

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

**SEALED**  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA

2025 OCT 21 PM 3:07

OFFICE OF THE CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ALFREDO PINTO-MENDOZA, JUAN  
MANUEL GOUVEIA-AGUILERA,  
YOINBER ALFONSO MOREY MOREY,  
FRAYNER ESMITH JIMINEZ-GOMEZ,  
YEREMY JOSUE TARAZONA-PAEZ,  
ANGEL ARGENIS MARTINEZ PERALTA,  
GUSTAVO ARTURO PUERTA COLINA,  
CRISTHIAN ALEXANDER MUNOZ  
PEREZ, DYFRED JOFIEL REYES-  
PALACIOS, EYDER BUENO FRANCIA,  
CRISTIAN MANUEL TOVAR-OLIVARES,  
SNAIDER STHIFERSON CASTRO  
HIDALGO, JOSE ANTONIO ALIENDRES  
GARCIA, YOHALEX GARCIA-  
VALLADARES, ALEXANDER JOSE  
MAYORA-BLANCO, JOHAN RODRIGUEZ-  
HERNANDEZ, IVAN JOSE ANGULO  
FLORES, JOSE DAVID ALVAREZ-  
JIMENEZ, MARIA RIOS-AREVALO A/K/A  
MARIA R. BETANIA, DARWIN DANIEL  
SALINAS-VICTORRA, JOVITO  
BRAKWAITTE-BLANCO, ANIBEL DEL  
VALLE RIVAS GONZALEZ, EDUAR  
JESUS PAEZ AVENDANO, GUSTAVO  
ENRIQUE SOCORRO PINO, RAYMUNDO  
SANTIAGO OLGUIN, JOSE RAFAEL  
VILLASMIL-SALAS, JESHUA ESCALONA  
MATA, JHONELIER JESUS TOVAR  
DURAN, DAVID RAMIRO FALLO-  
SANTONICOLA, JOEL ALEJANDRO  
MORANTES LEAL, ENDIS DANIEL  
GONZALEZ ORTEGA, and YENDRY  
ALEXANDRA ACOSTA GARCIA,

Defendants.

8:25CR190

SUPERSEDING  
INDICTMENT

18 U.S.C. § 1349

18 U.S.C. § 371

18 U.S.C. § 1344

18 U.S.C. § 2113(a)

18 U.S.C. §§ 1030(a)(5), (c)(4)(A)

The Grand Jury charges that

### **INTRODUCTION**

At times relevant to this Indictment:

1. "Malware" is an abbreviated term for "malicious software." Malware refers to software programs designed to damage or do other unwanted actions on a computer system.
2. A jackpotting attack is a type of cyberattack where criminals exploit vulnerabilities in Automated Teller Machines ("ATMs") by using malware to force the ATMs to dispense cash without debiting an account.

### **FINANCIAL INSTITUTIONS**

3. The following banks were insured by the Federal Deposit Insurance Corporation:
  - a. Premier Bank
  - b. Arbor Bank
  - c. West Gate Bank
  - d. Iowa State Savings Bank
  - e. Oklahoma Heritage Bank
  - f. McCook National Bank
  - g. Adams County Bank
  - h. Dundee Bank
  - i. Adrian Bank
  - j. Five Points Bank
  - k. Baker Boyer Bank
  - l. Cornhusker Bank
  - m. Heritage Bank

- n. Columbus Bank & Trust
- o. Iowa Trust & Savings Bank
- p. Farmers and Merchants Bank
- q. Cornerstone Bank
- r. Heartland Bank
- s. Points West Bank
- t. Bank of the Sierra

4. The following credit unions were insured by the National Credit Union Administration Board:

- a. Mountain America Credit Union
- b. Heartland Credit Union
- c. Washington State Employees Credit Union
- d. 5 Star Community Credit Union
- e. AmeriCU Credit Union
- f. Foothills Federal Credit Union
- g. High Point Federal Credit Union
- h. First Source Federal Credit Union
- i. Blue Ox Credit Union
- j. North Platte Union Pacific Employee Community Credit Union
- k. Trius Federal Credit Union
- l. Merced School Employees Federal Credit Union

**COUNT I**  
CONSPIRACY TO COMMIT BANK FRAUD

5. Paragraphs 1-4 are hereby incorporated and re-alleged herein.

6. From on or about January 1, 2024 and continuing through on or about August 1, 2025, in the District of Nebraska and elsewhere, including Venezuela, Colombia, and Mexico, the defendants, ALFREDO PINTO-MENDOZA, JUAN MANUEL GOUVEIA-AGUILERA, YOINBER ALFONSO MOREY MOREY, FRAYNER ESMITH JIMINEZ-GOMEZ, YEREMY JOSUE TARAZONA-PAEZ, ANGEL ARGENIS MARTINEZ PERALTA, GUSTAVO ARTURO PUERTA COLINA, CRISTHIAN ALEXANDER MUNOZ PEREZ, DYFRED JOFIEL REYES-PALACIOS, EYDER BUENO FRANCIA, CRISTIAN MANUEL TOVAR-OLIVARES, SNAIDER STHIFERSON CASTRO HIDALGO, JOSE ANTONIO ALIENDRES GARCIA, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, JOHAN RODRIGUEZ-HERNANDEZ, IVAN JOSE ANGULO FLORES, JOSE DAVID ALVAREZ-JIMENEZ, MARIA RIOS-AREVALO A/K/A MARIA R. BETANIA, DARWIN DANIEL SALINAS-VICTORRA, JOVITO BRAKWAITTE-BLANCO, ANIBEL DEL VALLE RIVAS GONZALEZ, EDUAR JESUS PAEZ AVENDANO, GUSTAVO ENRIQUE SOCORRO PINO, RAYMUNDO SANTIAGO OLGUIN, JOSE RAFAEL VILLASMIL-SALAS, JESHUA ESCALONA MATA, JHONELIER JESUS TOVAR DURAN, DAVID RAMIRO FALLO-SANTONICOLA, JOEL ALEJANDRO MORANTES LEAL, ENDIS DANIEL GONZALEZORTEGA, and YENDRY ALEXANDRA ACOSTA GARCIA, and others known and unknown to the Grand Jury did knowingly and willfully conspire, combine, confederate and agree among each other and with other persons to execute a scheme to defraud a financial institution in violation of Title 18, United States Code, Section 1344.

7. It was part of the conspiracy for the defendants, ALFREDO PINTO-MENDOZA, JUAN MANUEL GOUVEIA-AGUILERA, YOINBER ALFONSO MOREY MOREY,

FRAYNER ESMITH JIMINEZ-GOMEZ, YEREMY JOSUE TARAZONA-PAEZ, ANGEL ARGENIS MARTINEZ PERALTA, GUSTAVO ARTURO PUERTA COLINA, CRISTHIAN ALEXANDER MUNOZ PEREZ, DYFRED JOFIEL REYES-PALACIOS, EYDER BUENO FRANCIA, CRISTIAN MANUEL TOVAR-OLIVARES, SNAIDER STHIFERSON CASTRO HIDALGO, JOSE ANTONIO ALIENDRES GARCIA, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, JOHAN RODRIGUEZ-HERNANDEZ, IVAN JOSE ANGULO FLORES, JOSE DAVID ALVAREZ-JIMENEZ, MARIA RIOS-AREVALO A/K/A MARIA R. BETANIA, DARWIN DANIEL SALINAS-VICTORRA, JOVITO BRAKWAITTE-BLANCO, ANIBEL DEL VALLE RIVAS GONZALEZ, EDUAR JESUS PAEZ AVENDANO, GUSTAVO ENRIQUE SOCORRO PINO, RAYMUNDO SANTIAGO OLGUIN, JOSE RAFAEL VILLASMIL-SALAS, JESHUA ESCALONA MATA, JHONELIER JESUS TOVAR DURAN, DAVID RAMIRO FALLO-SANTONICOLA, JOEL ALEJANDRO MORANTES LEAL, ENDIS DANIEL GONZALEZ ORTEGA, and YENDRY ALEXANDRA ACOSTA GARCIA, and others known and unknown, to defraud financial institutions by committing jackpotting attacks using the Ploutus malware.

#### MANNER AND MEANS OF THE CONSPIRACY

8. The manner and means by which the defendants and their associates, including members of the conspiracy known and unknown to the Grand Jury, conducted and participated in the conduct of the affairs of the conspiracy included, but are not limited to, the following:

- a. At a time no later than 2017, members of the conspiracy created and came into possession of the malware known as “Ploutus.”
- b. Members of the conspiracy began recruiting other coconspirators to deploy the

Ploutus malware at ATMs throughout the United States.

- c. Members of the conspiracy would identify particular financial institutions and, using encrypted messaging platforms like Telegram or WhatsApp, would direct other members to target those financial institutions.
- d. Members of the conspiracy would obtain keys that were capable of opening ATMs and provide them to other coconspirators.
- e. Members of the conspiracy would provide each other with step-by-step guides on how to deploy jackpotting malware onto ATMs.
- f. Members of the conspiracy would travel in groups and in multiple vehicles to the locations of targeted financial institutions. The vehicles used by the conspiracy would be shared with other groups, and members of the conspiracy would often travel in different groups. Members of the conspiracy would also arrange lodging at hotels or other rental accommodations.
- g. After receiving the locations of the targeted financial institutions, members of the conspiracy would travel to ATMs at the selected financial institutions. Members of the conspiracy would often conduct initial reconnaissance of the ATM by taking pictures of the exterior of the ATM and the lock on the ATM, and would note any other external security features such as a metal bar that would prevent members of the conspiracy from opening the ATM. Members of the conspiracy would also often open the hood or door of the ATM and take photographs of the computer within the ATM. Members of the conspiracy would often leave the location of the ATM but remain nearby in an effort to determine if the ATM had an alarm that triggered a law enforcement response,

and whether that alarm had been activated in opening the hood of the ATM. Similarly, members of the conspiracy would often glue or otherwise obstruct the sensors of the ATM to prevent it from deploying an alarm.

- h. Members of the conspiracy would then take steps to deploy the Ploutus malware without authorization on to the ATM either by removing the ATM's hard drive and installing the malware on the hard drive before reinstalling the hard drive into the machine, replacing the ATM's hard drive with a foreign drive pre-loaded with the Ploutus malware, or by connecting an external device such as a thumb drive or raspberry pi device with the malware to then deploy on the ATM's computer.
- i. Members of the conspiracy often received direction and guidance on deploying the Ploutus malware from other coconspirators, including by connecting a laptop to the ATMs or the ATMs' hard drives, allowing other coconspirators to remotely access software to activate the Ploutus malware to complete the ATM jackpotting attack. Members of the conspiracy would also often connect wireless keyboards and mice to the ATM's computer and join video calls with other members of the conspiracy who would provide instructions on how to deploy the Ploutus malware to complete the ATM jackpotting attack.
- j. The Ploutus malware's primary purpose was to issue unauthorized commands associated with the Cash Dispensing Module of the ATM in order to perform unauthorized withdrawals of currency. The malware consists of a number of separate files with different purposes, including: files that interface with the ATM, specifically, the Cash Dispensing Module, and can manipulate the ATM

to perform unauthorized currency withdrawals by sending programmatic instructions to perform dispensing operations within an ATM; files that contain anti-analysis measures to hinder forensic review, specifically software protection utilities to prevent reverse-engineering and debugging; and files that serve the function of deleting the malware from the system in an effort to conceal, create a false impression, mislead, or otherwise deceive employees of the financial institution from learning about the deployment of the malware on the ATM.

- k. If the Ploutus malware was successful and the ATM dispensed currency to members of the conspiracy, the members of the conspiracy would collect the currency and leave the ATM location.
- l. Once the currency had been obtained, members of the conspiracy on scene would often take their share of the criminal proceeds, which were typically a predetermined percentage or amount. The remaining criminal proceeds would then be distributed to other members of the conspiracy in a number of ways, including by using a courier to transport proceeds to other members of the conspiracy, depositing proceeds in bank accounts of Limited Liability Corporations which functioned as funnel accounts for the conspiracy, depositing proceeds in Bitcoin ATMs to remit back to members of the conspiracy, sending proceeds via a money transmitting business to members of the conspiracy, and depositing proceeds in members of the conspiracy's bank accounts and then further disbursing the proceeds via payment applications such as Zelle to other members within the conspiracy, among other methods.

Members of the conspiracy would also be reimbursed for travel expenses, such as gas and accommodations.

#### OVERT ACTS

9. In furtherance of the conspiracy, and to achieve the object and purposes thereof, in the District of Nebraska and elsewhere, the defendants, and others known and unknown to the Grand Jury, performed, aided and abetted the commission of, or caused to be performed the following overt acts, among others:

- a. On or about February 6, 2024, defendant GUSTAVO ENRIQUE SOCORRO PINO, and other individuals known and unknown to the Grand Jury, committed a jackpotting attack at the ATM located at Mountain America Credit Union at 4600 S. Redwood Rd. in Salt Lake City, Utah and obtained approximately \$56,800.
- b. On or about July 5, 2024, through on or about July 6, 2024, defendants RAYMUNDO SANTIAGO OLGUIN and JHONELIER JESUS TOVAR DURAN, and individuals known and unknown to the Grand Jury, committed a jackpotting attack at an ATM located at Heartland Credit Union at 1701 E. 23<sup>rd</sup> Ave. in Hutchinson, Kansas and obtained approximately \$25,000.
- c. On or about July 8, 2024, defendants RAYMUNDO SANTIAGO OLGUIN and JHONELIER JESUS TOVAR DURAN, and individuals known and unknown to the Grand Jury, committed a jackpotting attack at an ATM located at Heartland Credit Union at 1300 N. Plum St. in Hutchinson, Kansas and obtained approximately \$25,000.
- d. On or about July 18, 2024, and on or about July 26, 2024, defendants RAYMUNDO SANTIAGO OLGUIN and JOEL ALEJANDRO MORANTES

- LEAL, and individuals known and unknown to the Grand Jury, committed a jackpotting attack on the ATM belonging to the Washington State Employees Credit Union and located on the Evergreen State College campus at 2741 N.W. McCann Plaza in Olympia, Washington and obtained approximately \$70,600.
- e. On or about October 6, 2024, defendant JHONELIER JESUS TOVAR DURAN, and individuals known and unknown to the Grand Jury, committed a jackpotting attack at the ATM located at the Arbor Bank at 911 Central Ave. in Nebraska City, Nebraska and obtained approximately \$19,000.
- f. On or about December 11, 2024, defendants CRISTHIAN ALEXANDER MUNOZ PEREZ and YENDRY ALEXANDRA ACOSTA GARCIA, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Iowa State Savings Bank at 401 West Adams St. in Creston, Iowa and obtained approximately \$108,000.
- g. On or about January 10, 2025, defendants IVAN JOSE ANGULO FLORES, YEREMY JOSUE TARAZONA-PAEZ, and DARWIN DANIEL SALINAS-VICTORRA, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Oklahoma Heritage Bank at 1100 E. Lonnie Abbott Boulevard in Ada, Oklahoma, and obtained approximately \$28,800.
- h. On or about January 11, 2025, defendants IVAN JOSE ANGULO FLORES, YEREMY JOSUE TARAZONA-PAEZ, and DARWIN DANIEL SALINAS-VICTORRA, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Oklahoma Heritage Bank

at 515 S. Hickory in Roff, Oklahoma and obtained approximately \$34,590.

- i. On or about February 1, 2025, defendants YEREMY JOSUE TARAZONA-PAEZ and ANIBEL DEL VALLE RIVAS GONZALEZ, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at 5 Star Community Credit Union at 100 S. Cherry St. in Mount Pleasant, Iowa and obtained approximately \$25,000.
- j. On or about February 8, 2025, defendants JOSE DAVID ALVAREZ-JIMENEZ, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, and JOHAN RODRIGUEZ-HERNANDEZ, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at McCook National Bank at 17999 Hwy. 385 in Burlington, Colorado and obtained approximately \$12,430.
- k. On or about February 9, 2025, defendants JOSE DAVID ALVAREZ-JIMENEZ, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, and JOHAN RODRIGUEZ-HERNANDEZ, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Adams County Bank at 1307 N. Brass Ave. in Juniata, Nebraska and obtained approximately \$23,340.
- l. On or about February 10, 2025, defendants JOSE DAVID ALVAREZ-JIMENEZ, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, and JOHAN RODRIGUEZ-HERNANDEZ, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at the ATM located at Adams County Bank at 401 N. Smith

Ave. in Kenesaw, Nebraska and obtained approximately \$17,800.

- m. On or about March 3, 2025, defendant SNAIDER STHIFERSON CASTRO HIDALGO, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at the ATM located at AmeriCU Credit Union at 1916 Black River Blvd. in Rome, New York and attempted to obtain approximately \$48,156.
- n. On or about March 15, 2025, defendants MARIA RIOS-AREVALO, DARWIN DANIEL SALINAS-VICTORRA, JOVITO BRAKWAITTE-BLANCO, and DAVID RAMIRO FALLO-SANTONICOLA, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Foothills Federal Credit Union at 956 Mulberry St. in Loudon, Tennessee and obtained approximately \$66,000.
- o. On or about March 27, 2025, defendant CRISTHIAN ALEXANDER MUNOZ PEREZ, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at the ATM located at High Point Federal Credit Union at 1201 Wayne St. in Olean, New York and attempted to obtain approximately \$153,940.
- p. On or about March 27, 2025, through on or about March 28, 2025, defendant CRISTHIAN ALEXANDER MUNOZ PEREZ, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at the ATM located at First Source Federal Credit Union at 1822 Black River Rd. in Rome, New York and attempted to obtain approximately \$117,347.
- q. On or about March 27, 2025, through on or about March 28, 2025, defendant CRISTHIAN ALEXANDER MUNOZ PEREZ, and individuals known and

unknown to the Grand Jury attempted to commit a jackpotting attack at the ATM located at First Source Federal Credit Union at 4451 Commercial Dr. in New Hartford, New York and attempted to obtain approximately \$96,787.

- r. On or about March 30, 2025, defendant JESHUA ESCALONA MATA, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Dundee Bank at 5015 Underwood Ave. in Omaha, Nebraska and obtained approximately \$5,600.
- s. On or about March 30, 2025, defendant JESHUA ESCALONA MATA, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Dundee Bank at 1407 South 13<sup>th</sup> St. in Omaha, Nebraska and obtained approximately \$79,200.
- t. On or about April 1, 2025, defendant JESHUA ESCALONA MATA, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Dundee Bank at 302 South 38<sup>th</sup> St. in Omaha, Nebraska and obtained approximately \$39,960.
- u. On or about April 3, 2025, defendants IVAN JOSE ANGULO FLORES, JOSE ANTONIO ALIENDRES GARCIA, DYFRED JOFIEL REYES-PALACIOS, EYDER BUENO FRANCA, and YOINBER ALFONSO MOREY MOREY, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Adrian Bank at 1101 W. Fort Scott St. in Butler, Missouri and obtained approximately \$50,000.
- v. On or about April 3, 2025, defendants IVAN JOSE ANGULO FLORES, JOSE ANTONIO ALIENDRES GARCIA, DYFRED JOFIEL REYES-PALACIOS, EYDER BUENO FRANCA, and YOINBER ALFONSO MOREY MOREY,

and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Adrian Bank at 130 E. Main St. in Adrian, Missouri and obtained approximately \$3,800.

- w. On or about April 4, 2025, through on or about April 5, 2025, defendants YOINBER ALFONSO MOREY MOREY and JOSE RAFAEL VILLASMIL-SALAS, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at the ATM located at Five Points Bank at 518 N. Eddy St. in Grand Island, Nebraska attempted to obtain approximately \$163,960.
- x. On or about April 5, 2025, through on or about April 6, 2025, defendants JUAN MANUEL GOUVEIA-AGUILERA, ALFREDO PINTO-MENDOZA, and FRAYNER ESMITH JIMINEZ-GOMEZ, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Baker Boyer Bank at 1530 Plaza Way in Walla Walla, Washington and obtained approximately \$93,480.
- y. On or about April 5, 2025, through on or about April 6, 2025, defendants JUAN MANUEL GOUVEIA-AGUILERA, ALFREDO PINTO-MENDOZA, and FRAYNER ESMITH JIMINEZ-GOMEZ, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Baker Boyer Bank at 1931 E. Isaacs Ave. in Walla Walla, Washington and obtained approximately \$60,640.
- z. On or about April 5, 2025, through on or about April 6, 2025, defendants JUAN MANUEL GOUVEIA-AGUILERA, ALFREDO PINTO-MENDOZA, and FRAYNER ESMITH JIMINEZ-GOMEZ, and individuals known and

unknown to the Grand Jury committed a jackpotting attack at the ATM located at Baker Boyer Bank at 32-N Columbia St. in Milton-Freewater, Oregon and obtained approximately \$43,920.

- aa. On or about April 7, 2025, defendant YOINBER ALFONSO MOREY MOREY, and individuals known and unknown to the Grand Jury, attempted to commit a jackpotting attack at the ATM located at Arbor Bank at 923 Main St. in Hamburg, Iowa, and attempted to obtain approximately \$20,000.
- bb. On or about April 8, 2025, defendant YOINBER ALFONSO MOREY MOREY, and individuals known and unknown to the Grand Jury, attempted to commit a jackpotting attack at the ATM located at Arbor Bank at 18924 Evans St. in Elkhorn, Nebraska and attempted to obtain approximately \$20,000.
- cc. On or about April 8, 2025, defendant YOINBER ALFONSO MOREY MOREY, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at the ATM located at West Gate Bank at 1204 W. O St. in Lincoln, Nebraska and attempted to obtain approximately \$123,337.
- dd. On or about April 8, 2025, defendant YOINBER ALFONSO MOREY MOREY, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at the ATM located at Cornhusker Bank at 6100 Apples Way in Lincoln, Nebraska and attempted to obtain approximately \$48,500.
- ee. On or about April 9, 2025, defendants YOINBER ALFONSO MOREY MOREY, ANGEL ARGENIS MARTINEZ PERALTA, YEREMY JOSUE TARAZONA-PAEZ, and ANIBEL DEL VALLE RIVAS GONZALEZ, and individuals known and unknown to the Grand Jury attempted to commit a

- jackpotting attack at the ATM located at Five Points Bank at 2009 Diers Ave. in Grand Island, Nebraska and attempted to obtain approximately \$46,480.
- ff. On or about April 9, 2025, defendant YOINBER ALFONSO MOREY MOREY conducted reconnaissance of the ATM located at Heritage Bank at 1333 N. Webb Rd. in Grand Island, Nebraska, which was the subject of an attempt to commit a jackpotting attack and to obtain approximately \$13,410 by individuals known and unknown to the Grand Jury.
- gg. On or about April 13, 2025, defendants JESHUA ESCALONA MATA and GUSTAVO ARTURO PUERTA COLINA, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Columbus Bank & Trust at 2501 13<sup>th</sup> St. in Columbus, Nebraska and obtained approximately \$20,800.
- hh. On or about April 13, 2025, defendants JESHUA ESCALONA MATA and GUSTAVO ARTURO PUERTA COLINA, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Columbus Bank & Trust at 118 23<sup>rd</sup> St. in Columbus, Nebraska and obtained approximately \$50,400.
- ii. On or about April 13, 2025, defendants IVAN JOSE ANGULO FLORES, EYDER BUENO FRANCA, and DYFRED JOFIEL REYES PALACIOS, and individuals known and unknown to the Grand Jury committed a jackpotting attack at the ATM located at Iowa Trust and Savings Bank at 23918 Hwy. J18 in Moravia, Iowa and obtained approximately \$10,000.
- jj. On or about April 15, 2025, defendants EYDER BUENO FRANCA and DYFRED JOFIEL REYES PALACIOS, and individuals known and unknown

to the Grand Jury attempted to commit a jackpotting attack at the ATM located at Blue Ox Credit Union at 39900 Van Dyke Ave. in Sterling Heights, Michigan and attempted to obtain approximately \$37,373.

- kk. On or about April 27, 2025, defendants JUAN GOUVEIA-AGUILERA and ALFREDO PINTO-MENDOZA, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at the ATM located at North Platte Union Pacific Employees Community Credit Union at 420 Rodeo Rd. in North Platte, Nebraska and attempted to obtain approximately \$37,460.
- ll. On or about April 27, 2025, defendant CRISTHIAN ALEXANDER MUNOZ PEREZ, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at the ATM located at Trius Federal Credit Union at 2915 2<sup>nd</sup> Ave. in Kearney, Nebraska and attempted to obtain approximately \$15,520.
- mm. On or about April 27, 2025, defendant CRISTHIAN ALEXANDER MUNOZ PEREZ, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at the ATM located at Farmers and Merchants Bank at 617 1<sup>st</sup> St. in Milford, Nebraska and attempted to obtain approximately \$7,600.
- nn. On or about April 27, 2025, defendant CRISTHIAN ALEXANDER MUNOZ PEREZ, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at the ATM located at Farmers and Merchant Bank at 3015 2<sup>nd</sup> Ave. in Kearney, Nebraska and attempted to obtain approximately \$15,580.
- oo. On or about April 28, 2025, defendant IVAN JOSE ANGULO FLORES, and

- other individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at the ATM located at Premier Bank at 352 N. 114<sup>th</sup> St. in Omaha, Nebraska and attempted to obtain approximately \$18,340.
- pp. On or about April 28, 2025, defendant IVAN JOSE ANGULO FLORES, and other individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at an ATM located at Premier Bank at 16802 Burke St. in Omaha, Nebraska and attempted to obtain approximately \$5,790.
- qq. On or about April 28, 2025, defendants IVAN JOSE ANGULO FLORES and JOSE ANTONIO ALIENDRES GARCIA, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack at Adams County Bank at 1307 N. Brass Ave. in Juniata, Nebraska and attempted to obtain approximately \$6,080.
- rr. On or about April 28, 2025, defendants IVAN JOSE ANGULO FLORES and JOSE ANTONIO ALIENDRES GARCIA, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack on an ATM at Adams County Bank at 401 N. Smith Ave. in Kenesaw, Nebraska and attempted to obtain approximately \$2,360.
- ss. On or about April 28, 2025, defendant JOEL ALEJANDRO MORANTES LEAL, and individuals known and unknown to the Grand Jury committed a jackpotting attack on an ATM at Merced School Employees Federal Credit Union at 1890 S. Mercey Springs Rd. in Los Banos, California, and obtained \$98,400.
- tt. On or about May 8, 2025, defendant JOEL ALEJANDRO MORANTES LEAL, and individuals known and unknown to the Grand Jury attempted to commit a

jackpotting attack on an ATM at Bank of the Sierra at 247 E. Tulare Ave. in Tulare, California, and attempted to obtain all the currency contained within the ATM.

uu. On or about May 28, 2025, defendants JOEL ALEJANDRO MORANTES LEAL and ENDIS DANIEL GONZALEZ ORTEGA, and individuals known and unknown to the Grand Jury committed a jackpotting attack on an ATM at Points West Bank at 8100 6<sup>th</sup> Street in Wellington, Colorado and obtained \$8,000.

vv. On or about May 29, 2025, defendants JOEL ALEJANDRO MORANTES LEAL and ENDIS DANIEL GONZALEZ ORTEGA, and individuals known and unknown to the Grand Jury attempted to commit a jackpotting attack on an ATM at Points West Bank at 809 Illinois Street in Sidney, Nebraska and obtained \$32,000.

ww. On or about May 29, 2025, defendant EDUAR JESUS PAEZ AVENDANO, and individuals known and unknown to the Grand Jury committed a jackpotting attack on an ATM located at Cornerstone Bank at 211 Rock Bluff Rd. in Plattsmouth, Nebraska and obtained approximately \$54,000.

xx. On or about July 6, 2025, defendants SNAIDER STHIFERSON CASTRO HIDALGO and CRISTIAN MANUEL TOVAR-OLIVARES, attempted to commit a jackpotting attack on an ATM at Heartland Bank at 212 E. 56<sup>th</sup> St. in Kearney, Nebraska and attempted to obtain approximately \$17,000.

In violation of Title 18, United States Code, Section 1349.

**COUNT II**  
CONSPIRACY TO COMMIT BANK BURGLARY AND  
FRAUD IN CONNECTION WITH COMPUTERS

10. Paragraphs 1-4 are hereby incorporated and re-alleged herein.

11. From on or about January 1, 2024, and continuing through on or about August 1, 2025, in the District of Nebraska and elsewhere, the defendants, ALFREDO PINTO-MENDOZA, JUAN MANUEL GOUVEIA-AGUILERA, YOINBER ALFONSO MOREY MOREY, FRAYNER ESMITH JIMINEZ-GOMEZ, YEREMY JOSUE TARAZONA-PAEZ, ANGEL ARGENIS MARTINEZ PERALTA, GUSTAVO ARTURO PUERTA COLINA, CRISTHIAN ALEXANDER MUNOZ PEREZ, DYFRED JOFIEL REYES-PALACIOS, EYDER BUENO FRANCIA, CRISTIAN MANUEL TOVAR-OLIVARES, SNAIDER STHIFERSON CASTRO HIDALGO, JOSE ANTONIO ALIENDRES GARCIA, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, JOHAN RODRIGUEZ-HERNANDEZ, IVAN JOSE ANGULO FLORES, JOSE DAVID ALVAREZ-JIMENEZ, MARIA RIOS-AREVALO A/K/A MARIA R. BETANIA, DARWIN DANIEL SALINAS-VICTORRA, JOVITO BRAKWAITTE-BLANCO, ANIBEL DEL VALLE RIVAS GONZALEZ, EDUAR JESUS PAEZ AVENDANO, GUSTAVO ENRIQUE SOCORRO PINO, RAYMUNDO SANTIAGO OLGUIN, JOSE RAFAEL VILLASMIL-SALAS, JESHUA ESCALONA MATA, JHONELIER JESUS TOVAR DURAN, DAVID RAMIRO FALLO-SANTONICOLA, JOEL ALEJANDRO MORANTES LEAL, ENDIS DANIEL GONZALEZ ORTEGA, and YENDRY ALEXANDRA ACOSTA GARCIA and other individuals known and unknown to the Grand Jury, knowingly conspired and agreed with each other to commit acts and offenses against the laws of the United States, namely:

a. to enter or attempt to enter a building used in whole or in part as a bank whose

deposits were then insured by the Federal Deposit Insurance Corporation and by the National Credit Union Administration Board, with the intent to commit a larceny, in violation of Title 18, United States Code, Section 2113(a);

- b. to knowingly and with intent to defraud accessed and attempted to access a protected computer without authorization and by means of such conduct to further the intended fraud and obtain something of value, to wit: United States currency, in violation of Title 18, United States Code, Section 1030(a)(4); and
- c. to knowingly cause the transmission of a program, information, code, and command and as a result of such conduct, intentionally cause damage without authorization to a protected computer, and cause loss to persons during a 1-year period from the defendant's course of conduct affecting protected computers aggregating at least \$5,000 in value, and cause damage affecting 10 or more protected computers during a 1-year period in violation of 18 U.S.C. §§ 1030(a)(5)(A) and 1030(c)(4)(B).

12. The object of the conspiracy was to be accomplished by the manner and means as described in the lettered sub-paragraphs of Paragraph 8, which are re-alleged and incorporated as if set forth herein.

13. In furtherance of the conspiracy and to carry out its objectives, the defendants and individuals known and unknown to the Grand Jury undertook the acts described in lettered sub-

paragraphs of Paragraph 9, which are re-alleged and incorporated as if set forth herein.

In violation of Title 18, United States Code, Section 371.

**COUNTS III- XX**  
**BANK FRAUD**

14. Paragraphs 1-4 are hereby incorporated and re-alleged herein.

15. On or about the dates set forth below and in the following manner, in the District of Nebraska and elsewhere, the defendants as listed in the below table, while aiding and abetting one another, and with individuals known and unknown to the Grand Jury, did knowingly execute and attempt to execute a scheme to defraud a financial institution, by using Ploutus malware to execute a jackpotting attack in which Ploutus malware contained, among other things, files that contained anti-analysis measures to hinder forensic review, specifically software protection utilities to prevent reverse-engineering and debugging, and other files that served the function of deleting the malware from the system in an effort to conceal, create a false impression, mislead, or otherwise deceive employees of the financial institution from learning about the deployment of the malware on the ATM, each of the below constituting a separate count:

<b>COUNT</b>	<b>DATE</b>	<b>DEFENDANT(S)</b>	<b>THE BANK OR CREDIT UNION</b>
III	On or about October 6, 2024	JHONELIER JESUS TOVAR DURAN	The Arbor Bank at 911 Central Avenue in Nebraska City, Nebraska

