

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

UNITED STATES OF AMERICA,
PLAINTIFF,

v.

[1] JOSE JUAN ARROYO-MALDONADO, (a/k/a Colombia; Victor Davila-Perez; Jesus Martinez Alejandro Quintanilla; Antonio Mejias; Confesor Rodriguez; Cristobal Santiago-Colon; Dennis Sanchez; Edwin Gutierrez-Lombardi; Edwin Martinez-Aguayo; Edwin Martinez; Hector Gonzalez; Hector Santiago; Jesus Martinez Caballero; Jose Arroyo Maldonado; Jose Diaz; Juan Arroyo-Maldonado; Juan Maldonado; Pedro Ortiz; Juan Mojica-Landrau)
(Counts 1 through 37),

[2] JUAN MARRERO, a/k/a (Teddy; "El Viejo")
(Counts 1, 14 through 23, and 27 through 34),

[3] MILDRED RIVERA-MUNIZ, a/k/a (Gordy)
(Counts 1, 2, 5, 7, 29, 33, 35 through 37),

[4] RAY JONATHAN LOPEZ-SOTO
(Counts 1, 14 through 23, and 27 through 34),

[5] NICHOLAS JONES-BIRD, a/k/a/ (Nico)
(Counts 1, 4, 6, 7, 24, 25, 26),

[6] MERCEDES RIVERA-NIEVES
(Counts 1, 8, 9, 10, 11, and 12),

[7] BIENVENIDO GONZALEZ, a/k/a (Broky)
(Counts 1, 22),

[8] DAMIL MARRERO
(Counts 1, 26),

[9] MYRIAM MORALES
(Counts 1, 7, 33, 37),

[10] DANNY DIAZ-BOTTIA
(Counts 1, 3, 23),

[11] ULISA KESIA CEPEDA-VAZQUEZ, a/k/a (Michelle)
(Counts 1, 14, 22),

CRIMINAL NO. 12-341 (DRD)

VIOLATIONS:

- Bank Fraud, 18 U.S.C., §1344
- Attempt and Conspiracy, 18 U.S.C., §1344
- Laundering of Monetary Instruments, 18 U.S.C. §1956(a)(1)
- Engaging in Monetary Transactions, 18 U.S.C., §1957
- Aiding and Abetting, 18 U.S.C., §2
- Forfeiture Allegation, 18 U.S.C. §982(a)(2)(A)
- Forfeiture Allegation, 18 U.S.C. §982(a)(1)

THIRTY SEVEN COUNTS AND TWO
FORFEITURE ALLEGATIONS

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<p>[12] JESSE AVILES (Counts 1, 5),</p> <p>[13] JOEL IRIZARRY, a/k/a (Norberto Velazquez; Norberto Pineiro) (Counts 1, 24, 25, 29, 30),</p> <p>[14] WILMARIE FELICIANO (Counts 1, 25, 29, 30),</p> <p>[15] JOSE ROBLES SOTO (Count 1),</p> <p>[16] CARLOS CRUZ-RIVERA, a/k/a (“El Cano Llorens”) (Count 1),</p> <p>DEFENDANTS.</p>	
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THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At all times material to this indictment:

1. Scotiabank de Puerto Rico (Scotiabank), Banco Santander de Puerto Rico (BSPR), Banco Popular de Puerto Rico (BPPR), Banco Bilbao Vizcaya Argentaria, S.A. (BBVA), FirstBank, Chase Manhattan Bank and/or J.P. Morgan Chase (Chase), T.D. Bank, Citibank, Wachovia Bank (Wachovia) and Merrill Lynch 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.

3. Caribe Federal Credit ^{Union} ~~Union~~ (CFCU) and Pentagon Federal Credit Union (PFCU) were financial institutions whose deposits were insured by the National Credit Union Administration (NCUA), an independent agency of the United States.

COUNT ONE

**Conspiracy To Commit Bank Fraud
18 U.S.C. §§ 1349**

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

From in or around August 2010 and continuing through in or around May 2011, in the District of Puerto Rico and within the jurisdiction of this Court,

