CI-2]." CI-2 responded, "50 [\$50,000] even." ABEL stated, "Okay."

253. On or about December 12, 2013, using shipping labels provided by ABEL in an email, agents sent to Refinery A approximately 1,181.93 grams of 24-Karat gold, which agents had purchased with approximately \$49,027.02 of the proceeds obtained from RUIZ on December 10, 2013. Agents also enclosed in this shipment a Refinery A packing list that identified the shipping company as "Chicago Gold" and described the contents of the boxes as containing a total of 1,181.93 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on or about December 13, 2013.

254. On December 16, 2013, at approximately 11:37 a.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, "Close me down with 2860 of fine for \$1,251 [CI-

2 purchased 2,860 grams of gold at \$1,251 per ounce, using narcotics proceeds collected from RUIZ, NUNEZ GALVEZ (as discussed below), and a third money courier].” ABEL responded, “At 49 [\$1249 per ounce of gold]. . . . I have it at 47 [according to ABEL the current fair market value of gold is \$1247 per ounce, so ABEL and the CI-2 agreed upon \$1249].” CI-2 responded, “Okay.”

**XXI. ABEL Directs CI-2 to Collect and Launder \$20,000 in Narcotics Proceeds from NUNEZ GALVEZ (December 12, 2013).**

255. On December 11, 2013, between 2:48 p.m. and 2:49 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL stated, “(773) 673-2793 [Nunez Galvez Phone 1] on behalf of Chayin. It’s fine if it [collection of narcotics proceeds] can be done today, if not, tomorrow morning. To see if there is another one [second money courier] from tomorrow as well.” CI-2 responded, “Okay.”

256. At approximately 2:51 p.m., CI-2 had a consensually recorded call with JUAN CARLOS NUNEZ GALVEZ,<sup>39</sup> who was using telephone number (773) 673-

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<sup>39</sup> Agents identified NUNEZ GALVEZ as follows: As discussed below, on or about December 11 & 12, 2013, CI-2 had a consensually recorded call with the user of Nunez Galvez Phone 1. During this call, the user of this phone arranged to meet CI-2 in person at the Office Depot at the intersection of Cermak and Harlem Avenue on December 12, 2013, at approximately 12:20 p.m., for the purpose of delivering narcotics cash proceeds. Following this phone call, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed a Cicero Police Arrest photograph of “Juan C. Nunez,” and positively identified NUNEZ GALVEZ as the individual who delivered narcotics proceeds to CI-2 on December 12, 2013. In addition, as discussed below, law enforcement conducted a consent search at a residence where NUNEZ GALVEZ was living and his nephew with whom he resided at the time identified mail addressed “Juan C. Nunez Galvez” as belonging to his uncle. In addition, prior to this December 12 meeting, agents outfitted CI-2 with a concealed audio recording device, which captured NUNEZ GALVEZ’s voice. After reviewing the recording of the December 12 meeting, agents compared the voice of the man with whom CI-2 met to

2793 ("Nunez Galvez Phone 1"). During the call, CI-2 stated, "They [ABEL] asked me to call you, from Chayin [code name that ABEL provided CI-2 to vouch for CI-2's trustworthiness]. Can you hear me? Hello?" NUNEZ GALVEZ asked, "Is this Mr. David [code name to vouch for trustworthiness]?" CI-2 responded, "Yes, the one who's supposed to call on behalf of Chayin. Chayin." NUNEZ GALVEZ stated, "Okay." CI-2 asked, "[W]here do you want me to go to [to collect narcotics proceeds from NUNEZ GALVEZ]?" NUNEZ GALVEZ and CI-2 then agreed to speak again later.

257. On December 12, 2013, between approximately 10:59 a.m. and 12:07 p.m., CI-2 had a series of consensually recorded calls with NUNEZ GALVEZ, who was using Nunez Galvez Phone 1. During these calls, NUNEZ GALVEZ and CI-2 agreed to meet each other at approximately 12:20 p.m. in the parking lot of an Office Depot located at 7075 West Cermak Avenue in Berwyn, Illinois.

258. On December 12, 2013, at approximately 12:20 p.m., CI-2 met with NUNEZ GALVEZ and Individual P in the parking lot of the Office Depot located at 7075 West Cermak Avenue in Berwyn. Prior to this meeting, agents outfitted CI-2 with a concealed audio and video recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, and finding only \$71. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance observed NUNEZ GALVEZ exit a car driven by Individual P; walk to

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the voice of the man who was using Nunez Galvez Phone 1, and later Nunez Galvez Phone 2, in numerous, consensually recorded calls with CI-2, and determined that NUNEZ GALVEZ was the user of Nunez Galvez Phone 1 and Nunez Galvez Phone 2.

CI-2's vehicle; open the rear driver-side door; remove a medium-sized grey plastic shopping bag from the inside of his coat; and place the bag in the rear of CI-2's vehicle. During this meeting:

a. NUNEZ GALVEZ asked, "Where, where are you going to put it [the narcotics proceeds]?" CI-2 stated, "Put it in the back, over there." NUNEZ GALVEZ asked, "Right in the front [of the back seat of CI-2's vehicle], yes?" CI-2 asked, "They [ABEL] said fifty [\$50,000], right?" NUNEZ GALVEZ responded, "No, it's twenty-seven [\$27,000]. . . . That's what [NUNEZ GALVEZ's associate] said." CI-2 stated, "He [ABEL] told me fifty [\$50,000 was going to be delivered]."

b. NUNEZ GALVEZ stated, "I will ask him okay? But he [NUNEZ GALVEZ's associate] told me to bring twenty pesos [\$20,000]. . . . No, I will let him [NUNEZ GALVEZ's associate] know right away, because, he told me to bring you only twenty pesos [\$20,000]. . . . Yes, because I only had twenty [\$20,000]. . . . Either way just tell him that I gave you twenty [\$20,000]. . . . I just spoke to him [NUNEZ GALVEZ's associate] and I told him I was going to see you and that I would give you the twenty pesos [\$20,000], and he said, yes, that it was all right." CI-2 stated, "I'll call over there [ABEL in Mexico] and I'll tell them right away." NUNEZ GALVEZ stated, "Okay."

259. Following this meeting, surveillance followed NUNEZ GALVEZ and Individual P to, among other places, a residence located at 1934 Grove Street in Berwyn, Illinois ("Individual P Residence 1"), and observed both men enter the residence.

260. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved a medium-sized grey plastic shopping bag containing approximately \$20,000 in cash from CI-2's vehicle. Agents then transported the money to the Lyons Police Department, where a Cook County Sheriff's Department canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

261. Between 12:25 p.m. and 12:53 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During the exchange, CI-20 stated, "This one [NUNEZ-GALVEZ] only has twenty [\$20,000]." ABEL responded, "Crap. Well take them [\$20,000], let me mention it [to NUNEZ-GALVEZ's associate]. So they can get more [narcotics proceeds]. . . . They're twenty [\$20,000] even?" CI-2 responded, "No, I'm barely heading to the office [to count the narcotics proceeds received from NUNEZ-GALVEZ]." ABEL stated, "Okay."

262. At approximately 12:44 p.m., CI-2 had a consensually recorded call with NUNEZ GALVEZ, who was using Nunez Galvez Phone 1. During this call, NUNEZ GALVEZ stated, "[T]he other one [NUNEZ GALVEZ's associate] from over there [Mexico], he doesn't know him [ABEL]. I only had twenty bucks [\$20,000] with me. . . . That's what they told me to give to you." CI-2 stated, "Okay, so then, let me call over there [ABEL in Mexico] to see what they say." NUNEZ GALVEZ stated, "Alright, then. I apologize. Thank you."

263. At approximately 3:24 p.m., CI-2 exchanged a series of Blackberry messages with ABEL, who was using MLO Device 1. During this exchange, CI-2

stated, "Put me down for 20 [CI-2 collected \$20,000 from NUNEZ GALVEZ]." ABEL replied, "Okay."

264. As noted above, on or about December 16, 2013, between 11:37 a.m. and 11:39 a.m., CI-2 exchanged a series of Blackberry messages with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, "Close me for 2860 of fine at \$1251 [CI-2 purchased 2,860 grams of gold at \$1,251 per ounce, using narcotics proceeds collected from NUNEZ-GALVEZ, RUIZ, and a third courier]." ABEL responded, "At 49 [\$1249 per ounce of gold]. . . . I have it at 47 [according to ABEL the current fair market value of gold is \$1247 per ounce, so ABEL and the CI-2 agreed upon \$1249]." CI-2 responded, "Okay."

265. On December 16, 2013, between 5:02 p.m. and 5:04 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During the exchange, CI-2 stated, "I just sent you fifty of metal [\$50,000 worth of gold, purchased with the narcotics proceeds collected from RUIZ on December 10, 2013], I'll send you the rest [of the gold purchased with other collected narcotics proceeds] tomorrow." ABEL asked, "The twenty and fifty-one [the gold purchased with the \$20,000 in narcotics proceeds from NUNEZ-GALVEZ and the \$51,000 from another individual]." CI-2 responded, "Yes and what I'm missing [CI-2 will send the remaining gold that was purchased with narcotics proceeds, including those from NUNEZ-GALVEZ, the following day]." ABEL responded, "Okay."

266. On or about December 17, 2013, using a shipping label previously provided by ABEL, agents sent to Refinery A approximately 482.10 grams of 24-Karat gold, which agents had purchased with approximately \$19,500.99 of the proceeds obtained from NUNEZ GALVEZ. Agents also enclosed in this shipment a Refinery A packing list that identified the shipping company described the contents of the box as 482.10 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on December 18, 2013.

**XXII. ABEL and PARRA-PEDROZA Direct CI-2 to Collect and Launder \$62,000 in Narcotics Proceeds from ESTRADA (January 13, 2014).**

267. On or about January 9, 2014, between approximately 2:05 p.m. and 2:10 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL asked, "Could you [collect] 33 [\$33,000 from an individual subsequently identified as JOEL ESTRADA] today or tomorrow? And 67 [\$67,000 from an individual subsequently identified as OSCAR MONTES-LAMAS, as discussed below] for Monday?" CI-2 responded, "Tomorrow." ABEL stated, "They will call you later. . . . From Roy [codename courier will use to vouch for trustworthiness]."

268. At approximately 2:58 pm, CI-2 had a consensually recorded call with JOEL ESTRADA, who was using telephone number (773) 494-5502 ("Estrada Phone 1").<sup>40</sup> During this call, ESTRADA stated, "I'm calling on behalf of Roy [codename

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<sup>40</sup> Agents identified JOEL ESTRADA as follows: As discussed below, between January 9 and 13, 2014, CI-2 had a series of consensually recorded calls with the user of Estrada Phone 1. During these calls, the user of this phone arranged to meet CI-2 in person at the parking lot of a Food for Less located at 4821 W. North Avenue in Chicago on January 13, 2014, at approximately 11:29 a.m., for the purpose of delivering narcotics cash proceeds.

provided by ABEL]. Are you in the City?" ESTRADA and CI-2 then discussed meeting each other the following day and a possible location for the meeting.

269. On January 13, 2014, between approximately 9:07 a.m. and 9:31 a.m., CI-2 exchanged a series of consensually recovered BBMs with ABEL, who was using MLO Device 1. During the exchange, ABEL stated, "What are they going to do 63 [\$63,000] and 67 [\$67,000]. Let's see if it's true [ESTRADA is going to deliver \$63,000 and the other individual is going to deliver \$67,000]." CI-2 stated, "Yes I'm on my way [to collect narcotics proceeds from ESTRADA]." ABEL stated, "Okay. . . . Is this guy [ESTRADA] from Friday or someone else?" CI-2 replied, "Yes." ABEL asked, "Guy from Friday?" CI-2 responded, "Friday."

270. At approximately 11:12 am, CI-2 had a consensually recorded call with ESTRADA, who was using Estrada Phone 1. During this call, ESTRADA and CI-2 arranged to meet each other at about 11:20 a.m. on "North and Cicero . . . where there's a Food 4 Less and a place where they sell shoes, a Sketchers." ESTRADA stated that he was driving a grey car.

271. At approximately 11:29 a.m., ESTRADA and CI-2 met in the parking lot of Food for Less located at 4821 W. North Avenue in Chicago, Illinois. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device and

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Following these phone calls, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed a prior arrest photograph of "Joel Estrada," and positively identified ESTRADA as the individual who delivered narcotics proceeds to CI-2 on January 13, 2014. In addition, prior to this January 13 meeting, agents outfitted CI-2 with a concealed audio recording device, which captured ESTRADA's voice. After reviewing the recording of the January 13 meeting, agents compared the voice of the man with whom CI-2 met to the voice of the man who was using Estrada Phone 1, in numerous, consensually recorded calls with CI-2, and determined that ESTRADA was the user of Estrada Phone 1.



searched CI-2 and his/her vehicle for large amounts money and contraband, finding none. Surveillance observed ESTRADA exit his car, approach CI-2's vehicle, and place a bag into the back seat of CI-2's vehicle. During this meeting, CI-2 stated, "Can you put it [narcotics proceeds] behind here? You don't bring a bag? Just throw it back here. Which one is it?" ESTRADA responded, "It's sixty-two [\$62,000]." CI-2 stated, "Sixty-two? Okay, they [ABEL] said it would be sixty-three [\$63,000]. Uh, uh, well, they said it would be sixty-three and it's sixty-two. . . . But is well counted?" ESTRADA responded, "Yes."

272. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved from CI-2's vehicle a bag that contained approximately \$62,000 in cash. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

273. Between 12:36 p.m., and 12:37 p.m., CI-2 exchanged a series of BBMs with ABEL, who was using MLO Device 1. During the exchange, CI-2 stated, "On my way to the office [CI-2 collected narcotics proceeds from ESTRADA and was going to count the money]." ABEL asked, "Okay. Was it 63 [\$63,000] or less." CI-2 stated, "He [ESTRADA] said 62 [\$62,000]."

274. Between 1:35 p.m. and 2:06 p.m., CI-2 exchanged a series of BBMs with ABEL, who was using MLO Device 1. During the exchange, ABEL asked, "Have you checked [counted] the 62 [\$62,000 received from ESTRADA]." CI-2 responded, "That's what I'm doing. Put me down for 62 closed [CI-2 verified that

ESTRADA delivered \$62,000].” ABEL stated, “Okay.” CI-2 stated, “Send me guides [pre-paid shipping pre-addressed to labels Refinery A].”

275. On January 14, 2014, at 10:21 p.m., the UC Email Address received an email from Abel Email Account 3. The email attached five pre-paid shipping labels addressed to Refinery A.

276. On or about January 15, 2014, using one of the shipping labels provided by ABEL, agents sent to Refinery A approximately 47 ounces of 24-Karat gold, which agents had purchased with approximately \$59,955.03 of the proceeds obtained from ESTRADA. Agents also enclosed in this shipment a Refinery A packing list that identified the shipping company as “Chicago Gold” and described the contents of the boxes as containing a total of 1,461.86 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on or about January 17, 2014.

277. On January 17, 2014, between 9:27 a.m. and 9:42 a.m., CI-2 exchanged a series of BBM’s with PARRA-PEDROZA, who was using Blackberry Pin: 29BDE210 (“Parra-Pedroza Device 1”).<sup>41</sup> During the exchange, CI-2 said, “Close me

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<sup>41</sup> Agents identified PARRA-PEDROZA as the user of Parra-Pedroza Device 1 as follows: On or about January 2, 2014, CI-2 spoke on the phone with a man whose voice CI-2 recognized as PARRA-PEDROZA. The call was not recorded, but verified by toll records for CI-2’s phone. According to CI-2, during the call, PARRA-PEDROZA told CI-2 that he was getting another Blackberry device and asked for CI-2’s Blackberry PIN, so that PARRA-PEDROZA could send an invitation to CI-2’s Blackberry device that would allow the two individuals to communicate with each other using BBMs over PARRA-PEDROZA’s new device. On or about January 4, 2014, CI-2 received a BBM invitation from Parra-Pedroza Device 1. This was the only BBM invitation that CI-2 received following the January 2 call with PARRA-PEDROZA. Between March 6, 2014, and March 13, 2014, CI-2 exchanged numerous consensually BBMs with the user of Parra-Pedroza Device 1. During these conversations, the individual using Parra-Pedroza Device 1, whom agents and CI-2

3080 fine for \$1,251 [CI-2 purchased 3,080 grams of 24-karat gold with the narcotics proceeds collected from ESTRADA and MONTES-LAMAS (discussed below) at the current market price of \$1,251 per ounce].” PARRA-PEDROZA responded, “Okay.”

**XXIII. PINEDA SANCHEZ, PARRA-PEDROZA, and ABEL Direct CI-2 to Collect and Launder \$66,990 in Narcotics Proceeds from MONTES-LAMAS (January 14, 2014).**

278. On or about January 9, 2014, between approximately 4:01 p.m. and 7:19 p.m., CI-2 exchanged a series of BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL stated, “312 509 5840 [“Montes-Lamas Phone 1”] Oscar from Matias [codenames to vouch for trustworthiness]. 67 [\$67,000 to be delivered] so you guys could agree.” CI-2 responded, “Yes.”

279. On January 9, 2014, at approximately 10:17 p.m., according to toll records, Montes-Lamas Phone 1 was in contact with Mexico telephone number 52 (347) 103-1065. Based on my familiarity with this case, including prior and subsequent consensually recorded phone calls and consensually captured BBM

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believed to be PARRA-PEDROZA, arranged to meet CI-2 again in person in Las Vegas on Thursday, June 20, 2014, for the purpose of discussing CI-2’s efforts in furtherance of the Parra-Pedroza MLO. On or about March 13, 2014, CI-2 exchanged a series of messages with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. This exchange was not recorded, but it was made in the presence of law enforcement. During this exchange, CI-2 and the individual using Parra-Pedroza Device 1 arranged to meet later that day at the Las Vegas Premium Outlets mall in Las Vegas – the same location where CI-2 and PARRA-PEDROZA met on June 20, 2013. Agents conducting surveillance subsequently observed CI-2 meet with PARRA-PEDROZA at that outlet mall at the designated time. In addition, on or about March 21, 2014, CI-2 had a consensually recorded call with Parra-Pedroza, who was using Parra-Pedroza Device 1. Agents have compared the audio recording of PARRA-PEDROZA’s voice from this March 13, 2014, meeting (and from a prior meeting on June 20, 2013) to the recording of the voice of the man using Parra-Pedroza Device 1 and, based on that comparison, concluded that PARRA-PEDROZA is the user of the telephone function of Parra-Pedroza Device 1. According to Blackberry records, the phone number for Parra-Pedroza Device 1 is Mexican telephone number 52-333-578-1538.

exchanges, I believe that during this call, OSCAR MONTES-LAMAS<sup>42</sup> discussed with his Mexican associates the delivery of narcotics proceeds to CI-2.

280. On January 13, 2014, at approximately 11:55 a.m., CI-2 had a consensually recorded call with MONTES-LAMAS, who was using Montes-Lamas Phone 1. During the call, CI-2 stated, "I was asked to call you, on behalf of Matias, Oscar [codenames provided by ABEL]." MONTES-LAMAS responded, "He's my friend." CI-2 stated, "Okay. You were going to bring the title of a truck [narcotics proceeds]. When can you do it?" MONTES-LAMAS asked, "Where would it be my friend?" MONTES-LAMAS and CI-2 then discussed possible meeting locations and agreed to speak again later.

281. At approximately 4:00 p.m., CI-2 had a consensually recorded call with MONTES-LAMAS, who was using Montes-Lamas Phone 1. During this call, MONTES-LAMAS and CI-2 agreed to meet each other the following day.

282. Between approximately 5:20 p.m. and 5:21 p.m., CI-2 exchanged a series of BBMs with ABEL, who was using MLO Device 1. During this exchange,

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<sup>42</sup> Agents identified OSCAR MONTES-LAMAS as follows: As discussed below, between January 13 and 14, 2014, CI-2 had a series of consensually recorded calls with the user of Montes-Lamas Phone 1. During these calls, the user of this phone arranged to meet CI-2 in person at the parking lot of a Home Depot located at 12000 South Cicero Avenue in Alsip, at approximately 2:47 p.m., for the purpose of delivering narcotics cash proceeds. Following these phone calls, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed an Illinois driver's license photograph of "Oscar Montes-Lamas," and positively identified MONTES-LAMAS as the individual who delivered narcotics proceeds to CI-2 on January 14, 2014. In addition, prior to this January 14 meeting, agents outfitted CI-2 with a concealed audio recording device, which captured MONTES-LAMAS's voice. After reviewing the recording of the January 14 meeting, agents compared the voice of the man with whom CI-2 met to the voice of the man who was using Montes-Lamas Phone 1, in numerous, consensually recorded calls with CI-2, and determined that MONTES-LAMAS was the user of Montes-Lamas Phone 1.

ABEL asked, "The 67. Or nothing [has CI-2 arranged to collect \$67,000 in narcotics proceeds from MONTES-LAMAS or not]." CI-2 responded, "We just agreed to meet for tomorrow."

283. According to toll records, at approximately 5:42 p.m., Montes-Lamas Phone 1 was in contact with the same Mexican telephone number (52 (347) 103-1065). The following day, at approximately 11:03 a.m., Montes-Lamas Phone 1 was in contact with a telephone used by PINEDA SANCHEZ (Target Device 6). Based on my familiarity with this case, including prior and subsequent consensually recorded phone calls and consensually captured BBM exchanges, I believe that during these calls, MONTES-LAMAS discussed with PINEDA SANCHEZ and his other Mexican associates the delivery of narcotics proceeds to CI-2.

284. On or about January 14, 2014, between approximately 12:21 p.m. and 2:27 p.m., CI-2 had a consensually recorded call with MONTES-LAMAS, who was using Montes-Lamas Phone 1. During these calls, MONTES-LAMAS and CI-2 arranged to meet at the Home Depot near the intersection of 124th Street and Cicero Avenue in Alsip at approximately 2:47 p.m.

285. On or about January 14, 2014, at approximately 2:47 p.m., MONTES-LAMAS and CI-2 met in the parking lot of Home Depot located at 12000 South Cicero Avenue in Alsip. Prior to this meeting, agents outfitted the CI-2 with a concealed audio recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, finding none. Surveillance observed MONTES-LAMAS arrive at the parking lot, retrieve a white plastic bag from his vehicle, place

it in the rear of the CI-2's vehicle, and engage CI-2 in conversation. During this meeting:

a. CI-2 asked, "How much is it? Six-seven, [\$67,000] right?" MONTES-LAMAS responded, "Six-seven [\$67,000]. I think one is short by 10 peso [\$10 short]." CI-2 stated, "Okay. No, ten peso is no problem. When it is short by 500 or 1,000 then . . . ."

b. CI-2 asked, "And what about this other business [drug trafficking]? Is it going well or is it? It's slow. You know, I used to get almost 100 [\$100,000], 150 [\$150,000]. That's what everyone gave me. This is all I do, the tickets [collect narcotics proceeds]." MONTES-LAMAS responded, "The tickets. Right now it's very slow, very slow. Because since mid-December to these days, it's been slow because, first of all, everybody stops [selling drugs]. . . . Besides, this material [narcotics] is a little, there was some that was okay [good quality], but some other was very old, and people would get stuck [unable to sell the narcotics]. But if the material [narcotics] is good, one can . . . ."

c. CI-2 stated, "Yes, but anyway, we are not receiving a lot of material [narcotics proceeds] from over, perhaps twenty, thirty [\$20,000 to \$30,000 per delivery] now. This is what I do all day, everyday." MONTES-LAMAS stated, "Everyday. . . . I sometimes, this people, I'm reluctant to help them, because it's so little [small amount of narcotics proceeds], but they say they will be arriving on these days, but I couldn't tell you if it's true or not because they talk and talk."

d. CI-2 stated, "I have a cousin that wants work [to sell narcotics], but they don't give it to me, because they don't want me to get mixed with someone else [CI-2's bosses want to keep narcotics separate from the narcotics proceeds]." MONTES-LAMAS stated, "They also told me they were going to give me some [narcotics], but it has been very bad [quality]. I don't have many clients out there. But I have brothers in law that, if I help them, I can deliver them [narcotics] myself. And now I'm picking them [narcotics] up. But when there is nothing to do, I think that from somewhere else [obtain narcotics from a different source of supply], right? A guy, some guys from Guadalajara were telling me that perhaps they'll have something [narcotics] next week, but it remains to be seen." CI-2 asked, "Would you like me to call, would you like me to give you my cousin's [narcotics supplier's] number? He is trustworthy. I am trustworthy too because." MONTES-LAMAS stated, "Give me his number. If there is something, I'll call him."

e. MONTES-LAMAS stated, "Right now I know that there must be some [narcotics available to sell]. Those men I told you about [from Guadalajara] are already here. . . . They are already here. They've been here since the 16th but they haven't let go of any merchandise [narcotics]." CI-2 stated, "That's why. It all gets dried out [narcotics supply is exhausted]. They tell you it is fifty and then when I weigh it, it's just forty-five [CI-2's putative narcotics supplier has delivered drug shipments that weigh less than the agreed upon quantities]." MONTES-LAMAS responded, "Yes, it's what's been happening. Yes they are eleven, and then son of a bitch, is just ten [MONTES-LAMAS's narcotics supplier has also shorted

him on agreed drug quantities]. Yes, the weather is very dry [limited narcotics supply]. And then it can't be finished [sold]. People don't understand that they shouldn't provide bad material [low quality narcotics]. We are the ones who struggle. You simply present the material [narcotics] and it gets returned [rejected as poor quality], there is no need. . . . If they bring good material [good quality narcotics], one doesn't struggle at all [to sell it]."

f. CI-2 stated, "It is expensive." MONTES-LAMAS responded, "You deliver it [high quality narcotics], and then it's not going to be, [drug customers saying] 'I don't want this one, and this one is bad, and bring it here, and take it there.' It's a mess. They [narcotics sources of supply] didn't imagine that nobody wanted that one, it was fucked [low quality]. Now there isn't any [narcotics], so . . . ." CI-2 stated, "Well if you get something." MONTES-LAMAS responded, "I'll let you know."

g. CI-2 stated, "My name is Daniel [codename provided by PARRA-PEDROZA]." MONTES-LAMAS stated, "You just use the name who is, who is, 'Matias [codename provided by ABEL].'" CI-2 responded, "I don't know. The name is given by the old man [PARRA-PEDROZA and ABEL]." MONTES-LAMAS stated, "He [MONTES-LAMAS' associate] says, 'Matias is going to call you.'" CI-2 responded, "No, I am Daniel." MONTES-LAMAS stated, "Okay. No, but [MONTES-LAMAS' associate said] 'Matias is going to call you on behalf of Matias.'" CI-2 responded, "Yes, I was told 'Oscar on behalf of Matias [codenames provided by ABEL].'" MONTES-LAMAS stated, "Okay."



286. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved from CI-2's vehicle a white bag that contained approximately \$66,990 in cash. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

287. Between approximately 5:02 p.m. and 5:03 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, CI-2 stated, "Put me down 66990 [CI-2 collected \$66,990 from MONTES-LAMAS]." ABEL responded, "Okay."

288. On or about January 16, 2014, using one of the shipping labels provided by ABEL, agents sent to Refinery A approximately 52 ounces of 24-Karat gold, which agents had purchased with approximately \$65,639.08 of the proceeds obtained from MONTES-LAMAS. Agents also enclosed in this shipment a Refinery A packing list that identified the shipping company as "Chicago Gold" and described the contents of the boxes as containing a total of 1,617.38 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on or about January 17, 2014.

289. On or about January 17, 2014, between 9:27 a.m. and 9:42 a.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During the exchange, CI-2 stated, "Close me 3080 fine for \$1,251 [CI-2 purchased 3,080 grams of 24-karat gold with the narcotics proceeds collected from

ESTRADA (discussed above) and MONTES-LAMAS at the current market price of \$1,251 per ounce].” PARRA-PEDROZA responded, “Okay.”

**XXIV. PARRA-PEDROZA and ABEL Direct CI-2 to Collect and Launder \$107,280 in Narcotics Proceeds from RUIZ (January 17, 2014).**

290. On or about January 14, 2014, between approximately 11:00 a.m. and 11:16 a.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL stated, “Get hold of the 120 [\$120,000 from RUIZ].” CI-2 stated, “Let me take it to the La Refi [refinery, meaning CI-2’s putative gold supplier] just in case.” ABEL responded, “Okay. Tell him maybe 120 for today. Let see if he does it all [sells gold for all narcotics proceeds collected by CI-2].”

291. On or about January 14, 2014, between approximately 12:56 p.m. and 1:17 p.m., CI-2 exchanged a series of consensually captured BBMs with ABEL, who was using MLO Device 1. During this exchange, ABEL asked, “With the 120 [\$120,000]? What la refi [CI-2’s putative gold supplier] tell you?” CI-2 responded, “Going to see him [putative gold supplier] later.” ABEL stated, “Ok. To see if you could see each other today or tomorrow. . . . From Ricky [codename RUIZ will use to vouch for trustworthiness in delivery of narcotics proceeds] for \$120. So you guys could agree.”

292. On or about January 14, 2014 at approximately 6:39 p.m., CI-2 had a consensually recorded call with RUIZ, who was using Ruiz Phone 2. During this call, RUIZ asked, “Hello, am I speaking with Daniel?” CI-2 responded, “Yes.” RUIZ

stated, "I'm calling on behalf of Ricky." CI-2 and RUIZ then discussed where each other was located in order to coordinate a place to meet.

293. On or about January 15, 2014, at approximately 5:42 p.m., CI had a consensually recorded call with RUIZ, who was using Ruiz Phone 2. During this call:

a. RUIZ stated, "I was the one who spoke to you yesterday on behalf of Ricky [codename from ABEL]." CI-2 stated, "Yes, um, I called over there but I told him [ABEL] that I wouldn't be able [to collect narcotics proceeds] until Monday. Didn't they [RUIZ's drug associates] call you?" RUIZ responded, "They didn't call me. It's okay. I just wanted to let you know."

b. CI-2 stated, "Not until Monday, because the guy [CI-2's putative gold supplier] wanted me to bring him the, the tickets for the dance [narcotics proceeds for laundering] by Sunday, and I told him I wouldn't make it on Sunday. 'I have them for you for Monday or Tuesday.'" RUIZ stated, "I wasn't told. But with the information you just gave me, it's enough. We'll leave it pending [do the money drop later]."

