

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
Plaintiff,

v.

[1] ANGEL L. CARRASQUILLO-FERNANDEZ,  
a/k/a "Gordo,"

(Counts 1 to 4, 6, 22, 23 and 25)

[2] LUIS GUSTAVO SOTO-AGOSTO, a/k/a  
"Gosi,"

(Counts 1 to 3, 8, 18, 21, 22 and 32)

[3] DAVID SANCHEZ-BARRETO,  
(Counts 1 and 35)

[4] JAVIER MALDONADO-BAEZ, a/k/a  
"Bolin,"

(Counts 1, 6 and 25)

[5] FERNANDO COTTO-SANTIAGO,  
Counts 1, 4 and 23)

[6] ANTONIO CARRASQUILLO-SANTIAGO,  
(Count 1)

[7] JOSE E. VELAZQUEZ-BERNARD, a/k/a  
"Risitas,"

(Counts 1, 18 and 32)

[8] ALEX SOTO-AGOSTO, a/k/a "Toto,"  
(Counts 1 and 2)

[9] NELSON X. AGOSTO-MOREIRA, a/k/a  
"Popu,"

(Counts 1, 8 and 21)

[10] MILIANETTE SANCHEZ-APONTE,  
(Counts 1 and 21)

[11] KAILYNNE C. MATOS-GARCIA, a/k/a  
"Kai,"

(Counts 1, 2 and 22)

[12] ANGEL BARRETO-BAEZ,  
(Counts 1, 4, 6, 23 and 25)

[13] JULIO MEDINA-DIAZ,  
(Counts 1, 5 and 24)

[14] EUSEBIO ESPINOZA-NIEVES,  
(Counts 1, 7 and 26)

[15] JORGE A. SANTIAGO-VAZQUEZ,  
(Counts 1, 9, 11, 17, 27 and 29)

[16] RAFAEL VELAZQUEZ-PELUYERA,  
(Counts 1, 10, 12 and 28)

SUPERSEDING INDICTMENT

Crim. No. 10-211 (GAG)

Violations:

Counterfeit Securities, 18 U.S.C. §55  
Agg. Identity Theft, 18 U.S.C. §1028A  
Bank Fraud, 18 U.S.C. §1344  
Conspiracy, 18 U.S.C. §1349  
Forfeiture, 18 U.S.C. §982

THIRTY-FIVE COUNTS AND  
FORFEITURE ALLEGATIONS

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[17] ISMAELARROYO-FONTAÑEZ  
(Counts 1 and 14)  
[18] LUIS RIVERA-BERRIOS, a/k/a "Gringo,"  
(Counts 1, 15, 16 and 31)  
[19] ZORIMAR LOPEZ-CARRASQUILLO,  
(Counts 1, 13 and 30)  
[20] MARIBEL COTTO-NUÑEZ,  
(Counts 1, 18 and 32)  
[21] ROLANDO NEGRON-CAMACHO,  
(Counts 1, 19 and 33)  
[22] JESUS M. AYALA-OQUENDO, a/k/a  
"Pucho,"  
(Counts 1, 20 and 34)  
Defendants.

**THE GRAND JURY CHARGES:**

**GENERAL ALLEGATIONS**

At all times material to this indictment:

1. Scotiabank de Puerto Rico ("Scotiabank"), Banco Santander de Puerto Rico ("Banco Santander"), Banco Popular de Puerto Rico ("BPPR"), Banco Bilbao Vizcaya Argentaria, S.A. ("BBVA") and FirstBank were financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation ("FDIC").
2. Popular Auto, Inc. ("Popular Auto") was a wholly owned subsidiary of BPPR.

**COUNT ONE**

**Conspiracy To Commit Bank Fraud  
18 U.S.C. §§ 1349, 1344 and 2**

1. Paragraphs One and Two of the General Allegations section of this Indictment are realleged and incorporated by reference as though fully set forth herein.
2. From in or around May 2008 and continuing through in or around May 2010, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