- [1] JOSE JUAN ARROYO-MALDONADO, a/k/a (Colombia),
- [2] JUAN MARRERO, a/k/a (Teddy),
- [3] MILDRED RIVERA-MUNIZ,
- [4] RAY JONATHAN LOPEZ-SOTO,
- [5] NICHOLAS JONES-BIRD, a/k/a/ (Nico),
- [6] MERCEDES RIVERA-NIEVES,
- [7] BIENVENIDO GONZALEZ, a/k/a (Broky),
- [8] DAMIL MARRERO,
- [9] MYRIAM MORALES,
- [10] DANNY DIAZ-BOTTIA,
- [11] ULISA KESIA CEPEDA-VAZQUEZ, a/k/a (Michelle),
- [12] JESSE AVILES,
- [13] JOEL IRIZARRY, a/k/a (Norberto Velazquez),
- [14] WILMARIE FELICIANO,
- [15] JOSE ROBLES SOTO, and
- [16] CARLOS CRUZ-RIVERA, a/k/a (El Cano Llorens)

the defendants herein, and others known and unknown to the Grand Jury, did knowingly and willfully conspire and agree with each other to commit an offense against the United States, that is, devising a scheme and artifice to defraud Scotiabank, BPPR, Banco Santander, BBVA, Firstbank, Chase, Citibank, T.D. Bank, Wachovia, Merrill Lynch, each of which is a financial institution as defined in title 18, United States Code, Section 20, and CFCU, and PFCU, (whose deposits were insured by the Federal Deposit Insurance Corporation [FDIC] or the National Credit Union ^{Administration H.R.C.} Association [NACUA]), and/or to obtain moneys, funds, credits, assets, securities or other property owned by, or under the custody or control of said financial institutions, all 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). All in violation of Title 18, United States Code, Section 1349.

OBJECT OF THE CONSPIRACY

It was the object for the conspiracy for defendants and their coconspirators to unlawfully enrich themselves by defrauding financial institutions and obtaining money and property under the custody or control of financial institutions by, among other means: (a) fabricating false and fraudulent checks, (b) using stolen bank account information to conduct unauthorized financial

transactions, and/or (c) depositing false and fraudulent checks at financial institutions in order to fraudulently pay off car loan accounts, purchase motor vehicles and other tangible property.

MANNER AND MEANS OF THE CONSPIRACY

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

1. Throughout the course of the conspiracy defendants and others known and unknown to the Grand Jury used bank routing numbers and stolen bank account information to reproduce false and fraudulent checks and/or cause such false and fraudulent checks to be deposited at financial institutions in order to unlawfully obtain and/or attempt to obtain United States currency, motor vehicles and other tangible property valued in at least \$1,700,745.00 all or part under the custody and control of a financial institution. The scheme was accomplished among other means by causing false and fraudulent checks to be deposited at financial institutions in order to clear and pay off car loan accounts and/or in other instances pay off motor vehicles in full to car dealerships. The defendants would then obtain possession of new and/or used vehicles for personal gain and profit.

2. The leaders of the conspiracy [1] **JOSE JUAN ARROYO-MALDONADO, a/k/a (Colombia)**, hereinafter referred to as (**ARROYO**), and [2] **JUAN MARRERO, a/k/a (Teddy)**, hereinafter referred to as (**MARRERO**), were both inmates at the Bayamon State Penitentiary. Through the use of pre-paid cellular phones, defendants [1] **ARROYO** and/or [2] **MARRERO** would contact car dealerships and individuals posting vehicle sales on newspaper classifieds and induce them to believe they were legitimately interested in purchasing the vehicles.

3. It was part of the manners and means of the conspiracy that [1] **ARROYO**, [2] **MARRERO** and others would use false names and aliases when contacting individuals and car dealerships for the purpose of obtaining bank account information and setting up fraudulent purchases of motor vehicles.

4. Upon contacting the car dealerships or the individuals selling motor vehicles, [1]

ARROYO and/or **[2] MARRERO** would negotiate the price of the vehicle, obtain the bank account and car loan information from the dealerships and individuals, and indicate they would make a wire transfer to: a) the car dealership's bank account to cover the entire purchase amount of the vehicle from the dealership or, b) pay off the car loan debt on behalf of the individual selling cars through newspaper ads.

5. Upon obtaining bank account and car loan information, **[1] ARROYO** and/or **[2] MARRERO** would contact other codefendants and individuals known and unknown to the Grand Jury who would create and print false and fraudulent checks with the information provided by **[1] ARROYO** and/or **[2] MARRERO**. Codefendants and others known and unknown to the Grand Jury would, in turn, deposit and/or cause said fraudulent checks to be deposited at financial institutions to cover the entire purchase amount of the vehicle being bought from a car dealership or pay off the car loan debt from the individual selling cars in newspaper ads by making a payment with a false and fraudulent check to the financial institution holding the car loan with a false and fraudulent check. All as instructed and agreed with **[1] ARROYO** and/or **[2] MARRERO**.