294. At approximately 6:55 p.m., CI had a consensually recorded call with RUIZ, who was using Ruiz Phone 2. During this call, RUIZ repeatedly confirms he is speaking with "Daniel" and CI-2 promises to "call you [RUIZ] to tell you the time" of the pickup.

295. On or about January 16, 2014, between approximately 9:34 a.m. and 10:50 a.m., CI-2 exchanged a series of consensually captured BBMs with ABEL,

who was using MLO Device 1. During this exchange, ABEL asked, "What is up did the 120 [RUIZ] call you? . . . Did you talk with 120 already!? . . . What does the 120 [RUIZ] tell you?" CI-2 responded, "Not yet, I have not contacted him."

296. On or about January 16, 2014, between 12:34 p.m. and 3:05 p.m., CI-2 had several consensually recorded calls with RUIZ, who was using Ruiz Phone 2. During a call at 3:05 p.m., CI-2 stated, "I'm getting calls from over there [Mexico] constantly saying that I have to see you." RUIZ responded, "Tell them to cool off." CI-2 stated, "So I'm on way over there, but they keep asking, 'When am I getting there? When am I getting there?' I tell them, 'I'm on my way and I don't want all this constant calling.' . . . Can you call them [RUIZ's drug associates in Mexico]? Do me a favor, tell them you are kind of busy, and that we will meet later." RUIZ responded, "Okay then."

297. On or about January 16, 2014, at approximately 4:38 p.m., CI-2 had a consensually recorded call with RUIZ, who was using Ruiz Phone 2. During this call, CI-2 asked, "They [drug associates] haven't called you?" RUIZ responded, "Yes, they called me." CI-2 stated, "If you want to wait up, if you come to an agreement [with the drug associates], I'll get there later, even if its late. Unless you want to do what they are saying. Because they told me to tell you, would drive to wherever in this direction. And I said, 'Okay. I will call him to see what he says.' Because they keep calling me too." RUIZ stated, "Okay. I'll call you right back."

298. On January 16, 2014, at approximately 5:59 p.m. and 7:55 p.m., toll records for Ruiz Phone 2 show that the phone was in contact with Parra-Pedroza Device 1.

299. On or about January 16, 2014, at approximately 6:04 p.m., CI-2 had a consensually recorded call with RUIZ, who was using Ruiz Phone 2. During this call, CI-2 asked, "What did they [Mexican drug associates] tell you?" RUIZ responded, "To go where you are. Where are you?" CI-2 and RUIZ then discussed possible meeting locations.

300. On or about January 16, 2014, at approximately 6:07 p.m., CI-2 had a consensually recorded call with RUIZ, who was using Ruiz Phone 2. During this call, CI-2 stated, "Okay cousin, we are going to trust each other. We know who we are. Okay." RUIZ responded, "Alright."

301. At approximately 6:44 p.m., CI-2 had a consensually recorded call with RUIZ, who was using Ruiz Phone 2. During this call, CI-2 stated, "If the boss calls you, tell him that you are not moving [delivering proceeds] anymore, because . . . it's too late [in the day]." RUIZ responded, "Alright then. . . . I'm not going on the streets just like that." CI-2 stated, "Me too. I don't want to go on the streets at late hours." RUIZ stated, "No, not me. You and I already agreed on that [a late-hour delivery would more readily draw the attention of law enforcement]." They agreed to meet the following day.

302. Between approximately 7:48 p.m. and 7:55 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using

Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA asked, "Agreed to a time [to pick up money from RUIZ] yet?" CI-2 responded, "Yes, yes, he's not arriving at the agreed upon time. The thing is he's telling lies." CI-2 then advised PARRA-PEDROZA that he/she was meeting with RUIZ between 9:00 and 10:00 the following morning. PARRA-PEDROZA stated, "Okay."

303. Between approximately 7:55 p.m. and 7:57 p.m., toll records for Ruiz Phone 2 show that the phone was in contact with Parra-Pedroza Device 1 three times.

304. On January 17, 2014, between approximately 8:23 a.m. and 10:06 a.m., CI-2 had a series of consensually recorded calls with RUIZ, who was using Ruiz Phone 2. During these calls, RUIZ and CI-2 arranged to meet at a "Home Depot on Route 30" (3001 Plainfield Rd. in Joliet) at approximately 10:15 a.m.. During the second of these calls, at approximately 9:58 a.m., CI-2 stated, "As soon as I'm done with you [picking up narcotics proceeds], I will call the other guy [a different money courier] to come see me. I don't want to be moving around with the kids [RUIZ's narcotics proceeds]." RUIZ responded, "Okay."

305. On January 17, 2014, at approximately 10:19 a.m., CI-2 met with RUIZ in the parking lot of the Home Depot located at 3001 Plainfield Rd. in Joliet, Illinois. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, finding only \$24. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance, including surveillance video and

photographs, observed RUIZ park his car next to CI-2's vehicle, exit his car, retrieve an Old Navy bag from the back seat of his car, and hand the bag to CI-2, who then placed the bag in the rear of his/her vehicle.

306. During this meeting, CI-2 asked, "One hundred twenty [\$120,000]?" RUIZ responded, "No, it's one hundred seven and five hundred [\$107,500]. . . . That's what they told me." CI-2 stated, "I was told one hundred twenty. Would you like to call them over there [drug associates in Mexico]?" RUIZ responded, "I will let them know it is one hundred seven, five hundred [\$107,500], even."

307. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved from CI-2's vehicle an Old Navy bag containing approximately \$107,280 in cash. Agents then transported the money to the Lyons Police Department, where a Cook County Sheriff's Department canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

308. On or about January 20, 2014, between approximately 10:56 a.m. and 11:54 a.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA asked, "Are you bringing papers [collecting narcotics proceeds] or not anymore?" CI-2 stated, "I still have the 107 [\$107,280 collected from RUIZ on January 17]." PARRA-PEDROZA asked, "And when are you turning them in [sending gold purchased with RUIZ's proceeds to Refinery A]? . . . [Y]ou turn in now." CI-2

stated, “[CI-2’s putative gold supplier] Closes today but I’ll look at it in a while.”

PARRA-PEDROZA stated, “The refinery is closed.”

309. On or about January 21, 2014, using shipping labels provided by PARRA-PEDROZA in a prior email, agents sent to Refinery A approximately 2,550 grams of 24-Karat gold, which agents had purchased with a portion of the \$107,280 of the proceeds obtained from RUIZ on January 17, 2014. Agents also enclosed in this shipment (consisting of two separate boxes) Refinery A packing lists that identified the shipping company as “Chicago Gold” and described the contents of the boxes as containing a total of 2,550 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on or about January 22, 2014.

310. On or about January 23, 2014, CI-2 exchanged a series of BBMs with Individual M (a/k/a “JUNIPERA”), who was using MLO Device 1.<sup>43</sup> During this

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<sup>43</sup> As discussed above, on or about September 6, 2013, PARRA-PEDROZA advised CI-2 that he had given MLO Device 1 to his nephew, ABEL, for purposes of coordinating the money laundering scheme. On or about January 21, 2014, CI-2 exchanged a series of BBMs with an individual using MLO Device 1, but the Blackberry Messenger screen name had been changed from “Willy” (which ABEL had used when he was in possession of the device) to “Junipera.” During this exchange, the user of MLO Device 1 stated, “Pst. . . . I am juniper.” On or about January 21, 2014, CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA asked, “Do you still have the other pin [MLO Device 1] from Abel?” and “Did you receive the ‘pst.’?” CI-2 responded, “Yes.” PARRA-PEDROZA stated, “Junipera is bringing it. . . . It’s to do the closings [laundering of gold purchased by CI-2 with the narcotics proceeds].” CI-2 asked, “Okay, who is Junipera?” PARRA-PEDROZA responded, “She’s the one you saw in Las Vegas the last time [June 20, 2013].” As discussed above, surveillance observed PARRA-PEDROZA and a woman meet with CI-2 at an outlet mall in Las Vegas on June 20, 2013. According to Law Enforcement Database travel records, on or about June 19, 2013, a woman identified here as “Individual M” traveled with PARRA-PEDROZA from Mexico to the United States. Based on surveillance, travel records, and consensually captured Blackberry Messenger conversations, agents identified Individual M as the user of MLO Device 1 between January 21, 2014, and March 23, 2014. As discussed below, during a March 24, 2014, BBM exchange, PARRA-PEDROZA advised CI-2 that he resumed using MLO Device 1 no later than March 24, 2014.



exchange, CI-2 stated, "Close me 2550 of the fin at \$1266 [CI-2 purchased 2,550 grams of fine gold with the narcotics proceeds CI-2 received on January 17, 2014, and the current market price was \$1266 per ounce]." Individual M stated, "Yes. . . . 2550 ounces right?" CI-2 responded, "No grams."

**XXV. PARRA-PEDROZA Directs CI-2 to Collect and Launder \$150,000 in Narcotics Proceeds from LOPEZ-CABRERA (January 22, 2014).**

311. On or about January 20, 2014, between approximately 10:56 a.m. and 11:54 a.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange:

a. PARRA-PEDROZA asked, "Are you bringing papers [collecting narcotics proceeds] or not anymore? . . . Because there are 180 and 150 [\$180,000 and \$150,000 to be collected from men subsequently identified as OMAR LOPEZ-CABRERA and GABRIEL SALCEDO, as discussed below]." CI-2 stated, "[T]hose primos [LOPEZ and SALCEDO] tomorrow." PARRA-PEDROZA stated, "Then I'll make an appointment [arrange for the money delivery] with them [LOPEZ and SALCEDO] tomorrow. . . . It's going to be tomorrow or the following day."

b. PARRA-PEDROZA stated, "Okay we don't need to keep them [LOPEZ and SALCEDO] waiting so long because they'll leave us [use another money laundering operation to launder their narcotics proceeds]. . . . We have to get on it [collect the narcotics proceeds soon]. . . . They're [LOPEZ and SALCEDO] going to call you. . . . Answer them and tell them when [to deliver the narcotics proceeds]." CI-2 stated, "Yes I already have the phone in the hand waiting for it to ring." PARRA-PEDROZA stated, "On behalf of Pedro [code word SALCEDO will

use when delivering the narcotics proceeds to CI-2.” PARRA-PEDROZA stated, “It’s the 180 [SALCEDO has \$180,000 to be laundered].”

312. On or about January 20, 2014, between approximately 2:21 p.m. and 2:22 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA stated, “Another one [LOPEZ] from China [code word LOPEZ will use to deliver the narcotics proceeds] is going to call you. . . . With 150 [\$150,000].” CI-2 stated, “Okay the other one [SALCEDO] hasn’t called yet.”

313. On or about January 21, 2014, at approximately 8:28 a.m., CI-2 had a consensually recorded call with OMAR LOPEZ-CABRERA, who was using (773) 444-7522 (“Lopez Phone 1”).<sup>44</sup> During the call, LOPEZ stated, “I’m calling referred by La China [code word provided by PARRA-PEDROZA to vouch for

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<sup>44</sup> Agents identified OMAR LOPEZ-CABRERA and LOPEZ’s voice as follows: As discussed below, between January 21, 2014, and January 22, 2014, CI-2 had multiple consensually recorded calls with the man who was using Lopez Phone 1. During these calls, the man using Lopez Phone 1 arranged to meet CI-2 in person on January 22, 2014, near the intersection of Kedzie and 47th Street in Chicago, at approximately 2:40 p.m., for the purpose of delivering narcotics cash proceeds. Following these phone calls, surveillance observed CI-2 meet with, and obtain proceeds from two men at the designated time and place. After this meeting, a DuPage County Sheriff’s Officer conducted a traffic stop of the vehicle driven by the man with whom CI-2 met. During the stop, the driver produced a Mexican driver’s license bearing the driver’s photograph and the name “Omar Lopez-Cabrera.” The passenger produced a Mexican driver’s license bearing his photograph and name. Agents thereby positively identified LOPEZ and Individual X as the men who delivered narcotics proceeds to CI-2 on January 22, 2014. In addition, prior to this January 22, 2014, meeting, agents outfitted CI-2 with a concealed audio recording device, which captured the voices of the men with whom CI-2 met. Surveillance observed that, between the two men who met with CI-2, the man who was subsequently identified as LOPEZ did most of the talking. After reviewing the recording of the January 22, 2014, meeting, agents compared the voice of the man with whom CI-2 met (and who, between the two men, did most of the talking) to the voice of the man who was using Lopez Phone 1 in numerous, consensually recorded calls with CI-2, and determined that LOPEZ was the user of Lopez Phone 1. In addition, during the meeting between CI-2 and LOPEZ, CI-2 recognized LOPEZ’s voice to be the same as user of Lopez Phone 1.

trustworthiness].” CI-2 responded, “Okay, go ahead. Where do you want me to go [meet with LOPEZ to receive the narcotics proceeds]?” LOPEZ stated, “I’m by ‘Toraski’ [Pulaski Avenue] and ‘Ketelian’ [Kedzie Avenue], around here.” CI-2 responded, “Okay, let me arrange things, because I’m waiting for the phone call from over there [Mexico]. The car [narcotics proceeds] you have, does it have one hundred eighty [\$180,000], one hundred fifty [\$150,000], or one hundred sixty [\$160,000], or something like that?” LOPEZ responded, “I was told over there [Mexico] to tell you that the water was leaking, for one hundred fifty [\$150,000].”

314. On or about January 21, 2014, between approximately 10:34 a.m. and 10:49 a.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange:

a. PARRA-PEDROZA asked, “Have they [LOPEZ or SALCEDO] called you yet? . . . Is the order coming [will CI-2 send the gold from an earlier \$107,500 collection to Refinery A] today.” CI-2 responded, “[LOPEZ] Just finished talking to me about 150 [\$150,000] we’ll come to an agreement later [on where to meet]. . . . Yes [gold from the January 17 collection has been shipped].”

b. PARRA-PEDROZA stated, “They [LOPEZ] tell me you’re not going to send it [\$150,000] until Thursday [January 23, 2014]?” CI-2 asked, “Who said?” PARRA-PEDROZA responded, “The Primo [LOPEZ].” PARRA-PEDROZA asked, “Can’t you see them [LOPEZ] today or tomorrow [to receive the \$150,000]?” CI-2 stated, “I’m on it trying to see if I see them [LOPEZ] today or tomorrow early [to collect narcotics proceeds].” PARRA-PEDROZA stated, “Don’t go until Thursday

because they've [LOPEZ's associates in Mexico] have already scolded us." CI-2 stated, "Okay if it's not today then it's tomorrow morning for sure." PARRA-PEDROZA stated, "Right on."

c. PARRA-PEDROZA stated, "Listen, that Primo [LOPEZ] brings 500 [\$500,000] but will give us [smaller amounts] in order not to look bad. . . . Need to work hard."

315. On or about January 22, 2014, at approximately 2:27 p.m., CI-2 had a consensually recorded call with LOPEZ, who was using Lopez Phone 1. During this call:

a. LOPEZ stated, "I'm close. I'm almost there. Give me three or four minutes. The thing is that I went to pick up the spark plugs and the oil [money]." CI-2 stated, "Okay, all right. You saw me. I'm waiting for you over here." LOPEZ stated, "Place yourself [park] where there are no cars, not too close to the corner." CI-2 stated, "Okay, just get [park] right next to me. I've already fixed a guy's car here before [CI-2 has received narcotics proceeds at the Pete's Fresh Market located near the intersection of Kedzie and 47th Street], and there is no problems [law enforcement]." LOPEZ responded, "Okay. Stay there."

b. CI-2 stated, "Okay, when you get here, just get [park] right next to me and we'll just be chatting. And I'll do what I have to do [collect the narcotics proceeds from you]. It's not like you just come and go. We will be chatting and then you will go [a quick handoff would look suspicious]. Okay?" LOPEZ responded, "Get yourself where there are more cars, you are too alone there [LOPEZ did not

like where CI-2 was parked in the lot and directed CI-2 to move to a more populated area].” CI-2 stated, “Okay, all right.”

316. On or about January 22, 2014, at approximately 2:42 p.m., CI-2 met with LOPEZ at the Pete’s Fresh Market located at 4700 South Kedzie Avenue in Chicago. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, and found none. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance, which video recorded this meeting, observed a vehicle arrive at the Pete’s Fresh Market and park next to CI-2’s vehicle. Surveillance then observed LOPEZ and Individual X exit the car and Individual X retrieve a white plastic bag from the back seat of the vehicle and place it in the rear of CI-2’s vehicle. During this meeting:

a. LOPEZ stated, “I have it [narcotics proceeds].” CI-2 stated, “Ok, just put it here in the back [inside CI-2’s vehicle].” LOPEZ stated, “One hundred-fifty [\$150,000].” CI-2 confirmed, “One hundred-fifty [\$150,000], the boss [PARRA-PEDROZA] said you were going to give me more [narcotics proceeds] later.” LOPEZ replied, “Yes, tomorrow or day after tomorrow, you tell me.” CI-2 stated, “Okay, just to be in agreement and not so much mystery, now you already know me [meaning LOPEZ should feel comfortable delivering CI-2 a larger amount of narcotics proceeds].” LOPEZ replied, “Yes, yes, yes.”

b. CI-2 stated, "I'm coming from far away and traffic is bad with all this snow." LOPEZ stated, "Yes. At another place that is quieter. Here there is too much police."

c. CI-2 stated, "Tell me how you want me to call you [provide me with a nickname]." LOPEZ replied, "Chaparro." CI-2 stated, "Chaparro. Okay, just say 'I'm Chaparro' and I'll know who you are with more confidence [CI-2 will remember to trust LOPEZ when he calls in the future if he uses the codename 'Chaparro']."

317. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved the white plastic bag which contained approximately \$150,000 in cash. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

318. On or about January 22, 2014, at approximately 8:57 p.m., CI-2 had a consensually recorded call with LOPEZ, who was using Lopez Phone 1. During this call:

a. LOPEZ stated, "I'm the one from the little errand [the earlier delivery of narcotics proceeds], do you remember?" CI-2 asked, "Eh? Chaparro?" LOPEZ replied, "Yes, the Chaparrito. So, tomorrow, I'll give you a call to see what's going to be done there, about the paint [the second delivery of narcotics proceeds] and that." CI-2 stated, "Okay, maybe by Friday I'll be able to go paint over there [receive narcotics proceeds]. Because, tomorrow, I have another job [a different

delivery of narcotics proceeds to receive], and on Friday I can go paint your house there [meet with LOPEZ to accept the delivery].”

b. LOPEZ replied, “Oh, could you do me the favor of speaking to the owner of the house [PARRA-PEDROZA] over there [in Mexico]? If you could do it [receive narcotics proceeds] tomorrow, because tomorrow, then I can buy the paint [LOPEZ can receive his next load of narcotics].” CI-2 stated, “Yes, he told me but, the job he gave me in the morning, I have to paint a house with that guy and when I finish painting it, then I go and paint the other one. So that my work [narcotics proceeds] doesn’t pile up.” LOPEZ replied, “Okay.”

319. On or about January 22, 2014, between approximately 9:55 p.m. and 10:31 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA stated, “That if you can call China [LOPEZ] tomorrow, so she can give you another similar recipe [a second delivery of narcotics proceeds]. That is urgent to get out for the China.” CI-2 responded, “Let me get another cell [new cell phone number] tomorrow. Put me down for a 150 [CI-2 received \$150,000 from LOPEZ]. He [LOPEZ] called me already and I told him Friday [CI-2 arranged to meet LOPEZ on Friday].” PARRA-PEDROZA asked, “The China?” CI-2 responded, “Yes, China called me I told her [LOPEZ] Friday, so I wouldn’t let her down.” PARRA-PEDROZA stated, “Okay, all set.”

320. On or about January 23, 2014, between approximately 12:50 p.m. and 1:00 p.m., CI-2 exchanged a series of BBMs with Individual M, who was using MLO

Device 1. During this exchange, CI-2 stated, "Okay, close out for me 114 of the good kind at \$1265 [CI-2 purchased 114 ounces of 24 Karat gold at the current fair market value \$1,265 per ounce]." Individual M replied, "It's at \$1264. . . . \$1263 and it's falling [the market value of gold is currently at \$1,263 and dropping, so PARRA-PEDROZA will pay CI-2 at \$1,264 per ounce]." CI-2 stated, "Close it out for me at 1,265, that's how I closed it [the price CI-2 paid for the gold]." Individual M responded, "He's [PARRA-PEDROZA] telling me no, that at \$1264 and that it's dropping." CI-2 stated, "It went up already . . . 65 [the price of gold had climbed back up to \$1,265 per ounce], tell him." Individual M responded, "He's telling me no, 64 [PARRA-PEDROZA was locking the price at \$1,264 per ounce] . . . that it's the maximum [final price at which CI-2 will be paid]." CI-2 stated, "OK."

321. On or about January 24, 2014, using a shipping label provided by ABEL and two shipping labels provided by PARRA-PEDROZA, agents sent to Refinery A approximately 3,528.75 grams of 24-Karat gold, which agents had purchased with approximately \$146,007.94 of the proceeds obtained from LOPEZ. Agents also enclosed in this shipment a Refinery A packing list that identified the shipping company as "Chicago Gold" and described the contents of the boxes as containing a total of 3,528.75 grams of 24-Karat gold. According to FedEx records, this shipment arrived at Refinery A on or about January 27, 2014.



**XXVI. PINEDA SANCHEZ and PARRA-PEDROZA Direct CI-2 to Collect and Launder \$180,000 in Narcotics Proceeds from SALCEDO (January 22, 2014).**

322. As discussed above, on or about January 20, 2014, at the same time that he arranged for CI-2 to collect approximately \$150,000 from LOPEZ, PARRA-PEDROZA also arranged for CI-2 to collect approximately \$180,000 from SALCEDO. See ¶ 311, *supra*.

323. On or about January 20, 2014, between approximately 10:56 a.m. and 11:54 a.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA stated, "On behalf of Pedro [code word SALCEDO will use when delivering the narcotics proceeds to CI-2]. . . . It's the 180 [SALCEDO has \$180,000 to be laundered]."

324. On or about January 21, 2014 at approximately 6:22 p.m., CI-2 had a consensually recorded call with GABRIEL SALCEDO,<sup>45</sup> who was using telephone

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<sup>45</sup> Agents identified GABRIEL SALCEDO and his voice as follows: As discussed below, between January 21 and 22, 2014, CI-2 had multiple consensually recorded calls with the man who was using Salcedo Phone 1. During these calls, the man using Salcedo Phone 1 arranged to meet CI-2 in person on January 22, 2014, at a McDonald's located off the parking lot of the Cermak Plaza Shopping Center in Berwyn, at approximately 6:00 p.m., for the purpose of delivering narcotics cash proceeds. At the direction of agents, CI-2 was late for the scheduled meeting, but approximately two hours after the designated time of the meeting, agents conducting surveillance observed a male in a vehicle parked in the designated McDonald's parking lot. Agents then instructed CI-2 to place a call to Salcedo Phone 1. At the same time as CI-2's call, surveillance observed the man in the McDonald's parking lot answer a cellular telephone. Following this meeting, officers of Cook County Sheriff's Police Department conducted a traffic stop of the vehicle driven by the man surveillance observed in the parking lot. Officers also obtained the occupant's consent to search a cell phone found in his possession and discovered that he was in possession of Salcedo Phone 1. In addition, agents who had listened to recorded calls between CI-2 and the user of Salcedo Phone 1 were present during the interview of SALCEDO and, after overhearing SALCEDO speak, these agents determined that SALCEDO was the user of Salcedo Phone 1. Because he was driving without a valid driver's license, SALCEDO's car was temporarily confiscated and he was taken to a local police department, where he

number (312) 315-3983 ("Salcedo Phone 1"). During the call, SALCEDO stated, "A friend [SALCEDO's associate] gave me this number." CI-2 responded, "Okay. Pedro?" SALCEDO responded, "The chubby one, yes." SALCEDO and CI-2 then made arrangements to meet the next day near the intersection of "Cermak and Harlem" at approximately 5:30 or 6:00 p.m.

325. At approximately 6:35 p.m., CI-2 had a consensually recorded call with SALCEDO, who was using Salcedo Phone 1. During this call, SALCEDO stated, "The friend [SALCEDO's associate] told me it's [the delivery on narcotics proceeds] on behalf of El Botas [PINEDA-SANCHEZ]." CI-2 responded, "Ok, then I'll be there around six [6:00 p.m.]. . . . You are the same guy, right? The one on Cermak and Harlem?" SALCEDO responded, "Yes."

326. On or about January 22, 2014, between approximately 6:10 p.m. and 6:52 p.m., CI-2 had a series of consensually recorded calls with SALCEDO, who was using Salcedo Phone 1. During these calls, SALCEDO directed CI-2 to meet him in a McDonald's parking lot near the intersection of Cermak and Harlem in Chicago. During the call at 6:52 p.m., SALCEDO stated, "I'm here outside of McDonalds."

327. At the time of this 6:52 p.m. call, surveillance was established in and around the Cermak Plaza Shopping Center, including the McDonalds parking lot within the shopping center. Surveillance observed SALCEDO sitting inside a grey minivan ("Salcedo Vehicle 1") near the McDonald's.

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advised that his name was "Gabriel Salcedo." Agents obtained a prior booking photo of GABRIEL SALCEDO and determined that SALCEDO was the man who had planned to meet with CI-2 earlier that evening.

328. At approximately 7:55 p.m., CI-2 placed a consensually recorded call to SALCEDO, who was using Salcedo Phone 1. At the same time as this call, surveillance observed SALCEDO answer his cellular telephone while sitting in the driver's seat of Salcedo Vehicle 1, which was parked in the parking lot of the McDonald's where he and CI-2 had agreed to meet. During the call, CI-2 stated, "I'm already here. Are you here?" SALCEDO replied, "Here I am, parked here in, from McDonalds this way, in a grey van. I have the signal lights on of the van so you can park right next to me."

329. At approximately 7:59 p.m., CI-2 had a consensually recorded call with SALCEDO, who was using Salcedo Phone 1. During the call, CI-2 asked, "Is there a grey car with you?" SALCEDO replied, "A van, a grey van." CI-2 stated, "Yes, the van is yours. But I went by and I saw a car from the other buddies over there. And a police car too." SALCEDO replied, "Yes, one [a police car] arrived here. Come where I am and you can follow me." CI-2 stated, "Move from there. Because I don't like how this is working out."

330. At approximately 8:06 p.m., CI-2 had a consensually recorded call with SALCEDO, who was using Salcedo Phone 1. During the call, CI-2 stated, "Yes, come over here to Sports Authority. I didn't like the environment [presence of law enforcement] over there." SALCEDO asked, "Where are you at?" CI-2 stated, "At the Sports Authority here on Harlem [Avenue]. It's about two streets away from where you are." SALCEDO replied, "Oh, yes, I will go there."

331. At approximately 8:06 p.m., a Cook County Sheriff's Officer conducted a traffic stop on Salcedo Vehicle 1. During the traffic stop, the officer observed that SALCEDO was the only person in the car and determined that SALCEDO was driving without a valid driver's license. In the course of the stop, a canine trained to detect the odor of narcotics alerted to the presence of narcotics in the vehicle. After obtaining SALCEDO's verbal consent to search the car, officers discovered and seized \$110,000 in cash.

332. On or about January 22, 2014, between approximately 8:28 p.m. and 10:31 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, CI-2 stated, "He's not answering." PARRA-PEDROZA responded, "Let's see, hold on. Don't move [leave the area]. The [SALCEDO's] boss over here [in Mexico] said to give him [SALCEDO] 15 minutes." Later, PARRA-PEDROZA stated, "Flee. Better. We don't like this over here anymore. And we are the ones taking the risk. Keep me posted on the way [PARRA PEDROZA directs CI-2 to leave the area because he does not want the PARRA-PEDROZA MLO to be responsible for the loss in the event the money is seized by law enforcement]."

333. On or about January 23, 2014, between approximately 5:15 p.m. and 5:33 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA stated, "They [SAUCEDO's associates] are asking me what type of car you have and what color that because supposedly they [law enforcement] caught Pedro [SALCEDO]." CI-2

responded, "I have a red truck." PARRA-PEDROZA stated, "Okay." CI-2 asked, "Was it police or the bajadores [slang word for bandits or thieves]?" PARRA-PEDROZA responded, "I think it was police."

**XXVII. PARRA-PEDROZA Directs CI-2 to Collect and Launder Approximately \$59,960 in Narcotics Proceeds from SAMORI and through Refinery B International (February 27, 2014).**

334. On or about February 25, 2014, between approximately 3:13 p.m. and 3:33 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA stated, "Primo [subsequently identified as HARRUNAH SAMORI] is going to deliver. . . . He is at the city of the winds [Chicago]. Says to get a hotel [rent a hotel room], once you are there he will arrive. He wants to count [the money]. Its two of 50 [two deliveries, each \$50,000]. One day one and next day another." CI-2 stated, "OK, [SAMORI] should contact me so we could agree." PARRA-PEDROZA stated, "He wants a hotel. Going to be 2 days. Make sure you rent it [hotel room] for 2 days or change it the next day. Better off changing it [renting a room at a different hotel for the second delivery]. . . . Another thing is that he is black American. He always has work for *compa* [the cartel] and can be trusted"

335. On or about February 26, 2014, at approximately 2:45 p.m., CI-2 had a consensually recorded call with HARRUNAH SAMORI, who was using telephone number (630) 926-5471 ("Samori Phone 1").<sup>46</sup> During the call, CI-2 asked, "What

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<sup>46</sup> Agents identified HARRUNAH SAMORI as follows: As discussed below, between February 26 and 27, 2014, CI-2 had several consensually recorded calls with the user of Samori Phone 1. During these calls, the user of this phone arranged to meet CI-2 in person at the AutoZone located at 7206 Archer Avenue in Summit, Illinois on February 27, 2014,

time do you want me to get a place [hotel room]?" SAMORI responded, "It's up to you. What time is good for you?" CI-2 stated, "Okay. Give me like one hour, let me just get a place [hotel room]."