- [1] ANGEL L. CARRASQUILLO-FERNANDEZ,
- [2] LUIS GUSTAVO SOTO-AGOSTO,
- [3] DAVID SANCHEZ BARRETO,
- [4] JAVIER MALDONADO-BAEZ,
- [5] FERNANDO COTTO-SANTIAGO,
- [6] ANTONIO CARRASQUILLO-SANTIAGO,
- [7] JOSE E. VELAZQUEZ-BERNARD,
- [8] ALEX SOTO-AGOSTO,
- [9] NELSON X. AGOSTO-MOREIRA,
- [10] MILIANNETTE SANCHEZ-APONTE,
- [11] KAILYNNE C. MATOS-GARCIA,
- [12] ANGEL BARRETO-BAEZ,
- [13] JULIO MEDINA-DIAZ,
- [14] EUSEBIO ESPINOZA-NIEVES,
- [15] JORGE A. SANTIAGO-VAZQUEZ,
- [16] RAFAEL VELAZQUEZ-PELUYERA,
- [17] ISMAEL ARROYO-FONTAÑEZ
- [18] LUIS RIVERA-BERRIOS
- [19] ZORIMAR LOPEZ-CARRASQUILLO,
- [20] MARIBEL COTTO-NUÑEZ ,
- [21] ROLANDO NEGRON-CAMACHO, and
- [22] JESUS M. AYALA-OQUENDO,

defendants herein, aiding and abetting each other, did willfully, that is with intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury: to knowingly and with intent to defraud devise execute and cause the execution of a scheme and artifice to defraud a financial institution, including, Scotiabank, BPPR, Banco Santander, BBVA, and Firstbank, which scheme and artifice would employ a material falsehood, and to obtain moneys, funds, credits, and assets owned by, and under the custody and control of said financial institutions, by means of false and fraudulent pretenses, representations, and promises relating to a material fact, in violation of Title 18, United States Code, Sections 1344(1) and (2).

PURPOSE OF THE CONSPIRACY

3. It was the purpose of the conspiracy that defendants and their coconspirators would obtain money and property from financial institutions by, among other things: (a) cashing fraudulent business checks; (b) using stolen identities and account information to conduct unauthorized cash withdrawals; (c) obtaining unsecured personal loans using false employment and identification documents; and (d) securing vehicle financing using false employment and identification documents.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and their co-conspirators sought to accomplish the objects and purpose of the conspiracy included, among others, the following:

4. Throughout the course of the conspiracy defendants and other coconspirators known and unknown to the Grand Jury used the account information and means of identification over eighteen (18) individuals to unlawfully obtain over \$500,000 in cash and property from financial institutions. This was accomplished by cashing fraudulent checks, engaging in unauthorized cash withdrawals, and obtaining bank loans from financial institutions.

5. The leader of the conspiracy [1] ANGEL CARRASQUILLO-FERNANDEZ would provide false employment and identification documents to the coconspirators recruited to conduct the fraudulent transactions. In addition, CARRASQUILLO-FERNANDEZ would drive the coconspirators to the financial institutions and wait for them outside while they completed the transactions.

6. At different times in the conspiracy, coconspirators [2] LUIS G. SOTO-AGOSTO, [4] JAVIER MALDONADO-BAEZ, [5] FERNANDO COTTO-SANTIAGO, [6] ANTONIO CARRASQUILLO-SANTIAGO, [7] JOSE E. VELAZQUEZ-BERNARND, and [8] ALEX

**SOTO-AGOSTO** would recruit additional coconspirators, sometimes referred to in the conspiracy as “jockeys,” and provide them with the necessary false documents and instructions on completing the fraudulent transactions. In addition to acting as recruiters, **MALDONADO-BAEZ** and **CARRASQUILLO-SANTIAGO** would also act as a “jockeys.”

7. At different times in the conspiracy, [3] **DAVID SANCHEZ-BARRETO** would facilitate the conspiracy by supplying false documents and receiving and disposing of the vehicles purchased with fraudulent financing.

8. From in or around May 2009 continuing through in or around October 2009, bank employee and coconspirator [9] **NELSON X. AGOSTO-MOREIRA** knowingly furthered and facilitated the conspiracy by supplying [2] **LUIS GUSTAVO SOTO-AGOSTO** with account numbers, photos of signatures, and personal information of bank clients for the purpose of manufacturing false employment and identification documents and conducting fraudulent financial transactions.

9. In or around 2009, auto dealership employee [10] **MILIANETTE SANCHEZ-APONTE** knowingly furthered and facilitated the conspiracy by supplying [2] **LUIS GUSTAVO SOTO-AGOSTO** with the names, addresses, social security numbers and other personal information of auto dealership clients, including credit reports, for the purpose of manufacturing false employment and identification documents and conducting fraudulent financial transactions.