6. Once the deposit of the false and fraudulent check was made, **[1] ARROYO** and/or **[2] MARRERO** would contact the car dealerships and individuals selling vehicles and inform them that a wire transfer was made and instructed them to verify their bank accounts to confirm that a deposit for the purchase amount of the vehicle had been deposited at the dealership's bank account or that the car loan had been paid off on behalf of the individuals selling cars on classifieds, thus, deceiving the individuals and car dealership representatives into believing that funds would be immediately available in their accounts via an alleged wire transfer.

7. Upon verifying that a deposit was made or that a payment for the entire loan debt was made at the request of **[1] ARROYO** and/or **[2] MARRERO**, car dealerships and/or individuals selling vehicles would transfer the title and possession of the motor vehicle to codefendants and others known and unknown to the Grand Jury in belief that the price of the vehicle had been legitimately paid or that the car loan had been paid off in its entirety. Days later,

the financial institutions, car dealerships and individuals selling vehicles would notice that the checks deposited by defendants were false and fraudulent.

8. At various times during the conspiracy, [1] **ARROYO** and/or [2] **MARRERO** would use stolen bank account information to conduct wire transfers and/or electronic payments to financial institutions in order to pay off car loans and instruct other coconspirators to obtain title and possession of motor vehicles.

9. At various times during the conspiracy, coconspirators [3] **MILDRED RIVERA-MUNIZ**, [4] **RAY JONATHAN LOPEZ-SOTO**, [5] **NICHOLAS JONES-BIRD**, a/k/a/ (Nico), [6] **MERCEDES RIVERA-NIEVES**, [7] **BIENVENIDO GONZALEZ**, a/k/a (Broky), [8] **DAMIL MARRERO**, [9] **MYRIAM MORALES**, [10] **DANNY DIAZ-BOTTIA**, [11] **ULISA KESIA CEPEDA-VAZQUEZ**, a/k/a (Michelle), [12] **JESSE AVILES**, [13] **JOEL IRIZARRY**, a/k/a (Norberto Velazquez), [14] **WILMARIE FELICIANO**, [15] **JOSE ROBLES SOTO**, [16] **CARLOS CRUZ-RIVERA** and others known and unknown to the Grand Jury would communicate and agree with [1] **ARROYO** and/or [2] **MARRERO** and others to: a) fabricate and print false and fraudulent checks for deposit at various financial institutions; b) cause such false and fraudulent checks to be deposited at financial institutions, and/or c) arrange the pick up of motor vehicles from car dealerships or from individuals selling vehicles through newspaper ads that had been paid off with false and fraudulent checks.

ACTS IN FURTHERANCE OF THE CONSPIRACY

In an effort to carry out their objectives of the conspiracy to defraud, codefendants carried out the following acts among others, in furtherance of the conspiracy:

1. Counts 2 through 34 of this indictment are hereby incorporated herein by reference as if fully set forth herein, each count constituting an overt act in furtherance of the conspiracy.

2. In or about August of 2010, [5] **NICHOLAS JONES-BIRD**, acting in conjunction with [1] **ARROYO**, obtained a bank account number from an individual whose initials are K.M. for the alleged purpose of transferring and depositing funds for the purchase of a commercial property.

Such funds were never deposited. The bank account information was used by defendants to prepare the false checks referred to in Counts 24, 25 and 26 of this indictment.

3. On or about October 1, 2010, [6] **MERCEDES RIVERA-NIEVES** faxed to a person whose initials are H.M., a copy of a bank deposit slip and receipt thereof of BPPR pertaining to a fraudulent check in the amount of \$30,888.04 that had been deposited at a financial institution to pay off a car loan related to the vehicle referred to in Count 9 of this indictment.

4. On or about October, 2010, codefendant [5] **NICHOLAS JONES-BIRD**, upon instructions of [1] **ARROYO** and [2] **MARRERO**, transferred possession of a 2008 Chevrolet Corvette, referenced in Counts 4 and 8 of this Indictment, to [11] **ULISA KESIA CEPEDA-VAZQUEZ**.

5. On or about October, 2010 [16] **CARLOS CRUZ-RIVERA** recruited [6] **MERCEDES RIVERA-NIEVES** into the conspiracy for the purpose of having her prepare false and fraudulent checks, as well as make deposits of said fraudulent checks at various financial institutions.

6. On or about November, 2010, codefendant [11] **ULISA KESIA CEPEDA-VAZQUEZ**, after receiving numerous telephone calls and requests from a car dealership salesman for the return of a 2010 Ford Explorer that had been purchased with a fraudulent check as more fully described in Count 14 of this indictment, left the vehicle at a mall parking lot in Caguas, Puerto Rico, for the car salesman to pick the vehicle and thus attempt to avoid being identified with the scheme.