336. On or about February 26, 2014, at approximately 3:42 p.m., CI-2 had a consensually recorded call with SAMORI, who was using Samori Phone 1. During this call, CI-2 asked, "You want to bring the whole thing [both \$50,000 deliveries] today? They told me it was going to be half today, half tomorrow. You want to do everything today, or no?" SAMORI responded, "Let me call him [SAMORI's associate] and talk to him and I'll call you right back."

337. On or about February 26, 2014, at approximately 3:57 p.m., CI-2 had a consensually recorded call with SAMORI, who was using Samori Phone 1. During this call, CI-2 asked, "What'd they [SAMORI's associates] say?" SAMORI responded, "I'm waiting for them to call me back right now." CI-2 stated, "If not, then just bring the fifty [\$50,000] today and we'll do fifty [\$50,000] tomorrow."

338. On or about February 26, 2014, at approximately 6:01 p.m., CI-2 had a consensually recorded call with SAMORI, who was using Samori Phone 1. During the call, SAMORI stated, "We should do it [deliver narcotics proceeds] in the

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at approximately 1:16 p.m., for the purpose of delivering narcotics cash proceeds. Following these phone calls, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed an Illinois driver's license photograph of "Harrunah R. Samori," and positively identified SAMORI as the individual who delivered narcotics proceeds to CI-2 on February 27, 2014. In addition, as discussed below, the individual who delivered narcotics proceeds to CI-2 on February 27, 2014, arrived to the meeting in a vehicle that, according to SOS records, is registered to "Harrunah R. Samori." In addition, during a debrief immediately following this February 27, 2014, meeting, CI-2 advised agents that he/she recognized the voice of the man with whom he/she met to be the same voice of the man who was using Samori Phone 1.

morning." CI-2 responded, "They called me over there [Mexico]. I'm already here [at the hotel]. They told me to get a room. I'm already here and I've been waiting for you." SAMORI stated, "Okay. Do it in the morning." CI-2 stated, "Let me call over there [to Mexico] and see what they say. And let me call you back in five minutes."

339. On or about February 26, 2014, between approximately 6:09 p.m. and 6:42 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, CI-2 stated, "Walter [PARRA-PEDROZA], been waiting for 4 hours. This . . . guy [SAMORI] first says he is on the way and now until tomorrow." PARRA-PEDROZA asked, "Already send you for tomorrow?" CI-2 replied, "Yes, now you owe me for the hotel. Call him to confirm that he cancelled on me. We don't need failures [problems]." PARRA-PEDROZA stated, "Okay. Give me 5 minutes. Everything is good. Tomorrow 830 or 9 [reschedule the meeting for tomorrow between 8:30 a.m. and 9:00 a.m.]."

340. On or about February 27, 2014, between approximately 9:33 a.m. and 1:16 p.m., CI-2 had a series of consensually recorded calls with SAMORI, who was using Samori Phone 1. During these calls, SAMORI and CI-2 arranged to meet each other in the parking lot of the AutoZone located at 7206 Archer Avenue in Summit, Illinois, at approximately 1:16 p.m.

341. On or about February 27, 2014, at approximately 1:16 p.m., CI-2 and SAMORI met in the parking lot of the AutoZone located at 7206 Archer Avenue in Summit. Prior to this meeting, agents outfitted CI-2 with a concealed audio

recording device and searched CI-2 and his/her vehicle for large amounts of money and contraband, finding only \$20. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance videotaped this meeting, and observed SAMORI arrive in a black truck registered in his name and park next to CI-2's vehicle. Surveillance then observed CI-2 exit his/her vehicle, approach the passenger side window of SAMORI's truck, retrieved a black plastic bag from the passenger seat of the truck, and placed the bag into the back of CI-2's vehicle. During this meeting, CI-2 stated, "Role the window down. You got it [narcotics proceeds]?" According to CI-2, SAMORI pointed to a black plastic bag that was lying on the front passenger seat and said that there were six bundles, each containing \$10,000.

342. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents retrieved from CI-2's vehicle a black plastic bag containing approximately \$59,960 in cash. Agents then transported the money to the Lyons Police Department, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

343. On or about February 27, 2014, between approximately 3:12 p.m. and 3:21 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA asked, "What is up?" CI-2 stated, "I am verifying [counting SAMORI's money]. Write me down for 59960 [\$59,960]." PARRA-PEDROZA responded, "OK."



344. On or about March 3, 2014, between approximately 2:09 p.m. and 3:00 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA stated, "Don't send a gold package [FedEx package containing fine gold to Refinery A]." CI-2 responded, "Okay." PARRA-PEDROZA stated, "Don't call the number I gave you anymore. They caught the refinery of the beach [Refinery A]."<sup>47</sup> CI-2 responded, "Get out of here. Now what?" PARRA-PEDROZA stated, "Who knows?"

345. On or about March 4, 2014, between approximately 10:56 p.m. and 11:17 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA stated, "You think he [CI-2's putative gold supplier, later introduced as UCA-1] will be able to pay us the first sixty [wire transfer SAMORI's \$59,960] and eight [\$8,000 collected from a different money courier], before explaining it [a new plan to wire transfer narcotics proceeds to bank accounts, as discussed below] to him?" CI-2 responded, "I think so." PARRA-PEDROZA stated, "Ask him [UCA-1] what information he needs from the bank so we can send it [bank account and routing numbers that would allow CI-2 and UCA-1 to wire transfer future narcotics proceeds to a bank account designated by PARRA-PEDROZA]."

346. On or about March 11, 2014, between approximately 10:09 a.m. and 10:18 a.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA asked,

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<sup>47</sup> On or about January 31, 2014, federal agents in the Southern District of Florida executed a search warrant at Refinery A in connection with an unrelated investigation.

"When are you going to send the package [gold purchased with proceeds collected from SAMORI and others]? . . . Can you do it today?" CI-2 responded, "Let me see if the refinery [CI-2's putative gold supplier] will be giving it to me today, okay?"

347. On or about March 11, 2014, between approximately 4:57 p.m. and 5:00 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA stated, "The address is: 606 S. Hill St. Interior 1013, Los Angeles, California 90014. To the name [Refinery B, a company that will take the place of Refinery A in exchanging gold for cash]." CI-2 responded, "Alright then." PARRA-PEDROZA asked, "Will you be putting it [sending the gold] today?" CI-2 responded, "Early tomorrow."

348. On or about March 12, 2014, agents sent to Refinery B approximately 76 ounces of 24-Karat gold, which agents had purchased with proceeds that CI-2 obtained from SAMORI and two other individuals. According to FedEx records, this shipment arrived at Refinery B on or about March 13, 2014.

349. On or about March 12, 2014, at approximately 3:21 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, CI-2 stated, "Close out 76 + 44 total 120 ounces of the fine at 1370 [CI-2 purchased 76 grams and 44 grams (120 grams total) of 24 Karat gold at the current fair market value of \$1,370 per ounce, using narcotics proceeds collected from SAMORI and other individuals]." PARRA-PEDROZA responded, "Okay. Did you send the package [gold to Refinery B]?" CI-2 responded, "Yes." PARRA-PEDROZA stated, "Pass me the guide [FedEx tracking number],

please. . . . Yes, because with the guide [FedEx tracking number] they'll [Refinery B] give us money in advance. How is the material [gold] sent? As bars, sheets or coins?" CI-2 responded, "In ounces of the good kind [one-ounce gold bars]." PARRA-PEDROZA asked, "Did you send the 120 [120 ounces] or only 76 [76 ounces]?" CI-2 responded, "Only 76 of the one ounce bars." PARRA-PEDROZA responded, "Okay, all set."

**XXVIII. PARRA-PEDROZA and CI-2 Meet to Discuss PARRA-PEDROZA's Money Laundering Operation (March 13, 2014).**

350. On March 10, 2014, between 11:12 p.m., and 11:26 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During this exchange, PARRA-PEDROZA stated, "[T]omorrow we [PARRA-PEDROZA and PINEDA SANCHEZ] have the defense meeting [a meeting with Mexican drug traffickers regarding who should bear responsibility for law enforcement's seizure of \$110,000 from SALCEDO on January 22, 2014], but a lot of people came down [a large number of drug traffickers will attend the meeting]. Too many people. . . . [T]o be honest I escaped it [PARRA-PEDROZA did not plan to attend the meeting]. I told them [Mexican drug traffickers] that I was leaving tomorrow to the game [Las Vegas, Nevada] and the meeting with you [CI-2] was on Wednesday [March 12, 2014]."

351. On or about March 13, 2014, PARRA-PEDROZA and CI-2 met at a shopping mall in Las Vegas, Nevada. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device, but due to a technical malfunction, not all of the meeting was recorded. CI-2 traveled under constant surveillance from a

staging location to the meeting. Surveillance observed CI-2 meet with PARRA-PEDROZA inside the mall. During this meeting, PARRA-PEDROZA stated, "The meeting I mentioned to you the other day got pretty hot. Very hot. But there are some people over there [Mexican drug traffickers] watching us. Some people, some tough people. . . . [W]hen they knew, when they found out I was coming over here [Las Vegas] to see you, these are like tests. They said, 'How come you are going over there?' They think you are a cop. They said, 'How come you are going over there? Well, no, that takes balls [Mexican drug traffickers think PARRA-PEDROZA is brave to meet with CI-2, whom they believe is working with law enforcement].' I am sure."

352. Following the meeting between CI-2 and PARRA-PEDROZA, agents debriefed CI-2 regarding the meeting. According to CI-2:

a. PARRA-PEDROZA stated that, to justify the payments that Refinery A sent him for the gold that CI-2 and others shipped to the company on his behalf, he needed to create paperwork showing that he had sold gold to Refinery A. PARRA-PEDROZA explained that he created the paperwork he needed by exporting brass from Mexico to Refinery A, but in the paperwork he claimed that the brass was gold.

b. PARRA-PEDROZA said that once Refinery A received the brass, they filled out paperwork that claimed they received gold instead of brass. PARRA-PEDROZA explained that gold was more valuable than brass, and that by sending the brass, he was able to get false paperwork that would justify Refinery A sending

him payments in Mexico for the gold the company had actually received from people in the United States, like CI-2.

c. PARRA-PEDROZA told CI-2 that "Diego [PINEDA SANCHEZ]" was "Botas." PARRA-PEDROZA also said that PINEDA SANCHEZ had all of the connections to the "primos," meaning that Mexican drug traffickers would contact PINEDA-SANCHEZ when they wanted to get the drug money they generated in the United States back to Mexico. PARRA-PEDROZA told CI-2 that once PINEDA SANCHEZ received a contract to launder the money, PINEDA SANCHEZ used PARRA-PEDROZA and people like CI-2 to get the money back to Mexico.

d. PARRA-PEDROZA said that PINEDA-SANCHEZ got the nickname "Botas," which means "boots," because there is a family photograph in PINEDA-SANCHEZ's hometown that shows PINEDA-SANCHEZ as a young boy wearing adult cowboy boots that covered his entire legs.

**XXIX. PINEDA SANCHEZ and PARRA-PEDROZA Arrange for CI-2 to Collect and Launder Narcotics Proceeds from NEVAREZ; UM 5787 and DIAZ; and UM 5056 and ACOSTA (March 26-31, 2014).**

353. Between March 24 and 31, 2014, PINEDA SANCHEZ and Individual I arranged through PARRA-PEDROZA for CI-2 to collect \$10,280 in narcotics proceeds from NEVAREZ, \$37,220 in narcotics proceeds from UM 5787 and EMMANUEL DIAZ, and \$100,020 from UM 5056 and OSCAR ACOSTA ("ACOSTA"). PINEDA SANCHEZ and PARRA-PEDROZA also directed CI-2 to obtain a new cellular telephone because Individual I and his fellow Mexican drug

traffickers were concerned about CI-2's connection to a recent seizure of narcotics proceeds by law enforcement.

**A. PINEDA SANCHEZ Directs CI-2 to Get a New Phone to Use to Contact Narcotics Proceeds Couriers.**

354. On March 24, 2014, at approximately 5:48 p.m. [TD6 Session ## 32033, 32035], PINEDA SANCHEZ, who was using Target Device 6, exchanged a series of BBMs with Individual I, who was using Blackberry PIN28890C21 ("Individual I Device 1"). During the exchange, Individual I asked, "Boots [PINEDA SANCHEZ], do you have the number for the one over there [CI-2's telephone number in the United States] already?" PINEDA SANCHEZ responded, "Let me see."

355. Between 6:41 p.m. and 6:45 p.m., CI-2 exchanged a series of Blackberry Messenger messages with PARRA PEDROZA, who was using MLO Device 1. During this exchange, PARRA PEDROZA stated, "It's me Walter [PARRA PEDROZA], from Juni's [MLO Device 1, which had until this exchange been used by a different member of the Parra-Pedroza MLO who went by the name "Junipera"<sup>48</sup>]. . . . I need a new number for the primos [a new telephone number for the money couriers to contact CI-2], but for today." CI-2 asked, "This one that I have [CI-2's current phone], don't use anymore? Only three time [CI-2 only used that phone to coordinate the delivery of narcotics on three occasions]." PARRA-PEDROZA responded, "But they [Individual I] don't want that [telephone number] anymore

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<sup>48</sup> As discussed above, on or about January 21, 2014, PARRA-PEDROZA advised CI-2 that he had given MLO Device 1 to "Junipera," who was subsequently identified as Individual M, for purposes of conducting closings on gold that CI-2 purchased on behalf of the money laundering scheme. As indicated in this March 24, 2014, BBM exchange, PARRA-PEDROZA resumed using MLO Device 1 no later than March 24, 2014.

and they're the ones that are defending us [referring to the dispute regarding who should bear responsibility for the \$110,000 SALCEDO seizure]. Let's listen to him [Individual I]." CI-2 stated, "Okay, let me order one [a new telephone] right now."

356. Between approximately 8:14 p.m. and 8:16 p.m. [TD6 Session ## 32175-32184], PINEDA SANCHEZ, who was using Target Device 6, exchanged a series of BBMs with Individual I, who was using Individual I Device 1. During this exchange, Individual I asked, "Boots [PINEDA SANCHEZ], did you get number [new telephone number for CI-2]?" PINEDA SANCHEZ responded, "They [PARRA-PEDROZA] just sent him [CI-2] to buy them [new phone]. That he [CI-2] didn't have the other ones [cell phones] anymore." Individual I stated, "Oh, okay. All set. . . . So they [Individual I's U.S.-based money courier] can see him [CI-2] early [to deliver the narcotics proceeds]."

357. At approximately 10:37 p.m. [TD6, Session #32289], PINEDA SANCHEZ, who was using Target Device 6, received a BBM message from Individual I, who was using Individual I Device 1. In this message, Individual I asked, "Did they [CI-2 and PARRA-PEDROZA] give you the # [telephone number for CI-2], Boots [PINEDA]."

358. On March 25, 2014, at approximately 11:59 a.m., CI-2 sent a Blackberry Message to PARRA-PEDROZA, who was using MLO Device 1. In this message, CI-2 wrote, "Seven, seven three, six, three, nine, eight, two, one, four [773-639-8214] this is my number [for the drug traffickers and money couriers]."

359. On March 25, 2014, at approximately 12:00 p.m., [TD6 Session ## 32363, 32364], PINEDA SANCHEZ, who was using Target Device 6, exchanged a series of Blackberry messages with Individual I. During this exchange, PINEDA SANCHEZ stated, "I have the number [CI-2's new phone number] already."

360. On March 25, 2014, between approximately 2:27 p.m., and 2:28 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 asked, "Alright. What time is the cousin [individual who will deliver narcotics proceeds to CI-2] going to call me today." PARRA-PEDROZA responded, "I don't know, I passed the number [gave CI-2's new phone number to PINEDA SANCHEZ] already."

**B. PINEDA SANCHEZ and PARRA-PEDROZA Arrange for CI-2 to Collect Narcotics Proceeds from Two Different Money Couriers - NEVAREZ and UM 5787.**

361. On March 25, 2014, at approximately 11:50 a.m., CI-2 exchange a series of Blackberry Messages with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 asked, "Oh, and tell me how many tickets [the next money courier will deliver] so I can start setting aside space in la refi [CI-2's refinery where he purchases the gold], okay?" PARRA-PEDROZA stated, "Yes, I think it's sixty [\$60,000]."

362. On March 25, 2014, at approximately 2:55 p.m., CI-2 had a consensually recorded call with ALFONSO NEVAREZ,<sup>49</sup> who was using Nevarez Phone 1. During the call:

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<sup>49</sup> Agents identified NEVAREZ as follows: As discussed below, between March 25 and 26, 2014, CI-2 had several consensually recorded calls with the man who was using



a. NEVAREZ stated, "Yes, Chino [incorrect codename for CI-2]." CI-2 responded, "Yes." NEVAREZ stated, "No, Daniel [code name for CI-2]." CI-2 stated, "Daniel. I'm Daniel." NEVAREZ replied, "Okay, when will I be able to see you [to deliver narcotics proceeds]." CI-2 answered, "I think tomorrow. They [PARRA-PEDROZA] already called me from over there [Mexico]. . . . I'll get close by. Melrose [Park], okay? There by North [Avenue], there by Mannheim [Road]. More or less where do you want to meet?" NEVAREZ responded, "Yes, that sounds good."

b. CI-2 asked, "They didn't tell you how many miles the car had [the amount of narcotics proceeds NEVAREZ would deliver to CI-2]?" NEVAREZ responded, "No." CI-2 stated, ". . . that the car had sixty miles [\$60,000]." NEVAREZ stated, "[unintelligible] the title." CI-2 asked, "Okay, with the title, the car has twenty miles [\$20,000] on the title or it has more?" NEVAREZ responded, "Like a hundred miles [\$10,000]." CI-2 stated, "Oh, shit. Okay, no, well too bad. Well, let me call them [PINEDA SANCHEZ and PARRA-PEDROZA] again because

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Nevarez Phone 1. During these calls, the man using Nevarez Phone 1 arranged to meet CI-2 in person at the Home Depot at the intersection of North Avenue and Wolf Road near Melrose Park on March 26, 2013 at approximately 3:15 p.m., for the purpose of delivering narcotics cash proceeds. Following these phone calls, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed an Illinois State Driver's License photograph of "Alfonso Nevarez," and positively identified NEVAREZ as the individual who delivered narcotics proceeds to CI-2 on March 26, 2014. In addition, prior to this March 26, 2014 meeting, agents outfitted CI-2 with a concealed audio recording device, which captured NEVAREZ's voice. After reviewing the recording of the March 26, 2014 meeting, agents compared the voice of the man with whom CI-2 met to the voice of the man who was using Nevarez Phone 1 in numerous, consensually recorded calls with CI-2, and determined that NEVAREZ was the user of Nevarez Phone 1.

they told me that it had sixty miles [\$60,000]." NEVAREZ stated, "Oh, okay. Yeah, well." NEVAREZ and CI-2 agreed to talk again later.

363. On March 25, 2014, between 3:17 p.m. and 3:19 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange, CI-2 stated, "Okay, no it's just 10 [\$10,000] he [NEVAREZ] said." PARRA-PEDROZA responded, "No, they [PINEDA SANCHEZ] told me it was 60 [\$60,000] over here." CI-2 stated, "Well he [NEVAREZ] said only that [\$10,000], check [with PINEDA SANCHEZ]." PARRA-PEDROZA responded, "Alright, let me see."

364. On March 25, 2014, at approximately 3:19 p.m., CI-2 had a consensually recorded call with an unidentified man ("UM 5787"), who was using UM 5787 Phone 1. During the call, UM 5787 stated, "Daniel [CI-2's codename]." CI-2 stated, "Okay, go ahead buddy." UM 5787 said, "That's good. Listen, I was just calling you on behalf of Chino [Individual I]. . . . To see if I could see you so we could go have a taco [deliver narcotics proceeds]. But I think it's going to have to be tomorrow [March 26, 2014]. . . . Look, tomorrow I'm going to be around the area of, where should I tell you, by Melrose [Park] and all that." CI-2 stated, "Oh, okay. A guy [NEVAREZ] wanted to see me there also in Melrose [Park]. Like, around what time do you have time?" UM 5787 responded, "I'll let you know, but more or less around this time [3:00 p.m.]" CI-2 asked, "So how many tickets [amount of narcotics proceeds to be delivered]? Because they [PARRA-PEDROZA] had told me about a guy that had seventy tickets [\$70,000]. . . . Are you the one with the

seventy [\$70,000].” UM 5787 responded, “No half that [\$35,000].” UM 5787 and CI-2 agreed to talk again the following day.

365. On March 25, 2014, between 3:23 p.m. and 3:39 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDORZA, who was using MLO Device 1. During this exchange, CI-2 stated, “Okay. Another one [UM5787] that has 30 [\$30,000] called me. Who do you want me to see [collect narcotics proceeds from]? They [NEVAREZ and UM5787] both work and get out late and can only meet one [either NEVAREZ or UM5787].” PARRA-PEDROZA responded, “They [NEVAREZ and UM5787] are two [different money couriers]. Well, if you could meet both of them that would be better.” CI-2 stated, “Well yeah, only if I can meet one tomorrow and then the other on Thursday. It’s like a three hour difference [in pick-up times], that’s why I can only meet one [either NEVAREZ or UM5787].” PARRA-PEDROZA said, “Oh, okay. Go to the big one [collect narcotics proceeds from UM5787 first].” CI-2 replied, “Okay.”

366. On March 25, 2014, at approximately 3:47 p.m. [TD6 Session ##32534, 32538, 32539], PINEDA SANCHEZ, who was using Target Device 6, exchanged a series of Blackberry messages with Individual I. During the exchange, Individual I stated, “There will be two [money couriers, NEVAREZ and UM 5787] calling [CI-2], Boots [PINEDA SANCHEZ]. . . . The other one [UM 5787] has forty six [\$46,000], I think. I’ll let you know right now.” PINEDA SANCHEZ responded, “Bam [Okay].”

367. Between approximately 4:39 p.m. and 4:40 p.m., [TD6 Session #32586, 32590, 32591, 32593], PINEDA SANCHEZ, who was using Target Device 6,

exchanged a series of Blackberry messages with Individual I, who was using Individual I Device 1. During the exchange Individual I stated, "Yeah, Boots [PINEDA SANCHEZ], that the other one [UM 5787] is going to give the rest [of the narcotics proceeds]. They [Individual I's associates] want you to see that one little by little [arrange for CI-2 to collect only small amounts of narcotics proceeds] because they [Individual I's associates] know [CI-2's] the one with the accident [referring to the \$110,000 SALCEDO seizure en route to CI-2], but everything is cool. Just so that they [Individual I's associates] build confidence [in CI-2]." PINEDA SANCHEZ responded, "Oh, okay." Individual I stated, "But, that's good, so that they [Individual I's associates] could see that your guy [CI-2] is fine [not cooperating with law enforcement]." PINEDA SANCHEZ responded, "Affirmative."

368. At approximately 7:55 p.m. [TD5, Session #32765], PINEDA SANCHEZ, who was using Target Device 6, received a Blackberry message from Individual I, who was using Individual I Device 1. During this exchange, Individual I stated, "Listen, could you call the one [CI-2] from chicas [code word for Chicago] to see what he tells you [about collecting narcotics proceeds from NEVAREZ and UM5787] please."

369. Between approximately 8:48 p.m. and 8:52 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange, PARRA-PEDROZA asked, "How are you with the cousin [NEVAREZ and UM5787]." CI-2 responded, "The one with the 30 [UM5787, who planned to deliver \$30,000] agreed [to deliver] that tomorrow at 3:00

p.m. [UM5787 would deliver the narcotics proceeds to CI-2].” PARRA-PEDROZA asked, “And the one of 10 [NEVAREZ, who planned to deliver \$10,000].” CI-2 responded, “That one [NEVAREZ] said that he would gather more by Friday if I wanted to wait. Or to call over there to see what they [PINEDA SANCHEZ and PARRA-PEDROZA] would tell me.” PARRA-PEDROZA stated, “Hold on, let me see.” CI-2 stated, “It didn’t matter if I would go pick that [\$10,000] up, but call to see what they [PINEDA SANCHEZ and PARRA-PEDROZA] tell you.”

370. Between approximately 8:48 p.m. and 9:16 p.m. [TD6 Session ## 32794-32816], PINEDA SANCHEZ, who was using Target Device 6, exchanged a series of Blackberry messages with Individual I, who was using Individual I Device 1. During this exchange, Individual I asked, “Boots [PINEDA SANCHEZ], did they tell you about Mejia [code name for CI-2]?” PINEDA SANCHEZ responded, “One [UM 5787] told him [CI-2] he has thirty [\$30,000]. He [CI-2] will see him [UM 5787] tomorrow at three [3:00 p.m.]. . . . And the one [NEVAREZ] with ten [\$10,000], that if they [CI-2] give him [NEVAREZ] until Friday [March 28, 2014] and he’ll [NEVAREZ] get more [narcotics proceeds] together.” Individual I stated, “Thirty [\$30,000] and another ten [\$10,000] then, right?” PINEDA SANCHEZ responded, “Mejia [CI-2] told him [NEVAREZ] that he [CI-2] couldn’t make that decision [to delay collection until NEVAREZ collects additional narcotics proceeds].” Individual I stated, “Let me see about that [NEVAREZ delaying the delivery of the \$10,000 until he is has more narcotics proceeds].” PINEDA SANCHEZ stated, “That he [NEVAREZ] should call over here [Mexico, to get permission to delay

delivery]. . . . But, the one [UM 5787] with thirty [\$30,000] at three tomorrow [3:00 p.m. on March 26, 2014]." Individual I responded, "All, set."

371. On March 26, 2014, at approximately 11:35 a.m., CI-2 had a consensually recorded a call with NEVAREZ, who was using Nevarez Phone 1. During the call:

a. CI-2 stated, "[T]hey [PARRA-PEDROZA] switched it on me [the order in which CI-2 would collect narcotics proceeds]. I was about to call you. I'm going to meet you, uh, tomorrow or Friday. They [PARRA-PEDROZA] didn't tell me when." NEVAREZ responded, "Oh, because they're [Individual I] calling me right now, asking if I met with you already. I said to myself, 'Let me call him [CI-2],' just to confirm with you right now [about when they will meet to deliver the narcotics proceeds]."

b. CI-2 stated, "I don't know, because I had another guy that the car had sixty miles [\$60,000] and they [PARRA-PEDROZA] told me to go see him and to leave you for either tomorrow or Friday. So then I'll give you a call a little later. If they call you, you tell him that it's set for either tomorrow or Friday. I don't know what arrangements they're going to make for me over here but I'll call you tomorrow and I'll see you tomorrow at twelve [12:00 p.m.] or I'll see you on Friday." NEVAREZ said, "Alright, so then let me . . . ." CI-2 stated, "I told him [PARRA-PEDROZA] since yesterday. I told him, 'Look, I have this guy,' this and that, 'I have this other one.' He [PARRA-PEDROZA] said, 'Okay, go see the bigger

one [UM 5787] and the little one [NEVAREZ] you either see on Thursday or Friday.' I already had told them since yesterday."

c. NEVAREZ stated, "Either way, either way if, I'm going to, [collect] a little bit more [narcotics proceeds] and then it's up to them [Individual I]." CI-2 stated, "Okay, that's what they told me. Maybe either Thursday or Friday they're going to call you to see when ready. It's going to be either Thursday or Friday." NEVAREZ stated, "Yes, alright then, let me mention that to them [Individual I]."

372. Between 2:20 p.m. and 2:40 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange, CI-2 stated, "Walter [PARRA-PEDROZA] this fucking cousin [UM 5787] changed the time on me. He [UM 5787] said that he's working and doesn't get out until 7 at night." PARRA-PEDROZA responded, "Shit, let me check over here [with PINEDA SANCHEZ]." CI-2 stated, "Okay, I'm going to check if the one of 10 [NEVAREZ, who planned to deliver \$10,000] is ready. I'm going to go pick up the one of 10 [NEVAREZ]. And tell the other one [UM5787] to be ready for tomorrow."

373. On March 26, 2014, at approximately 2:29 p.m., CI-2 had a consensually recorded call with UM 5787, who was using UM 5787 Phone 1. During this call, CI-2 told UM 5787 that he/she was on the way to their scheduled meeting, but UM 5787 stated that he was not available to meet. UM 5787 and CI-2 agreed to talk again later.

374. On March 26, 2014, at approximately 2:38 p.m., CI-2 had a consensually recorded call with NEVAREZ, who was using Nevarez Phone 1. During the call, CI-2 stated, "Hey buddy, they [PARRA-PEDROZA] want me to go see you [today] after all. I'll arrive there [in Melrose Park near North Avenue and Manheim]. . ." NEVAREZ responded, "Yes." CI-2 stated, "I think in like half an hour or forty five minutes." NEVAREZ stated, "Alright, then man. It's set."

375. On March 26, 2014, between approximately 2:50 p.m. and 3:08 p.m., [TD6 Session ## 33144-33181], PINEDA SANCHEZ, who was using Target Device 6, exchanged a series of Blackberry messages with Individual I. During this exchange, PINEDA SANCHEZ stated, "Listen, dude the one of the 30 [UM 5787, who had \$30,000] said yesterday that today at three [the meeting with CI-2 would be at 3:00 p.m. today] and right now he called until seven [7:00 p.m.], because he's working. . . . Can you please confirm that everything is okay [make sure UM 5787 has not been arrested by law enforcement]? . . . Let me tell [CI-2] yes [UM 5787 has not been arrested by law enforcement], so [CI-2] can meet him at seven [7:00 p.m.]." Individual I stated, "Buddy, that your buddy [CI-2] is the one that doesn't want to do it [meet to collect the narcotics proceeds] until Friday. Let me ask. . . . That's what he [NEVAREZ] told me for the one of ten [\$10,000]." PINEDA SANCHEZ stated, "Let me check that [PINEDA will check with PARRA-PEDROZA who in turn will ask CI-2 why the delivery of narcotics proceeds has been delayed]."