10. At different times in the conspiracy, coconspirators [11] **KAILYNNE MATOS-GARCIA**, [12] **ANGEL BARRETO-BAEZ**, [13] **JULIO MEDINA-DIAZ**, [14] **EUSEBIO ESPINOZA-NIEVES**, [15] **JORGE A. SANTIAGO-VAZQUEZ**, [16] **RAFAEL VELAZQUEZ-PELUYERA**, [17] **ISMAEL ARROYO-FONTAÑEZ**, [18] **LUIS RIVERA-BERRIOS**, [19]

**ZORIMAR LOPEZ-CARRASQUILLO, [20] MARIBEL COTTO-NUÑEZ, [21] ROLANDO NEGRON-CAMACHO, and [22] JESUS M. AYALA-OQUENDO,** acting as “jockeys,” used false employment and identification documents to effectuate the fraudulent transactions including, cashing fraudulent business checks, conducting unauthorized cash withdrawals, obtaining unsecured personal loans, and securing vehicle financing. Some of these fraudulent transactions included the following:

a. On or about May 22, 2008, [2] **LUIS G. SOTO-AGOSTO, [3] ALEX SOTO-FERNANDEZ, [11] KAILYNNE MATOS-GARCIA** and [19] **ZORIMAR LOPEZ-CARRASQUILLO** used a false identification document provided by [1] **ANGEL CARRASQUILLO-FERNANDEZ** to attempt the unauthorized withdrawal of \$6,000 from an account at BPPR under the name of an individual known as I.I.S.H.

b. In and around August 2008 continuing through in or around September 2008, [1] **ANGEL CARRASQUILLO-FERNANDEZ, [4] JAVIER MALDONADO-BAEZ, [5] FERNANDO COTTO-SANTIAGO,** and [12] **ANGEL BARRETO-BAEZ** used false employment and identity documents to cash fraudulent checks and obtain unsecured loans from various financial institutions including BPPR, Firstbank, and Banco Santander.

c. On or around August 12, 2008, [13] **JULIO MEDINA-DIAZ,** having been recruited by [5] **FERNANDO COTTO-SANTIAGO,** obtained a \$15,000 loan from Firstbank using false employment and identity documents provided by [1] **ANGEL CARRASQUILLO-FERNANDEZ.**

d. On or about October 27, 2008, [1] **ANGEL CARRASQUILLO-FERNANDEZ, [2] LUIS G. SOTO-AGOSTO,** and [11] **KAILYNNE MATOS-GARCIA** used false employment and

identification documents provided by **CARRASQUILLO-FERNANDEZ** attempting to obtain a loan for \$15,000 from Firstbank.

e. On or about December 20, 2008 and continuing through to on or about December 23, 2008, [14] **EUSEBIO ESPINOZA-NIEVES**, having been recruited by [5] **FERNANDO COTTO-SANTIAGO**, used false identification documents to obtain and partially disburse a loan for \$19,689.43 from Banco Santander.

f. On or about March 14, 2009 and March 23, 2009, [2] **LUIS G. SOTO-AGOSTO**, assisted by [9] **NESLON X. AGOSTO-MOREIRA**, presented to BPPR approximately \$8,207 in fraudulent checks purportedly drawn from an account at Interamerican University of Puerto Rico, Bayamon Campus.

g. From on or about April 24, 2009 and continuing through to on or about April 29, 2009, [15] **JORGE A. SANTIAGO-VAZQUEZ** and [16] **RAFAEL VELAZQUEZ-PELUYERA**, using the identity of an individual know as L.A.C.R., supplied by [9] **NELSON X. AGOSTO-MOREIRA**, secured approximately \$33,700.02 in financing from Scotiabank to purchase a 2010, Smart, Passion, bearing Puerto Rico License Plate HKB-343 and presented to BPPR approximately \$8,653.03 in fraudulent business checks purportedly drawn from an account belonging to "Jose A. Vila, Inc."

h. From on or about May 18, 2009 and continuing through to May 19, 2009, [16] **RAFAEL VELAZQUEZ-PELUYERA** used bank account information supplied by [9] **NELSON X. AGOSTO-MOREIRA** to attempt to withdraw, without authorization, approximately \$18,000 from an account under the name of an individual known as J.C.A.R. at BPPR.