7. On or about December, 2010, upon instructions from [1] **ARROYO** and [2] **MARRERO**, codefendant [7] **BIENVENIDO GONZALEZ** received from an individual whose initials are A.A.C. a 2010 Nissan Armada, referenced in Count 17 of this Indictment.

8. On or about December, 2010, codefendant [7] **BIENVENIDO GONZALEZ**, upon instructions of [1] **ARROYO** and [2] **MARRERO**, transferred possession of a 2010 Nissan Armada, referenced in Count 17 of this Indictment, to [11] **ULISA KESIA CEPEDA-VAZQUEZ**.

9. On or about March 18, 2011, [1] **ARROYO** and/or [2] **MARRERO** contacted an individual whose initials are M.R. and asked him/her to pick up a fraudulent check in the amount of \$34,336.43 from [15] **JOSE ROBLES-SOTO** who had been instructed to deliver the checks by **MARRERO**.

10. On or about April 29, 2011 [1] **ARROYO** and/or [2] **MARRERO** contacted an individual whose initials are Y.C.F. and asked him/her to deposit at financial institutions fraudulent checks made by [4] **RAY JONATHAN LOPEZ-SOTO** on behalf of [1] **ARROYO** and/or [2] **MARRERO** in the sums of \$36,650.00; \$42,995.00; \$53,800.00; \$51,950.00 and \$32,995.00. Said fraudulent checks were handed to Y.C.F. by [15] **JOSE ROBLES-SOTO**.

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

COUNTS TWO THROUGH THIRTY FOUR

Bank Fraud

18 U.S.C. §§1344 and 2

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

From in or around August, 2010, through in or around May, 2011, in the District of Puerto Rico and elsewhere within the jurisdiction of this Court,

[1] **JOSE JUAN ARROYO-MALDONADO, a/k/a (Colombia),**
[2] **JUAN MARRERO, a/k/a (Teddy),**
[3] **MILDRED RIVERA-MUNIZ,**
[4] **RAY JONATHAN LOPEZ-SOTO,**
[5] **NICHOLAS JONES-BIRD, a/k/a/ (Nico),**
[6] **MERCEDES RIVERA-NIEVES,**
[7] **BIENVENIDO GONZALEZ, a/k/a (Broky),**
[8] **DAMIL MARRERO,**
[9] **MYRIAM MORALES,**
[10] **DANNY DIAZ-BOTTIA,**
[11] **ULISA KESIA CEPEDA-VAZQUEZ, a/k/a (Michelle),**
[12] **JESSE AVILES,**
[13] **JOEL IRIZARRY, a/k/a (Norberto Velazquez), and**
[14] **WILMARIE FELICIANO,**

the defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly and willfully devise a scheme and artifice to defraud Scotiabank, BPPR, BSPR, BBVA, FirstBank, Chase, Citibank, T.D. Bank, Wachovia, Merrill Lynch, each of which is

a financial institution as defined in Title 18, United States Code, Section 20, and CFCU, and PFCU, (whose deposits were insured by the Federal Deposit Insurance Corporation or the National Credit Union Administration), and to obtain moneys, funds, credits, assets, securities and other property owned by and under the custody and control of said financial institutions, all 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) and Section (2).

OBJECT OF THE SCHEME AND ARTIFICE

It was the object of the scheme to defraud for defendants and their coconspirators to unlawfully enrich themselves by defrauding financial institutions and obtaining money and property under the custody or control of financial institutions by, among other means: (a) fabricating false and fraudulent checks; (b) using stolen bank account information to conduct unauthorized financial transactions, and/or (c) depositing false and fraudulent checks at financial institutions in order to fraudulently pay off car loan accounts, purchase motor vehicles and other tangible property.