**C. CI-2 Collects \$10,280 in Narcotics Proceeds from NEVAREZ, as Directed by PINEDA SANCHEZ and PARRA-PEDROZA.**

376. On March 26, 2014, at approximately 3:06 p.m., CI-2 had a call with NEVAREZ, who was using Nevarez Phone 1. Due to technical difficulties, this call was not recorded, but it was confirmed by toll records. According to CI-2, during the call, NEVAREZ and CI-2 agreed to meet at the Home Depot located at 37 West North Avenue in Melrose Park, Illinois soon after the call.

377. On March 26, 2014, at approximately 3:19 p.m., CI-2 and NEVAREZ met in the parking lot of the Home Depot located at 37 West North Avenue in Melrose Park. Prior to this meeting, agents outfitted CI-2 with a concealed audio recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, and found none. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance observed NEVAREZ park his car next to CI-2's vehicle, exit his car, retrieve a bag, and place the bag into the back of CI-2's vehicle. During this meeting,

a. CI-2 stated, "How much is it? Just put it there. How much is it? Just put it here. Just like that." NEVAREZ asked, "Just like that?" CI-2 stated, "Yeah, just get out of your car so it looks like we are talking. Yeah, yeah."

b. NEVAREZ stated, "You know, here there are a lot of policemen, in the corners. I live right here. . . . Like, in that store over there, there is one [policeman] who gets out of his car, goes inside and he comes walking, like that." CI-2 stated, "I do this every day, it's what I do every day."

c. CI-2 asked, "And how's your business doing?" NEVAREZ responded, "It's going." CI-2 asked, "Are you with China [code name '*El Chino*']? With, with whom?" NEVAREZ responded, "I don't know. They will tell you there [in Mexico]. I don't know who it is. I will call my buddy right now and, yes, but on behalf of *El Chino*, yes." CI-2 stated, "So, then it's from China. He is there. He is from there." NEVAREZ stated, "Yes, from over there."

d. NEVAREZ stated, "It's ten, two hundred, eighty [\$10,280]." CI-2 confirmed, "Ten, two hundred, eighty?" NEVAREZ responded, "Yes."

378. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents recovered a bag which contained approximately \$10,280 in cash. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

379. On March 26, 2014, between 3:29 p.m. and 5:42 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange:

a. PARRA-PEDROZA stated, "[T]hey [PINEDA SANCHEZ] told me that the one of thirty [UM 5787, who planned to deliver \$30,000] for today at seven [7:00 p.m.]." CI-2 responded, "You're crazy I already received the one of ten [collected \$10,000 in narcotics proceeds from NEVAREZ]. I'm heading to the office. The one of the thirty [UM 5787] already called me, that he'll be ready tomorrow at one [1:00 p.m.]."

b. PARRA-PEDROZA asked, "But he [UM 5787] called you?" CI-2 replied, "I called him. And asked him if he was ready and he [UM 5787] said that he was going to go to the bella [Aurora, Illinois] and that he was going to leave it [the narcotics proceeds] there with a buddy [subsequently identified as DIAZ, as discussed below]. So he [DIAZ] could turn it into me tomorrow at one [1:00 p.m.]" PARRA-PEDROZA stated, "Oh, okay."

c. CI-2 stated, "Write down 10280 [\$10,280 as the amount CI-2 collected from NEVAREZ]." PARRA-PEDROZA responded, "Okay."

380. On March 26, 2014, between approximately 5:45 p.m. and 5:52 p.m., [TD6 Session ## 33398-33401], PINEDA SANCHEZ, who was using Target Device 6, exchanged a series of Blackberry messages with Individual I. During the exchange, PINEDA SANCHEZ stated, "Ten thousand, two hundred and eighty [\$10,280] confirmed [received from NEVAREZ]." Individual I responded, "Affirmative [NAVAREZ reported the same amount]."

**D. CI-2 Collects \$37,220 in Narcotics Proceeds from UM 5787 and DIAZ, as Directed by PINEDA SANCHEZ and PARRA-PEDROZA.**

381. On March 27, 2014, at approximately 9:10 a.m., CI-2 had a consensually recorded call with UM 5787, who was using UM 5787 Phone 1. During this call, UM 5787 stated, "Listen, I was just calling you to let you know that right now at, the guy [DIAZ] is going to call you in twenty minutes so you can agree on something with him [arrange a time to collect narcotics proceeds]. . . . Okay, so he [DIAZ] can see you at one [1:00 p.m.]"

382. At approximately 9:32 a.m., CI-2 had a consensually recorded call with DIAZ, who was using Diaz Phone 1.<sup>50</sup> During the call, DIAZ asked, "Uh, Mejia? [codename for CI-2 used by Individual I in a prior communication with PINEDA SANCHEZ]?" CI-2 replied, "Yes, go ahead." DIAZ stated, "What was I going to tell you? Let see if we can go get a taco or what [the same code that UM 5787 previously used when he first connected with CI-2, meaning meet to deliver narcotics proceeds]." CI-2 asked, "Are you the guy that's over towards Vella [Aurora, Illinois]?" DIAZ responded, "Yes." CI-2 said, "Okay, they [UM5787] told me around one [1:00 p.m.]. . . . [A]round the stores [Aurora Outlet Mall] that are next to the eighty eight [Interstate 88], right?" DIAZ responded, "That's it. . . . I'll be there at one [1:00 p.m.] on the dot."

383. On March 27, 2014, at approximately 1:08 p.m., CI-2 and DIAZ met in the parking lot of the Adidas Store located at 1650 Premium Outlet Boulevard in Aurora. Prior to this meeting, agents outfitted CI-2 with a concealed audio and video recording device and searched CI-2 and his/her vehicle for large amounts

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<sup>50</sup> Agents identified DIAZ and his voice as follows: As discussed below, on or about March 27, 2014, CI-2 had a consensually recorded call with the man who was using Diaz Phone 1. During this call, the man using Diaz Phone 1 arranged to meet CI-2 in person at the Adidas Store at 1650 Premium Outlet Boulevard, in Aurora, Illinois on March 27, 2013, at approximately 1:08 p.m., for the purpose of delivering narcotics cash proceeds. Following this phone call, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed an Illinois State Driver's License photograph of "Emmanuel Diaz," and positively identified DIAZ as the individual who delivered narcotics proceeds to CI-2 on March 27, 2014. In addition, prior to this March 27, 2014 meeting, agents outfitted CI-2 with a concealed audio recording device, which captured DIAZ's voice. After reviewing the recording of the March 27, 2014 meeting, agents compared the voice of the man with whom CI-2 met to the voice of the man who was using Diaz Phone 1 in numerous, consensually recorded calls with CI-2, and determined that DIAZ was the user of Diaz Phone 1.

money and contraband, and finding none. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance observed DIAZ park his car next to CI-2's vehicle, approach CI-2's vehicle, and hand CI-2 a gray plastic bag through the passenger window. During this meeting, DIAZ stated that he had brought "thirty-seven, three hundred [\$37,300]."

384. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents recovered a plastic sandwich bag which contained approximately \$37,220 in cash. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

385. On March 28, 2014, between approximately 12:07 p.m. and 12:10 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 1. During the exchange, CI-2 said, "Close me up 1093.16 refined to \$1295 [CI-2 and PARRA-PEDROZA agreed to a current market value of \$1,295 per ounce for 1,093.16 grams of gold that CI-2 purchased with at narcotics proceeds he/she received from NEVAREZ and DIAZ]."

386. On or about March 31, 2014, agents sent via Fed Ex approximately 35 ounces of gold bars, which agents had purchased with approximately \$46,007 of the proceeds obtained from NEVAREZ and DIAZ, to a gold refinery in Los Angeles that had been previously designated by PARRA-PEDROZA. According to FedEx records, the shipment arrived at the Los Angeles refinery on April 2, 2014.

**E. PINEDA SANCHEZ, Individual I, and PARRA-PEDROZA Arrange for CI-2 to Collect \$100,020 in Narcotics Proceeds from UM 5056 and ACOSTA (March 31, 2014).**

387. On March 27, 2014 – soon after DIAZ first arranged to deliver the \$37,220 in narcotics proceeds to CI-2, but before they met to exchange the money – PINEDA SANCHEZ, Individual I, and PARRA-PEDROZA began making arrangements for CI-2 to collect narcotics proceeds from a third set of money couriers – UM 5056 and ACOSTA.<sup>51</sup> CI-2 ultimately collected \$100,200 in narcotics proceeds from ACOSTA, as directed by PINEDA SANCHEZ, Individual I, and PARRA-PEDROZA, on March 31, 2014.

388. On March 27, 2014, at approximately 9:17 a.m., CI-2 had a consensually recorded call with an unidentified man (“UM 5056”), who was using UM 5056 Phone 1. During this call:

a. UM 5056 asked, “Can I speak with Mr. Mejia [the codename that Individual I used for CI-2 in a prior call with PINEDA SANCHEZ]?” CI-2 responded, “Yes, it’s me. Well, no. I’m just Daniel. Mejia is someone else. But you,

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<sup>51</sup> Agents identified OSCAR ACOSTA and his voice as follows: As discussed below, between March 30 and 31, 2014, CI-2 had consensually recorded calls with the man who was using Acosta Phone 1. During these calls, the man using Acosta Phone 1 arranged to meet CI-2 in person at the Home Depot at 37 West North Avenue in Melrose Park, Illinois on March 31, 2013 at approximately 3:00 p.m., for the purpose of delivering narcotics cash proceeds. Following this phone call, surveillance observed CI-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed an Illinois arrest photograph of “Oscar Acosta,” and positively identified ACOSTA as the individual who delivered narcotics proceeds to CI-2 on March 31, 2014. In addition, prior to this March 31, 2014 meeting, agents outfitted CI-2 with a concealed audio recording device, which captured ACOSTA’s voice. After reviewing the recording of the March 31, 2014 meeting, agents compared the voice of the man with whom CI-2 met to the voice of the man who was using Acosta Phone 1 in numerous, consensually recorded calls with CI-2, and determined that ACOSTA was the user of Acosta Phone 1.

you were going to call me. Go ahead and tell me." UM 5056 stated, "I'm calling on behalf of Pollo [code name to vouch for UM 5056's trustworthiness]." CI-2 responded, "Yes, eh, I was told that you would be ready around one [1:00 p.m.]?"

b. UM 5056 stated, "I'm ready now, if you want, right now." CI-2 stated, "No, I'm a bit far from there, uh . . . . Aren't you the guy that I'm supposed to see, over there, by La Bella [Aurora, Illinois, referring to DIAZ]?" UM 5056 responded, "No, no, no, here by Chicalote [Chicago]." CI-2 stated, "Oh, oh, then you are someone else. Okay, I was going to see a guy, over there by La Bella [DIAZ in Aurora]." UM 5056 said, "No, no, I don't go over there."

c. CI-2 asked, "Do you know how many miles the car has [the amount of narcotics proceeds to be delivered]?" UM 5056 responded, "Seventy [\$70,000], something like that." CI-2 said, "Ah, ok, let me call over there [Mexico], the owner of the dealer [PARRA-PEDROZA] and I'll tell him about this because he sent me over there [Aurora] to see another car [collect narcotics proceeds from DIAZ]. Okay. I will call you later and tell you whether I'll see you tomorrow or later on. Let's see what they tell me over there. . . . I'm kind of far away, I'm kind of far from there, from Los Vientos [Chicago]. . . . [R]ight now I will go to La Bella [Aurora] to see another guy [DIAZ]."

389. Between approximately 11:29 a.m. and 11:34 a.m. [TD6 Session ## 33918-33929], PINEDA SANCHEZ, who was using Target Device 6, exchanged a series of Blackberry messages with Individual I, who was using Individual I Device 1. During the exchange:

a. PINEDA SANCHEZ asked, "Which one is that one? Thirty [\$30,000 to be delivered by DIAZ] or seventy [\$70,000 to be delivered by UM 5056]." Individual I responded, "I don't know. . . . If you want ask [CI-2, who is in contact with both couriers], please." PINEDA SANCHEZ stated, "Ok."

b. Individual I stated, "Well, this one [UM 5056], has nothing to do with the ten [the \$10,280 previously delivered by NEVAREZ] and my buddy [UM 5056] just came down to drop off the paper [narcotics proceeds], if something happens [UM 5056 is arrested by law enforcement] I'm going to get into a bind with that [the collection from UM 5056 is of greater urgency to Individual I]. . . . What should I tell the guy [UM 5056]." PINEDA SANCHEZ responded, "They're [PARRA-PEDROZA] inquiring [asking CI-2 if he/she can collect the narcotics proceeds from UM5056]."

390. Between 11:55 a.m. and 12:40 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device

1. During the exchange:

a. PARRA-PEDROZA stated, "You don't have enough time to see the other cousin [UM 5056]?" CI-2 replied, "Let me see at what time this one arrives [DIAZ]." PARRA-PEDROZA stated, "Okay. They're from the same boss [DIAZ and UM 5056 are both delivering narcotics proceeds on behalf of Individual I]. The one with the seventy [UM 5056 who planned to deliver \$70,000] is more urgent because he's not from there [Chicago]."



b. CI-2 stated, "I'm on the road to see the one of thirty [DIAZ who planned to deliver \$30,000]." PARRA-PEDROZA stated, "Help me out with the other one [UM 5056], they're on my ass. They're on my ass." CI-2 stated, "Let me see, it's because they're [the two couriers are] far apart from each other and it's raining with ice and the floor is really slippery and there's a lot of traffic." PARRA-PEDROZA stated, "And there's going to be a hurricane and the lake is going to flood and Jordan is going to die . . . . [CI-2] what other excuses do you have jajaja. Give me a hand, even if you see him [UM 5056] late. He has very good mileage [a large amount of narcotics proceeds]. They're up my ass, I swear to you." CI-2 replied, "Let me meet with the one with thirty [DIAZ] first."

391. On March 27, 2014, at approximately 6:06 p.m., CI-2 had a consensually recorded call with UM 5056, who was using UM 5056 Phone 1. During this call:

a. CI-2 stated, "Yeah, they [PARRA-PEDROZA] told me to give you a call. Uh, no the thing is that they were bothering me up there saying to call you and call you and call you. . . . So get on the same page with those guys over there [PINEDA SANCHEZ, Individual I, and PARRA-PEDROZA] because that guy [PARRA-PEDROZA] keeps bothering me too much."

b. UM 5056 stated, "Uh-huh, well if you had someone here [in Chicago] I would gladly meet them here over there." CI-2 stated, "Let me tell them [PINEDA SANCHEZ and PARRA-PEDROZA], or you give them [Individual I] a call and tell them that we're too far apart from each other. . . . Daniel [CI-2's

codename], yeah? Or Mejia [codename that Individual I used in a prior communication with PINEDA SANCHEZ]? . . . Well the thing is that Mejia was the other mail man [another U.S.-based member of the Parra-Pedroza MLO] and I'm Daniel, it's the same one." UM 5056 responded, "Oh, okay."

c. CI-2 stated, "Yes, because they told me, look, if they say that if it's Mejia, I would know that it's the other mail man [money launderer]." UM 5056 responded, "Oh, okay." CI-2 and UM 5056 then agreed that they were too far from one another to meet that day. UM 5056 stated, "No, let me give them [Individual I] a call over there." CI-2 stated, "Call over there because I'm a little too far and I told that guy [PARRA-PEDROZA], 'Look, it's raining and there's a lot of traffic. It's going to take me like two, three hours to get over there.' But no, you're going to go pick up something. Just get on the same page with them over there and tell them that I called you already and see what they tell you."

392. On March 28, 2014, at approximately 10:46 a.m., CI-2 had a consensually recorded call with UM 5056, who was using UM 5056 Phone 1. During this call, CI-2 stated, "I have no place to work on the car [to store the narcotics proceeds]. I won't be able to work on it [purchase gold with the narcotics proceeds] until Monday. It's because these guys don't agree on something with me. They sent to go fix a car that had ten miles [\$10,280 collected from NAVAREZ], why the hell did they send me to go fix a fucking car that far. They should have sent me to go work on another car that had more miles [a larger amount of narcotics proceeds] that needed more work to be done to it." UM 5056 stated, "I'm gathering

more [narcotics proceeds], either by Monday or Tuesday, I think that I'll have another one that has like a hundred thousand miles [\$100,000] too." CI-2 stated, "[W]hatever miles you have on Monday, I'll fix the car for you. . . . [O]n Monday, I'll fix it, I'll order the parts and send everything through the mail [purchase the gold with the narcotics proceeds and mail it to the refinery]." UM5056 stated, "Okay, let me call him [Individual I] over there buddy."

393. On March 28, 2014, between 10:39 a.m. and 11:46 a.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange:

a. CI-2 stated, "Refi [CI-2's putative gold refiner] isn't receiving me and I'm not going to hold on to those [collect and hold narcotics proceeds from UM 5056] until Monday." PARRA-PEDROZA stated, "Stop playing. They're going to kill me, that's the cousin [Individual I] that urged me the most. . . . Help me out only with the one with the seventy [UM 5056 with \$70,000]. Honestly, they're going to kill me. Because we have to send that buddy [UM 5056] back. . . . The boss [Individual I] wants to choke me over here."

b. PARRA-PEDROZA stated, "[H]e already scolded me. . . . It's because that cousin [UM 5056] is really important. They're [Individual I] really upset over here already. They're starting to give us responsibilities even though we don't have them [UM 5056's narcotics proceeds]. . . . It's the people that are helping us that you won't come [Individual I and UM 5056 are members of the DTO that are defending PARRA-PEDROZA and CI-2 against allegations by other Mexican drug

traffickers that the Parra-Pedroza MLO should bear responsibility for law enforcement's seizure of \$110,000 on January 22, 2014, from a money courier in Chicago who was in route to meet with CI-2]. . . . They're [Individual I] not going to let it go. Do me that favor [CI-2]. They're going to kick our ass and this time there's no one to defend us."

394. On March 28, 2014, between 12:10 p.m., and 1:33 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange:

a. PARRA-PEDROZA stated, "[T]he boss [PINEDA SANCHEZ and Individual I] is pressuring me a lot. . . . Do me that favor [pick up UM 5056's money], if I let this guy down [Individual I] all the shit is going to fall on us. . . . The boss [Individual I] keeps nagging and nagging. Lend me a hand because they're going to turn on me. Leave them in the office [collect the narcotics proceeds now and hold onto them until CI-2's gold supplier is ready to take the money]."

b. CI-2 stated, "Oh Walter [PARRA-PEDROZA], this boss [Individual I] doesn't understand. First he sends us one of ten [\$10,280 from NEVAREZ] and then another one of thirty seven [\$37,220 from DIAZ] because he didn't have time [to wait for all narcotics proceeds to be gathered for one delivery]. And now he's trying to rush this one [narcotics proceeds delivery from UM 5056], tell him to organize himself so he won't be in a rush." PARRA-PEDROZA responded, "I know. You know that in any other occasion I'll ignore them. But they're on me like never before. But this buddy [Individual I] put his life on the

table for us [defending the Parra-Pedroza MLO regarding law enforcement's January 2014 money seizure]. It's that serious and he's asking me for that huge favor. Help me."

c. CI-2 stated, "But why are they in a rush? Look, the more they insist the less trust I have in them. You know that if you tell me, 'There's a cousin tomorrow' I will attend him. But I already know rushing doesn't help out." PARRA-PEDROZA stated, "Oh, the cousin [Individual I] told me to take care of things out of there. And that he's [UM 5056] risking being there with tickets and not to be taking care of the other thing. Don't be scared [concerned that UM 5056 is working with law enforcement], the one that's insisting is the one from here [Individual I]. And it's a guy that already took out a gun for us in a meeting [defending the Parra-Pedroza MLO regarding the January 2014 seizure]. Oh and he [Individual I] already told me that if they drop in on him [law enforcement seized money from UM 5056], if they're from there or some other place that he's [Individual I] going to blame me. . . . [B]ecause he's risking it and he already has two days there [UM 5056 has waited in Chicago for CI-2 to pick up the money for two days]. . . . Do me that favor [pick up the money] and I'll give you my one percent [PARRA-PEDROZA's profit on the laundered proceeds]. I don't want to profit anything; the thing that, I want is not to let him down. That buddy [Individual I] saved everyone's life, he even pleaded for you not to come [Individual I defended the Parra-Pedroza MLO against Mexican drug traffickers who blamed them for law enforcement's January 2014 money seizure]."

395. On March 29, 2014, between 1:01 p.m. and 7:50 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange PARRA-PEDROZA stated, "The one with the seventy [UM 5056, who previously planned to deliver \$70,000] has a hundred [\$100,000] already. Should we pick them up fifty [\$50,000] on Monday and fifty [\$50,000] on Tuesday? Or pick everything up together?" CI-2 responded, "Everything. Tell me what day do you want me to go pick it up [the narcotics proceeds]." PARRA-PEDROZA replied, "On early Monday." CI-2 agreed, "Okay, I'll get it [\$100,000] on Monday."

396. On March 30, 2014, between approximately 1:15 p.m., and 1:27 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, "It's another cousin [someone other than UM 5056 (subsequently identified as OSCAR ACOSTA, as discussed below) will be delivering UM 5056's money]. . . . They're going to call you on behalf of Oliver [codename to vouch for the courier's trustworthiness]."

397. At approximately 2:48 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using an unidentified telephone number. During the call:

a. PARRA-PEDROZA asked "Are you going to meet him [ACOSTA] tomorrow?" CI-2 stated, "I need for him [ACOSTA] to call me today so I know where I'm going to go, where I'm going to go meet him [ACOSTA]. He was the one that called me, but since we already had agreed that I was going to meet the one

with the seventy [UM 5056, who originally planned to deliver \$70,000] tomorrow. So then I told him." PARRA-PEDROZA stated, "It's the same person [ACOSTA will be delivering UM 5056's money]. . . . [T]he guy of the seventy [UM 5056] already left [the Chicago area]. . . . This guy [ACOSTA] kept the seventy [UM 5056 gave ACOSTA the \$70,000 to deliver to CI-2] but he [ACOSTA] brought another thirty [an additional \$30,000 to be laundered]. It's a hundred kilometers [\$100,000 total]. . . . So then, it's the same. So just think of it as not needing to see the guy with the seventy [because UM 5056 gave his \$70,000 to ACOSTA]."

b. PARRA-PEDROZA stated, "They [PINEDA SANCHEZ] called me to scold me [about CI-2's delay in picking up the money from ACOSTA]. . . . So then I'm going to tell him [PINEDA SANCHEZ] that you got confused. I'm going to tell him what happened, that it was all a big mistake [CI-2 put off collecting from ACOSTA because he/she did not realize that ACOSTA was delivering UM 5056's money]."

c. PARRA-PEDROZA stated, "[I]t's one hundred kilometers [\$100,000]." CI-2 stated, "It's just I want to be sure because this guy, the other guy the one with the refiner [CI-2's putative gold supplier] would wait for me. But this guy is a little bit more sensitive because if I tell him that I'm going and then I tell him that I'm not, he gets crazy." PARRA-PEDROZA stated, "Right now I'll call him [PINEDA-SANCHEZ], I mean I'll call them [PINEDA-SANCHEZ and Individual I] and tell them that it was just a mix up and to tell them to tell the guy [ACOSTA] to call right now or tomorrow."

398. At approximately 5:36 p.m., CI-2 had a consensually recorded call with ACOSTA, who was using Acosta Phone 1. During this call:

a. ACOSTA stated, "Yeah, I'm calling on behalf of Mejia [the codename that Individual I used for CI-2 in a prior call with PINEDA SANCHEZ]." CI-2 stated, "Yeah, go ahead." ACOSTA stated, "Alright. Uh, can we meet you today?" CI-2 stated, "Uh, not today. Uh, look, can't be done because I have another guy that has to pick up his stuff for tomorrow. Uh, but he [PARRA-PEDROZA] said that guy that he had a hundred miles [\$100,000 to deliver]. I don't know if that's you." ACOSTA replied, "No, I don't know sir. But I . . ."

b. CI-2 stated, "Okay, uh, let me ask you, how many years does your car have [what amount of narcotics proceeds will ACOSTA deliver]?" ACOSTA replied, "Honestly I don't know, but I think that we're going to be around there [\$100,000] too." CI-2 stated, "Okay then. Well look, let me get on the same page over here because I have another guy [UM 5056] that his car broke down, he's been calling me since Friday and let me see if, see if I fix his tomorrow and as soon as I'm done fixing his, I'll give you a call and see if I could go and attend you."

399. On March 31, 2014, at approximately 10:18 a.m., CI-2 had a consensually recorded call with ACOSTA, who was using Acosta Phone 1. During this call, ACOSTA and CI-2 agreed to meet each other near the intersection of North Avenue and Manheim in Melrose Park at approximately 3:00 p.m.

400. Between approximately 10:51 a.m. and 2:20 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this



exchange, CI-2 stated, "He [ACOSTA] just answered me. I told him I would see him about three [3:00 p.m.] or maybe sooner." PARRA-PEDROZA stated, "Okay, let's meet with the cousin [collect narcotics proceeds from ACOSTA] and send a package [mail the gold that was purchased with narcotics proceeds previously collected from NAVAREZ and DIAZ]."

401. On March 31, 2014, at approximately 3:00 p.m., CI-2 and ACOSTA met in the parking lot of the Home Depot located at 37 West North Avenue in Melrose Park. Prior to this meeting, agents outfitted CI-2 with a concealed audio and video recording device and searched CI-2 and his/her vehicle for large amounts money and contraband, finding only \$128. CI-2 traveled under constant surveillance from a staging location to the meeting. Surveillance observed ACOSTA park his car next to CI-2's vehicle, exit his car, retrieve a black bag and brown box, and place the bag and box into the back of CI-2's vehicle. During this meeting:

a. ACOSTA stated, "Here, I have your request [narcotics proceeds]." CI-2 asked, "What number [how much] is it?" ACOSTA replied, "Another guy checked it out [counted the narcotics proceeds were counted by someone else]."

b. CI-2 stated, "They [PARRA-PEDROZA] told me it was seventy [\$70,000] from one [UM 5056] and thirty [\$30,000] that you were bringing, then it has to be one hundred [\$100,000 in total narcotics proceeds]." ACOSTA stated, "It's two [two separate deliveries], I don't know how much [total amount of money], but it's two. They're from two guys [drug traffickers]. I picked it up and the [cardboard]

box is sealed. I have not touched it. . . . In the black bag there, it's six, eight [\$68,000]. . . . The [cardboard] box is closed, I don't know how much it is."

402. Following this meeting, CI-2 drove under constant surveillance to a designated meeting location where agents recovered a black bag and brown box from CI-2's car. Agents discovered that the black bag and brown box contained a combined total of approximately \$100,020 in cash. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

403. At approximately 6:41 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "Okay, put a hundred [\$100,000] down for me." PARRA-PEDROZA responded, "Okay."

404. On April 2, 2014, between approximately 9:06 a.m. and 1:32 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the conversation, CI-2 stated, "Two, three, two, six point two, eight of the fine one closed at one, two, nine, five [CI-2 and PARRA-PEDROZA agreed to a current market value of \$1,295 per ounce for 2326.28 grams of gold that CI-2 purchased with at narcotics proceeds he/she received from ACOSTA]." PARRA-PEDROZA responded, "Okay."

405. On or about April 7, 2014, agents sent via Fed Ex approximately 74.8 ounces of gold bars, which agents had purchased with approximately \$97,249 of the

proceeds obtained from ACOSTA, to Refinery B in Los Angeles. According to FedEx records, the shipment arrived at Refinery B on April 8, 2014.

**XXX. PARRA-PEDROZA Instructs CI-2 to Wire Transfer Narcotics Proceeds to Subject Bank Account 2 (June 13, 2014).**

406. On or about May 28, 2014, between approximately 9:38 a.m. and 9:50 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange:

a. PARRA-PEDROZA stated, "Over here we did find out you have a tail. They followed the one that almost delivered the last 100 [SALCEDO] too and it was the dudes that were defending us and there are a lot of them following you. Like they did with China [another courier]. What we don't know is if they are perros [police] or rats [thieves]." CI-2 stated, "So then I'm the sick one [drawing unwanted attention], but they [police] have not stopped me." PARRA-PEDROZA replied, "Because if they stop you it will be over and if they don't stop you, you continue to bring more people [allow law enforcement to identify additional drug traffickers and money couriers]."

b. CI-2 asked, "Did something happen to the ones they followed?" PARRA-PEDROZA responded, "There were no more accidents [seizures by law enforcement] after the one from the mall, but still regularly but we thought of a new way to work."

c. CI-2 stated, "Let's see how it is go ahead [continue collecting narcotics proceeds]." PARRA-PEDROZA responded, "That you don't show up at any place in any given moment. They'll [money couriers] only call you to tell you they're

going to the 'refi [CI-2's putative gold supplier, an undercover agent UCA-1].'  
There's going to be a secretary [money courier who will take the place of CI-2], she will take the tickets and the refi [UCA-1] will make an electronic transfer to an account [bank account] in your country and it's done, because no one wants to see you over here anymore." CI-2 stated, "But will the secretary deliver to me or how is it going to work?" PARRA-PEDROZA responded, "No to the refi [UCA-1] directly, but refi [UCA-1] will not receive anything if you don't call [to relay that the secretary will deliver the narcotics proceeds]. You will not be left out." CI-2 responded, "Oh okay I understand, sounds good."