i. From on or about June 8, 2009 continuing through June 21, 2009, [17] **ISMAEL ARROYO-FONTAÑEZ** presented to BPPR approximately \$4,039.98 in fraudulent business checks purportedly drawn from account belonging to "Steri-Tech, Inc."

j. On or about June 6, 2009, [18] **LUIS RIVERA-BERRIOS** used false employment and identity documents in the name of an individual known as J.P.D.T., whose identity was supplied by [9] **NELSON X. AGOSTO-MOREIRA**, to obtain a personal loan for approximately \$18,447.45 at Firstbank.

k. On or about June 11, 2009, [18] **LUIS RIVERA-BERRIOS** used account information supplied by [9] **NELSON X. AGOSTO-MOREIRA** to withdraw without authorization \$19,000 from an account belonging to an individual known as J.P.D.T. at BPPR.

l. On or about July 8, 2009, [19] **ZORIMAR LOPEZ-CARRASQUILLO**, having been recruited by [1] **ANGEL CARRASQUILLO-FERNANDEZ**, used identity documents in the name the of an individual known as G.R.C., whose identity was supplied by [10] **MILIANETTE SANCHEZ-ACOSTA**, to secure approximately \$37,762 in financing to purchase a 2009 Chevrolet, Traverse, bearing Puerto Rico license plate HKL-685.

m. On September 25, 2009, [17] **ISMAEL ARROYO-FONTAÑEZ**, having been recruited by [6] **ANTONIO CARRASQUILLO-SANTIAGO**, used false employment and identity documents in the name of an individual known as J.P.G., whose identity was supplied by [10] **MILIANETTE SANCHEZ-ACOSTA**, attempting to obtain a personal loan for approximately \$10,913.86 at Firstbank.

n. In and around December 2009, [20] **MARIBEL COTTO-NUÑEZ**, having been recruited and provided with a false identification document by [2] **LUIS G. SOTO-AGOSTO** and

[7] **JOSE E. VELAZQUEZ-BERNARD**, attempted to withdraw without authorization \$3,800 from an account under the name of an individual known as I.L.O.V. at Firstbank.

o. On or around February 19, 2010, [21] **ROLANDO NEGRON-CAMACHO**, having been recruited by [4] **JAVIER MALDONADO-BAEZ**, used false employment and identification documents in the name of an individual known as C.J.C.E. attempting to secure approximately \$49,900 in financing from Popular Auto to purchase a 2010 Mercedes Benz, GLK 350, SUV, bearing Puerto Rico License number HLF-873.

p. On or about April 16, 2010, [22] **JESUS M. AYALA-OQUENDO** used false employment and identity documents in the name of an individual known as J.O.S. to secure approximately \$18,565.50 in financing from Scotiabank to purchase a 2009 Toyota, Corolla, bearing Puerto Rico license plate number HHN-469, which was subsequently delivered to [3] **DAVID SANCHEZ-BARRETO**.

q. On or about May 12, 2010, [22] **JESUS M. AYALA-OQUENDO** used false employment and identity documents in the name of an individual known as J.A.F.G., to secure approximately \$23,000 in financing from Popular Auto to purchase a 2006 BMW, 325, bearing Puerto Rico license plate number GJR-669, which was subsequently delivered to [3] **DAVID SANCHEZ-BARRETO**.

All in violation of Title 18, United States Code, Sections 1349 and 2.

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**COUNTS TWO THROUGH TWENTY**

**Bank Fraud**

**18 U.S.C. §§1344, 1349 and 2**

1. Paragraphs One and Two of the General Allegations section of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or around the dates set forth below, in the District of Puerto Rico and within the jurisdiction of this Court, the defendants set forth below, aiding and abetting each other, did knowingly and with intent to defraud execute and cause the execution of, and attempt to execute and cause the execution of, a scheme and artifice to defraud financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation, which scheme and artifice would employ a material falsehood, and to obtain moneys, funds, credits, and assets owned by, and under the custody and control of, said financial institutions, by means of false and fraudulent pretenses, representations, and promises relating to a material fact, in violation of Title 18, United States Code, Sections 1344(1) and (2), 1349 and 2.