SCHEME AND ARTIFICE TO DEFRAUD

The manner and means by which the defendants sought to accomplish the objects and purpose of the scheme to defraud included, among others, the following:

1. Paragraphs One 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

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

Count	Date on/about	Defendant(s)	Act in Execution
2	08/03/2010	[1] JOSE JUAN ARROYO-MALDONADO; [3] MILDRED RIVERA-MUNIZ	Coordinated and/or caused to be deposited a false and fraudulent check in the amount of \$20,000.00 at BSPR account no.4000153112.
3	8/12/2010	[1]JOSE JUAN ARROYO-MALDONADO; and [10] DANNY DIAZ-BOTTIA	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the amount of \$39,751.06 at CFCU, purporting to be a check from an account in Merrill Lynch for the purpose of paying off a car loan debt, in connection with a fraudulent purchase of a 2008 BMW 335i from an individual with initials A.P..
4	8/18/2010	[1]JOSE JUAN ARROYO-MALDONADO; and [5]NICHOLAS JONES-BIRD,	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$58,028.98 at FirstBank, purporting to be a check from an account at Merrill Lynch for the purpose of paying off a car loan debt, in connection with a fraudulent purchase of a 2008 Chevrolet Corvette from an individual with initials E.F.P..
5	8/18/2010	[1]JOSE JUAN ARROYO-MALDONADO; [3] MILDRED RIVERA-MUNIZ, and [12] JESSE AVILES-RIVERA	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$16,442.89 at FirstBank, purporting to be a check from an account at Merrill Lynch for the purpose of fraudulently paying off a car loan, in connection to 2007 Mitsubishi Outlander.

6	8/21/2010	[1]JOSE JUAN ARROYO-MALDONADO, and [5]NICHOLAS JONES-BIRD,	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$26,352.46 at FirstBank purporting to be a check from an account at Merrill Lynch for the purpose of paying off a car loan, in connection with a fraudulent purchase of a 2006 Infiniti M35 from an individual with initials C.F.C..
7	8/23/2010	[1]JOSE JUAN ARROYO-MALDONADO; [5] NICHOLAS JONES-BIRD, [3] MILDRED RIVERA-MUNIZ, and [9] MYRIAM MORALES	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$20,806.19 at PFCU, purporting to be a check from an account in Merrill Lynch for the purpose of paying off a car loan, in connection with a fraudulent purchase of a 2007 Dodge Aspen from an individual with initials J.F.
8	10/1/2010	[1]JOSE JUAN ARROYO-MALDONADO, and [6] MERCEDES RIVERA-NIEVES	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$58,751.85 at FirstBank, purporting to be a check from an account at Chase for the purpose of paying off a car loan, in connection with the concealment of a fraudulent purchase of a 2008 Chevrolet Corvette from an individual with initials E.F.P.
9	10/1/2010	[1]JOSE JUAN ARROYO-MALDONADO, and [6] MERCEDES RIVERA-NIEVES	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$30,888.04 at BPPR/Popular Auto, purporting to be a check from an account at Chase for the purpose of paying off a car loan, in connection with a fraudulent purchase of a 2008 BMW 330 from individuals with the initials of L.M. and E.E..

10	10/6/2010	[1]JOSE JUAN ARROYO-MALDONADO, and [6] MERCEDES RIVERA-NIEVES	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$27,643.82 at FirstBank, purporting to be a check from an account at Chase, for the purpose of fraudulently paying off a car loan, in connection with an attempt to fraudulently purchase a 2009 Ford Sport Track Adrenalin from an individual with initials J.T.M..
11	10/6/2010	[1]JOSE JUAN ARROYO-MALDONADO, and [6] MERCEDES RIVERA-NIEVES	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$14,859.57 at BPPR, purporting to be a check from an account at Chase for the purpose of paying off a car loan, in connection with a a fraudulent purchase of a 2009 Ford Econoline Van from a company with initials P.A.
12	10/6/2010	[1]JOSE JUAN ARROYO-MALDONADO, and [6] MERCEDES RIVERA-NIEVES	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the amount of \$51,535.76 at BPPR, purporting to be a check from an account at Chase for the purpose of paying off a car loan, in connection with a fraudulent purchase of a 2010 Mercedes Benz 350 from an individual with initials of L.G..
13	10/13/2010	[1]JOSE JUAN ARROYO-MALDONADO, and [3] MILDRED RIVERA-MUNIZ	Coordinated, conducted and/or caused to be conducted four (4) fraudulent electronic debits in the sums of \$14,766.50 each, from a stolen account at BPPR, account no. 157057232, belonging to a company with initials C.H. for the purpose of paying off a car loan account, in connection with a fraudulent purchase of a 2009 Mercedes Benz SLK300 from an individual with initials S.J.R..

14	11/18/2010	<p>[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, [4] RAY JONATHAN LOPEZ-SOTO, and [11]JULISA KESIA CEPEDA-VAZQUEZ</p>	<p>Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$27,745.75 at FirstBank, purporting to be a check from an account at BPPR, using a stolen account number 057234108, in connection with a fraudulent purchase of a 2010 Ford Explorer from a car dealership.</p>
15	11/18/2010	<p>[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, and [4] RAY JONATHAN LOPEZ-SOTO</p>	<p>Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$53,582.75 at Santander, purporting to be a check from an account at BPPR, using a stolen account number 057234108, in connection with an attempt to fraudulently purchase a Ford Pick-up truck from a car dealership.</p>
16	11/29/2010	<p>[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, and [4] RAY JONATHAN LOPEZ-SOTO</p>	<p>Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$17,387.50, purporting to be a check from an account at BPPR, in connection with an attempt to conduct a fraudulent purchase of jewelry from a jewelry store.</p>
17	12/6/2010	<p>[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, [4] RAY JONATHAN LOPEZ-SOTO,</p>	<p>Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$55,640.00 at Scotiabank, purporting to be a check from an account at Chase, in connection with a fraudulent purchase of a 2010 Nissan Armada from a car dealership with initials A.L..</p>

18	12/8/2010	[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, and [4] RAY JONATHAN LOPEZ-SOTO	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$152,700.00 at Citibank, purporting to be a check from an account at Chase, in connection with an attempt to conduct a fraudulent purchase of a 2010 MACK Truck from a dealership.
19	12/8/2010	[1] JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, and [4] RAY JONATHAN LOPEZ-SOTO	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$55,961.00 at BPPR, purporting to be a check from an account at Chase, in connection with an attempt to conduct a fraudulent purchase of heavy duty construction equipment from a dealership.
20	12/8/2010	[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, and [4] RAY JONATHAN LOPEZ-SOTO	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$289,488.50 at BPPR, purporting to be a check from an account at Chase, in connection with an attempt to conduct a fraudulent purchase of heavy duty construction equipment from a dealership.
21	12/14/2010	[1]JOSE JUAN ARROYO-MALDONADO, and [2] JUAN MARRERO, and [4] RAY JONATHAN LOPEZ-SOTO	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$94,900.00 at BPPR, purporting to be a check from an account at Chase, in connection with an attempt to conduct a fraudulent purchase of a 2008 Porsche Carrera from a car dealership with initial G.H..

22	12/14/2010	<p>[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, [4] RAY JONATHAN LOPEZ-SOTO, [7] BIENVENIDO GONZALEZ [11]ULISA KESIA CEPEDA-VAZQUEZ,</p>	<p>Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$39,899.00 at BPPR, purporting to be a check from an account at Chase, in connection with a fraudulent purchase of a 2010 Toyota Venza from a car dealership.</p>
23	12/14/2010	<p>[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, [4] RAY JONATHAN LOPEZ-SOTO, and [10] DANNY DIAZ BOTTIA</p>	<p>Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$120,862.00 at FirstBank, purporting to be a check from an account at Chase, in connection with a fraudulent purchase of a 2011 Chevrolet Corvette and a 2010 Chevrolet Camaro from a car dealership with initials R.M..</p>
24	12/16/2010	<p>[1]JOSE JUAN ARROYO-MALDONADO, [5] NICHOLAS JONES-BIRD, [13] JOEL IRIZARRY</p>	<p>Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$35,894.37 at FirstBank, purporting to be a check from an account at Chase, using a stolen account no. 807590724 from JP Morgan-Chase for the purpose of paying off a car loan, in connection with a fraudulent purchase of a 2009 Mitsubishi Lancer Ralliart from an individual with initials M.P..</p>
25	12/16/2010	<p>[1]JOSE JUAN ARROYO-MALDONADO, [5] NICHOLAS JONES-BIRD [13] JOEL IRIZARRY, and [14] WILMARIE FELICIANO</p>	<p>Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$17,984.85 at FirstBank, purporting to be a check from an account at Chase, using stolen account number 807590724 from JP Morgan-Chase, for the purpose of paying off a car loan, in connection with a fraudulent purchase of a 2009 Nissan Sentra from a an individual with initials C.S.M..</p>

26	12/31/2010	[1]JOSE JUAN ARROYO-MALDONADO, [5] NICHOLAS JONES-BIRD, and [8] DAMIL MARRERO	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$17,700.00 at BPPR, purporting to be a check from an account at Chase, using stolen account number 807590724 from JP Morgan-Chase, in connection with a fraudulent purchase of 2 all terrain vehicles (ATVs) and 1 motorcycle from a dealership.
27	1/20/2011	[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, and [4] RAY JONATHAN LOPEZ-SOTO	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$28,349.00 at BBVA, purporting to be a check from an account at Chase, in connection with a fraudulent purchase of a 2010 Ford Econoline from a car dealership.
28	1/25/2011	[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, and [4] RAY JONATHAN LOPEZ-SOTO	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$35,550.00 at BPPR, purporting to be a check from an account at T.D. Bank, using stolen account number 8244753401 from T.D. Bank, in connection with an attempt to fraudulently purchase a 2008 Toyota Venza from a car dealership.
29	1/27/2011	[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, [3] MILDRED RIVERA-MUNIZ, [4] RAY JONATHAN LOPEZ-SOTO, [13]JOEL IRIZARRY, and [14] WILMARIE FELICIANO	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$45,995.00 at BPPR, purporting to be a check from an account at T.D. Bank, using stolen account number 8244753401 from T.D. Bank, in connection with a fraudulent purchase of a 2010 GMC Acadia from a car dealership.

30	1/28/2011	[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, [4] RAY JONATHAN LOPEZ-SOTO, [13] JOEL IRIZARRY, and [14]WILMARIE FELICIANO,	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$33,545.00 at BPPR, purporting to be a check from an account at T.D. Bank, using stolen account number 8244753401 from T.D. Bank, in connection with a fraudulent purchase of a 2011 Mitsubishi Endeavor from a car dealership.
31	3/30/2011	[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, and [4] RAY JONATHAN LOPEZ-SOTO,	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$44,995.00 at Santander, purporting to be a check from an account at Wachovia Bank, in connection with an attempt to conduct a fraudulent purchase a 2011 Chrysler Town & Country from a car dealership.
32	4/27/2011	[1]JOSE JUAN ARROYO-MALDONADO [2] JUAN MARRERO, and [4] RAY JONATHAN LOPEZ-SOTO,	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$25,445.00 at BPPR, purporting to be a check from an account at Chase, in connection with an attempt to fraudulently purchase a 2011 Scion from a car dealership.
33	4/27/2011	[1]JOSE JUAN ARROYO-MALDONADO [2] JUAN MARRERO, and [4] RAY JONATHAN LOPEZ-SOTO, [3]MILDRED RIVERA-MUNIZ, AND [9]MYRIAM MORALES	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$50,000.00 at Santander, purporting to be a check from an account at Chase.

34	5/2/2011	[1]JOSE JUAN ARROYO-MALDONADO, [2] JUAN MARRERO, and [4] RAY JONATHAN LOPEZ-SOTO	Coordinated, fabricated and/or caused to be deposited a false and fraudulent check in the sum of \$32,995.00 at FirstBank, purporting to be a check from an account at Chase, in connection with an attempt to fraudulently purchase a 2008 Mercedes Benz C300 from a car dealership.
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Each count listed above constituting a separate and distinct violation of Title 18, United States Code, Sections 1344(1) and (2), and Section 2.

COUNTS THIRTY FIVE THROUGH THIRTY SIX
Engaging in Monetary Transactions in Property
Derived from Specified Unlawful Activity
18 U.S.C. § 1957 and 2

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

On or about the dates listed below, in the District of Puerto Rico and within the jurisdiction of this Court,

[1]JOSE JUAN ARROYO-MALDONADO, and
[3] MILDRED RIVERA-MUNIZ,

defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, as specified in each count below, did knowingly engage and/or attempted to engage in monetary transactions affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000.00, such property having been derived from the specified unlawful activity of Bank Fraud, in violation of Title 18, United States Code, Sections 1344(1) and (2), as described in the table below:

COUNT	DATE	DEFENDANTS INVOLVED	TRANSACTION
35	08/05/2010	[1]JOSE JUAN ARROYO-MALDONADO, and [3] MILDRED RIVERA-MUNIZ	Coordinated and caused to be made a transfer in the sum of \$15,000.00 from checking account no. 4000153112 at BSPR to savings account no. 4000940882 at BSPR, constituting proceeds from the specified unlawful activity of Bank Fraud as set forth in Counts 1 and 2 of this indictment.
36	11/18/2010	[1] JOSE JUAN ARROYO-MALDONADO, [3] MILDRED RIVERA-MUNIZ	Coordinated and caused to be cashed a check in the sum of \$29,500.00 issued by a car dealership from bank account no. 048224855 at BPPR pertaining to the fraudulent sale to such dealership of a 2007 Mercedes Benz GL 450, which had been the proceeds of the specified unlawful activity of bank fraud not charged herein.

Each count listed above constituting a separate and distinct violation of Title 18, United States Code, Sections 1957 and 2.

COUNT THIRTY SEVEN
Laundering of Monetary Instruments
18 U.S.C. § 1956(a)(1)(A)(i) and 2

On or about April 29, 2011, in the District of Puerto Rico, and within the jurisdiction of this Honorable Court,

[1]JOSE JUAN ARROYO-MALDONADO,
[3] MILDRED RIVERA-MUNIZ, and
[9]MYRIAM MORALES

the defendants herein, aiding and abetting each other, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and/or foreign commerce, to wit: the cashing of a check in the amount of \$10,000.00 dollars from Santander account number 3004745867, which involved the proceeds of a specified unlawful activity, that is bank fraud, with the intent to promote the carrying on of the specified unlawful activity of bank fraud, and while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity. All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

FORFEITURE ALLEGATION

18 U.S.C. §982(a)(2)(A)

1. The allegations contained in Counts One through Thirty Four 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 one or more of the offenses in violation of Title 18, United States Code, Sections 1344 and 1349, set forth in Counts One through Thirty Four of this Indictment,

- [1] JOSE JUAN ARROYO-MALDONADO, a/k/a (Colombia),
- [2] JUAN MARRERO, a/k/a (Teddy),
- [3] MILDRED RIVERA-MUNIZ,
- [4] RAY JONATHAN LOPEZ-SOTO,
- [5] NICHOLAS JONES-BIRD, a/k/a/ (Nico),
- [6] MERCEDES RIVERA-NIEVES,
- [7] BIENVENIDO GONZALEZ, a/k/a (Broky),
- [8] DAMIL MARRERO,
- [9] MYRIAM MORALES,
- [10] DANNY DIAZ-BHOTIA,
- [11] ULISA KESIA CEPEDA-VAZQUEZ, a/k/a (Michelle),
- [12] JESSE AVILES,
- [13] JOEL IRIZARRY, a/k/a (Norberto Velazquez),
- [14] WILMARIE FELICIANO,
- [15] JOSE ROBLES SOTO,
- [16] CARLOS CRUZ RIVERA, a/k/a (El Cano Llorens)

the defendants herein, 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 \$156,988.31, 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, including but not limited to:

- i. 2009 Mercedes Benz SLK300, VIN: DBWK54F29F191199
- ii. 2007 Mercedes Benz C230, VIN: WDBRF54H17F863627
- iii. Jewelry: One pair of gold earrings; one gold ring and two Rado watches
- iv. Mercedes Benz C230 Car Rims
- v. Mercedes Benz C230 Front Grille
- vi. U.S. Currency in the amount of \$1,802.00

All of the above property seized on March 31, 2011.

c. REAL PROPERTY:

All the lots or parcels of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, of a residential property shown below, located located at Urb. Jardines de Monaco II #7 Portugal St. Manati, PR 00674 in Puerto Rico, more particularly described as:

URBAN: Block "A" Lot 12, Jardines de Monaco Development, Second Section, located at Coto Sur and Rio Arriba Saliente Wards of the Municipality of Manati, Puerto Rico, with a superficial area of 332.50 square meters, and bounding on the north, in 25.00 meters with Cacique Construction, Inc.; on the South, in 25 meters, with Lot No. 11; on the East, in 13.30 meters, with Street No. 5. It contains a masonry one-story home with three bedrooms and one bathroom.



The above described and shown property was used by codefendants and coconspirators to:

1) promote the scheme to defraud, and 2) used to conceal articles, vehicles and tangible property, product of the scheme to defraud.

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.

FORFEITURE ALLEGATION

18 U.S.C. §982(a)(1)

1. The allegations contained in Count Thirty Five through Thirty Seven of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(1).

2. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1956 and 1957, the defendants,

[1] JOSE JUAN ARROYO-MALDONADO, a/k/a (Colombia),

[3] MILDRED RIVERA-MUNIZ,

[9] MYRIAM MORALES,

shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

a. Money Judgment: A sum of money of at least \$39,700.00, representing the amount of proceeds obtained as a result of the offenses mentioned above, for which the defendants are jointly and severally liable.

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;
- 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).


TRUE BILL

FOREPERSON *JU*

Dated:

April 26, 2012

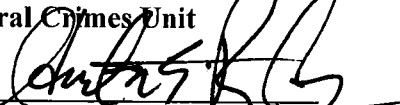
ROSA EMILIA RODRIGUEZ-VELEZ
UNITED STATES ATTORNEY



Jose A. Ruiz Santiago
Assistant United States Attorney
Chief of the Criminal Division



Ernesto G. Lopez-Soltero
Assistant United States Attorney
Deputy Chief, White Collar and
General Crimes Unit



Hector E. Ramirez-Carbo
Assistant United States Attorney

Dated: *4/25/2012*