407. On June 5, 2014, between approximately 2:36 p.m. and 2:44 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange:

a. PARRA-PEDROZA asked, "Who are they [money couriers] going to call? Where are they going to meet [to deliver narcotics proceeds]? Remember that you don't exist. . . . Because they [narcotics traffickers] don't like you anymore and for security because you did leave them constantly on the last ones [CI-2 refused to pick-up narcotics proceeds]." CI-2 responded, "Okay let me arrange it."

b. PARRA-PEDROZA stated, "We thought that they [money couriers] were going to call the dude of the refi [UCA-1] directly and they were going to meet right there. With the papers [narcotics proceeds] already." CI-2 responded, "Yes." PARRA-PEDROZA stated, "Just stay on top of the guy of the refi [UCA-1]. . . . Because I depend on him [to collect narcotics proceeds]." CI-2 responded, "Don't

worry, I will arrange it all that, they [money couriers] are not going to see me.” PARRA-PEDROZA stated, “Okay. So then, give me a number [UCA-1’s phone number] to see if Monday [money couriers can deliver narcotics proceeds].” CI-2 responded, “Let me get the number.”

408. On or about June 13, 2014, between approximately 9:21 a.m. and 5:47 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange:

a. PARRA-PEDROZA stated, “I will pass you the accounts [bank accounts into which UCA-1 should deposit collected narcotics proceeds]. . . . I need to pass the information of the accounts.” CI-2 responded, “Okay.”

b. PARRA-PEDROZA asked, “Can we deliver [narcotics proceeds] today? Or not. Or on Tuesday.” CI-2 replied, “For early Tuesday.” PARRA-PEDROZA stated, “Okay they [money courier] already have the number [UCA-1’s cell phone number] and they are ready [to deliver narcotics proceeds] for Tuesday. That [money courier] already has the ticket [narcotics proceeds].”

c. PARRA-PEDROZA stated, “Bank. Citibank N.A. Account [XXXX]5306 Aba. [XXXXXX]0089 Beneficiary Vector Casa de Bolsa S.A. De C.V. Final Reference. [XXXXXXXXX]4454 [“Subject Bank Account 2”]. . . . This last business is part of the final reference. Let me know when it is released [money is deposited into the account]. They [PARRA-PEDROZA’s associates] ask me for a dollar for proof [UCA-1 or CI-2 must wire transfer \$1 into Subject Bank Account 2

to assure that future wire deposits will go through]. For before Tuesday [the scheduled collection of additional narcotics proceeds].” CI-2 responded, “Okay.”

d. PARRA-PEDROZA said, “So you can tell him [UCA-1]. That is they [PARRA-PEDROZA’s associates] don’t see the dollar they don’t take ticket [PARRA-PEDROZA’s associates will not instruct courier to deliver narcotics proceeds to UCA-1 until the dollar is deposited into Subject Bank Account 2]. And everyone is going to scold me [if UCA-1 doesn’t deposit the dollar before Tuesday].” CI-2 responded, “Okay. He [UCA-1] is going to deposit \$100 [into Subject Bank Account 2] for you.” PARRA-PEDROZA stated, “Okay let me know.”

409. On or about June 16, 2014, agents wire transferred approximately \$100 from an undercover checking account into Subject Bank Account 2.

410. On or about June 16, 2014, between approximately 11:33 a.m. and 3:18 p.m., CI-2 exchanged a series of consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, “Let me know about the 100 so they can check on it.” CI stated, “I already sent them to you, check and see if you got it.” PARRA-PEDROZA later stated, “Yes. The 100 arrived.”

**XXXI. PARRA-PEDROZA Directs CI-2 to Collect and Launder Multiple Amounts of Narcotics Proceeds from ORTIZ (June 25, 2014).**

411. Between June 19 and 25, 2014, PARRA-PEDROZA directed CI-2 to arrange for UCA-1 to collect narcotics proceeds from ALMA LORENA ORTIZ DE ROSAS VERA on two separate occasions on June 25, 2014. ORTIZ delivered approximately \$80,000 to UCA-1 as scheduled, and law enforcement seized another

approximately \$59,452 from her later the same day, before she had an opportunity to meet with UCA-1.

**A. PARRA-PEDROZA Directs CI-2 to Collect and Launder \$80,000 in Narcotics Proceeds from ORTIZ (June 25, 2014).**

412. On or about June 19, 2014, between approximately 12:15 p.m. and 3:11 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, "250 there [\$250,000 to collect] but not in the street. Ask him [UCA-1] if it [the meeting] can be in the office." CI-2 replied, "Let me tell him."

413. On or about June 20, 2014, between approximately 1:05 p.m. and 6:16 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange, CI-2 said, "I'll receive [the narcotics proceeds] on Monday, but it should be for sure." PARRA-PEDROZA asked, "Where? On the street of [or] office." CI-2 responded, "On the street." PARRA-PEDROZA said, "Okay, let me ask them [associates of the courier, who was later identified as ORTIZ<sup>52</sup>]. They're going to call you now [to arrange a time and place to deliver the

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<sup>52</sup> Agents identified ALMA LORENA ORTIZ DE ROSAS VERA as follows: As discussed below, on or about June 25, 2014, CI-2 had a consensually recorded call with the woman who was using (224) 563-5240 ("Ortiz Phone 1"). During this call, the woman using Ortiz Phone 1 arranged to meet UCA-1 in person at the Target parking lot located at 7601 S. Kingery Highway in Willowbrook, on June 25, 2013, at approximately 1:24 p.m., for the purpose of delivering narcotics cash proceeds. Following this phone call, surveillance observed UCA-1 meet with, and obtain proceeds from, a woman at the designated time and place. Agents conducting surveillance subsequently viewed a United States Visa photograph of "Alma Lorena Ortiz De Rosas Vera," and positively identified ORTIZ as the individual who delivered narcotics proceeds to UCA-1 on June 25, 2014. In addition, prior to this June 25, 2014 meeting, agents outfitted UCA-1 with a concealed audio recording device, which captured OTRIZ's voice. After reviewing the recording of the June 25, 2014 meeting, agents compared the voice of the female with whom UCA-1 met to the voice of the

narcotics proceeds].” PARRA-PEDROZA later stated, “Give me [UCA-1’s] number, please. Never mind. I found it.”

414. On or about June 20, 2014 at approximately 6:10 p.m., UCA-1 received the following voicemail message from an unknown male [UM] using telephone number (867) 202-0986: “Hey [UCA-1’s first name], I’m sorry, uh, he [ORTIZ’s associate] wants to make the meeting for Monday. We’re gonna call, like, Sunday. He’s gonna be over there on Monday to make the, the meeting with you for the tickets [delivery of narcotics proceeds], okay? Thank you. Bye.”

415. On June 22, 2014, between approximately 12:24 p.m. and 1:57 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange, PARRA-PEDROZA stated, “They [ORTIZ’s associate] told me that they left him a voicemail and that they’ll call him early tomorrow to see about time and place [for ORTIZ to deliver narcotics proceeds to UCA-1].” CI-2 stated, “Okay, yes.” PARRA-PEDROZA stated, “Alright, Just tell him [UCA-1] not to get scared.”

416. On June 23, 2014, between approximately 11:23 a.m. and 1:58 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange:

a. PARRA-PEDROZA stated, “The girl [ORTIZ] is barely going over there [to the United States] because she had a molar infected. [ORTIZ] Will get there in the evening. If you [UCA-1] can see her early in the morning.” CI-2

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man who was using Ortiz Phone 1 in the consensually recorded calls with UCA-1, and determined that ORTIZ was the user of Ortiz Phone 1.



stated, "Okay here it goes just like he [UCA-1] told me. He [UCA-1] says to go to hell that it ends there [UCA-1 is frustrated because ORTIZ is not around to deliver the narcotics proceeds as scheduled]."

b. PARRA-PEDROZA stated, "Well you already know that's how this is [drug traffickers often are delayed when delivering narcotics proceeds]. Then there is no point in the woman [ORTIZ] leaving [Mexico]. She's just going for that [to deliver narcotics proceeds to UCA-1]. They [ORTIZ's associates] will kill me. They have a shit load [narcotics proceeds] put away [ready to be laundered]. . . . Because they are receiving [narcotics proceeds], and they have accumulated [a lot of money that needs to be laundered to Mexico]. I already told them not to receive [any more narcotics proceeds]. But have him [UCA-1] do me the favor of taking that out [collecting ORTIZ's money]."

c. CI-2 stated, "Well send the lady [ORTIZ] and if this one [UCA-1] doesn't want to [collect the narcotics proceeds] I'll take it out with another one [find someone else to collect and send the money]." PARRA-PEDROZA asked, "But how will you make the deposits [into Subject Bank Account 2]?" CI-2 responded, "I'll work things out with [UCA-1]."

417. On June 24, 2014, between approximately 8:36 a.m. and 8:43 a.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange, PARRA-PEDROZA stated, "The lady [ORTIZ] gets there until 12 with you [ORTIZ arrives in Chicago at 12:00 p.m.]. . . . [T]here was a security stop [ORTIZ entered the United States through a city other than Chicago

to avoid a record of her traveling to Chicago]. Because flying from here [Guadalajara, Mexico] directly to you [Chicago] is dangerous, they [law enforcement] ask you too many questions. . . . Okay, I'm going to see if they [ORTIZ] take you the 100 [ORTIZ will deliver \$100,000]."

418. On or about June 24, 2014, at approximately 4:53 p.m., UCA-1 had a consensually recorded call with ORTIZ, who was using Ortiz Phone 1. During the call, UCA-1 stated, "This is a friend of [CI-2's nickname]. . . . This is [UCA-1's first name]." ORTIZ stated, "Oh, yes, this is the person that is been, the papers [narcotics proceeds]? Tomorrow?" UCA-1 responded, "Yes. You gotta' drop off the papers [narcotics proceeds]. What time? About twelve o'clock, good for you?" ORTIZ responded, "Yes, sounds good." UCA-1 asked, "How many tickets [amount of narcotics proceeds] are you dropping off?" ORTIZ responded, "Not sure, I will do, check out this tonight, okay?" UCA-1 stated, "Alright. I'll give you a text and approximately where to meet." ORTIZ responded, "Okay, thank you."

419. On or about June 25, 2014, between approximately 11:34 a.m. and 1:28 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, "Let me know when [UCA-1] is at his spot with the hamburgers [at the meet location]. . . . I'll let you know right now to which account [bank account where ORTIZ's narcotics proceeds should be wired]." CI-2 stated, "He [UCA-1] says that he's already waiting for her [ORTIZ], but that the lady is lost." PARRA-PEDROZA stated, "Ready 80 [ORTIZ will deliver \$80,000]."

420. On or about June 25, 2014, at approximately 1:28 p.m., UCA-1 and ORTIZ met in the parking lot of a Target store located at 7601 South Kingery Highway in Willowbrook. Prior to this meeting, agents outfitted UCA-1 with a concealed audio recording device and surveillance agents video recorded the delivery of narcotics proceeds from ORTIZ. Surveillance observed ORTIZ arrive at the location, park next to UCA-1's vehicle, exit her vehicle carrying a black back pack, and placed the back pack inside UCA-1's vehicle. During this meeting:

a. ORTIZ stated, "This is eighty [\$80,000]." UCA-1 asked, "It's eighty?" ORTIZ stated, "Eighty." UCA-1 asked, "I thought they said it was two fifty tickets [\$250,000]." ORTIZ responded, "No, no, no. They told me to give you eighty. So, you're the person right?" UCA-1 stated, "Yeah, I'm [UCA-1's first name]. Did you count it?" ORTIZ responded, "Yes, I did." UCA-1 asked, "It's all there? Eighty?" ORTIZ responded, "It's all there."

b. UCA-1 asked, "Is there somebody that you can call to make sure that this is the right amount? 'Cause, like I said, I don't want to be on the hook for two hundred and fifty tickets [\$250,000] if there's only eighty here. I don't want somebody to say I took it, you know?" ORTIZ stated, "I understand, but it's eighty. They [ORTIZ's associates in Mexico] just confirmed me that amount. Okay? Don't worry." UCA-1 responded, "Okay. I don't want anybody thinking I took their money." ORTIZ stated, "No, no, no. I know. Be careful, okay?" UCA-1 responded, "It's dangerous. You be careful."

421. Following this meeting, UCA-1 drove to the HSI Chicago Field Office where agents retrieved from UCA-1's vehicle a black back pack containing \$80,000 in cash. At the HSI Chicago Field Office, a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

422. On or about June 25, 2014, between approximately 1:35 p.m. and 1:53 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, "It's going to be to the first [bank] account; to the one of Vector [Subject Bank Account 2] . . . The one to which he [UCA-1] sent 100 [\$100] as a test." CI-2 responded, "Okay."

423. On or about June 25, 2014, agents wire transferred \$76,800 of the proceeds obtained from ORTIZ into Subject Bank Account 2.

424. On or about June 25, 2014, between approximately 7:27 p.m. and 7:29 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA asked, "When does he [UCA-1] transfer [wire the money]?" CI-2, not knowing that agents had already wired the money, replied, "Tomorrow." PARRA-PEDROZA replied, "Okay."

425. On or about June 26, 2014, between approximately 11:01 a.m. and 11:02 a.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, "Okay, but will he [UCA-1] do it [wire the money] today?" CI-2 responded, "Yes." PARRA-PEDROZA stated, "Alright, ready it already went through [PARRA-PEDROZA received the wire]." CI-2 replied, "Okay."

**B. PARRA-PEDROZA Directs CI-2 to Collect and Launder Another \$59,452 in Narcotics Proceeds from ORTIZ (June 25, 2014).**

426. On or about June 25, 2014, at approximately 1:49 p.m. and following her meeting with UCA-1, surveillance observed ORTIZ travel to the US Bank located at 400 75th Street in Downers Grove, Illinois. According to bank records, ORTIZ deposited \$8,500 dollars into a US Bank account number xxxxxxxx9568 in the name of Individual Z ("Subject Bank Account 3").

427. At approximately 2:13 p.m., surveillance observed ORTIZ enter a US Bank located at 7460 Woodward Avenue in Woodridge, Illinois. According to bank records, ORTIZ deposited \$5,100 into Subject Bank Account 3.

428. On or about June 25, 2014, between approximately 1:35 p.m. and 1:53 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "If you want to send more today [arrange for ORTIZ to deliver additional narcotics proceeds] because he [UCA-1] is leaving tomorrow." PARRA-PEDROZA stated, "Okay, let me ask."

429. On or about June 25, 2014, at approximately 1:54 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using telephone number 52-331-367-7645 ("Parra-Pedroza Phone 10"). During this call, PARRA-PEDROZA stated, "Listen, he's [ORTIZ's associate] telling me yes, yes they are . . . , but right now they're going to deliver a big lunch [large amount of money] right now, two and a half [\$250,000]. . . but that will only be at the office [can only be delivered to a secure location such as UCA-1's office]; otherwise they will take you a little piece, a bite [a smaller amount of money]." CI-2 responded, "Tell him

[ORTIZ's associate] that yes, give me the two and a half [\$250,000] right there [delivered on the street], man. Anyway, there's no problem, everything will be fine." PARRA-PEDROZA replied, "Okay. Let me tell them and I will call you back right now."

430. On or about June 25, 2014, at approximately 2:59 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 10. During this call:

a. PARRA-PEDROZA stated, "They [ORTIZ] have it [the narcotics proceeds] already. . . . But the thing is that the people are serious and new people. The girl [ORTIZ] was here [in Mexico] the day before yesterday. . . . She just left and is only going for that. She is only going to be dedicated to seeing [delivering narcotics proceeds to] [UCA-1's first name]. If right now you were to tell me that send me some over here, she would go to the [UCA-1's] address and would take all the lunch [money], the lunch is big. That one [\$250,000] that I told you about a bit ago, they were going to pick it up, right now, extra from what they already have. In other words, have him start working already [make arrangements to wire the \$80,000 that ORTIZ previously delivered]."

b. CI-2 responded, "Yes. That one goes out [gets laundered] and then next week he can receive it at the office because that is what he wants to look into." PARRA-PEDROZA stated, "Well, let me tell them [ORTIZ's associates] if they can take at least eighty again [coordinate a delivery for an additional \$80,000]."

431. At approximately 3:31 p.m., surveillance observed ORTIZ circling the parking lot of a Walmart located at 2000 Orchard Road in Montgomery, Illinois, while talking on her cell phone. At approximately 3:46 p.m., surveillance observed Individual AA approach ORTIZ's vehicle and hand ORTIZ a pink Victoria's Secret bag. ORTIZ then departed the Walmart parking lot.

432. At approximately 4:43 p.m., surveillance observed ORTIZ travel to a Bank of America located at 899 North Randall Road in Geneva, Illinois. According to bank records, ORTIZ deposited \$7,200 dollars into Bank of America account number xxxxxxxx2629 held in the name of Individual BB.

433. At approximately 6:25 p.m., a DuPage County Sheriff's (DPCS) Officer observed ORTIZ make an illegal lane change while driving eastbound on North Avenue in Carol Stream, Illinois and conducted a traffic stop. During this stop, the driver identified herself as "Alma Lorena Ortiz De Rosas Vera" and produced a United States of America Border Visa Crossing Card in her name. The officer observed a pink Victoria's Secret bag containing a black plastic bag on the passenger seat of the vehicle. When the officer asked ORTIZ what was inside the plastic bag, ORTIZ stated that the bag contained money. When the officer asked ORTIZ how much money was in the plastic bag, ORTIZ stated that there was \$60,000. ORTIZ consented to a search of the bag. The officer opened the plastic bag and discovered that it contained several rubber banded bundles of cash, totaling \$59,452. A canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

434. ORTIZ then agreed to go to the DuPage County Sheriff's Office for further questioning. Prior to this interview, ORTIZ advised officers that she understood that she had a right not to speak with them and a right to consult an attorney. During this interview, ORTIZ stated that the money she was transporting was for a land transaction, but was unable to produce any paperwork related to the land transaction. ORTIZ stated that she did not know the individual who delivered the money to her and was unwilling to provide the name of the person who directed her to pick up the money. ORTIZ stated that the money was not hers and that she did not want it. ORTIZ agreed to abandon the money. When agents asked her if her abandonment of the money would create a safety concern for her upon her return to Mexico, ORTIZ stated that approximately \$59,452 was not a significant amount of money and all she would need was a receipt showing that law enforcement had seized money.

435. Based on my familiarity with this case, including the aforementioned calls and communications between PARRA-PEDROZA and CI-2, I believe that the approximately \$59,452 in cash seized from ORTIZ on June 25, 2014, were a portion of the same narcotics proceeds that PARRA-PEDROZA was seeking to have delivered to UCA-1 later that day.

**XXXII. PARRA-PEDROZA Directs CI-2 and UCA-1 to Collect and Launder \$62,350 in Narcotics Proceeds from NUNEZ GALVEZ (July 16, 2014).**

436. On July 15, 2014, between approximately 12:06 p.m. and 4:53 p.m., CI-2 exchanged a series of Blackberry Messages with PARRA-PEDROZA, who was



using MLO Device 1. During this exchange, PARRA-PEDROZA stated, “[T]hey want to deliver [narcotics proceeds] but they are cousins [drug trafficker/money courier]. . . . For them to meet them in the street.” CI-2 asked, “How much [narcotics proceeds]. . . . And when?” PARRA-PEDROZA responded, “When, let me ask. . . . 88 [CI-2 is to collect \$88,000 in narcotics proceeds]. . . . They [Mexican drug traffickers] are going to give me a number [the money courier’s phone number].”

437. On July 15, 2014, between approximately 7:47 p.m. and 8:01 p.m., CI-2 exchanged a series of Blackberry Messages with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, “(614) 679-9740 [later identified as NUNEZ GALVEZ’s telephone number (“Nunez Galvez Phone 2”)] ask for ‘Chikilla [code name to vouch for CI-2’s trustworthiness] \$62,500 [to be collected]. . . . You have to call [NUNEZ GALVEZ].”

438. At approximately 9:49 p.m., CI-2 had a consensually recorded call with NUNEZ GALVEZ, who was using Nunez Galvez Phone 2. During this call, CI-2 stated, “Yes, Chiquilla [code name PARRA-PEDROZA provided to vouch for CI-2’s trustworthiness].” NUNEZ GALVEZ responded, “Yes, that’s me.” CI-2 stated, “Okay, I was told to call you. That we have to, you have to give me a title for a car [narcotics proceeds to be laundered].” NUNEZ GALVEZ stated, “Okay.” CI-2 asked, “Okay. Where do you want me to go [to collect the narcotics proceeds]?” NUNEZ GALVEZ stated, “It’s over here . . . .” CI-2 stated, “Okay, tomorrow like around twelve, twelve-thirty is that okay? Listen, a white guy [UCA-1] will go and

pick it [narcotics proceeds] up, okay? I'll call you and he'll pick it up. . . . Yes, because they [PARRA-PEDROZA] just told me to call and he's [UCA-1's] the one that picks up [the narcotics proceeds]. He's the accountant." NUNEZ GALVEZ stated, "Okay. Yes, that's fine, they [NUNEZ GALVEZ's associates in Mexico] say that I have to give it [narcotics proceeds] to that man [UCA-1]." CI-2 stated, "His name is [UCA-1's first name]." CI-2 and NUNEZ GALVEZ then agreed to talk again the next day.

439. Between approximately 10:04 p.m. and 10:08 p.m., CI-2 exchanged a series of Blackberry Messages with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, "They [NUNEZ GALVEZ's associates in Mexico] are asking me to confirm if we were the ones that called [to coordinate the delivery of narcotics proceeds from NUNEZ GALVEZ]." CI-2 stated, "Yes, [UCA-1] called first but the cousin [NUNEZ GALVEZ] doesn't speak English and I called but it's all set for tomorrow at twelve [12:00]." PARRA-PEDROZA stated, "Okay all set."

440. On July 16, 2014, between approximately 12:21 p.m. and 12:36 p.m., CI-2 had a series of consensually recorded calls with NUNEZ GALVEZ, who was using Nunez Galvez Phone 2. During these calls, CI-2 arranged for NUNEZ GALVEZ to meet with UCA-1 at approximately 12:36 p.m. in the parking lot located at the southeast corner of Harlem Road and Cermak Avenue in Berwyn. During the last of these calls, NUNEZ-GALVEZ asked, "Tell him [UCA-1] to get out, and to come into mine [car], or do you want me to switch with him?" CI-2 responded, "Just

take it [narcotics proceeds] to his car [UI] and then call me.” NUNEZ-GALVEZ stated, “Alright then.”

441. On July 16, 2014, at approximately 12:36 p.m., UCA-1 met with NUNEZ GALVEZ and Individual P in the parking lot located at the southeast corner of Harlem Road and Cermak Avenue in Berwyn. Prior to this meeting, agents outfitted UCA-1 with a concealed audio recording device. Surveillance observed NUNEZ GALVEZ exit a car driven by Individual P; retrieve a bag from the back seat of his car; approach and shake hands with UCA-1; and place the bag in the back cargo area of UCA-1’s vehicle. During this meeting:

a. UCA-1 stated, “Let’s go throw it [the bag containing the narcotics proceeds] in the back [of UCA-1 vehicle] . . . . Throw it back here. How much we have in there? How many tickets [how much money]?” NUNEZ GALVEZ responded, “Ah, six, six-two, fifty [\$62,500].” UCA-1 asked, “Sixty-two [\$62,000]?” NUNEZ GALVEZ stated, “Yeah, fifty.” UCA-1 asked, “Did you count it?” NUNEZ GALVEZ responded, “Yeah.” UCA-1 stated, “Sixty-two thousand, five-hundred tickets [\$62,500]?” NUNEZ-GALVEZ responded, “Yeah.” UCA-1 asked, “You counted?” GALVEZ responded, “Yeah, it’s good [all the money is there].”

b. UCA-1 stated, “Hey, why don’t we give [CI-2] a call, just to make sure this is right. . . . I’ll let you talk to him, make sure we got everything right because I don’t want to, I want to get it right.”

442. During this meeting between NUNEZ GALVEZ and UCA-1, at approximately 12:36 p.m., CI-2 had a consensually recorded call with NUNEZ

GALVEZ, who was using Nunez Galvez Phone 2. During this call – which took place in the presence of UCA-1 – NUNEZ GALVEZ stated, “I already left it [delivered narcotics proceeds to UCA-1].” CI-2 stated, “You already dropped it? Okay, uh, sixty two with five hundred [\$62,500]. Okay, uh, I was just waiting for this guy [UCA-1] to call to confirm with him, but.” NUNEZ GALVEZ stated, “I’m over here with him [UCA-1]. If you want, I can put him on so you can talk to him.” CI-2 stated, “Okay. Let’s see, put him [UCA-1] on. Okay.” NUNEZ GALVEZ then handed his phone to UCA-1, who stated in NUNEZ GALVEZ’s presence, “It’s okay.”

443. Following this meeting, surveillance followed NUNEZ GALVEZ and Individual P to, among other places, Individual P Residence 1, and observed both men enter the residence.

444. Following this meeting, UCA-1 handed the bag that he/she obtained from NUNEZ GALVEZ to the other agents, who determined that the bag contained approximately \$62,350 in cash. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

445. On July 16, 2014, between approximately 3:16 p.m. and 4:26 p.m., CI-2 exchanged a series of Blackberry Messages with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA asked, “Did you guys already check it out [count the narcotics proceeds that were delivered by NUNEZ GALVEZ]?” CI-2 responded, “Total \$62350.” PARRA-PEDROZA stated, “Okay.”

446. On July 17, 2014, between approximately 9:33 a.m. and 12:26 p.m., CI-2 exchanged a series of Blackberry Messages with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 asked, "Where should I send you the mail [into which bank account should the narcotics proceeds be wire transferred]?" PARRA-PEDROZA responded, "Let me see. . . . Vector please [Subject Bank Account 2]. . . . Let me know when it [the money has been wire transferred] is there please."

447. On July 17, 2014, agents wire transferred \$59,856 from an undercover checking account into Subject Bank Account 2.

448. On July 17, 2014, between approximately 2:24 p.m. and 2:34 p.m., CI-2 exchanged a series of Blackberry Messages with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "\$59,856 I sent you, all set." PARRA-PEDROZA responded, "Okay, thank you."

**XXXIII. PARRA-PEDROZA Directs UCA-1 to Collect and Launder Over \$100,000 in Narcotics Proceeds from NUNEZ GALVEZ (July 23, 2014).**

449. On July 23, 2014, at approximately 10:42 a.m., UCA-1 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 10. This call was recorded, but due to technical difficulties, only UCA-1's voice can be heard on the recording. According to UCA-1, during this call, PARRA-PEDROZA identified himself as "Carlos" and asked if CI-2 had changed his/her telephone number because PARRA-PEDROZA had been unable to reach CI-2. PARRA-PEDROZA stated that he was trying to contact CI-2 to arrange the pickup

of more "tickets [narcotics proceeds]." PARRA-PEDROZA stated that he was not sure if he (PARRA-PEDROZA) should be contacting UCA-1 directly, but UCA-1 assured PARRA-PEDROZA that it was not a problem to contact him/her directly. To arrange pickups in the future, UCA-1 agreed to speak with PARRA-PEDROZA again later that day.

450. On July 23, 2014, at approximately 11:52 a.m., UCA-1 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 10. Due to technical difficulties, only UCA-1's voice can be heard on the recording. According to UCA-1, during this call, PARRA-PEDROZA stated that he had a contract to pick up "100 tickets [\$100,000]" and directed UCA-1 to call the "primo [NUNEZ GALVEZ]" in Chicago who would be delivering the money at telephone number "(614) 679-9740 [Nunez-Galvez Phone 2]." PARRA-PEDROZA instructed UCA-1 to tell the money courier, "I am calling Hugo on behalf of Raul [code names to vouch for UCA-1's trustworthiness]."

451. On July 23, 2014, at approximately 1:47 p.m., UCA-1 had a consensually recorded call with NUNEZ-GALVEZ, who was using Nunez-Galvez Phone 2. Due to technical difficulties, only UCA-1's voice can be heard on the recording. According to UCA-1, during the conversation, UCA-1 stated that he was "calling on behalf of Raul" and asked NUNEZ GALVEZ if he could drop off the "tickets" on Friday [July 25, 2014]. NUNEZ GALVEZ and UCA-1 then made arrangements to meet on Friday, July 25, 2014, at 10:00 am.

452. On July 23, 2014, between approximately 2:13 p.m. and 2:43 p.m., CI-2 exchanged a series of Blackberry Messages with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, "614 679 9740 [contact Nunez Galvez Phone 2 to collect narcotics proceeds] Hugo on behalf of Raul [code words to vouch for CI-2's trustworthiness]. And could it [collection of narcotics proceeds] be tomorrow? The thing is that that guy [NUNEZ GALVEZ] has been ready since Monday. They [PINEDA-SANCHEZ and other members of the MLO] are already scolding me. And it's urgent."

453. On July 23, 2014, agents and officers of the Berwyn Police Department met with Individual P at Individual P Residence 1. During this meeting, Individual P advised that he resided at Individual P Residence 1 and his uncle from Mexico had been staying with him at that residence for approximately two weeks. Individual P gave law enforcement verbal and written consent to search the residence. During the search, Individual P identified the room in which his uncle from Mexico had been staying, in which law enforcement found:

- a Cicero Police Department citation issued to "Juan C. Nunez";
- a Unidos wire transfer receipt which listed the sender as "Juan Carlos Nunez-Galvez";
- numerous pieces of mail addressed to "Juan Nunez Galvez" at Individual P Residence 1;
- a locked safe; and
- four Bank of America deposit slips, each documenting a \$5,000 deposit (a total of \$20,000) into the same bank account on July 23, 2014.

Individual P advised law enforcement that the numerous pieces of mail addressed to "Juan Nunez Galvez" belonged to his uncle. Individual P told agents that the safe was not his and he did not know who it belonged to. Law enforcement seized the safe and the four Bank of America deposit slips documenting the \$20,000 worth of deposits into the same account.

454. Following this search, agents obtained surveillance photographs from Bank of America capturing the four deposits associated with the four, \$5,000 deposit slips seized from NUNEZ GALVEZ's room within Individual P Residence 1. Agents compared the images of the individual in the bank surveillance photographs to an arrest photograph of NUNEZ GALVEZ and previous surveillance photographs, and determined that NUNEZ GALVEZ was the individual who made those four cash deposits.

455. On July 23, 2014, officers of the Berwyn Police Department obtained a warrant from the Honorable Judge Love in the Circuit Court of Cook County, authorizing the search of the safe that they seized from NUNEZ GALVEZ's room within Individual P Residence 1. During that search, law enforcement found \$138,860 in U.S. currency.