**PURPOSE OF THE SCHEME AND ARTIFICE**

3. It was the purpose of the scheme and artifice to defraud that defendants would obtain money and property from financial institutions by, among other things: (a) cashing fraudulent business checks; (b) using stolen identities and account information to conduct unauthorized cash withdrawals; (c) obtaining unsecured personal loans using false employment and identification documents; and (d) securing vehicle financing using false employment and identification documents.

THE SCHEME AND ARTIFICE

4. Paragraphs Four through Six and Eight through Nine of the Manner and Means section of Count One of this Indictment are re-alleged and incorporated herein by reference as a description of the scheme and artifice.

ACTS IN EXECUTION OF THE SCHEME AND ARTIFICE

5. On or about the dates specified as to each count below, in the District of Puerto Rico and elsewhere within the jurisdiction of this court, defendants, as specified in each count, aiding and abetting each other, did execute and attempt to execute the scheme and artifice, and did cause and attempt to cause said scheme and artifice to be executed, as more particularly described in each count set forth below:

Count	Approx. Date	Defendant(s)	Act in Execution
2	5/22/2008	[1] ANGEL CARRASQUILLO-FERNANDEZ, [2] LUIS GUSTAVO SOTO-AGOSTO, [8] ALEX SOTO-AGOSTO, and [11] KAILYNNE C. MATOS-GARCIA	Attempting without authorization to withdraw \$6,000 from account number ending in 4150 at BPPR belonging to an individual known as I.I.S.H.
3	10/27/2008	[1] ANGEL CARRASQUILLO-FERNANDEZ and [2] LUIS GUSTAVO SOTO-AGOSTO	Attempting to disburse loan number ending in 5271 in the amount of \$15,000 from Firstbank, using false employment and identification documents in the name of an individual known as C.Y.O.
4	8/4/2008	[1] ANGEL CARRASQUILLO-FERNANDEZ, [5] FERNANDO COTTO-SANTIAGO and [12] ANGEL BARRETO-BAEZ	Obtaining loan number ending in 1259 at Banco Santander in the amount of \$28,000 using false employment and identification documents in the name of an individual known as R.R.C.

5	8/12/2008	<b>[13] JULIO MEDINA-DIAZ.</b>	Obtaining loan number ending in 1101 at Firstbank in the amount of \$15,000 using false employment and identification documents in the name of an individual known as L.O.J.H.
6	9/11/2008 to 9/17/2008	<b>[1] ANGEL CARRASQUILLO-FERNANDEZ, [4] JAVIER MALDONADO-BAEZ and [12] ANGEL BARRETO BAEZ</b>	Obtaining \$4,500 from Banco Santander by cashing check number 002 from a fraudulent account opened in the name of an individual known as J.R.L. and funded with false business checks purportedly drawn from an account belonging to "Valcor."
7	12/20/2008	<b>[14] EUSEBIO ESPINOZA-NIEVES</b>	Obtaining loan number ending in 7813 at Banco Santander in the amount of \$19,689.43 using false identification documents in the name of an individual known as O.S.M.
8	3/23/2009	<b>[2] LUIS GUSTAVO SOTO-AGOSTO and [9] NELSON X. AGOSTO-MOREIRA</b>	Cashing four (4) fraudulent business checks at BPPR purportedly drawn from an account belonging to Interamerican University of Puerto Rico, Bayamon Campus in the amounts of \$1,872.00, \$1,890.50, \$1,800.00, and \$1,900.75.
9	4/24/2009	<b>[15] JORGE A. SANTIAGO-VAZQUEZ</b>	Securing approximately \$33,700.02 in financing from Scotiabank using false identification documents in the name of an individual known as L.A.C.R. to purchase a 2010, Smart, Passion, bearing Puerto Rico license plate HKB-343.