IV	On or about February 9, 2025	JOSE DAVID ALVAREZ-JIMENEZ,  YOHALEX GARCIA-VALLADARES,  ALEXANDER MAYORA-BLANCO, and  JOHAN RODRIGUEZ-HERNANDEZ	The Adams County Bank at 1307 North Brass Avenue in Juniata, Nebraska
V	On or about February 10, 2025	JOSE DAVID ALVAREZ-JIMENEZ,  YOHALEX GARCIA-VALLADARES,  ALEXANDER MAYORA-BLANCO, and  JOHAN RODRIGUEZ-HERNANDEZ	The Adams County Bank at 401 North Smith Avenue in Kenesaw, Nebraska
VI	On or about March 30, 2025	JESHUA ESCALONA MATA	The Dundee Bank at 5015 Underwood Avenue in Omaha, Nebraska
VII	On or about March 30, 2025	JESHUA ESCALONA MATA	The Dundee Bank at 1407 South 13 <sup>th</sup> Street in Omaha, Nebraska
VIII	On or about April 1, 2025	JESHUA ESCALONA MATA	The Dundee Bank at 302 S. 38 <sup>th</sup> Street in Omaha, Nebraska
IX	On or about April 4, 2025, through on or about April 5, 2025	YOINBER ALFONSO MOREY MOREY, and  JOSE RAFAEL VILLASMIL-SALAS	The Five Points Bank at 518 N. Eddy Street in Grand Island, Nebraska
X	On or about April 9, 2025	YOINBER ALFONSO MOREY MOREY,  ANGEL ARGENIS MARTINEZ PERALTA,	The Five Points Bank at 2009 Diers Avenue in Grand Island, Nebraska

		YEREMY JOSUE TARAZONA-PAEZ,  ANIBEL DELVALLE RIVAS GONZALEZ, and  CRISTHIAN ALEXANDER MUNOZ PEREZ	
XI	On or about April 8, 2025	YOINBER ALFONSO MOREY MOREY,	The Cornhusker Bank at 6100 Apples Way in Lincoln, Nebraska
XII	On or about April 13, 2025	JESHUA ESCALONA MATA, and  GUSTAVO ARTURO PUERTA COLINA	The Columbus Bank & Trust at 2501 13 <sup>th</sup> Street in Columbus, Nebraska
XIII	On or about April 13, 2025	JESHUA ESCALONA MATA, and  GUSTAVO ARTURO PUERTA COLINA	The Columbus Bank & Trust at 118 23 <sup>rd</sup> Street in Columbus, Nebraska
XIV	On or about April 27, 2025	JUAN MANUEL GOUVEIA-AGUILERA, and  ALFREDO PINTO- MENDOZA	The North Platte Union Pacific Employees Credit Union in North Platte, Nebraska
XV	On or about April 27, 2025	CRISTHIAN ALEXANDER MUNOZ PEREZ	The Trius Federal Credit Union at 2915 2 <sup>nd</sup> Avenue in Kearney, Nebraska
XVI	On or about April 28, 2025	IVAN JOSE ANGULO FLORES, and  JOSE ANTONIO ALIENDRES GARCIA	The Adams County Bank at 401 North Smith Avenue in Kenesaw, Nebraska

XVII	On or about April 28, 2025	IVAN JOSE ANGULO FLORES, and  JOSE ANTONIO ALIENDRES GARCIA	The Adams County Bank at 1307 North Brass Avenue in Juniata, Nebraska
XVIII	On or about May 29, 2025	EDUAR JESUS PAEZ AVENDANO	The Cornerstone Bank at 211 Rock Bluff Road in Plattsmouth, Nebraska
XIX	On or about May 29, 2025	JOEL ALEJANDRO MORANTES LEAL, and  ENDIS DANIEL GONZALEZ ORTEGA	The Points West Bank at 809 Illinois Street in Sidney, Nebraska
XX	On or about July 6, 2025	SNAIDER STHIFERSON CASTRO HIDALGO, and  CRISTIAN MANUEL TOVAR-OLIVARES	The Heartland Bank at 212 E 56th Street in Kearney, Nebraska

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNTS XXI-XXXVIII**  
**BANK BURGLARY**

16. Paragraphs 1-4 are hereby incorporated and re-alleged herein.

17. On or about the dates set forth below and in the following manner, in the District of Nebraska and elsewhere, the below specified defendants, while aiding and abetting one another, and with individuals known and unknown to the Grand Jury, did enter or attempt to enter a building used in whole or in part as a bank whose deposits were then insured by the Federal Deposit Insurance Corporation or a credit union whose deposits were insured by the National Credit Union Administration Board, with the intent to commit a larceny, each of the below constituting a separate count:

COUNT	DATE	DEFENDANT(S)	THE BANK OR CREDIT UNION
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XXI	On or about October 6, 2024	JHONELIER JESUS TOVAR DURAN	The Arbor Bank at 911 Central Avenue in Nebraska City, Nebraska
XXII	On or about February 9, 2025	JOSE DAVID ALVAREZ-JIMENEZ,  YOHALEX GARCIA- VALLADARES,  ALEXANDER MAYORA-BLANCO, and  JOHAN RODRIGUEZ- HERNANDEZ	The Adams County Bank at 1307 North Brass Avenue in Juniata, Nebraska
XXIII	On or about February 10, 2025	JOSE DAVID ALVAREZ-JIMENEZ,  YOHALEX GARCIA- VALLADARES,  ALEXANDER MAYORA-BLANCO, and  JOHAN RODRIGUEZ- HERNANDEZ	The Adams County Bank at 401 North Smith Avenue in Kenesaw, Nebraska
XXIV	On or about March 30, 2025	JESHUA ESCALONA MATA	The Dundee Bank at 5015 Underwood Avenue in Omaha, Nebraska
XXV	On or about March 30, 2025	JESHUA ESCALONA MATA	The Dundee Bank at 1407 South 13 <sup>th</sup> Street in Omaha, Nebraska
XXVI	On or about April 1, 2025	JESHUA ESCALONA MATA	The Dundee Bank at 302 S. 38 <sup>th</sup> Street in Omaha, Nebraska
XXVII	On or about April 4, 2025, through on or about April 5, 2025	YOINBER ALFONSO MOREY MOREY, and  JOSE RAFAEL VILLASMIL-SALAS	The Five Points Bank at 518 N. Eddy Street in Grand Island, Nebraska

XXVIII	On or about April 9, 2025	YOINBER ALFONSO MOREY MOREY,  ANGEL ARGENIS MARTINEZ PERALTA,  YEREMY JOSUE TARAZONA-PAEZ,  ANIBEL DELVALLE RIVAS GONZALEZ, and  CRISTHIAN ALEXANDER MUNOZ PEREZ	The Five Points Bank at 2009 Diers Avenue in Grand Island, Nebraska
XXIX	On or about April 8, 2025	YOINBER ALFONSO MOREY MOREY,	The Cornhusker Bank at 6100 Apples Way in Lincoln, Nebraska
XXX	On or about April 13, 2025	JESHUA ESCALONA MATA, and  GUSTAVO ARTURO PUERTA COLINA	The Columbus Bank & Trust at 2501 13 <sup>th</sup> Street in Columbus, Nebraska
XXXI	On or about April 13, 2025	JESHUA ESCALONA MATA, and  GUSTAVO ARTURO PUERTA COLINA	The Columbus Bank & Trust at 118 23 <sup>rd</sup> Street in Columbus, Nebraska
XXXII	On or about April 27, 2025	JUAN MANUEL GOUVEIA-AGUILERA, and  ALFREDO PINTO-MENDOZA	The North Platte Union Pacific Employees Credit Union in North Platte, Nebraska
XXXIII	On or about April 27, 2025	CRISTHIAN ALEXANDER MUNOZ PEREZ	The Trius Federal Credit Union at 2915 2 <sup>nd</sup> Avenue in Kearney, Nebraska
XXXIV	On or about April 28, 2025	IVAN JOSE ANGULO FLORES, and	The Adams County Bank at 401 North Smith Avenue in Kenesaw,

		JOSE ANTONIO ALIENDRES GARCIA	Nebraska
XXXV	On or about April 28, 2025	IVAN JOSE ANGULO FLORES, and  JOSE ANTONIO ALIENDRES GARCIA	The Adams County Bank at 1307 North Brass Avenue in Juniata, Nebraska
XXXVI	On or about May 29, 2025	EDUAR JESUS PAEZ AVENDANO	The Cornerstone Bank at 211 Rock Bluff Road in Plattsmouth, Nebraska
XXXVII	On or about May 29, 2025	JOEL ALEJANDRO MORANTES LEAL, and  ENDIS DANIEL GONZALEZ ORTEGA	The Points West Bank at 809 Illinois in Sidney, Nebraska
XXXVIII	On or about July 6, 2025	SNAIDER STHIFERSON CASTRO HIDALGO, and  CRISTIAN MANUEL TOVAR-OLIVARES	The Heartland Bank at 212 E 56th Street in Kearney, Nebraska

All in violation of Title 18, United States Code, Sections 2113(a) and 2.

**COUNTS XXXIX-LVI**

**INTENTIONAL DAMAGE TO A PROTECTED COMPUTER**

18. Paragraphs 1-4 are hereby incorporated and re-alleged herein.

19. On or about the dates set forth below and in the following manner, in the District of Nebraska and elsewhere, the below specified defendants, while aiding and abetting one another, and with individuals known and unknown to the Grand Jury, did knowingly cause the transmission of a program, information, code, and command and, as a result of such conduct, intentionally caused damage, and attempted to cause damage, without authorization, to a protected computer exclusively for the use of a financial institution and used by or for a financial institution listed

below and to a protected computer used in and affecting interstate commerce and communication, and the offense caused loss to persons during a 1-year period from the defendant's course of conduct affecting protected computers aggregating at least \$5,000 in value, each of the below constituting a separate count:

<b>COUNT</b>	<b>DATE</b>	<b>DEFENDANT(S)</b>	<b>THE BANK OR CREDIT UNION</b>
XXXIX	On or about October 6, 2024	JHONELIER JESUS TOVAR DURAN	The Arbor Bank at 911 Central Avenue in Nebraska City, Nebraska
XL	On or about February 9, 2025	JOSE DAVID ALVAREZ-JIMENEZ,  YOHALEX GARCIA- VALLADARES,  ALEXANDER MAYORA-BLANCO, and  JOHAN RODRIGUEZ- HERNANDEZ	The Adams County Bank at 1307 North Brass Avenue in Juniata, Nebraska
XLI	On or about February 10, 2025	JOSE DAVID ALVAREZ-JIMENEZ,  YOHALEX GARCIA- VALLADARES,  ALEXANDER MAYORA-BLANCO, and  JOHAN RODRIGUEZ- HERNANDEZ	The Adams County Bank at 401 North Smith Avenue in Kenesaw, Nebraska
XLII	On or about March 30, 2025	JESHUA ESCALONA MATA	The Dundee Bank at 5015 Underwood Avenue in Omaha, Nebraska
XLIII	On or about March 30, 2025	JESHUA ESCALONA MATA	The Dundee Bank at 1407 South 13 <sup>th</sup> Street in Omaha, Nebraska

XLIV	On or about April 1, 2025	JESHUA ESCALONA MATA	The Dundee Bank at 302 S. 38 <sup>th</sup> Street in Omaha, Nebraska
XLV	On or about April 4, 2025, through on or about April 5, 2025	YOINBER ALFONSO MOREY MOREY, and JOSE RAFAEL VILLASMIL-SALAS	The Five Points Bank at 518 N. Eddy Street in Grand Island, Nebraska
XLVI	On or about April 9, 2025	YOINBER ALFONSO MOREY MOREY,  ANGEL ARGENIS MARTINEZ PERALTA,  YEREMY JOSUE TARAZONA-PAEZ,  ANIBEL DELVALLE RIVAS GONZALEZ, and  CRISTHIAN ALEXANDER MUNOZ PEREZ	The Five Points Bank at 2009 Diers Avenue in Grand Island, Nebraska
XLVII	On or about April 8, 2025	YOINBER ALFONSO MOREY MOREY,	The Cornhusker Bank at 6100 Apples Way in Lincoln, Nebraska
XLVIII	On or about April 13, 2025	JESHUA ESCALONA MATA, and  GUSTAVO ARTURO PUERTA COLINA	The Columbus Bank & Trust at 2501 13 <sup>th</sup> Street in Columbus, Nebraska
XLVIX	On or about April 13, 2025	JESHUA ESCALONA MATA, and  GUSTAVO ARTURO PUERTA COLINA	The Columbus Bank & Trust at 118 23 <sup>rd</sup> Street in Columbus, Nebraska
L	On or about April 27, 2025	JUAN MANUEL GOUVEIA-AGUILERA, and	The North Platte Union Pacific Employees Credit Union in North Platte, Nebraska

		ALFREDO PINTO-MENDOZA	
LI	On or about April 27, 2025	CRISTHIAN ALEXANDER MUNOZ PEREZ	The Trius Federal Credit Union at 2915 2 <sup>nd</sup> Avenue in Kearney, Nebraska
LII	On or about April 28, 2025	IVAN JOSE ANGULO FLORES, and  JOSE ANTONIO ALIENDRES GARCIA	The Adams County Bank at 401 North Smith Avenue in Kenesaw, Nebraska
LIII	On or about April 28, 2025	IVAN JOSE ANGULO FLORES, and  JOSE ANTONIO ALIENDRES GARCIA	The Adams County Bank at 1307 North Brass Avenue in Juniata, Nebraska
LIV	On or about May 29, 2025	EDUAR JESUS PAEZ AVENDANO	The Cornerstone Bank at 211 Rock Bluff Road in Plattsmouth, Nebraska
LV	On or about May 29, 2025	JOEL ALEJANDRO MORANTES LEAL, and  ENDIS DANIEL GONZALEZ ORTEGA	The Points West Bank at 809 Illinois Street in Sidney, Nebraska
LVI	On or about July 6, 2025	SNAIDER STHIFERSON CASTRO HIDALGO, and  CRISTIAN MANUEL TOVAR-OLIVARES	The Heartland Bank at 212 E 56th Street in Kearney, Nebraska

All in violation of Title 18, United States Code, Sections 1030(a)(5)(A), (c)(4)(B), and

2.

### **FORFEITURE**

1. The allegations contained in Counts I and III through XX of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(2)(A).

2. The allegations contained in Counts II and XXI through XXXVIII of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

3. The allegations contained in Counts II and XXXIX through LVI of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2)(B), and 1030(i); and Title 28, United States Code, Section 2461(c).

4. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1344 and 1349 set forth in Counts I and III through XX of this Indictment, the defendant[s], ALFREDO PINTO-MENDOZA, JUAN MANUEL GOUVEIA-AGUILERA, YOINBER ALFONSO MOREY MOREY, FRAYNER ESMITH JIMINEZ-GOMEZ, YEREMY JOSUE TARAZONA-PAEZ, ANGEL ARGENIS MARTINEZ PERALTA, GUSTAVO ARTURO PUERTA COLINA, CRISTHIAN ALEXANDER MUNOZ PEREZ, DYFRED JOFIEL REYES-PALACIOS, EYDER BUENO FRANCA, CRISTIAN MANUEL TOVAR-OLIVARES, SNAIDER STHIFERSON CASTRO HIDALGO, JOSE ANTONIO ALIENDRES GARCIA, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, JOHAN RODRIGUEZ-HERNANDEZ, IVAN JOSE ANGULO FLORES, JOSE DAVID ALVAREZ-JIMENEZ, MARIA RIOS-AREVALO A/K/A MARIA R. BETANIA, DARWIN DANIEL SALINAS-VICTORRA, JOVITO BRAKWAITTE-BLANCO, ANIBEL DEL VALLE RIVAS GONZALEZ, EDUAR JESUS PAEZ AVENDANO, GUSTAVO ENRIQUE SOCORRO PINO, RAYMUNDO SANTIAGO OLGUIN, JOSE RAFAEL VILLASMIL-SALAS, JESHUA ESCALONA MATA, JHONELIER JESUS TOVAR DURAN, DAVID RAMIRO FALLO-

SANTONICOLA, JOEL ALEJANDRO MORANTES LEAL, ENDIS DANIEL GONZALEZ ORTEGA, and YENDRY ALEXANDRA ACOSTA GARCIA, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 982(a)(2)(A), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s). Upon conviction of the offenses in violation of Title 18, United States Code, Sections 371 and 2113 set forth in Counts II and XXI through XXXVIII of this Indictment, the defendant[s], ALFREDO PINTO-MENDOZA, JUAN MANUEL GOUVEIA-AGUILERA, YOINBER ALFONSO MOREY MOREY, FRAYNER ESMITH JIMINEZ-GOMEZ, YEREMY JOSUE TARAZONA-PAEZ, ANGEL ARGENIS MARTINEZ PERALTA, GUSTAVO ARTURO PUERTA COLINA, CRISTHIAN ALEXANDER MUNOZ PEREZ, DYFRED JOFIEL REYES-PALACIOS, EYDER BUENO FRANCIA, CRISTIAN MANUEL TOVAR-OLIVARES, SNAIDER STHIFERSON CASTRO HIDALGO, JOSE ANTONIO ALIENDRES GARCIA, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, JOHAN RODRIGUEZ-HERNANDEZ, IVAN JOSE ANGULO FLORES, JOSE DAVID ALVAREZ-JIMENEZ, MARIA RIOS-AREVALO A/K/A MARIA R. BETANIA, DARWIN DANIEL SALINAS-VICTORRA, JOVITO BRAKWAITTE-BLANCO, ANIBEL DEL VALLE RIVAS GONZALEZ, EDUAR JESUS PAEZ AVENDANO, GUSTAVO ENRIQUE SOCORRO PINO, RAYMUNDO SANTIAGO OLGUIN, JOSE RAFAEL VILLASMIL-SALAS, JESHUA ESCALONA MATA, JHONELIER JESUS TOVAR DURAN, DAVID RAMIRO FALLO-SANTONICOLA, JOEL ALEJANDRO MORANTES LEAL, ENDIS DANIEL GONZALEZ ORTEGA, and YENDRY ALEXANDRA ACOSTA GARCIA, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 982(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds obtained,

directly or indirectly, as a result of such violation(s). Upon conviction of the offenses in violation of Title 18, United States Code, Sections 371 and 1030 set forth in Counts II and XXXIX through LVI of this Indictment, the defendant[s], ALFREDO PINTO-MENDOZA, JUAN MANUEL GOUVEIA-AGUILERA, YOINBER ALFONSO MOREY MOREY, FRAYNER ESMITH JIMINEZ-GOMEZ, YEREMY JOSUE TARAZONA-PAEZ, ANGEL ARGENIS MARTINEZ PERALTA, GUSTAVO ARTURO PUERTA COLINA, CRISTHIAN ALEXANDER MUNOZ PEREZ, DYFRED JOFIEL REYES-PALACIOS, EYDER BUENO FRANCIA, CRISTIAN MANUEL TOVAR-OLIVARES, SNAIDER STHIFERSON CASTRO HIDALGO, JOSE ANTONIO ALIENDRES GARCIA, YOHALEX GARCIA-VALLADARES, ALEXANDER JOSE MAYORA-BLANCO, JOHAN RODRIGUEZ-HERNANDEZ, IVAN JOSE ANGULO FLORES, JOSE DAVID ALVAREZ-JIMENEZ, MARIA RIOS-AREVALO A/K/A MARIA R. BETANIA, DARWIN DANIEL SALINAS-VICTORRA, JOVITO BRAKWAITTE-BLANCO, ANIBEL DEL VALLE RIVAS GONZALEZ, EDUAR JESUS PAEZ AVENDANO, GUSTAVO ENRIQUE SOCORRO PINO, RAYMUNDO SANTIAGO OLGUIN, JOSE RAFAEL VILLASMIL-SALAS, JESHUA ESCALONA MATA, JHONELIER JESUS TOVAR DURAN, DAVID RAMIRO FALLO-SANTONICOLA, JOEL ALEJANDRO MORANTES LEAL, ENDIS DANIEL GONZALEZ ORTEGA, and YENDRY ALEXANDRA ACOSTA GARCIA, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2)(B), and 1030(i); and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s). The property to be forfeited includes, but is not limited to, the following:

SEALED

- a. A sum of money equal to the total amount of proceeds traceable to such offenses for which the Defendants are convicted at least in the amount of \$2,177,580.00.

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

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c)

All pursuant to Title 18 United States Code Sections 981(a)(1)(C), 982(a)(2) and (A) and (B), 1030(i); and Title 28, United States Code, Section 2461(c).

A TRUE BILL.

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FOREPERSON *llv*

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.

*Sean P. Lynch*  
\_\_\_\_\_  
SEAN P. LYNCH, #25275  
Assistant U.S. Attorney