456. Based on my familiarity with this case, including the aforementioned and subsequent calls and communications between PARRA-PEDROZA and CI-2, I believe that the \$138,860 in cash seized from NUNEZ GALVEZ's room within Individual P Residence 1 on July 23, 2014, were the same narcotics proceeds that



NUNEZ GALVEZ intended to deliver to CI-2 and UCA-1, at the direction of PARRA-PEDROZA.

457. On July 24, 2014, between approximately 9:55 a.m. and 10:03 a.m., CI-2 exchanged a series of Blackberry Messages with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, "Change of numbers. [UCA-1's] number and all the others [CI-2 and UCA-1 should drop all their phones]." CI-2 asked, "What happened?" PARRA-PEDROZA responded, "The guy [NUNEZ GALVEZ] from the appointment got sick [law enforcement seized NUNEZ GALVEZ's narcotics proceeds]. . . . I am also going to change this one [drop PARRA-PEDROZA's phone]. Can I call you in a little while at the one [CI-2's new cell phone number] you gave me yesterday? You're not going to throw that one out, right?" CI-2 responded, "Yes. No, this one [phone] is fresh [new and uncompromised]." PARRA-PEDROZA stated, "Okay, then we will turn off all of them [phone numbers] and in a little while I will call you. So we can connect again [exchange new cell phone numbers]."

**XXXIV. PINEDA SANCHEZ, INDIVIDUAL L, and PARRA-PEDROZA Direct CI-2 and UCA-1 to Collect and Launder Approximately \$143,980 in Narcotics Proceeds from REYNA-TELLEZ (July 25, 2014).**

458. On or about July 24, 2014, between approximately 5:34 p.m. and 5:36 p.m., CI-2 exchanged a series of text messages with PARRA-PEDROZA, who was using Mexican telephone number 52-331-804-0394 ("Parra-Pedroza Phone 11"). During this exchange, PARRA-PEDROZA stated, "7084419142 [Reyna-Tellez Phone

1] by the primo, it's 80 [\$80,000], tell me if you got it [received the text message]."

CI-2 replied, "Yes."

459. On or about July 24, 2014, at approximately 5:41 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 11. During the call, PARRA-PEDROZA stated, "He [REYNA-TELLEZ] doesn't speak English. . . . But anyway, if you want, make the appointment. . . . See if you guys can meet today or early tomorrow, because they have . . . they are going to have more [narcotics proceeds], right now they are bringing that [\$80,000]. . . . Tomorrow they are going to bring almost the same thing again [another delivery of approximately \$80,000 in narcotics proceeds]. . . . To try to take it out fast." CI-2 replied, "Okay. So then I will make the appointment with them and see what they tell me." PARRA-PEDROZA said, "All right, all set, okay."

460. On or about July 24, 2014 at approximately 5:54 p.m., CI-2 had a consensually recorded call with LUIS REYNA-TELLEZ, who was using telephone number (708) 441-9142 ("Reyna-Tellez Phone 1").<sup>53</sup> During this call:

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<sup>53</sup> Agents identified REYNA-TELEZ as follows: As discussed below, between July 24 and 25, 2014, CI-2 had several consensually recorded calls with the man who was using Reyna-Tellez Phone 1. During these calls, the man using Reyna-Tellez Phone 1 arranged to meet UCA-1 in person at a Target parking lot located at 7601 South Kingery Highway, Willowbrook, Illinois, on July 25, 2014, at approximately 2:00 p.m., for the purpose of delivering narcotics cash proceeds. Following these phone calls, surveillance observed UCA-1 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance and UCA-1 subsequently viewed a Mexican passport photograph of "Luis Jetzael Reyna-Tellez," and positively identified REYNA-TELEZ as the individual who delivered narcotics proceeds to UCA-1 on July 25, 2014. In addition, prior to this July 25, 2014 meeting, agents outfitted UCA-1 with a concealed audio recording device, which captured REYNA-TELEZ's voice. After reviewing the recording of the July 25, 2014 meeting, agents compared the voice of the man with whom UCA-1 met to the voice

a. CI-2 asked, "Yes, can I speak to nephew, please?" REYNA-TELLEZ responded, "Yes." CI-2 stated, "Okay, I am calling, well, they [PARRA-PEDROZA] didn't tell me on behalf of who [no codename provided], but it's from down there [Mexico] that they have a car [narcotics proceeds] that they were going to deliver to me." REYNA-TELLEZ responded, "Uh no, no, no, that I was going to deliver?" CI-2 stated, "Yes, and that the car had eighty miles [\$80,000 in narcotics proceeds], they said, they just called me." REYNA-TELLEZ stated, "Oh, I'll call right now and see what they [REYNA-TELLEZ's associates in Mexico] say."

b. CI-2 stated, "Oh okay, because they said that they could [deliver to UCA-1] today or tomorrow." REYNA-TELLEZ responded, "Most likely for tomorrow, primo." CI-2 asked, "Okay, then how should we do it? Are you going to call there [to Mexico] first and then call me?" REYNA-TELLEZ replied, "Yes and then I will get in touch with you." CI-2 said, "Uh-huh okay, then call over there and say that it's [UCA-1's first name] or on behalf of [UCA-1's first name], but I mean, I am [UCA-1's first name, meaning CI-2 works with UCA-1], they didn't tell me on behalf of whom. They just told me that it was with 'nephew,' so call there and see what's up and then call me and we will get in agreement to go and see that [arrange a delivery time and location], okay?" REYNA-TELLEZ replied, "All right, buddy."

461. On or about July 24, 2014, between approximately 5:57 p.m. and 6:10 p.m., CI-2 exchanged a series of text messages with PARRA-PEDROZA, who was using Parra-Pedroza Phone 11. During this exchange, CI-2 said, "That he [REYNA-

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of the man who was using Reyna-Tellez Phone 1 in numerous, consensually recorded calls with CI-2, and determined that REYNA-TELEZ was the user of Reyna-Tellez Phone 1.

TELLEZ] is going to call to your ranch [REYNA-TELLEZ's associates in Mexico] because they didn't tell him anything." PARRA-PEDROZA responded, "Okay."

462. On or about July 24, 2014 at approximately 7:15 p.m., CI-2 had a consensually recorded call with REYNA-TELLEZ, who was using Reyna-Tellez Phone 1. During the call:

a. CI-2 asked, "Did they [REYNA-TELLEZ's associates in Mexico] tell you already?" REYNA-TELLEZ responded, "Yes, yes." REYNA-TELLEZ and CI-2 then made arrangements for REYNA-TELLEZ to meet with UCA-1 the following day near the intersection of I-55 and Kingery Road in Willowbrook.

b. CI-2 stated, "Oh, it's going to be an American guy [UCA-1] who is going to receive it [narcotics proceeds]. Okay?" REYNA-TELLEZ responded, "Yes, yes." CI-2 asked, "Didn't they [REYNA-TELLEZ's associates in Mexico] tell you over there because I have asked them to tell you guys that it is an American guy [UCA-1], in case you want to verify with them over there. Okay?" REYNA-TELLEZ replied, "No, he [REYNA-TELLEZ's associate in Mexico] didn't tell me, but we're communicating here." CI-2 stated, "Okay. So then you are aware, that way you don't get all spooked [concerned about CI-2 or UCA-1's involvement with law enforcement]." REYNA-TELLEZ responded, "When I am ready, I'll call you when I head out."

c. CI-2 stated, "Okay, alright then. That way I don't make you wait. So that you don't wait for me because I would rather wait for you ten or fifteen minutes, than have you wait for me because I have nothing to do, but you are

going with your car compromised [transporting narcotics proceeds]." REYNA-TELLEZ responded, "Yes, okay, yes."

463. On or about July 24, 2014, between approximately 7:54 p.m. and 8:22 p.m., CI-2 exchanged a series of text messages with PARRA-PEDROZA, who was using Parra-Pedroza Phone 11. During this exchange, PARRA-PEDROZA asked, "So?" CI-2 replied, "Yeah." PARRA-PEDROZA stated, "He [REYNA-TELLEZ] will bring more [narcotics proceeds in excess of \$80,000] tomorrow, find a way to put it all [to launder the entire amount of money]." CI-2 replied, "Okay."

464. On or about July 24, 2014, at approximately 8:45 p.m., CI-2 had an unrecorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 11. This call was verified by toll records. According to CI-2, during this call, PARRA-PEDROZA told CI-2 that the "primo [REYNA-TELLEZ]" had an additional \$65,000 in narcotics proceeds to deliver.

465. On July 24, 2014, between 8:36 p.m. and 8:56 p.m. [TD7 Session # 22967-22995], PINEDA SANCHEZ who was using Target Device 7 exchanged a series of BBMs with Individual L, who was using Blackberry Pin: 79859F41 ("Individual L Device 1"). During the exchange, Individual L stated, "Listen, ask for [CI-2's] number, so we can confirm tomorrow [money pick-up from REYNA-TELLEZ], because I think that at the time that you'll meet [CI-2] will be flying [Individual L is concerned that CI-2 will be flying to Mexico to attend a meeting (regarding narcotics proceeds that had recently been seized by law enforcement) at the same time that UCA-1 and REYNA-TELLEZ are scheduled to meet]." PINEDA

SANCHEZ responded, "Okay. Let me call [get CI-2's number]." Individual L responded, "Okay."

466. On July 24, 2014, between 9:50 p.m. and 10:11 p.m. [TD7 Session ##23025-38], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with Individual L, who was using Individual L Device 1. During this exchange, PINEDA SANCHEZ stated, "Hey I already talked to Walt [PARRA-PEDROZA, based on his BBM screen name "Walt Disney"]. He is going to leave his phones here [PARRA-PEDROZA traveled to the United States but left the telephones that he used to conduct money laundering activities in Mexico]. With people from his office [FNU LNU (a/k/a "OLIVER")]. I know them, there is no issue [OLIVER is trustworthy]. They'll be alert, if anything they will call me." INDIVIDUAL L responded, "Okay."

467. On or about July 25, 2014, at approximately 10:02 a.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 11. During this call, PARRA-PEDROZA stated, "I am going to head over there [Las Vegas] and this guy is going to have my phone [Parra-Pedroza Phone 11], his name is Oliver. . . . He [Oliver] is going to call you to see how that thing with the cousin [REYNA-TELLEZ] is going. What time is the appointment going to be?" CI-2 responded, "He said that for today at like noon." PARRA-PEDROZA stated, "Oh okay, he [Oliver] is going to be on standby through [text] messages."

468. At approximately 11:53 a.m., surveillance observed REYNA-TELLEZ depart a residence at 5612 W. Park Avenue in Cicero ("Reyna-Tellez Residence 1")

carrying a red bag. Based on my familiarity with this case, including subsequent consensually recorded phone calls between REYNA-TELLEZ and CI-2, I believe that this red bag contained approximately \$80,000 in narcotics proceeds.

469. On or about July 25, 2014 at approximately 12:02 p.m., CI-2 had a consensually recorded call with REYNA-TELLEZ, who was using Reyna-Tellez Phone 1. During the call, CI-2 stated, "They [PARRA-PEDROZA] called me that they left you another car [narcotics proceeds in excess of \$80,000] for today or don't you have it? Because they told me that you were going to bring me a car with eighty miles [\$80,000] and then tomorrow or in a little while another one with sixty-five [\$65,000]." REYNA-TELLEZ responded, "I don't have that one [the additional \$65,000]. I only have the eighty [\$80,000] one." CI-2 asked, "Yes, so then what are we going to do about the other one?" REYNA-TELLEZ replied, "In a little while, right?" CI-2 said, "Okay, well then, let me tell them [PARRA-PEDROZA] that we will do it [meet] in a little while. . . . Are you on your way?" REYNA-TELLEZ replied, "Yeah, I'm on my way."

470. On or about July 25, 2014, at approximately 12:31 p.m., CI-2 had a consensually recorded call with REYNA-TELLEZ, who was using Reyna-Tellez Phone 1. During the call, CI-2 stated, "Hey, they [PARRA-PEDROZA] told me for you to come by and pick up the other car [additional \$65,000]." REYNA-TELLEZ responded, "Oh yeah, I'll come by there [deliver narcotics proceeds] right now." CI-2 stated, "So then come by for the other car [additional \$65,000] and you can deliver both of them, so as to not bother him [UCA-1] tomorrow. Okay? Don't take too long

because this guy [UCA-1] keeps calling me. When you are coming by this way?" CI-2 and REYNA-TELLEZ then made arrangements for REYNA-TELLEZ and UCA-1 to meet in the parking lot of a Target store located on South Kingery Highway in Willowbrook, Illinois. CI-2 stated, "[P]ass by for the other car [additional \$65,000] so we don't have to be doing things tomorrow, okay?" REYNA-TELLEZ responded, "All right primo."

471. At approximately 1:22 p.m., surveillance observed REYNA-TELLEZ return to Reyna-Tellez Residence 1 and enter the residence empty-handed. At approximately 1:28 p.m., surveillance observed REYNA-TELLEZ exit the residence carrying a tan bag.

472. On or about July 25, 2014, between 1:28 p.m. and 1:30 p.m. [TD7 Session ##23141-47], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with INDIVIDUAL L, who was using Individual L Device 1. During this exchange, INDIVIDUAL L stated, "They're [REYNA-TELLEZ] going to deliver everything [both the \$80,000 and the \$65,000]." PINEDA SANCHEZ asked, "Do they [REYNA-TELLEZ] have it all there??" INDIVIDUAL L responded, "I think so." PINEDA SANCHEZ stated, "Okay." INDIVIDUAL L stated, "Or check if they [UCA-1] already saw them [collected from REYNA-TELLEZ]." PINEDA SANCHEZ stated, "Hold on."

473. On or about July 25, 2014, at approximately 1:57 p.m., CI-2 had a consensually recorded call with REYNA-TELLEZ, who was using Reyna-Tellez



Phone 1. During this call, CI-2 guided REYNA-TELLEZ to the Target parking lot, where REYNA-TELLEZ met with UCA-1.

474. On July 25, 2014, at approximately 1:59 p.m., UCA-1 and REYNA-TELLEZ met in the Target parking lot located at 7601 South Kingery Highway, Willowbrook, Illinois. Prior to this meeting, agents outfitted UCA-1 with a concealed audio recording device. Surveillance video recorded the meeting. Surveillance observed REYNA-TELLEZ arrive at the parking lot, park his vehicle next to UCA-1's vehicle, exit his vehicle, retrieve a tan bag from the back seat, and hand the bag to UCA-1 who placed the bag inside the rear cargo area of UCA-1 vehicle. During this meeting:

a. UCA-1 asked, "Do you have the tickets [narcotics proceeds]?" REYNA-TELLEZ responded, "Yeah." UCA-1 stated, "Come on. We'll put them in the back." UCA-1 asked, "How much is there?" REYNA-TELLEZ responded, "One hundred forty-four. . .one, four, four [\$144,000]." UCA-1 confirmed, "Okay. One, four, four [\$144,000]?" REYNA-TELLEZ responded, "Yes."

b. UCA-1 stated, "Let's give [CI-2] a call real quick and make sure we're good."

475. During the meeting between REYNA-TELLEZ and UCA-1 – at approximately 2:02 p.m. – CI-2 had a consensually recorded call with REYNA-TELLEZ, who was using Reyna-Tellez Phone 1. REYNA-TELLEZ placed the call in the presence of UCA-1. During the call, CI-2 asked, "Are you with him [UCA-1] already?" REYNA-TELLEZ responded, "Yes." CI-2 asked, "Okay, what is the total

[amount of narcotics proceeds]?" REYNA-TELLEZ stated, "One, four, four [\$144,000]." CI-2 confirmed, "One forty-four [\$144,000], okay."

476. Following this meeting, UCA-1 drove to the HSI Chicago Field Office where agents retrieved a tan bag containing approximately \$143,980 in cash from UCA-1's vehicle. At the HSI Chicago Field Office, a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

477. On or about July 25, 2014, between approximately 2:06 p.m. and 4:25 p.m., CI-2 exchanged a series of text messages with OLIVER, who was using Parra-Pedroza Phone 11. During this exchange:

a. CI-2 stated, "I will see him [UCA-1] in a little bit and as soon as he [UCA-1] verifies [counts the narcotics proceeds delivered by REYNA-TELLEZ], I will call you. He [REYNA-TELLEZ] said that it was 144 [\$144,000], but that it [the money] still needs to be verified [counted by UCA-1]." OLIVER asked, "Has it been verified?" CI-2 replied, "No, he is just now on his way, he hasn't verified yet. Where am I going to send you the mail [what bank account should UCA-1 wire the money to]?" OLIVER asked, "Which one [bank account] do you send them to [previous wire transfers]?" CI-2 stated, "To Vector Casa de Bolsa [Subject Bank Account 2]."

b. OLIVER stated, "I will tell you which one [bank account] in a moment. Is it verified, 144 [\$144,000]?" CI-2 said, "No, but just so I can get a head start, so I don't run out of time."

478. On July 25, 2014, between 3:15 p.m. and 3:16 p.m. [TD7 Session ##23222-25], PINEDA SANCHEZ, who was using Target Device 7, exchanged a

series of BBMs with Individual L, who was using Individual L Device 1. During this exchange, PINEDA SANCHEZ stated, "They are asking me where they should send the mail to [to which bank account should UCA-1 wire the narcotics proceeds that he/she received from REYNA-TELLEZ]?? They [UCA-1] still haven't counted [the narcotics proceeds] but they want to be ready already." Individual L responded, "To Vector [Subject Bank Account 2]." PINEDA SANCHEZ responded, "Okay."

479. On or about July 25, 2014, between approximately 3:22 p.m. and 4:25 p.m., CI-2 exchanged a series of text messages with OLIVER, who was using Parra-Pedroza Phone 11. During this exchange, OLIVER stated, "To the same one [Subject Bank Account 2]." CI-2 replied, "Okay." OLIVER asked, "Did it get verified [counted] and they [PINEDA SANCHEZ] are asking me if there will be time to put [wire transfer the money] it today?" CI-2 responded, "We are on it, give me about 30 minutes." OLIVER responded, "Okay."

480. On or about July 25, 2014, agents wire transferred \$138,221 from an undercover checking account into Subject Bank Account 2.

481. On or about July 25, 2014, between approximately 5:39 p.m. and 5:41 p.m., CI-2 exchanged a series of text messages with OLIVER, who was using Parra-Pedroza Phone 11. During this exchange, CI-2 stated, "All set, 143980 received [\$143,980 from REYNA-TELLEZ]. And \$138221 was sent to you. It's in the mail [has been wired] already, so you can receive it in a little while." OLIVER stated, "Thank you."

482. On or about July 25, 2014, between 5:10 p.m. and 7:10 p.m. [TD7 Session ##23356-57], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with Individual L, who was using Individual L Device 1. During this exchange, PINEDA SANCHEZ stated, "It's that, right? . . . and was it fine what they counted [was the amount that UCA-1 reported from the REYNA-TELLEZ collection correct]?"

483. At approximately 7:24 p.m., according to toll records for Reyna-Tellez Phone 1, Reyna-Tellez Phone 1 had an approximately five minute call with Mexican telephone number (52) 747-162-1564. Based on my familiarity with this case, including prior and subsequent consensually recorded phone calls and consensually captured BBM exchanges, I believe that during this call, REYNA-TELLEZ advised his Mexican associates, including Individual L, that he had delivered approximately \$143,980 in narcotics proceeds to UCA-1.

484. On July 28, 2014, between 11:03 a.m. and 11:05 a.m. [TD7 Session ##23418-27], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with Individual L, who was using Individual L Device 1. During this exchange, Individual L stated, "It went through [the narcotics proceeds from REYNA-TELLEZ were deposited into Subject Bank Account 2]. Everything is good." PINEDA SANCHEZ responded, "I'm sorry. It's because I didn't have the bb [Blackberry]. Hey, Walt [PARRA-PEDROZA] asked me if you have something [narcotics proceeds to be laundered] for this week. Because [UCA-1's first name] said he was going out, but if there's something [narcotics proceeds to launder], well,

either way he'll [UCA-1] get it [pick-up the narcotics proceeds]. But, well, it has to be for sure." Individual L responded, "Yes, I'm already checking that out."

485. On July 28, 2014, between 2:01 p.m. and 2:12 p.m. [TD7 Session ##23532-39], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with Individual L, who was using Individual L Device 1. During this exchange, Individual L stated, "Your part [payment for laundering REYNA-TELLEZ's narcotics proceeds] is there with the girls. He told me to take that from Walt [PARRA-PEDROZA] from what I lent him [PARRA-PEDROZA told Individual L to keep PARRA-PEDROZA's share from laundering REYNA-TELLEZ's narcotics proceeds because PARRA-PEDROZA owes Individual L money from a previous loan]." PINEDA SANCHEZ responded, "Yes, it's fine. Don't worry about it. Hey, did you check out that detail; that it's 1% on top of the delivery [PINEDA SANCHEZ and PARRA-PEDROZA collectively receive 1% payment of the amount of money laundered]." Individual L responded, "Yes, this time it was paid like that. I left him 8750 [8,750 pesos, which equals approximately \$674.11, or 0.47% of the amount of narcotics proceeds delivered by REYNA-TELLEZ]." PINEDA SANCHEZ responded, "Okay, perfect."

**XXXV. PINEDA SANCHEZ and MARIA LOERA ALVARADO  
Coordinate the Collection and Laundering of \$132,000 in  
Narcotics Proceeds from MOTA (August 5, 2014).**

486. On August 1, 2014, between approximately 11:35 a.m. and 11:54 a.m., [TD7, Session ## 24510-15], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with MARIA LOERA ALVARADO, who was using

Target Device 9.<sup>54</sup> During this exchange, PINEDA SANCHEZ stated, "Hey, they have 133 [\$133,000] in Chicas [Chicago]. Is there a way [to collect and launder]?" LOERA ALVARADO responded, "Let me ask. And they are already ready. To inform."

487. On August 1, 2014, between approximately 12:44 p.m. and 12:48 p.m. [TD9 Session ##59603-15], LOERA ALVARADO, who was using Target Device 9, exchanged a series of BBMs with Individual CC, who was using Individual CC Device 1. During this exchange, LOERA ALVARADO asked, "Have they not told you . . . of the chicas [narcotics proceeds delivery in Chicago]." Individual CC

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<sup>54</sup> Agents identified MARIA LOERA ALVARADO as follows: On August 14, 2014, between 4:41 p.m. and 4:45 p.m. [TD9, Session ##65295-300], the user of Target Device 9 exchanged a series of BBMs with FNU LNU ("BORI"). During this exchange, BORI asked, "Aunt, can you send me your information and your niece's?" The user of Target Device 9 responded, "Yes. [Individual T]. Maria Dolores Loera Alvarado." In addition, in numerous intercepted BBMs, the user of Target Device 9 is referred to, and responds to, the name "Mary." On April 24, 2014 [TD9 Session #18178], and May 13, 2014 [TD9 Session # 33970], the user of Target Device 9 updated her Blackberry Messenger display image to include a photograph of, among others, an adult male and female. On April 29, 2014 [TD10 Session ##27717], the user of Target Device 9 sent a photograph to Individual FF, who was using Blackberry Pin 2A75BF5E ("Individual FF Device 1"), which photograph depicted, among others, the same adult male and female. On May 10, 2014, at approximately 1:54 p.m. [TD9 Session ##33342-60], the user of Target Device 9 exchanged a series of Blackberry Messages with FNU LNU (a/k/a "MATEO"), who was using Mateo Device 1. During this conversation, the user of Target Device 9 stated, "Call the office. I'm in Michoacan. 36473915." According to a consular database system, "Maria Dolores Loera Alvarado" listed the phone number "3-647-3915" as her work telephone number in a Non-immigrant Visa Application. Agents compared the photograph included with LOERA ALVARADO's Non-immigrant Visa application to the intercepted photographs discussed above, and based on that comparison, determined that LOERA ALVARADO was the adult female depicted in the photographs associated with Target Device 9. In addition, LOERA ALVARADO's Non-immigrant Visa application listed Individual S as LOERA ALVARADO's husband. Agents compared a copy of a photograph included with Individual S's Non-immigrant Visa application to the photographs of the intercepted photos discussed above, and based on that comparison, determined that LOERA ALVARADO's husband is the adult male depicted in the photographs associated with Target Device 9.

responded, "Alright Mary. Send me the number [PINEDA SANCHEZ's money courier, subsequently identified as EFREN MOTA] please."

488. On August 1, 2014, between approximately 1:00 p.m. and 1:04 p.m. [TD7 Session ##24554-61], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with Individual O, who was using Individual O Device 1. During this exchange, PINEDA SANCHEZ stated, "That we have to pass it [MOTA's phone number]. To see if they can pick it [narcotics proceeds] up today." Individual O responded, "Let's see. If it can't be done today, tomorrow yes, right?" PINEDA SANCHEZ responded, "We won't let them down. But let me check if they work tomorrow."

489. On August 2, 2014, at approximately 12:12 p.m. [TD9 Session #60184], LOERA ALVARADO, who was using Target Device 9, received a BBMs from Individual CC, who was using Individual CC Device 1. In this message, Individual CC forwarded LOERA ALVARADO a message between Individual CC and Individual DD. In this forwarded message:

a. Individual CC stated, "Mr. excuse me I have a question, are they going to communicate for the greeting [is Individual DD's Chicago contact – an undercover agent ("UCA-2") – going to arrange to collect narcotics proceeds from MOTA]?"

b. Individual DD responded, "Let me asks Mr. I will let you know. Mr Here's the # so your guy [MOTA] can call instead (815) 915-4432 [UCA-2 Phone 1] series #G27576338H [a serial number from a U.S. bill] for Libardo on behalf of

Omar [codenames to vouch for trustworthiness]. When they deliver the paper to my friend. He will deliver some bills with that series [UCA-2 will present a U.S. bill with the aforementioned serial number to MOTA to vouch for trustworthiness]. That way you and I can be more calm, does that sound better to you. Mr. the buddy tells me that this way we can be more calm and coordinate this way." Individual CC stated, "Ok Mr, I will pass him [MOTA] the info with pleasure."

490. On August 2, 2014, between approximately 12:22 p.m. and 12:24 p.m. [TD7 Session ##24775-79], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with MARIA LOERA ALVARADO, who was using Target Device 9. During this exchange, LOERA ALVARADO forwarded the above exchange between Individual CC and Individual DD that included UCA-2 Phone 1, and stated, "I'll forward you the conversation, that way when they [MOTA] are ready you can call them [UCA-2]. It seems that they don't answer." PINEDA SANCHEZ asked, "I should hand over the cell [UCA-2 Phone 1]?? And the series [U.S. dollar bill serial number] as well??"

491. On August 2, 2014, between approximately 12:27 p.m. and 12:30 p.m. [TD7 Session #24780-88], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with Individual O, who was using Individual O Device 1. During this exchange, PINEDA SANCHEZ stated, "Call instead (815) 915-4432 [UCA-2 Phone 1] series #G27576338H for Libardo on Omar's behalf. When the guy [MOTA] hands over the papers you all have to give him a bill with this series number. It's his proof of delivery [UCA-2's proof that he/she collected the proceeds



as directed]. It seems that your guy [MOTA] isn't answering. They told me to call whenever we are ready. That they are ready to pick up the lunch [narcotics proceeds]." Individual O responded, "Your guy has to give the bills." PINEDA SANCHEZ stated, "Yes. You deliver the lunch [narcotics proceeds] and they [UCA-2] will give you the bill as proof that they received."

492. On August 2, 2014, at approximately 12:31 p.m. [TD7 Session ##24789-91], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with LOERA ALVARADO, who was using Target Device 9. During this exchange, PINEDA SANCHEZ stated, "I already passed it [UCA-2 Phone 1 and the serial number]. That they [MOTA] will call right now. That they have been ready since yesterday."

493. On August 2, 2014, between approximately 2:50 p.m. and 3:05 p.m. [TD7 Session ##24841-49], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with Individual O, who was using Individual O Device 1. During this exchange, Individual O stated, "312-218-9126 [Mota Phone 1] try calling that number, it's turned on. It's [UCA-2 Phone 1] sending them to voicemail. Brother-in-law on behalf of the barber shop. Give them a call to that number." PINEDA SANCHEZ responded, "It's sending it to which voicemail? The one I sent you [UCA-2 Phone 1]? What?"

494. On August 2, 2014, between approximately 3:06 p.m. and 3:07 p.m. [TD7 Session ##24850-56], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with LOERA ALVARADO, who was using Target

Device 9. During this exchange, PINEDA SANCHEZ stated, "312-218-9126 [Mota Phone 1] brother in law on behalf of the barber shop. That they [MOTA] keep calling that number you gave me [UCA-2 Phone 1] and it keeps sending it to the voicemail. They gave me another one that is turned on. That they called yours [UCA-2 Phone 1] Mary and it goes to voicemail. That if you guys can call." LOERA ALVARADO responded, "Oops."

495. On August 2, 2014, between approximately 1:11 p.m. and 5:22 p.m., an undercover officer ("UCA-2"), who was using UCA-2 Phone 1, received several missed calls from EFREN MOTA, who was using telephone number (312) 218-9126 ("Mota Phone 1").<sup>55</sup> Within that same time frame, UCA-2 returned the call. This call was not recorded. During the call, UCA-2 provided MOTA the code "Omar de parte Libardo." MOTA advised UCA-2 that he was "ready," which UCA-2 understood to mean that MOTA was ready to deliver narcotics proceeds to UCA-2.

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<sup>55</sup> Agents identified EFREN MOTA as follows: As discussed below, between August 2 and 5, 2014, UCA-2 had numerous calls with the man who was using Mota Phone 1. During these calls, the user of Mota Phone 1 arranged to meet UCA-2 in person on West 45th Street, near the Target parking lot located at Pulaski Road and West 43rd Street in Chicago, on August 5, 2014, for the purpose of delivering narcotics cash proceeds. Soon before their meeting, the user of Mota Phone 1 advised UCA-2 that he was in the Target parking lot, stated that he was wearing sunglasses, and described his vehicle. Immediately before the meeting, UCA-2 observed MOTA in the Target parking lot, speaking on a cellular telephone, at the same time that UCA-2 was speaking with the user of Mota Phone 1 over the phone and acknowledging that he could see the user of Mota Phone 1. During that same call, the user of Mota Phone 1 directed UCA-2 to meet him on West 45th Street near the Target parking lot, and UCA-2 then followed MOTA out of the Target parking lot to the designated side street. Following these calls, surveillance observed UCA-2 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed an Illinois driver's license photograph of "Efren Mota," and positively identified MOTA as the individual who delivered narcotics proceeds to UCA-2 on August 5, 2014. In addition, after meeting with MOTA, UCA-2 identified MOTA as the user of Mota Phone 1.

UCA-2 and MOTA agreed to meet on the morning of Monday, August 4, 2014, near Midway Airport in Chicago.

496. On August 2, 2014, at approximately 6:17 p.m. [TD9, Session ##60294], LOERA ALVARADO, who was using Target Device 9, sent a BBM to Individual CC, who was using Individual CC Device 1. In this message, LOERA ALVARADO stated, "They [MOTA and UCA-2] already made an agreement, they'll meet on Monday."

497. On or about August 4, 2014, at approximately 9:14 a.m., UCA-2 placed a telephone call to MOTA, who was using Mota Phone 1. This call was not recorded. During this call, MOTA told UCA-2 he was busy and could meet after 12:00 p.m.

498. On or about August 4, 2014, between approximately 11:12 a.m. and 11:20 a.m. [TD7, Session ##24999-25016], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of Blackberry messages with LOERA ALVARADO, who was using Target Device 9. During this exchange, LOERA ALVARADO stated, "They're telling me they call chicas [Chicago]. And that they [MOTA] are busy. . . . It was left that your friend [MOTA] would call to meet at the point but he hasn't called. They [UCA-2] called your friend [MOTA] back and he said to call him later on that he was busy. So it would be best to call him when he is no longer busy. They were supposed to call one another early and he hasn't called for the Chicago thing, and they called him on this side and he answered saying he was busy and he would call later." PINEDA SANCHEZ stated, "Okay. I'll let them know."

499. During this same exchange, LOERA ALVARADO forwarded PINEDA SANCHEZ a conversation between Individual CC and Individual DD. In that forwarded conversation, Individual DD stated, "Sir, the buddy just called me, that if they could call in order to greet. The 132 [UCA-2 is ready to collect \$132,000 from MOTA]. . . . They [UCA-2] called your friend [MOTA] back and he said to call him later, that he was busy. So instead, call him when he is not longer busy." Individual CC stated, "Let's leave it like that, the 132 [the collection of \$132,000], sir, for the moment."

500. On August 5, 2014, between approximately 8:16 a.m. and 9:37 a.m., UCA-2 had a series of calls with MOTA, who was using MOTA Phone 1. These calls were not recorded. During these calls, MOTA told UCA-2 that he was ready, and they agreed to meet at approximately 9:45 a.m. at the "store with the red dot [Target]" on "P Street [Pulaski]."

501. At approximately 9:41 a.m., surveillance observed MOTA arrive in the parking lot of the Target located at 4433 South Pulaski Avenue in Chicago, circle the lot, then exit and drive to the Pete's Fresh Market parking lot located directly north of the Target on Pulaski Avenue. Surveillance then observed MOTA slowly circle the Pete's Fresh Market, exit the lot, and drive to West 45th Street where he parked near the intersection on South Springfield Avenue.

502. At approximately 9:43 a.m., UCA-2 arrived at the Target located at in Chicago and received a call from MOTA, who was using MOTA Phone 1. This call was not recorded. According to UCA-2, during the call, MOTA stated that he was

not comfortable delivering the narcotics proceeds in the Target parking lot because there was a security car there, and told UCA-2 to do the exchange on "the side street [West 45th Street]." UCA-2 drove to and parked on West 45th street at the corner just east of Springfield. Surveillance then observed MOTA exit his vehicle and meet with UCA-2. During this unrecorded meeting:

a. MOTA asked UCA-2 for the dollar bill with serial #G275766338, but UCA-2 did not give it to him.

b. MOTA retrieved a black garbage bag from his vehicle, and handed it to UCA-2. UCA-2 asked, "How much was it?" MOTA responded, "132 [\$132,000]." MOTA then returned to his vehicle and departed the area.

503. Following this meeting, UCA-2 gave the black garbage bag to other law enforcement officers, who discovered that the bag contained four bundles of cash totaling approximately \$132,000.<sup>56</sup>

504. On August 5, 2014, between approximately 2:00p.m. and 5:17 p.m. [TD9 Session ##61125-431], LOERA ALVARADO, who was using Target Device 9, exchanged a series of BBMs with Individual CC, who was using Individual CC Device 1. During this exchange:

a. LOERA ALVARADO stated, "Hey, that they already delivered the 133 [MOTA delivered \$133,000]. . . . And they say that the guy [UCA-2] they gave it to, that he is an officer [police]. Right now. And that they put a tail on them. . . . Diego [PINEDA SANCHEZ] says if you can ask because they threatened

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<sup>56</sup> Law enforcement, as part of a separate investigation, subsequently forwarded this money to Mexico, but did not do so immediately.

him. That's what I'm telling him." Individual CC asked, "Who threatened who? I'm confused. . . . And what do you mean they put a tail on him? Let's see if he can tell you more clearly, I'm asking right now."

b. Individual CC asked, "You mean, over there, they give him the bill's serial number that I gave you at the time [UCA-2's dollar bill that served as the receipt for collecting narcotics proceeds]? More likely than not they [UCA-2] must have given him [MOTA] the bill, that was the password for the hello [agreed code to proceed with the handoff of narcotics proceeds]." Later, Individual CC asked, "Did Diego [PINEDA SANCHEZ] tell you whether they [UCA-2] gave them [MOTA] the serial number [code from the bill] or the money, so that we can know in the mean time?" LOERA ALVARADO responded, "He didn't tell me."

505. On August 5, 2014, between approximately 3:40 p.m. and 3:43 p.m. [TD7 Session ##25360-68], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with Individual O, who was using Individual O Device 1. During this exchange, Individual O stated, "They [MOTA's Mexican associates] are calling me already." PINEDA SANCHEZ responded, "That's what I'm working on. Did they tell you about the receipt [the serial number from UCA-2's dollar bill] already? I don't have the code anymore, dude. But they will send it to me shortly." Individual O stated, "What you guys should be doing is confirming if he [UCA-2] fucking received already. Before they [MOTA's Mexican associates] back-out."

506. On or about August 5, 2014, between approximately 4:27 p.m. and 4:48 p.m. [TD7 Session ## 25414-28], PINEDA SANCHEZ, who was using Target Device

7, exchanged a series of Blackberry messages with LOERA ALVARADO, who was using Target Device 9. During this exchange:

a. PINEDA SANCHEZ stated, "Check what he [Individual O] wrote to me: It's taking too long, tell me what's going on before they let the horse drop on me, if not so I can start asking for the favor. Hey and you don't have the number from over there [phone number to LOERA ALVARADO's Chicago-based contact]??? If not I'll call to ask him haha. . . . Or do you think they will be upset if I call?" LOERA ALVARADO responded, "That the guy that allocates [arranges for the collection of narcotics proceeds from various money couriers] is at a meeting right now that he won't be long."

b. PINEDA SANCHEZ stated, "The thing is that they are frustrating me, Mary. They [Individual O and his associates] want me to go right now to Plaza Mexico and wait there until they take care of us [UCA-2 reports that he/she collected the \$132,000]. I told them that I was busy. That I'm not able to." LOERA ALVARADO responded, "I understand."

507. On or about August 5, 2014, between approximately 5:59 p.m. and 7:32 p.m. [TD7 Session ##25466-502], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of Blackberry messages with LOERA ALVARADO, who was using Target Device 9. During this exchange, PINEDA SANCHEZ stated, "What I don't understand Mary, is how can they [UCA-2] tell us that they don't attend to him because they [MOTA] are busy and that they [MOTA] don't answer, to tell us they do know who we are. But to confirm the delivery, they [UCA-2] can't locate us

anymore. They need the serial number [from UCA-2's dollar bill] to see who is the cousin from over there." LOERA ALVARADO responded, "Yeah." PINEDA SANCHEZ stated, "Tell them that it's the one from the barber shop. Let's see if like that they'll know." LOERA ALVARADO stated (possibly quoting a prior message from Individual DD), "No sir, that his guy [MOTA] hasn't called him; he [UCA-2] hasn't received the 133 [\$133,000]."

508. On August 6, 2014, between approximately 10:15 a.m. and 10:41 a.m. [TD7 Session ##25537-667], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with Individual O, who was using Individual O Device

1. During this exchange:

a. Individual O stated, "This guy is closed up, man. [MOTA's associate is telling Individual O:] Hey Carlos tell them to stop fucking around. I made the deal [to launder proceeds] with you and I'm holding you accountable [for the lost \$132,000]. You only send fucking cops [to pick up the money]." PINEDA SANCHEZ stated, "He shouldn't be an asshole. You heard what they told us over here, man."

b. Individual O stated, "[MOTA's associate is telling Individual O:] And I don't give a fuck what your friend says. You pay me. . . . The deal [to launder money] was between you and me. Therefore, I'm holding you accountable [for the lost \$132,000]. . . . Let's see what they tell me, man, if not I'm going to drop the ball [be held responsible for the loss], man. I won't pay that much money, first of all, I don't have it. Fucking shit." PINEDA SANCHEZ stated, "Well yeah, man, that's



why I'm telling you that we'll get together with the guy. And have my buddy and yours sort it out, then. But he shouldn't act like a smart ass; that just because he doesn't want to lose, we have to pay."

c. Individual O stated, "And this guy [MOTA or MOTA's associate] is closed up; that he doesn't want to meet anybody." PINEDA SANCHEZ stated, "He [MOTA] should prove to you that he delivered. Have him give us the bill [received from UCA-2] and we will pay him."

509. On August 6, 2014, between 10:19 a.m. and 10:24 a.m. [TD7 Session ## 25559-25589], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with LOERA ALVARADO, who was using Target Device 9. Due to technical issues, only messages sent from LOERA ALVARADO to PINEDA SANCHEZ were captured. During the exchange, LOERA ALVARADO stated, "Did you clarify about the chicas thing [MOTA's \$132,000 delivery in Chicago]. . . . If they [MOTA's associates] have the serial number [from UCA-2's dollar bill], then with that. But he [MOTA] has to have the bill. Because that's the counter-receipt [for the narcotics proceeds drop off]."

510. On August 6, 2014, at approximately 1:20 p.m., UCA-2 received a call from an unknown man ("UM 1440"), who was using a Mexican telephone number. This call was not recorded. According to UCA-2, during the call, UM 1440 asked UCA-2 if he/she had collected "132 [\$132,000]" earlier that day in four baggies. UCA-2 responded, "Yes." UM 1440 stated "okay" and hung up the phone.

511. On August 6, 2014, between 2:42 p.m. and 2:44 p.m., [TD9, Session ## 62038-62047], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with LOERA ALVARADO, who was using Target Device 9. During this exchange, PINEDA SANCHEZ stated, "It's just that they got very mad because they said the police followed them [MOTA]. Well, they do not know if it was cops. But they were followed." LOERA ALVARADO responded, "Yes."

512. On August 6, 2014, between 3:36 p.m. and 3:43 p.m., [TD9 Session ##62164-85], LOERA ALVARADO, who was using Target Device 9, exchanged a series of BBMs with Individual CC, who was using Individual CC Device 1. During this exchange, Individual CC stated, "[W]e [LOERA ALVARADO, Individual CC, and their associates] did not show intimidation to anyone, Diego's [PINEDA SANCHEZ's] friends would tell him, Hey dude, calm down. What about the favors I have done for you, no one is robbing you [MOTA's \$132,000]." LOERA ALVARADO responded, "Yes." Individual CC stated, "Imagine if they report us [MOTA is arrested and tells police about his associates], the police come and they charge all of us and we can't finish it [launder the money to Mexico] because of an idiot [MOTA]. Because of that and you didn't see us anymore, for any stupid thing they will take you in and investigate you, imagine that. Just because of a dumbass [MOTA]." LOERA ALVARADO responded, "Yes, I know. The dumbass thinks that it's easy." Individual CC stated, "With everything [incriminating evidence] that we have in the cell phones."

513. On August 6, 2014, between 3:36 p.m. and 3:56 p.m. [TD7 Session ##25863-82], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with Individual O, who was using Individual O Device 1. During this exchange, Individual O stated, "This fucking guy [MOTA's Mexican associate] asked me, how are we doing; to not let him down with the check [delivery of the \$132,000 from MOTA] because he's going out." PINEDA SANCHEZ stated, "They are taking 10 thousand dollars [\$10,000 fee for laundering \$132,000]. Tell him to pick you up in the meantime. Until we pay. They are looking for dollars and they can't find [UCA-2 has not confirmed delivery of \$132,000 yet]. It's not for sure yet but to go ahead and look into it." Individual O responded, "No man, you better pay or they are kill you; this guy is worse than Ivan [Mexican drug trafficker]. Imagine, he took care of your 'Tocayo.'"

514. On August 6, 2014, at approximately 3:49 p.m., UCA-2 received a call from another unknown male ("UM 4874"), who was using a Mexican telephone number. This call was not recorded. According to UCA-2, during this call, UM 4874 asked UCA-2 if he received "132 [\$132,000]" earlier today. UCA-2 responded, "Yes." UM 4874 said fine and hung up the telephone.

515. On August 6, 2014, between 9:36 p.m. and 9:41 p.m., [TD7, Session ##26204-26220], PINEDA SANCHEZ, who was using Target Device 7, exchanged a series of BBMs with Individual O, who was using Individual O Device 1. During the exchange:

a. PINEDA SANCHEZ stated, "Well, but also his people [UCA-2] could have been followed [by police], dude. It could be that they already had it." Individual O responded, "That's what I said. So he's [MOTA's associate] set on his decision that it's on me when it leaves; when he drops it and so on [the risk of loss on the \$132,000 passes to Individual O once MOTA delivered it to UCA-2]."

b. PINEDA SANCHEZ stated, "[T]hose risks doesn't pertain to us, because if it was like that, that would be messed up. . . . Aside from that we are responding for the paper [responsible for the loss of the money], we would also have to be responsible for whatever happens days after the fact. . . . Well we should see what happens. But when it comes to the law, everything can be investigated with attorneys, dude. . . . And it has to say right there [in arrest paperwork] how they [police] got him [UCA-2], if it was an anonymous report or an investigation or it was someone else. It says everything [if the \$132,000 had been seized by law enforcement, PINEDA SANCHEZ intended to learn how exactly the money was seized, and who was responsible for the loss, by hiring an attorney to obtain paperwork associated with that seizure]."

516. Based on my familiarity with this case, including the intercepted communications discussed above, I believe that following MOTA's delivery of approximately \$132,000 to UCA-2, PINEDA SANCHEZ, Individual O, LOERA ALVARADO, and Individual CC (a) believed that the \$132,000 had been seized by law enforcement; (b) attempted to determine whether law enforcement was investigating MOTA, UCA-2, or both; and (c) discussed who, between MOTA's

associates and PINEDA SANCHEZ's associates, would bear responsibility for the loss of the \$132,000.

**XXXVI. PINEDA SANCHEZ and PARRA-PEDROZA Direct CI-2 and UCA-1 to Collect and Launder Approximately \$100,000 in Narcotics Proceeds from BARRERA-PEREZ (August 8, 2014).**

517. On or about August 6, 2014, between approximately 12:53 p.m. and 4:52 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, "7738292405 [Barrera-Perez Phone 1] by George [codename to vouch for trustworthiness]. 100 [\$100,000 to deliver] trips around the block." CI-2 responded, "Okay. . . . I told [UCA-1] to call him." PARRA-PEDROZA responded, "No, he [BARRERA-PEREZ] speaks Spanish. . . . No, he doesn't speak English. . . . Just Spanish, you call. . . . Confirm for me when you call." CI-2 replied, "Okay." PARRA-PEDROZA asked, "Done yet? . . . The thing is that they [BARRERA-PEREZ's associates] are asking me. It's urgent for them." CI-2 responded, "Okay, I am calling him [BARRERA-PEREZ]."

518. At approximately 4:46 p.m., CI-2 had a consensually recorded call with FEDERICO BARRERA-PEREZ, who was using telephone number (773) 829-2405 ("Barrera-Perez Phone 1").<sup>57</sup> During this call, CI-2 asked, "Hey how are you? With

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<sup>57</sup> Agents identified BARRERA-PEREZ as follows: As discussed below, between August 6 and 8, 2014, CI-2 had numerous consensually recorded call with the man who was using Barrera-Perez Phone 1. During these calls, the user of Barrera-Perez Phone 1 arranged to meet UCA-1 in person at the Walmart parking lot located at 4646 West Diversey Avenue in Chicago, Illinois, on August 8, 2014 at approximately 10:24 a.m., for the purpose of delivering narcotics cash proceeds. Following these calls, surveillance observed UCA-1 meet with, and obtain proceeds from, a man at the designated time and place. Agents conducting surveillance subsequently viewed a previous arrest photograph of

George [codename provided by PARRA-PEDROZA]?" BARRERA-PEREZ responded, "Yeah, what's up?" CI-2 replied, "So then they [PARRA-PEDROZA] just told me to give you a call. . . . That you had a title of a car that they were going to give to me [narcotics proceeds to be delivered]." BARRERA-PEREZ stated, "Yes, where are you at?" CI-2 stated, "Let me call the guy over there [UCA-1] to see if he can [pick up the narcotics proceeds], uh, tomorrow. I think the one that will arrive to pick up the car is the, uh, is another, another guy. It's a white guy. . . . Okay? It's a white guy. But I don't want you to get scared when you see him, okay." BARRERA-PEREZ responded, "Okay." CI-2 stated, "It's, it's, it's a white guy. It's an American who fixes the cars [launders the money]." BARRERA-PEREZ responded, "Yes, yes, they [BARRERA-PEREZ's associates] told me about it, uh-huh." BARRERA-PEREZ and CI-2 then arranged for BARRERA-PEREZ to meet with UCA-1 on Friday, August 8, 2014.

519. According to toll records for Barrera-Phone 1, on August 6, 2014, between 5:35 p.m. and 9:29 p.m., Barrera Phone 1 contacted four different Mexico-based telephone numbers a total of five times. Based on my familiarity with this case, including prior and subsequent consensually recorded phone calls and consensually captured BBM exchanges, I believe that during these calls,

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"Federico Barrera-Perez," and positively identified BARRERA-PEREZ as the individual who delivered narcotics proceeds to UCA-1 on August 8, 2014. In addition, prior to this August 8, 2014 meeting, agents outfitted UCA-1 with a concealed audio recording device, which captured BARRERA-PEREZ's voice. After reviewing the recording of the August 8, 2014 meeting, agents compared the voice of the male with whom UCA-1 met to the voice of the man who was using Barrera-Perez Phone 1 in the consensually recorded calls with CI-2, and determined that BARRERA-PEREZ was the user of Barrera-Perez Phone 1.

BARRERA-PEREZ discussed his plans to deliver narcotics proceeds to UCA-1 with his Mexican associates.

520. On August 8, 2014, between approximately 10:06 a.m. and 10:11 a.m., CI-2 had two calls with BARRERA-PEREZ, who was using Barrera-Perez Phone 1. Due to a technical malfunction, these calls were not recorded, but they were verified by tolls and made in the presence of agents. According to CI-2, during these calls, BARRERA-PEREZ and CI-2 arranged for BARRERA-PEREZ to meet UCA-1 in the parking lot of a Wal-Mart located near the intersection of Diversey and Cicero in Chicago at approximately 10:24 a.m. BARRERA-PEREZ stated that he would be driving a green Versa, and CI-2 advised that UCA-1 was in a black sport utility vehicle parked close to the entrance of the Walmart.

521. At approximately 10:24 p.m., BARRERA-PEREZ and UCA-1 met in the parking lot of Walmart located at 4646 West Diversey Avenue in Chicago. Prior to this meeting, agents outfitted UCA-1 with a concealed audio recording device. Surveillance observed BARRERA-PEREZ retrieve a white plastic bag from his vehicle and place it in the rear of UCA-1's vehicle. During this meeting, UCA-1 asked, "How many tickets we got?" BARRERA-PEREZ responded, "Hundred. One, zero, zero [\$100,000]." UCA-1 stated, "Oh, one hundred. Okay, you count it?" BARRERA-PEREZ responded, "Uh-huh." UCA-1 asked, "You count all of it?" BARRERA-PEREZ responded, "Yes." UCA-1 asked, "What was your name? I'm [UCA-1's first name]." BARRERA-PEREZ responded, "I'm Fred."

522. At approximately 10:27 a.m., CI-2 had a consensually recorded call with BERRERA-PEREZ, who was using Barrera-Perez Phone 1. During this call, BERRERA-PEREZ stated, "Uh, done [BARRERA-PEREZ delivered the narcotics proceeds]." CI-2 stated, "You already saw him [UCA-1]? Okay, uh, what number was it? Uh, one hundred miles [\$100,000]? How many? Huh? Uh, how many miles did you leave him? One hundred [\$100,000]?" BARRERA-PEREZ responded, "Okay."

523. Following this meeting, UCA-1 handed the bag that he/she obtained from BARRERA-PEREZ to the other agents, who determined that the bag contained approximately \$100,000 in cash. Agents then transported the money to the HSI Chicago Field Office, where a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

524. Between approximately 2:21 p.m. and 3:47 p.m., CI-2 exchanged a series consensually captured BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "One hundred [\$100,000] even [BARRERA-PEREZ delivered \$100,000 to UCA-1]." PARRA-PEDROZA stated, "Okay. Are you going to send it today [wire the money into Subject Bank Account 2]?" CI-2 responded, "He [UCA-1] will send it in about two hours." PARRA-PEDROZA responded, "Okay. . . . Supposedly next week there's going to be a kilo of beef [\$1 million of narcotics proceeds]. But these guys [drug traffickers in Mexico] are bigger liars than you and I together."



525. On August 8, 2014, agents wire transferred \$96,000 from an undercover checking account into Subject Bank Account 2.

526. On August 8, 2014, between 3:48 p.m. and 3:49 p.m. [TD7 Session ##26887-92), PINEDA-SANCHEZ who was using Target Device 7, exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, "The mail came in already [UCA-1 wired proceeds collected from BARRERA-PEREZ into Subject Bank Account 2]. Now we have to wait until next week to see if it's going to be like you are saying [additional money laundering contracts]." PINEDA SANCHEZ asked, "The payment for this [BARRERA-PEREZ pick-up], you won't make it until Monday, right?" PARRA-PEDROZA responded, "I think so." PINEDA SANCHEZ stated, "Alright."

**XXXVII. PARRA-PEDROZA Directed CI-2 and UCA-1 to Collect and Launder Approximately \$210,960 in Narcotics Proceeds from REYNA-TELLEZ (August 14, 2014).**

527. On or about August 11, 2014, between approximately 10:32 a.m. and 10:36 a.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA stated, "7084419142 [Reyna-Tellez Phone 1] with Guillo on behalf of Tio [code name CI-2 must use to vouch for trustworthiness]." CI-2 replied, "Okay." PARRA-PEDROZA stated, "I told you 273 times that you look really bold [REYNA-TELLEZ will deliver approximately \$273,000 in narcotics proceeds]."

528. On or about August 11, 2014 at approximately 11:02 a.m., CI-2 had a consensually recorded call with REYNA-TELLEZ, who was using Reyna-Tellez

Phone 1. During this call, CI-2 asked, "Yes, with Guillo [codename PARRA-PEDROZA provided to vouch for CI-2's trustworthiness]." REYNA-TELLEZ responded, "Yes, what's up?" CI-2 stated "Okay, I am calling on behalf of Tio [vouching codename]. He told me you have a car [narcotics proceeds] that you are going to give to me." REYNA-TELLEZ responded, "Yes, yes." REYNA-TELLEZ and CI-2 then agreed to meet the next day. REYNA-TELLEZ asked, "At the same place [referring to REYNA-TELLEZ's previous delivery of narcotics proceeds to UCA-1 on July 25, 2014]?" CI-2 replied, "I don't know where we met the other time." REYNA-TELLEZ asked, "You will let me know where, right? You will let me know tomorrow?" CI-2 stated, "Yes."

529. On or about August 11, 2014, at approximately 1:12 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA asked, "Is there an appointment [for UCA-1 and REYNA-TELLEZ to meet] already?" CI-2 replied, "Yes, early tomorrow."

530. On or about August 11, 2014, between approximately 6:13 p.m. and 9:15 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "Listen, [UCA-1's first name] just called me because he had an emergency and he will not be able to pick up [narcotics proceeds from REYNA-TELLEZ]." PARRA-PEDROZA responded, "We can't do that [cancel the delivery]. It is a lot [large amount of money] and if they keep it, we'll be fucked up if anything happens [PARRA-PEDROZA will be held

responsible in the event the money is seized by law enforcement]. No, see how it can be done [make other arrangements to receive the delivery from REYNA-TELLEZ]. . . . Yeah, we can't change plans. Much less with those quantities [large amounts of money]. Because then things can happen [the money could be seized]. . . . I'm nervous."

531. On or about August 12, 2014 at approximately 10:43 a.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 10. During the call, PARRA-PEDROZA stated, "Thing is that they [REYNA-TELLEZ's associates in Mexico] are calling, 'How's everything going? Everything alright?' And I'm like, 'Yes.'" CI-2 stated, "[T]he problem is that he's [UCA-1] figuring out what he can do to send it [wire the money]. Because if I go pick it up and then I can't send it, then it is going to be worse because they [REYNA-TELLEZ's associates in Mexico] will be there like, 'Where is it?'" PARRA-PEDROZA stated, "Yes, yes. Thing is that this is the first big one [larger than usual delivery of narcotics proceeds] and if we let them down then maybe . . . ." CI-2 stated, "I'll let you know in an hour, more or less. Because that man [UCA-1] is checking out how he can do it." PARRA-PEDROZA replied, "Okay."

532. On or about August 12, 2014 at approximately 10:54 a.m., CI-2 had a consensually recorded call with REYNA-TELLEZ, who was using Reyna-Tellez Phone 1. During the call, REYNA-TELLEZ stated, "This is Guillo [vouching codename from PARRA-PEDROZA] speaking." CI-2 replied, "Oh, yes, the guy

[UCA-1] is a little bit behind [running late] and I'm checking out how we can work this out. I'll be calling you shortly." REYNA-TELLEZ stated, "Okay."

533. On or about August 12, 2014, at approximately 12:49 p.m., CI-2 had a consensually recorded call with REYNA-TELLEZ, who was using Reyna-Tellez Phone 1. During the call, CI-2 stated, "Hey, primo, this guy [UCA-1] won't be able to do it [receive narcotics proceeds] today. Can you do it tomorrow around noon?" REYNA-TELLEZ replied, "Yes, that's fine."

534. On or about August 12, 2014, between approximately 1:32 p.m. and 1:33 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, PARRA-PEDROZA asked, "What's up?" CI-2 replied, "That he [REYNA-TELLEZ] can [deliver] tomorrow." PARRA-PEDROZA replied, "Okay."

535. On or about August 13, 2014, between approximately 9:48 a.m. and 10:01 a.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During this exchange, CI-2 stated, "Walter [PARRA-PEDROZA], give me a call. [UCA-1's first name] says he's not receiving [narcotics proceeds from REYNA-TELLEZ], that he's not the one who's going to receive." PARRA-PEDROZA responded, "No, then no. It's delicate [REYNA-TELLEZ and associates do not want to deliver the narcotics proceeds to anyone other than UCA-1 or CI-2]. . . . Thing is they [REYNA-TELLEZ's associates] have been bringing [narcotics proceeds] to you for a long time." CI-2 stated, "Then say no [cancel the delivery] to avoid problems."

536. On or about August 14, 2014, agents met with REYNA-TELLEZ at Reyna-Tellez Residence 1, where surveillance twice observed REYNA-TELLEZ on July 25, 2014. During this meeting, REYNA-TELLEZ identified himself as "Luis Reyna-Tellez" and stated that he was the lone resident of Reyna-Tellez Residence 1. REYNA-TELLEZ also provided agents with written consent to search Reyna-Tellez Residence 1, which is a one-bedroom apartment. During the search, agents discovered approximately \$210,960 in bundled cash found concealed underneath a dresser in REYNA-TELLEZ's bedroom of the apartment.

537. Based on my familiarity with this case, including the aforementioned calls and communications between PARRA-PEDROZA and CI-2, I believe that the \$210,960 in cash seized from REYNA-TELLEZ's residence on August 14, 2014, were the same narcotics proceeds that REYNA-TELLEZ intended to deliver to CI-2, at the direction of PARRA-PEDROZA.

**XXXVIII. PARRA-PEDROZA Directs CI-2 and UCA to Collect and Launder Approximately \$100,000 in Narcotics Proceeds from SANANTONIO and RUIZ (August 26, 2014).**

538. On or about August 19, 2014, between approximately 4:28 p.m. and 7:04 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Blackberry PIN 26769474 ("Parra-Pedroza Device 2").<sup>58</sup> During this exchange,

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<sup>58</sup> Agents identified PARRA-PEDROZA as the user of Parra-Pedroza Device 2 as follows: On or about August 13, 2014, CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange, PARRA-PEDROZA told CI-2 that he was getting a new phone. On or about August 14, 2014, PINEDA-SANCHEZ exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange, PARRA-PEDROZA told PINEDA-SANCHEZ that he was going to send PINEDA-SANCHEZ a BBM invitation and instructed PINEDA-SANCHEZ to accept the invitation. Shortly thereafter, PINEDA-SANCHEZ received a BBM message from

PARRA-PEDROZA stated, "Look at the sheet [email] that I sent you." CI-2 asked, "Did you send it to me in the email?" PARRA-PEDROZA replied, "Yes." CI-2 later stated, "There's nothing in the mail [UC Email Address]." PARRA-PEDROZA responded, "Oh damn. Hold on. . . . I'll send it to you again later on."

539. On or about August 19, 2014, at 9:35 p.m., UC Email Address received an email from email account daniel.primos.tocayo@hotmail.com ("Parra-Pedroza Email Account 2"). The body of this email stated:

62=0

83=1

71=2

49=3

57=4

66=5

35=6

21=7

18=8

96=9

Make an appointment = let's go to the beach

Appointment was made = it's warm

Which day = [depends on the day]

I am on my way = the beers are cold

I am on my way back = I'm with my wife

I am verifying = I have diarrhea

Mercedes = ticket is complete

Hamburger = is missing/short

It's fucked up = I like your sister

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Parra-Pedroza Device 2. PINEDA-SANCHEZ then exchanged a series of BBMs with PARRA-PEDROZA, who was using MLO Device 1. During the exchange over MLO Device 1, PINEDA-SANCHEZ confirmed the screen name for Parra-Pedroza Device 2 and asked who would be using the new device (Parra-Pedroza Device 2). PARRA-PEDROZA responded, "It's my new bb." Between August 14 and 19, 2014, CI-2 received a BBM invitation from Parra-Pedroza Device 2. This was the only BBM invitation that CI-2 received following CI-2's August 13 BBM exchange with PARRA-PEDROZA regarding PARRA-PEDROZA getting a new phone. Between August 14, 2014 and August 19, 2014, CI-2 began communicating with PARRA-PEDROZA over Parra-Pedroza Device 2.

They are following me and I have money with me = let's go to the  
movie theater  
Monday = Red  
Tuesday = Yellow  
Wednesday = Green  
Thursday = White  
Friday = Blue  
Saturday = Black  
Sunday = Purple

540. On or about August 19, 2014, between approximately 9:36 p.m. and 9:40 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 2. During this exchange, PARRA-PEDROZA stated, "I already sent you the codes, but from a different email address. I put a different member of the family ["daniel.primos.tocayo" of Parra-Pedroza Email Account 2]."

CI-2 responded, "Okay." PARRA-PEDROZA stated, "Make a small copy [of the codes] and laminate it."

541. On or about August 21, 2014, between approximately 8:30 a.m. and 12:48 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 2. During this exchange, PARRA-PEDROZA asked, "Do you have the codes already?" CI-2 responded, "Yes." PARRA-PEDROZA stated, "Okay. To use those already when we need to. . . . Did you learn them already?"

CI-2 responded, "Um . . . almost." PARRA-PEDROZA stated, "Ha-ha. Okay."

542. On or about August 21, 2014, between approximately 8:42 p.m. and 8:44 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 2. During this exchange, PARRA-PEDROZA stated, "The red one [Monday, August 25, 2014] we'll start with 2 orders. . . . One is of 66 62 62 [500,

possibly meaning \$500,000] and the other one of 96 62 62 [900, possibly meaning \$900,000]. . . . Let's see if we can work all the colors [pick up narcotics proceeds every day of the week]. [UCA-1] and his brother go to the beach [make an appointment] the whole week." CI-2 responded, "Okay."

543. On or about August 25, 2014, at approximately 12:21 p.m., CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Parra-Pedroza Device 2. Following this exchange, agents reviewed the exchange and documented several of the messages. During this exchange, PARRA-PEDROZA stated, "21-21-96-57-49-66-57-49-83-21 [phone number 779-435-4317 (Sanantonio Phone 1)] with Gallo from Douglas. [UCA-1] call. \$83-62-62 [\$100,000]."

544. On or about August 26, 2014, at approximately 11:15 a.m., UCA-1 had a consensually recorded call with man believed to be Ernesto RUIZ,<sup>59</sup> who was using telephone number (779) 435-4317 ("Sanantonio Phone 1"). During the call, UCA-1 stated, "Yeah, I'm calling on behalf of Gallo [codename provided by PARRA-PEDROZA]." RUIZ responded, "Yeah, what's up?" UCA-1 asked, "Got some tickets [narcotics proceeds] to drop off today?" RUIZ stated, "Yeah man." RUIZ and UCA-1 discussed meeting each other later that day near the intersection of Interstate-55 and Illinois Route 30.

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<sup>59</sup> As discussed below, during an interview later this same day, SANANTONIO told agents that he received Sanantonio Phone 1 from RUIZ on August 26, 2014. SANANTONIO stated that RUIZ told him that an individual (UCA-1) would be calling on Sanantonio Phone 1 with the code word "El Gallo" and directed SANANTONIO to deliver \$100,000 to that individual. During the interview, agents showed SANANTONIO an Illinois driver's license photo of "Ernesto Ruiz." SANANTONIO confirmed the identity of RUIZ and told agents that RUIZ is his boss.



545. On or about August 26, 2014 between approximately 12:52 p.m. and 1:00 p.m., UCA-1 placed two calls to SANANTONIO, who was using Sanantonio Phone 1.<sup>60</sup> Only UCA-1's side of the conversation was recorded. During these calls, UCA-1 stated, "Yeah, I'm calling on behalf of Gallo." According to UCA-1, SANANTONIO and UCA-1 agreed to meet each other at approximately 1:30 p.m. at a Target store located on Illinois Route 30 in Joliet near the Joliet mall, and SANANTONIO advised that he was driving a grey car.

546. At approximately 1:15 p.m., surveillance observed SANANTONIO depart a residence at 560 Ohio Street in Joliet ("Sanantonio Residence 1") carrying a large shopping bag. Surveillance observed SANANTONIO enter a silver vehicle, which was registered in his name at Sanantonio Residence 1, and departed the area.

547. At approximately 1:15 p.m., a Will County Sheriff's Officer conducted a traffic stop on SANANTONIO's vehicle. During the stop, SANANTONIO presented a Illinois driver's license bearing his photograph and name and admitted to having money in the vehicle. Law enforcement officers observed on the front passenger

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<sup>60</sup> Agents identified SANANTONIO and his voice as follows: As discussed below, on August 26, 2014, UCA-1 had numerous calls with the man who was using Sanantonio Phone 1. During these calls, the user of Sanantonio Phone 1 arranged to meet UCA-1 in person at a Target store located on Illinois Route 30 in Joliet, near the Joliet Mall, at approximately 1:30 p.m. for the purpose of delivering narcotics cash proceeds. Approximately 15 minutes before the scheduled meeting, law enforcement conducted a traffic stop of SANANTONIO, who presented an Illinois driver's license bearing the driver's photograph and the name "Jose Sanantonio." During this stop, SANANTONIO stated that he had \$100,000 in the car and stated that he was en route to deliver the money to an unknown man at the Joliet Mall. At the time of the traffic stop, SANANTONIO was in possession of Sanantonio Phone 1. In a statement to police later that day, SANANTONIO recounted two telephone conversations during which an unknown man who spoke only English (UCA-1) and arranged for the two men to meet at the Joliet Mall.

seat a shopping bag containing a large amount of U.S. currency. SANANTONIO stated that the bag contained approximately \$100,000 and that he was on his way to the Joliet Mall to deliver the money to an unknown man. SANANTONIO also stated that he had an additional \$80,000 stored at Sanantonio Residence 1. SANANTONIO stated that the money in his car and at his residence was narcotics proceeds.

548. Following this stop, SANANTONIO gave law enforcement officers written consent to search Sanantonio Residence 1. During this search, SANANTONIO led agents to a box beside his bed in the basement apartment. SANANTONIO stated that the box contained approximately \$80,000, but agents later determined that the total was approximately \$122,000.

549. SANANTONIO then agreed to speak with agents at the Will County Sheriff's Office. Prior to this interview, agents advised SANANTONIO of his *Miranda* rights. SANANTONIO signed a written waiver of those rights and agreed to speak with agents. SANANTONIO also gave agents written consent to search a cell phone found on his possession at the time of the traffic stop, and agents found that this phone was Sanantonio Phone 1. During this interview, SANANTONIO stated that:

a. On or about August 12, 2014, ERNESTO RUIZ delivered approximately \$200,000 to SANANTONIO at Sanantonio Residence 1.

SANANTONIO and RUIZ hand counted the money.<sup>61</sup> RUIZ was supposed to pay SANANTONIO \$1,000 for his assistance, but did not.

b. On August 26, 2014, RUIZ again stopped by Sanantonio Residence 1 with approximately \$30,000. RUIZ also gave SANANTONIO Sanantonio Phone 1 and stated that someone would be calling to arrange for a meeting. RUIZ stated that the caller would ask to speak with "El Gallo." RUIZ instructed SANANTONIO to make arrangements to deliver \$100,000 to the individual.

c. A short while later, SANANTONIO received a telephone call on Sanantonio Phone 1. The caller spoke only English and asked to speak to "El Gallo." SANANTONIO and the man initially agreed to meet at the Target store in Joliet, but the man called back a short while later and asked him for his vehicle description and changed the meet location to the Joliet Mall. SANANTONIO stated RUIZ has paid him approximately \$5,000 for delivering this money.

d. SANANTONIO believes that all the money that he has received and delivered on behalf of RUIZ is money that RUIZ earned from the sale of narcotics.

550. SANANTONIO was released without charges so as not to compromise the ongoing investigation.

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<sup>61</sup> During this interview, agents showed SANANTONIO a Illinois driver's license photograph of RUIZ, and SANANTONIO identified RUIZ as the man who provided him with the money.

**XXXXI. PARRA-PEDROZA Directs CI-2 and UCA-1 to Collect and Launder Approximately \$140,000 in Narcotics Proceeds from DURBIN (August 28, 2014).**

551. On or about August 28, 2014, at approximately 12:16 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using telephone number 52-333-452-1847 ("Parra-Pedroza Phone 12"). During this call, PARRA-PEDROZA stated, "Hey. I have a client. . . . For right now." CI-2 stated, "Let me call [UCA-1] to see what he says. What about tomorrow?" PARRA-PEDROZA stated, "No, because he's [money courier later identified as VIRGIL DURBIN<sup>62</sup>] going out of town [traveling to Chicago from Kentucky]. That's why I was telling you yesterday, I'm going to give you this number, he's going out of town. They're watching us to make sure nothing goes wrong. . . . These new people [associates providing narcotics proceeds], they're laid back, but they want to see, since this dude [DURBIN] is here to deliver. It's fourteen times one hundred, [\$140,000] right? They want to see everything's good, and if everything passes good, then no problem, you are not the ones [under police surveillance] and it has to be today. . . . I'm going to send them [UCA-1's] number and they're going to call him. . . . Just tell him [UCA-1] it has to be for today, so that way we can cleanse ourselves from the

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<sup>62</sup> Agents identified VIRGIL DURBIN as follows. As discussed below, on or about August 28, 2014, UCA-1 met with a man in the parking lot of a Target store located at 7601 South Kingery Highway in Willowbrook, Illinois, for the purpose of collecting narcotics proceeds. Agents conducting surveillance subsequently viewed a Kentucky driver's license photograph of "Virgil Durbin," and positively identified DURBIN as the individual who delivered narcotics proceeds to UCA-1 on August 28, 2014. In addition, DURBIN arrived at the meeting in a vehicle that, according to a law enforcement database, is registered to a holding company that owns Enterprise rental cars ("Durbin Vehicle 1"). According to Enterprise records, at the time of this August 28, 2014, meeting, Durbin Vehicle 1 had been rented to Individual Z at a branch in Bardstown, Kentucky. According to a database that tracks publicly filed information, Individual Z is DURBIN's wife).

other one [prove to PARRA-PEDROZA's associates that CI-2 was not responsible for law enforcement's seizure of \$220,000 from SANANTONIO]."

552. On or about August 28, 2014, at approximately 1:52 p.m., UCA-1 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 12. During this call:

a. PARRA-PEDROZA stated, "Hi. I'm Carlos. . . . You can pick up [narcotics proceeds] today or tomorrow?" UCA-1 responded, "Well, I don't know. I'd like to talk to you about that. [CI-2's nickname] told me what happened yesterday [money seizure from SANANTONIO] and it makes me a little nervous." PARRA-PEDROZA stated, "Yeah, this guy [SANANTONIO] tell me, have a problem with the police, but uh, he tell you call two or three times. This is not really, or yes? . . . She tell me, you call with him [SANANTONIO] two or three times. It's really not real, no?" UCA-1 replied, "Yeah. I told you I called him [SANANTONIO] several times because I was waiting in the parking lot and he never showed up. But now I know why [police seized \$220,000 from SANANTONIO] and that kind of concerns me a bit. I don't want to have any problems here."

b. PARRA-PEDROZA stated, "No, no, no, no. Don't have problems, you, me, and [CI-2's nickname]. No, no problems. But the persons of, you call, call with you, the persons of today, another client [DURBIN]? . . . You call with another client today [to schedule collection of narcotics proceeds]?" UCA-1 replied, "Well I have business to take care of today. Unrelated to your and my business."

c. UCA-1 stated, "Well you know, I'd really like us to sit down and talk about the details of our business before I pick up again because, again, I know what happened yesterday and that concerns me a bit. So, I'd like to sit down with you and talk things out first before we do any more ticket [narcotics proceeds] pickups." PARRA-PEDROZA stated, "Okay, a little bit understand. Let me, one hour and I call you." UCA-1 stated, "Okay. Maybe you can bring the girl back [to interpret for PARRA-PEDROZA and UCA-1]. What was her name, [Individual M's first name]?" PARRA-PEDROZA stated, "Yeah, [Individual M], yeah. [Individual M] call me, one hour with me."

553. On or about August 28, 2014, at approximately 2:25 p.m., UCA-1 had a consensually recorded call with an unidentified female ("UF-1"), who was using telephone number 52-333-828-6827 ("UF-1 Phone 1"). During the call:

a. UF-1 stated, "Somebody gave me this [UCA-1's] number and tell me. I think it is [CI-2's nickname]. Let me see. They told me to call, [UCA-1's first name], hold on." UCA-1 stated, "This is [UCA-1's first name]. Who is this?" UF-1 stated, "Oh, this is [UCA-1]? They told me to call you. Okay, somebody. My driver [DURBIN] is on his way. I don't know if you know that somebody is going to pick up, sorry, not to pick up, to deliver some letters [narcotics proceeds]. . . . Somebody told me to call. My driver [DURBIN] is on his way. He speaks only English. He told me to call you because he was thinking you speak Spanish. So let me tell him [DURBIN] to call you. Let me tell you what he needs, to get close to, you know, to

where you are. I don't know, like a Walmart, or a plaza, or a restaurant [a location where the DURBIN can meet UCA-1 to deliver the narcotics proceeds]."

b. UCA-1 asked, "Who told you I was picking up letters [receiving narcotics proceeds] today? I was unaware of that." UF-1 stated, "Oh, you did not know. Oh, okay. Let me call back. Because they gave me this number [UCA-1's number]. They told me to call [UCA-1's first name]. That [CI-2's nickname] gave this number." UF-1 and UCA-1 agreed to speak again later.

554. On or about August 28, 2014 at approximately 2:48 p.m., UCA-1 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 12. During this call, PARRA-PEDROZA stated, "[Individual M] is here." A female believed to be Individual M stated, "Hi [UCA-1]?" UCA-1 stated, "Somebody [UF-1] just called me twenty minutes ago and asked where I was to drop of some letters [narcotics proceeds]. I don't know anything about this, so if he can tell me what's going on, I'd appreciate that." Individual M stated, "Oh yeah. He [PARRA-PEDROZA] is telling me that that's okay. That someone is going to, that that person [UF-1] was going to call you." This call was disconnected.

555. On or about August 28, 2014 at approximately 2:48 p.m., UCA-1 had a consensually recorded call with Individual M, who was using Parra-Pedroza Phone 12. During this call:

a. Individual M stated, "He [PARRA-PEDROZA] is asking me if you're going to meet the person [DURBIN] that called you early this morning." UCA-1 responded, "Because I respect Carlos and the business we have together, yes

I will. But I'd like to negotiate six points [6% commission] for this transaction just because it's last minute and things have been chaotic the last few days. . . . [A]sk Carlos if he's okay with six points on this transaction. Just because things have been so chaotic the last few days and this is a last minute thing for me. . . . My commission. My take. . . . My compensation for doing this today." Individual M stated, "Carlos is telling me that he can't give you more money because the business is not working like that, but he's telling me that he can provide you with a person that is going to call you, like forever. He's the only one that's going to call you [UCA-1 would be dealing with the same money courier for all future deliveries of narcotics proceeds]."

b. UCA-1 stated, "Make sure the other person [DURBIN or UF-1] calls me back, so I can meet up with him today." Individual M stated, "Okay. I'll call you back."

556. On or about August 28, 2014, at approximately 3:34 p.m., UCA-1 had a consensually recorded call with UF-1, who was using UF-1 Phone 1. During this call, UF-1 stated, "I'm calling back. They [PARRA-PEDROZA] told me that they confirmed you, about the mail [collection of narcotics proceeds]." UCA-1 responded, "Yeah. Five o'clock today, is that good?" UF-1 responded, "Let me see because, he's [DURBIN] going all the way down, out there from Kentucky. Let me call him right now and ask if he can be there at five o'clock, okay?" UCA-1 asked, "He's coming from where? Kentucky?" UF-1 responded, "Yes." UF-1 later stated, "I'm going to give him [DURBIN] your number. He's an American." UCA-1 asked, "How many



tickets, or letters [narcotics proceeds] are we looking at?" UF-1 responded, "One-forty [\$140,000]."

557. Between approximately 6:05 p.m. and 6:08 p.m., UCA-1 exchanged two text messages with UF-1, who was using UF-1 Phone 1. During this exchange, UCA-1 advised that he was located at 7601 South Kingery Highway in Willowbrook, Illinois. UF-1 stated that her associate with the narcotics proceeds was driving a burgundy Toyota Corolla.

558. On August 28, 2014, at approximately 6:20 p.m., UCA-1 and DURBIN met in the parking lot of a Target store located at 7601 South Kingery Highway in Willowbrook. Prior to this meeting, agents outfitted UCA-1 with a concealed audio recording device and surveillance agents video recorded the meeting. Surveillance observed DURBIN and Individual Z arrive in Durbin Vehicle 1 (a 2014 red Toyota Corolla) and park next to UCA-1's vehicle. Surveillance then observed DURBIN exit the car, retrieve a medium size dark grey duffle bag from the backseat, place the duffle inside the rear cargo area of UCA-1's vehicle, and empty the contents. During this meeting:

a. DURBIN stated, "Long drive, long drive." UCA-1 asked, "You got some tickets [narcotics proceeds]?" DURBIN responded, "Yeah, I got." UCA-1 asked, "I heard you drove all the way up from Kentucky?" DURBIN responded, "Yeah."

b. DURBIN stated, "You want to set it in there and I'll, I'll let you take this [wrapped money] out. I don't want to touch the bag." UCA-1 asked, "How

much we got in here?" DURBIN replied, "It was, uh, one-forty [\$140,000], it was, uh, forty-one, five [\$141,500], and he [DURBIN's associate] took fifteen out. Fifteen hundred [\$1,500 was removed prior to the delivery]."

c. UCA-1 stated, "Oh, it's all wrapped up." DURBIN responded, "There's a tag on it, what it says." UCA-1 asked, "You guys count it? It's all there. I don't want to get fucked [shorted on the agreed delivery amount], you know what I'm saying?" DURBIN responded, "Oh yeah. I got you. I say it's right." UCA-1 stated, "I'm going to have to trust you on this one, pal. I'm not ripping through all that shit [plastic wrapping]." DURBIN stated, "Oh, no. He's got it wrapped hard."

d. DURBIN stated, "There's a number on it. You know what I'm saying?" UCA-1 stated, "I'm not going to dick around here too long." DURBIN stated, "Yeah. I got a long drive." UCA-1 asked, "You got to go all the way back?" DURBIN responded, "Yeah." UCA-1 asked, "They don't have any friends down there [Kentucky] to do this [launder narcotics proceeds]?" DURBIN responded, "I don't know."

559. Following this meeting, UCA-1 drove to the HSI Chicago Field Office where agents retrieved from UCA-1's vehicle a medium size dark grey duffle bag containing approximately \$140,000 in cash, wrapped tightly in plastic and tin foil with a blue sticky note. The number "140,000" was hand written on the note. At the HSI Chicago Field Office, a canine trained to detect the odor of narcotics sniffed the money and alerted positive for the presence of narcotics.

560. On or about August 28, 2014, at approximately 7:09 p.m., CI-2 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 12. During the call, PARRA-PEDROZA stated, "Now they [DURBIN's associates] called me. That they already saw [UCA-1]." CI-2 responded, "Now, he [UCA-1] just called, too. They already saw him. They are going to see." PARRA-PEDROZA asked, "To verify [count the money]?" CI-2 responded, "Uh-huh."

561. On or about August 28, 2014 at approximately 8:56 p.m., UCA-1 had a consensually recorded call with PARRA-PEDROZA, who was using Parra-Pedroza Phone 12. During this call, PARRA-PEDROZA stated, "Hi [UCA-1]. I'm Carlos. . . . The tickets?" UCA-1 responded, "Yes. I got the tickets today. Everything went smooth." PARRA-PEDROZA asked, "The tickets, the ticket is correct [DURBIN delivered the agreed upon \$140,000 in narcotics proceeds]?" UCA-1 responded, "Yes. There was a hundred and forty tickets [\$140,000]." PARRA-PEDROZA responded, "Okay."

562. On or about August 29, 2014, at the direction of PARRA-PEDROZA, agents wire transferred approximately \$134,400 of the proceeds obtained from DURBIN into Subject Bank Account 2.

563. On or about August 29, 2014, CI-2 exchanged a series of BBMs with PARRA-PEDROZA, who was using Blackberry PIN 22767637 ("Parra-Pedroza Device 3").<sup>63</sup> During this exchange, CI-2 stated PARRA-PEDROZA asked, "Did they

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<sup>63</sup> Agents identified PARRA-PEDROZA as the user of Parra-Pedroza Device 3 as follows: On or about August 28, 2014, CI-2 had several consensually recorded calls with PARRA-PEDROZA, who was using Parra-Pedroza Phone 12. During these calls, CI-2 and PARRA-PEDROZA discussed PARRA-PEDROZA's new Blackberry device. PARRA-

[UCA-1] send the mail [wire the money] already?" CI-2 replied, "Hold on, let me ask. The mail [money] was sent out [wired] already."

**XL. PINEDA SANCHEZ and PARRA-PEDROZA Directed CI-2 to Collect and Launder Narcotics Proceeds on at least 49 Separate Occasions Between June 2, 2013, and August 28, 2014.**

564. Between June 2, 2013, and August 28, 2014, and in the course of CI-2's cooperation with law enforcement, PINEDA SANCHEZ, PARRA-PEDROZA, ABEL, LOERA ALVARADO, or other individuals working on their behalf directed CI-2, UCA-1, and UCA-2 to collect and launder narcotics proceeds on approximately 49 separate occasions, including those discussed above. Specifically, PINEDA SANCHEZ, PARRA-PEDROZA, ABEL, LOERA ALVARADO, or others working on their behalf, directed CI-2, UCA-1, and UCA-2 to collect the following approximate amounts of narcotics proceeds on the following dates, in furtherance of this money laundering scheme:

\$53,475	June 2, 2013
\$110,000	June 5, 2013
\$30,010	June 10, 2013
\$98,999	June 11, 2013
\$283,740	June 25, 2013
\$110,000	June 28, 2013

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PEDROZA told CI-2 that he had a new Blackberry, but it wasn't working yet and that he was taking it to get it checked out. On August 28, 2014, agents emailed CI-2's new Blackberry PIN to PARRA-PEDROZA in a newly created email address provided to CI-2 by PARRA-PEDROZA. According to CI-2, PARRA-PEDROZA is the only person that CI-2 provided with CI-2's new Blackberry PIN. In another consensually recorded call, CI-2 told PARRA-PEDROZA in a recorded call that he/she had not received PARRA-PEDROZA's BBM invitation. PARRA-PEDROZA told CI-2 that he would resend the invitation to CI-2 using the new device. On or about August 29, 2014, CI-2 received a BBM invitation from Parra-Pedroza Device 3. This was the only BBM invitation that CI-2 received following the August 28 calls with PARRA-PEDROZA. On or about August 29, 2014, at approximately 10:47 a.m., CI-2 began communicating with PARRA-PEDROZA over Parra-Pedroza Device 3.

\$139,470	July 10, 2013
\$29,990	July 16, 2103
\$200,780	July 24, 2104
\$290,704	September 12, 2013
\$100,220	September 13, 2013
\$100,500	September 20, 2013
\$50,000	September 20, 2013
\$104,480	September 25, 2013
\$120,000	September 27, 2013
\$89,980	October 11, 2013
\$50,000	October 24, 2013
\$100,075	October 24, 2013
\$28,980	November 4, 2013
\$173,133	November 7, 2013
\$69,990	November 13, 2013
\$40,000	November 14, 2013
\$32,000	December 4, 2013
\$50,020	December 10, 2013
\$50,000	December 10, 2013
\$20,000	December 12, 2013
\$51,750	December 16, 2013
\$62,000	January 13, 2014
\$66,990	January 14, 2014
\$107,280	January 17, 2014
\$150,000	January 22, 2014
\$110,000	January 22, 2014
\$8,000	February 24, 2014
\$59,960	February 27, 2014
\$43,036	March 4, 2014
\$63,600	March 11, 2014
\$37,220	March 27, 2014
\$100,020	March 31, 2014
\$9,900	June 18, 2014
\$80,000	June 25, 2014
\$62,350	July 16, 2014
\$87,000	July 18, 2014
\$138,860	July 23, 2014
\$143,980	July 25, 2014
\$132,000	August 5, 2014
\$100,000	August 8, 2014
\$270,000	August 15, 2014
\$100,000	August 26, 2014
\$140,000	August 28, 2014

565. In the course of CI-2's cooperation with law enforcement, PINEDA SANCHEZ, PARRA-PEDROZA, ABEL, LOERA ALVARADO, or others working on their behalf have directed CI-2, UCA-1, and UCA-2 to collect and launder approximately \$4,650,492 in narcotics cash proceeds. In addition, according to CI-2, between August 2011 and October 2012, PINEDA SANCHEZ, PARRA-PEDROZA, or others working on their behalf directed CI-2 to collect and launder another approximately \$23 million in narcotics proceeds prior to CI-2's cooperation with law enforcement.

566. Refinery A records show that the refiner received the shipments of gold that agents shipped under the fictitious company name "Chicago Gold" (which name CI-2 created at the direction of PARRA-PEDROZA), and issued payment for that gold to a Mexican company called "Shopping Silver S.A. de C.V." As noted above, Shopping Silver was one of the shipper names that PARRA-PEDROZA directed CI-2 to use, prior to CI-2's cooperation with law enforcement, when CI-2 shipped gold purchased with narcotics proceeds to Refinery A. According to Refinery A records, between September 6, 2011, and January 28, 2014, the refiner received approximately \$98.7 million worth of gold in Shopping Silver's name. Based on my familiarity with this case, including the aforementioned records from Refinery A, I believe that PINEDA SANCHEZ, PARRA-PEDROZA, or others working on their behalf directed U.S.-based members of the Parra-Pedroza MLO, including CI-2, to collect and launder over \$98.7 million worth of narcotics proceeds through the

purchase of gold, which those U.S.-based members in turn sent to Refinery A under the name Shopping Silver.

567. Based on the foregoing, I believe that, between August 2011 and September 2014, PINEDA SANCHEZ, PARRA-PEDROZA, or others working on their behalf directed CI-2, UCA-1, and other U.S.-based members of the Parra-Pedroza MLO to collect and launder over \$101 million in narcotics cash proceeds, including: (a) over \$98.7 million, which was subsequently used to purchase gold that was sent to Refinery A; (b) approximately \$1,483,789, which was seized from couriers by law enforcement before reaching CI-2 or UCA-1; (c) approximately \$588,787, which was wire transferred to Subject Bank Account 2; and (d) approximately \$322,116, all but a small percentage of which was subsequently used to purchase gold that was shipped to Refinery B.

### CONCLUSION

568. Based on the foregoing, I respectfully submit that there is probable cause to believe that beginning in or about August 2011, and continuing until at least in or about September 2014, DIEGO PIENDA SANCHEZ, CARLOS PARRA-PEDROZA, JOSE ABEL MENDOZA-PARRA, MARIA LOERA ALVARADO, ERNESTO RUIZ-RAMIREZ, MARIO HERRERA, ANTHONY LEIVA, TEODOCIO CARO, LUIS REYNA-TELLEZ, HECTOR CHAVEZ CUEVAS, JUAN CARLOS NUNEZ GALVEZ, JOSE SANANTONIO, PEDRO SAUCEDO-PALOMINOS, OMAR LOPEZ-CABRERA, VIRGIL DURBIN, VALENTIN RODRIGUEZ, ALMA LORENA ORTIZ DE ROSAS VERA, CASMIRO ISAIAS-PADILLA, EFREN MOTA,

FELIX LEMUS-GUEVARA, PEDRO URQUIZA-OSORIO, LUIS ARMANDO ACOSTA VIZCARRA, OSCAR MONTES-LAMAS, JOEL ESTRADA, HARRANAH SAMORI, GABRIEL SALCEDO, TOMAS SALGADO REYNA, OSCAR ACOSTA, FEDERICO BARRERA-PEREZ, EMMANUEL DIAZ, JOSE HERNANDEZ OCHOA, and ALFONSO NEVAREZ, together with others known and unknown, conspired to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, namely, the delivery of quantities of United States currency to third parties, which transactions involved the proceeds of specified unlawful activity, namely the felonious buying and selling and otherwise dealing in a controlled substance, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code,



Section 1956(a)(1)(B)(i), all in violation of Title 18, United States Code,  
Section 1956(h).

FURTHER AFFIANT SAYETH NOT.

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Jill N. Dennewitz  
Special Agent  
Homeland Security Investigations

SUBSCRIBED AND SWORN to before me on February 9, 2015.

*Daniel G. Martin*  
DANIEL G. MARTIN  
United States Magistrate Judge