10	4/28/2009 to 4/29/2009	[16] RAFAEL VELAQZUEZ- PELUYERA	Cashing four (4) fraudulent business checks at BPPR purportedly drawn from an account belonging to "Jose A. Vila, Inc." in the amounts of \$1,863.24, \$1,583.16, \$1847.61 and \$1,911.41.
11	4/29/2009	[15] JORGE A. SANTIAGO- VAZQUEZ	Attempting to cash a fraudulent business check at BPPR purportedly drawn from an account belonging to "Jose A. Villa, Inc." in the amount of \$1,477.61.
12	5/18/2009	[16] RAFAEL VELAZQUEZ- PELUYERA	Withdrawing without authorization \$3,000 from account number ending in 3752 at BPPR in the name of an individual known as J.C.A.R.
13	7/8/2009	[19] ZORIMAR LOPEZ- CARRASQUILLO	Securing approximately \$36,762.00 in financing from Firstbank using false employment and identification documents in the name of an individual known as G.R.C. to purchase a 2009 Chevrolet, Traverse, bearing Puerto Rico license plate HKL-685.
14	6/8/2009	[17] ISMAELARROYO- FONTAÑEZ	Cashing two (2) fraudulent business checks at BPPR purportedly drawn from account belonging to "Steri-Tech, Inc." at BPPR for \$1,212.56 and \$1,304.28.
15	6/6/2009	[18] LUIS RIVERA-BERRIOS	Obtaing loan number ending in 4290 at Firstbank in the amount of \$18,447.00 using false employment and identification documents in the name of an individual known as J.P.D.T.

16	6/11/2009	[18] LUIS RIVERA-BERRIOS	Withdrawing without authorization approximately \$19,000 from account number ending in 4290 at BPPR in the name of an individual known as J.P.D.T.
17	6/11/2009	[15] JORGE A. SANTIAGO-VAZQUEZ	Attempting without authorization to withdraw \$3,000 from account number ending in 3761 at BPPR in the name of an individual known as J.O.R.M.
18	12/28/2009	[2] LUIS G. SOTO-AGOSTO, [7] JOSE E. VELAZQUEZ-BERNARD and [20] MARIBEL COTTO-NUÑEZ	Attempting without authorization to withdraw \$3,800 from account number ending in 1454 at Firstbank in the name of an individual known as I.L.O.V.
19	2/19/2010	[21] ROLANDO NEGRON-CAMACHO	Securing approximately \$49,494.00 in financing from Popular Auto, Inc. using false employment and identification documents in the name of an individual known as C.J.C.E. to purchase a 2010 Mercedes GLK, SUV, bearing Puerto Rico license plate HLF-873.
20	5/12/2010	[23] JESUS M. AYALA-OQUENDO	Securing approximately \$23,000 in financing from BPPR using false employment and identification documents in the name of an individual known as J.A.F.G. to purchase a 2006 BMW, 325, bearing Puerto Rico license plate GJR-669.

Each count listed above constituting a separate and distinct violation of Title 18, United States Code, Sections 1344(1) and (2), 1349 and 2.

**COUNTS TWENTY-ONE THROUGH THIRTY-FOUR**  
**Aggravated Identity Theft**  
**18 U.S.C. §§1028A and 2**

1. Paragraphs One through Two of the General Allegations of this Indictment are realleged and incorporated by reference as through fully set forth herein.

2. On or about the dates specified as to each count below, in the District of Puerto Rico and within the jurisdiction of this Court, defendants, as specified in each count, aiding and abetting each other, did knowingly possess, transfer and use, without lawful authority, a means of identification of another person, that is name, date of birth and social security number of the individuals set forth below, during and in relation to a felony enumerated in 18 U.S.C. §1028A(c), as more particularly described in each count below:

Count	Approx. Dates	Defendant(s)	Person(s)	Related Felony
21	5/2008 to 10/2009	[2] LUIS GUSTAVO SOTO-AGOSTO, [9] NELSON X. AGOSTO-MOREIRA and [10] MILIANETTE SANCHEZ-APONTE	M.S.A., L.V.C.M., J.O.R.M., L.A.C.R. G.R.C. and J.P.G.	Conspiracy, 18 U.S.C. §1349 (Count 1)
22	5/22/2008	[1] ANGEL CARRASQUILLO-FERNANDEZ, [2] LUIS GUSTAVO SOTO-AGOSTO, [8] ALEX SOTO-AGOSTO and [11] KAILYNNE C. MATOS-GARCIA	I.I.S.H.	Attempted Bank Fraud, 18 U.S.C. §1349 (Count 2)
23	8/4/2008	[1] ANGEL CARRASQUILLO-FERNANDEZ, [5] FERNANDO COTTO-SANTIAGO and [12] ANGEL BARRETO BAEZ	R.R.C.	Bank Fraud, 18 U.S.C. §1344 (Count 4)

24	8/12/2008	[13] JULIO MEDINA-DIAZ	L.O.J.H.	Bank Fraud, 18 U.S.C. §1344 (Count 5)
25	9/11/2008 to 9/17/2008	[1] ANGEL CARRASQUILLO-FERNANDEZ, [4] JAVIER MALDONADO-BAEZ and [12] ANGEL BARRETO-BAEZ	J.R.L.	Bank Fraud, 18 U.S.C. §1344 (Count 6)
26	12/20/2008	[14] EUSEBIO ESPINOZA-NIEVES	O.S.M.	Bank Fraud, 18 U.S.C. §1344 (Count 7)
27	4/24/2009	[15] JORGE A. SANTIAGO-VAZQUEZ	L.A.C.R.	Bank Fraud, 18 U.S.C. §1344 (Count 9)
28	5/18/2009	[16] RAFAEL VELAZQUEZ-PELUYERA	J.C.A.R.	Bank Fraud, 18 U.S.C. §1344 (Count 12)
29	6/11/2009	[15] JORGE A. SANTIAGO-VAZQUEZ	J.O.R.M.	Attempted Bank Fraud, 18 U.S.C. §1349 (Count 17)
30	7/8/2009	[19] ZORIMAR LOPEZ-CARRASQUILLO	G.R.C.	Bank Fraud, 18 U.S.C. §1344 (Count 13)
31	6/11/2009	[18] LUIS RIVERA-BERRIOS	J.P.D.T.	Bank Fraud, 18 U.S.C. §1344 (Count 16)
32	12/28/2009	[2] LUIS G. SOTO-AGOSTO, [7] JOSE E. VELAZQUEZ-BERNARD and [20] MARIBEL COTTO-NUÑEZ	I.L.O.V.	Attempted Bank Fraud, 18 U.S.C. §1349 (Count 18)
33	2/19/2010	[21] ROLANDO NEGRON-CAMACHO	C.J.C.E.	Bank Fraud, 18 U.S.C. §1344 (Count 19)

34	5/12/2010	[22] JESUS M. AYALA- OQUENDO	J.A.F.G.	Bank Fraud, 18 U.S.C. §1344 (Count 20)
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Each count listed above constituting a separate and distinct violation of Title 18, United States Code, §1028A(a)(1).

**COUNT THIRTY-FIVE**  
**Possessing Counterfeit Securities**  
**18 U.S.C. §513(a)**

On or about May 26, 2010, in the District of Puerto Rico and within the jurisdiction of this Court,

[3] **DAVID SANCHEZ-BARRETO,**

the defendant herein, did knowingly possess twenty-one (21) counterfeit checks purportedly drawn from an account belonging to the Municipal Government of Cidra, a political subdivision of the Commonwealth of Puerto Rico, totaling \$21,000, with the intent to deceive BPPR, in violation of Title 18, United States Code, §513(a).

**FORFEITURE ALLEGATION**  
**18 U.S.C. §982(a)(2)(A)**

1. The allegations contained in Counts One through Twenty, 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. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1344 and 1349, set forth in Counts One through Twenty of this Indictment, the defendants, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds obtained, directly or indirectly, by them as a result of such violations. The property to be forfeited includes, but is not limited to, the following:

a. MONEY JUDGMENT: A sum of money equal to \$500,000, in United States Currency, representing the amount of proceeds obtained as a result of the offenses mentioned above, for which the defendants are jointly and severally liable;

b. PERSONAL PROPERTY: Any property constituting, or derived from, proceeds obtained directly or indirectly, by defendants as a result of such violations;

3. If any of the property described above, as a result of any act or omission of the defendants: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; c) has been substantially diminished in value; or d) 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 the forfeiture procedures of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Section 982(a)(2)(A) and Title 21, United States Code, Section 853.

TRUE BILL,

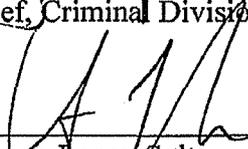
FOREPERSON

Dated:

JUNE 16 | 2010

**ROSA EMILIA RODRIGUEZ-VELEZ**  
United States Attorney

  
\_\_\_\_\_  
José Ruiz-Santiago  
Chief, Criminal Division

  
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Ernesto Lopez-Soltero  
Deputy Chief, White Collar Crimes  
Dated:

  
\_\_\_\_\_  
Charles R. Walsh  
Assistant United States Attorney  
Dated: