

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEBORAH J. FLORES, (1)
[DOB: 11/16/1965],

SHERRI E. GUTIERREZ, (2)
[DOB: 12/15/1966],

BRENDA DE LA CRUZ, (7)
[DOB: 11/16/1979],

MARTIN ALEJANDRO LLANAS-RODRIGUEZ, (8)
[DOB: 05/05/1982],

JULIO CESAR LLANAS-RODRIGUEZ, (9)
[DOB: 10/26/1974],

ELDER ENRIQUE ORDONEZ-CHANAS, a/k/a "Flaco," (10)
[DOB: 07/13/1981],

RANFE ADAIAS HERNANDEZ-FLORES, a/k/a "Miguel," (12)
[DOB: 09/11/1989],

LUIS ADALBERTO FELIPE-LOPEZ a/k/a "Joel," a/k/a "Jorge Luis Nieves-Rivera," (13)
[DOB: 11/17/1982],

MARTIN LARA-RODRIGUEZ, (14)
[DOB: 01/30/1980],

RAFAEL HERNANDEZ-ORTIZ, a/k/a "Hugo," (15)
[DOB: 07/31/1981],

CHRISTOPHER B. ESCOBAR, (16)
[DOB: 10/27/1989],

SHAYNA R. VANVACTER, (17)
[DOB: 08/30/1986],

No. 12-06001-01/19-CR-SJ-GAF

**COUNT ONE - All Defendants
18 U.S.C. § 371**

(Conspiracy)
NMT 5 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class D Felony

**COUNTS TWO thru SEVEN
8 U.S.C. §§ 1324(a)(1)(A)(ii) and
1324(a)(1)(A)(v)(II)**

(Transporting Illegal Aliens)
NMT 10 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

**COUNTS EIGHT thru SIXTEEN
18 U.S.C. §§ 1028(a)(1), (b)(1), and 2**

(Unlawful Production of Identification Documents)
NMT 15 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

**COUNTS SEVENTEEN thru TWENTY-FIVE
18 U.S.C. §§ 1028(a)(7), (b)(1), and 2**

(Unlawful Transfer of the Means of Identification of Another)
NMT 15 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class C Felony

JON L. GRIPPANDO , (18))	COUNTS TWENTY-SIX thru THIRTY-
[DOB: 11/04/1987],)	FOUR
)	42 U.S.C. § 408(a)(7)(C) and 18 U.S.C. § 2
and)	(Social Security Fraud)
)	NMT 5 Years Imprisonment
MELISSA L. SCALLIONS , (19))	NMT \$250,000 Fine
[DOB: 10/03/1985],)	NMT 3 Years Supervised Release
)	Class D Felony
Defendants.)	
)	COUNTS THIRTY-FIVE thru FORTY-
)	FOUR
)	18 U.S.C. § 1028A
)	(Aggravated Identity Theft)
)	NLT 2 Years Imprisonment
)	NMT \$250,000 Fine
)	NMT 1 Years Supervised Release
)	Class E Felony
)	
<u>Defendant: Counts Summary:</u>)	COUNT FORTY-FIVE
)	8 U.S.C. § 1326
Flores: 1, 4-6, 9, 10-14,18, 21-24, 27,)	(Unlawful Re-Entry Into the United States by a
30-32, 37, 40-42)	Previously Deported or Removed Alien)
Gutierrez: 1, 2, 3, 8, 16, 34, 35, 44)	NMT 2 Years Imprisonment
De La Cruz: 1, 9, 10, 12, 21, 22, 30, 31,)	NMT \$250,000 Fine
40, 41)	NMT 1 Year Supervised Release
Martin Llanas-Rodriguez: 1, 13, 14, 19,)	Class E Felony
20, 23, 28, 29, 42, 43)	
Julio Llanas-Rodriguez: 1, 11, 13-15,)	\$100 Mandatory Special Assessment All Counts
23-25, 32, 33, 42, 43)	
Elder Ordonez-Chanas: 1, 9-15, 18-25,)	Forfeiture Allegation: All defendants
27-33, 37-43)	8 U.S.C. § 1324(b)
Ranfe Hernandez-Flores: 1, 4, 5)	18 U.S.C. §§ 1028(b)(5) and (g)
Luis Felipe-Lopez: 1, 2, 3, 7, 8, 16, 17, 26,)	18 U.S.C. § 982(a)(2)(B)
35, 36, 44, 45)	18 U.S.C. § 982(a)(6)(A)
Lara-Rodriguez: 1)	
Rafael Hernandez-Ortiz: 1, 6)	
Escobar: 1)	
Shayna Vanvacter: 1, 16, 44)	
Grippando: 1)	
Scallions: 1)	

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

At all times material to this Indictment:

GENERAL ALLEGATIONS

1. **SHERRI GUTIERREZ, DEBORAH FLORES, CHRISTOPHER ESCOBAR, SHAYNA VANVACTER, JON GRIPPANDO, MELISSA SCALLIONS,** Stephen Vanvacter, Sara Gonzalez, Christina Gonzalez, and Jessica Gonzalez are United States citizens who resided in St. Joseph, Missouri.

2. **DEBORAH FLORES** and Stephen Vanvacter are two of the organizers of the business known as A to Z Auto Credit LLC, which is a used car dealership located in St. Joseph, Missouri.

3. **BRENDA DE LA CRUZ** is a United States citizen who resides in San Antonio, Texas.

4. **MARTIN ALEJANDRO LLANAS-RODRIGUEZ** and **JULIO CESAR LLANAS-RODRIGUEZ** are citizens and nationals of Mexico, who are unlawfully present in the United States residing in San Antonio, Texas. **MARTIN ALEJANDRO LLANAS-RODRIGUEZ** has been previously deported from the United States to Mexico.

5. **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,” RANFE ADAIAS HERNANDEZ-FLORES a/k/a “Miguel,”** and Nelson Dariseo Bautista-Orozco are citizens and nationals of Guatemala, who are unlawfully present in the United States residing in Carthage, Missouri.

6. **LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera,”** is a citizen and national of Guatemala, who is unlawfully present in the United States and resided in North Carolina. **LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera,”** has been previously deported from the United States.

7. **RAFAEL HERNANDZ-ORTIZ a/k/a “Hugo,”** is a citizen and national of Mexico, who is unlawfully present in the United States and resides in Minnesota.

8. **MARTIN LARA-RODRIGUEZ,** is a citizen and national of Mexico, who is unlawfully present in the United States and resided in Chicago, Illinois, and Lexington, North Carolina.

9. The Saint Joseph, Missouri license office is located at 2319 N. Belt Highway, St. Joseph, Missouri 64506. The St. Joseph, Missouri license office is overseen by the Missouri Department of Revenue and it is operated by an independent contractor. The independent contractor that operates the office is St. Joseph License, LLC. In order to obtain a Missouri driver’s or nondriver’s license, applicants are required to provide proof of U.S. citizenship which may be shown by a certified U.S. birth certificate. Applicants must also provide proof of their Social Security Number, which may be shown by presenting a valid Social Security card. Applicants must also provide proof of a Missouri residential address.

COUNT ONE

Conspiracy to transport illegal aliens, to unlawfully produce identification documents, to unlawfully transfer the means of identification of another person, and to commit social security fraud

10. Paragraphs 1 through 8 of the general allegations section as set forth above, are re-alleged and expressly incorporated as if fully set forth herein.

11. From on or about November 2009, and continuing until January 10, 2012, in the Western District of Missouri and elsewhere, defendants **SHERRI GUTIERREZ, DEBORAH FLORES, BRENDA DE LA CRUZ, MARTIN ALEJANDRO LLANAS-RODRIGUEZ, JULIO CESAR LLANAS-RODRIGUEZ, ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,” RANFE ADAIAS HERNANDEZ-FLORES a/k/a “Miguel,” LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera,” MARTIN LARA-RODRIGUEZ, RAFAEL HERNANDEZ-ORTIZ a/k/a “Hugo,” CHRISTOPHER ESCOBAR, SHAYNA VANVACTER, JON GRIPPANDO, MELISSA SCALLIONS,** knowingly and willfully conspired, combined, confederated and agreed with each other and Stephen Vanvacter, Sara Gonzalez, Christina Gonzalez, Jessica Gonzalez, Nelson Dariseo Bautista-Orozco and others known and unknown to the grand jury, to violate the laws of the United States, specifically, to commit the following offenses:

- a) Transporting illegal aliens in violation of 8 U.S.C. § 1324(a)(1)(A)(ii);
- b) Unlawful production of an identification document in violation of 18 U.S.C. § 1028(a)(1);
- c) Unlawful transfer of the means of identification of another person in violation of 18 U.S.C. § 1028(a)(7); and
- d) Social security fraud in violation of 42 U.S.C. § 408(a)(7).

Manner and Means of the Conspiracy

12. The manner and means by which the conspiracy operated included, but was not limited to the following:

- a) It was part of the conspiracy that illegal aliens would travel from across the United States to St. Joseph, Missouri, to obtain either a Missouri driver’s or nondriver’s license at the St.

Joseph license office, with unlawfully obtained birth certificates and Social Security cards. From November 2009, until the date of this Indictment it is estimated that over 3,500 Missouri driver and nondriver licenses have been unlawfully issued to illegal aliens as part of this conspiracy.

b) It was further part of the conspiracy that **SHERRI GUTIERREZ, DEBORAH FLORES, CHRISTOPHER ESCOBAR, SHAYNA VANVACTER, JON GRIPPANDO, MELISSA SCALLIONS**, Stephen Vanvacter, Sara Gonzalez, Christina Gonzalez, Jessica Gonzalez and others would accompany illegal aliens to the St. Joseph license office, under the guise of being translators, in order to assist them with obtaining a Missouri driver's or nondriver's license that was in the name of another person who was listed on unlawfully obtained birth certificates and Social Security cards.

c) It was further part of the conspiracy that illegal aliens would request assistance from **SHERRI GUTIERREZ, DEBORAH FLORES, CHRISTOPHER ESCOBAR, SHAYNA VANVACTER, JON GRIPPANDO, MELISSA SCALLIONS**, Stephen Vanvacter, Sara Gonzalez, Christina Gonzalez, Jessica Gonzalez, **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a "Flaco," RANFE ADAIAS HERNANDEZ-FLORES a/k/a "Miguel," LUIS ADALBERTO FELIPE-LOPEZ a/k/a "Joel" a/k/a "Jorge Luis Nieves-Rivera," RAFAEL HERNANDEZ-ORTIZ a/k/a "Hugo," MARTIN LARA-RODRIGUEZ** and others in obtaining birth certificates and Social Security cards in the names of others. These birth certificates and Social Security cards would then be used by the illegal aliens to obtain Missouri driver's or nondriver's licenses, all of which could then be used by the illegal aliens to remain unlawfully in the United States, to unlawfully obtain employment and for other unlawful purposes.

d) It was further part of the conspiracy that **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco”** would request document sets from **MARTIN ALEJANDRO LLANAS-RODRIGUEZ, JULIO CESAR LLANAS-RODRIGUEZ,** and **BRENDA DE LA CRUZ** to be of a specific age range for either a male or a female that corresponded with the illegal alien who was the customer.

e) It was further part of the conspiracy that **SHERRI GUTIERREZ, DEBORAH FLORES, CHRISTOPHER ESCOBAR, SHAYNA VANVACTER, JON GRIPPANDO, MELISSA SCALLIONS,** Stephen Vanvacter, Sara Gonzalez, Christina Gonzalez, Jessica Gonzalez and others would usually instruct and assist the illegal aliens to practice memorizing the names on the birth certificates, the names of the parents on the birth certificates, the dates of birth, the social security numbers and also practice signing the name similar to the signature that appeared on the Social Security card.

f) It was further part of the conspiracy that **SHERRI GUTIERREZ, DEBORAH FLORES,** Stephen Vanvacter, Sara Gonzalez, Christina Gonzalez, Jessica Gonzalez, **LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera”, ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** and others would sometimes alter the Social Security cards by chemically removing the signatures from the Social Security cards to allow the illegal alien to sign the cards.

g) It was further part of the conspiracy that **SHERRI GUTIERREZ, DEBORAH FLORES, CHRISTOPHER ESCOBAR, SHAYNA VANVACTER, JON GRIPPANDO, MELISSA SCALLIONS,** Stephen Vanvacter, Sara Gonzalez, Christina Gonzalez, Jessica

Gonzalez and others would assist the illegal aliens prepare for potential questions from the license office employees.

h) It was further part of the conspiracy that **SHERRI GUTIERREZ, DEBORAH FLORES, CHRISTOPHER ESCOBAR, SHAYNA VANVACTER, JON GRIPPANDO, MELISSA SCALLIONS**, Stephen Vanvacter, Sara Gonzalez, Christina Gonzalez, Jessica Gonzalez and others would assist the illegal aliens who did not live in Missouri, by providing them with a Missouri residential address to use in order to obtain the Missouri driver's or nondriver's license.

i) It was further part of the conspiracy that **SHERRI GUTIERREZ, DEBORAH FLORES, CHRISTOPHER ESCOBAR, SHAYNA VANVACTER, JON GRIPPANDO, MELISSA SCALLIONS**, Stephen Vanvacter, Sara Gonzalez, Christina Gonzalez, Jessica Gonzalez and others would usually collect money from the illegal aliens for the document sets and Missouri driver's or nondriver's license. The money would usually then be paid to **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a "Flaco,"** or Nelson Dariseo Bautista-Orozco who would then pay **MARTIN ALEJANDRO LLANAS-RODRIGUEZ, JULIO CESAR LLANAS-RODRIGUEZ**, or **BRENDA DE LA CRUZ**. The illegal aliens were usually charged between \$1,500 and \$1,600 for the document sets and the Missouri driver's and nondriver's licenses. From November 2009, until the date of this Indictment it is estimated that over \$5,250,000 in gross proceeds have been paid by illegal aliens to members of this conspiracy.

j) It was part of the conspiracy that **MARTIN ALEJANDRO LLANAS-RODRIGUEZ, JULIO CESAR LLANAS-RODRIGUEZ** and **BRENDA DE LA CRUZ** would obtain state issued birth certificates, usually from the State of Texas, and they would also obtain a

Social Security card in the name of the individual on the birth certificate, so they would have a matching document set.

k) It was further part of the conspiracy that **MARTIN ALEJANDRO LLANAS-RODRIGUEZ, JULIO CESAR LLANAS-RODRIGUEZ** and **BRENDA DE LA CRUZ** would purchase birth certificates and social security cards from individuals, who were willing to sell their identification documents to **MARTIN ALEJANDRO LLANAS-RODRIGUEZ, JULIO CESAR LLANAS-RODRIGUEZ, BRENDA DE LA CRUZ** and others.

l) It was further part of the conspiracy that **SHERRI GUTIERREZ, DEBORAH FLORES**, Stephen Vanvacter, Sara Gonzalez, Christina Gonzalez, Jessica Gonzalez and others would usually receive birth certificates and Social Security cards from **MARTIN ALEJANDRO LLANAS-RODRIGUEZ, JULIO CESAR LLANAS-RODRIGUEZ, BRENDA DE LA CRUZ, ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** and others via U.S. express mail packages.

Overt Acts

13. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Western District of Missouri and elsewhere:

a) On February 28, 2010, **SHERRI GUTIERREZ** sent a wire transfer to **JULIO CESAR LLANAS-RODRIGUEZ**, in the amount of \$450, reference number 40700166, which was received on March 1, 2010.

b) On January 24, 2011, **SHERRI GUTIERREZ** transported illegal aliens from the Motel 6 in St. Joseph, Missouri, to the St. Joseph license office.

c) On January 24, 2011, **LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera”**, transported illegal aliens from St. Joseph, Missouri, to North Carolina.

d) On February 21, 2011, **LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera”**, transported illegal aliens from North Carolina to St. Joseph, Missouri.

e) On February 22, 2011, **SHERRI GUTIERREZ** and **MELISSA SCALLIONS** transported illegal aliens from **GUTIERREZ’s** residence and the Motel 6 in St. Joseph, Missouri, to the St. Joseph license office.

f) On February 23, 2011, **LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera”**, transported illegal aliens from St. Joseph, Missouri, to North Carolina.

g) On May 25, 2011, **NELSON DARISEO BAUTISTA-OROZCO** deposited in his bank account with U.S. Bank, a check dated May 25, 2011, in the amount of \$5,900, from **DEBORAH FLORES**, and drawn on her A to Z Auto Credit bank account with Academy Bank.

h) On July 11, 2011, an express mail package was sent from “**Flaco Ordonez** 706 W. Mound St. Carthage, MO 64836” to “**Deborah Flores**, 1214 5 ave. Saint Joseph, MO 64505,” via the U.S. Mail. Inside the package was an envelope containing a Texas birth certificate and matching Social Security card. The package was delivered on July 12, 2011, and left in the mailbox at 1214 5th Ave., St. Joseph, Missouri. Sara Gonzalez came out of the house and retrieved the package from the mailbox.

i) On July 11, 2011, an express mail package was sent from “**Martin Llanas** 13700 Judson Rd Lot 148, San Antonio, TX 78233,” to “Francisco Lopez, 539 Olive St., Carthage, MO

64836,” via U.S. Mail. Inside the package was a manila envelope with the name “**Flaco**” written on the outside. Inside the envelope was a white envelope also with the name “**Flaco**” written on the outside. Inside the white envelope were six sets of Texas birth certificates with matching Social Security cards. The package was delivered on July 12, 2011, to 539 Olive St., Carthage, Missouri. **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** answered the door and accepted delivery of the package.

j) On July 14, 2011, an express mail package was sent from “**Martin Llanas**, 13700 Judson Rd., Lot 148, San Antonio, TX 78233” to “Francisco Lopez, 834 E. Chestnut St., Carthage, MO 64836,” via U.S. Mail. Inside the package was a manila envelope with the name “**Flaco**” written on the outside. Inside the envelope were six document sets, four were Texas birth certificates, there was one Alabama and one California birth certificate, and matching Social Security cards. The package was delivered on July 15, 2011.

k) On September 12, 2011, an express mail package was sent from “Brenda Cervantes, 1620 San Carlos, San Antonio, TX” to “Auto Credit A to Z, 5114 St. Joseph Ave., St. Joseph, Missouri 64505,” via U.S. Mail. Inside the package was a plain white envelope that contained five document sets. One was an Illinois birth certificate and the other four were Texas birth certificates and matching Social Security cards. The package was delivered on September 13, 2011, to 5114 St. Joseph Ave., St. Joseph, Missouri, and **DEBORAH FLORES** accepted delivery of the package.

l) On September 19, 2011, an express mail package was sent from “**Brenda De La Cruz**, 1620 San Carlos, SA TX 78207,” to “**Deborah Flores**, 1214 5Ave, Saint Joseph MO 64505,” via U.S. Mail. Inside the package was a plain white envelope that contained seven document sets

with Texas birth certificates and matching Social Security cards. The package was delivered on September 20, 2011, to the residence at 1214 5th Ave., St. Joseph, Missouri.

m) On September 19, 2011, an express mail package was sent from “**Martin Llanas**, 13700 Judson rd. lot. 148, San Antonio TX 78233,” to “**Deborah Flores**, 1214 5ave., Saint Joseph, MO 64505,” via U.S. Mail. Inside the package was a sealed and folded in half express mail package containing two document sets with Texas birth certificates and matching Social Security cards. The package was delivered on September 20, 2011, to the residence at 1214 5th Ave., St. Joseph, Missouri.

n). On September 19, 2011, an express mail package was sent from “13700 Judson Rd 148, **Julio Llanas**, San Antonio tx 78233,” to “Auto Credit A to Z, 5114 St Joseph Av., Saint Joseph, MO 64505,” via U.S. Mail. Inside the package was a single Texas birth certificate. The package was delivered on September 20, 2011, to Stephen Vanvacter at 5114 St. Joseph Ave., St. Joseph, Missouri.

o) On September 20, 2011, Sara Gonzalez and Christina Gonzalez transported illegal aliens from the K-Mart in St. Joseph, Missouri, to the St. Joseph license office and then back to the K-Mart.

p) On October 11, 2011, Christina Gonzalez and **DEBORAH FLORES** transported illegal aliens to the St. Joseph license office.

q) On October 14, 2011, **RANFE ADAIAS HERNANDEZ-FLORES a/k/a “Miguel,”** transported illegal aliens to the St. Joseph license office.

r) On October 20, 2011, **RANFE ADAIAS HERNANDEZ-FLORES a/k/a “Miguel,”** transported illegal aliens to the St. Joseph license office.

s) On October 22, 2011, Sara Gonzalez transported illegal aliens to the St. Joseph license office.

t) On October 24, 2011, an express mail package sent from “**Julio Llanas** 6419 Skyline Dr. 1058, Houston, TX 77057,” to “Nelson Bautista, 425 Oak St. Apt 2 Carthage, MO 64836,” via U.S. Mail. Inside the package was a sealed white business envelope, which contained two documents sets with Texas birth certificates, and matching Social Security cards. The package was delivered on October 25, 2011, to 425 Oak St., Carthage, Missouri, and Nelson Dariseo Bautista-Orozco retrieved the package from the mailbox.

u) On October 29, 2011, Sara Gonzalez, assisting **DEBORAH FLORES**, transported illegal aliens to the St. Joseph license office.

v) On January 4, 2012, **SHERRI GUTIERREZ** attempted to obtain a Missouri nondriver’s identification card at the St. Joseph license office for an illegal alien with an Idaho birth certificate and an altered social security card.

w) On January 8, 2012, **LUIS ADALBERTO FELIPE-LOPEZ** a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera”, transported illegal aliens from North Carolina to St. Joseph, Missouri.

x) On January 10, 2012, **LUIS ADALBERTO FELIPE-LOPEZ** a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera,” attempted to transport illegal aliens from North Carolina to St. Joseph, Missouri.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO through SEVEN

Transporting Illegal Aliens

COUNT TWO

14. On or about January 24, 2011, in the Western District of Missouri, **SHERRI GUTIERREZ** and **LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera”**, defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, knowing and in reckless disregard of the fact that certain illegal aliens, Reyna Veronica Coutino-Dominguez, Ana Lidia Vazquez-Cruz and Irma Ramirez-Capote, had come to, entered and remained in the United States in violation of law, did transport and move the aliens within the United States by means of transportation and otherwise in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(A)(v)(II).

COUNT THREE

15. Between on or about February 21 and February 23, 2011, in the Western District of Missouri, **SHERRI GUTIERREZ** and **LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, knowing and in reckless disregard of the fact that Reyna Veronica Coutino-Dominguez, an illegal alien had come to, entered and remained in the United States in violation of law, did transport and move the alien within the United States by means of transportation and otherwise in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(A)(v)(II).

COUNT FOUR

16. On or about October 14, 2011, in the Western District of Missouri, **DEBORAH FLORES** and **RANFE ADAIAS HERNANDEZ-FLORES a/k/a “Miguel,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, knowing and in reckless disregard of the fact that certain illegal aliens, Domingo Castro Reynoso and Linda Vanessa Villegas, had come to, entered and remained in the United States in violation of law, did transport and move the aliens within the United States by means of transportation and otherwise in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(A)(v)(II).

COUNT FIVE

17. On or about October 20, 2011, in the Western District of Missouri, **DEBORAH FLORES** and **RANFE ADAIAS HERNANDEZ-FLORES a/k/a “Miguel,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, knowing and in reckless disregard of the fact that certain illegal aliens, Gregorio Elias Esteban-Pedro and Jesus Esteban-Pedro, had come to, entered and remained in the United States in violation of law, did transport and move the aliens within the United States by means of transportation and otherwise in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(A)(v)(II).

COUNT SIX

18. On or about October 22, 2011, in the Western District of Missouri, **DEBORAH FLORES** and **RAFAEL HERNANDZ-ORTIZ a/k/a “Hugo,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, knowing and in reckless disregard of the fact that certain illegal aliens, Mayra Edith Lopez-Barrios, Claudia Guadalupe Guzman-Soto and Claudia Ferm-Aguilaz, had come to, entered and remained in the United States in violation of law, did transport and move the aliens within the United States by means of transportation and otherwise in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(A)(v)(II).

COUNT SEVEN

19. On or about January 10, 2012, in the Western District of Missouri, **LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera”**, defendant herein, aiding and abetting others, both known and unknown to the grand jury, knowing and in reckless disregard of the fact that certain illegal aliens, Carlos Perez-De la Cruz, Alex Lopez-Lozano, Israel Hernandez-Godinez, Isaias Carrillo-Adorno, Soledad Juarez-Cabrera, and Sebastian Sanchez-Juarez had come to, entered and remained in the United States in violation of law, did transport and move the aliens within the United States by means of transportation and otherwise in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(A)(v)(II).

COUNTS EIGHT through SIXTEEN

Unlawful Production of Identification Documents

COUNT EIGHT

20. On or about February 22, 2011, in the Western District of Missouri, **SHERRI GUTIERREZ and LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera”**, defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly and without lawful authority, produce an identification document, to wit, a Missouri nondriver’s license in the name of Jennifer Sarah Gutierrez, the production of the identification was in or affected interstate or foreign commerce, and the offense involved the production of an identification document that is or appears to be a driver’s license or personal identification card.

All in violation of Title 18, United States Code, Sections 1028(a)(1), 1028(b)(1), and 2.

COUNT NINE

21. On or about September 14, 2011, in the Western District of Missouri, **DEBORAH FLORES, BRENDA DE LA CRUZ and ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly and without lawful authority, produce an identification document, to wit, a Missouri nondriver’s license in the name of Adrian Garcia, the production of the identification document was in or affected interstate or foreign commerce, and the offense involved the production of an identification document that is or appears to be a driver’s license or personal identification card.

All in violation of Title 18, United States Code, Sections 1028(a)(1), 1028(b)(1), and 2.

COUNT TEN

22. On or about September 19, 2011, in the Western District of Missouri, **DEBORAH FLORES, BRENDA DE LA CRUZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly and without lawful authority, produce an identification document, to wit, a Missouri nondriver’s license in the name of Jesse Morales Jr., the production of the identification document was in or affected interstate or foreign commerce, and the offense involved the production of an identification document that is or appears to be a driver’s license or personal identification card.

All in violation of Title 18, United States Code, Sections 1028(a)(1), 1028(b)(1), and 2.

COUNT ELEVEN

23. On or about September 20, 2011, in the Western District of Missouri, **DEBORAH FLORES, JULIO CESAR LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly and without lawful authority, produce an identification document, to wit, a Missouri nondriver’s license in the name of Paul Anthony Jimenez, the production of the identification document was in or affected interstate or foreign commerce, and the offense involved the production of an identification document that is or appears to be a driver’s license or personal identification card.

All in violation of Title 18, United States Code, Sections 1028(a)(1), 1028(b)(1), and 2.

COUNT TWELVE

24. On or about September 20, 2011, in the Western District of Missouri, **DEBORAH FLORES, BRENDA DE LA CRUZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a**

“**Flaco**,” defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly and without lawful authority, produce identification documents, to wit, Missouri nondriver’s licenses in the names of Daniel Thomas Corona, Kevin Adrian Diaz, Efrain Villarreal-Santos, the production of the identification documents was in or affected interstate or foreign commerce, and the offense involved the production of identification documents that are or appear to be driver’s licenses or personal identification cards.

All in violation of Title 18, United States Code, Sections 1028(a)(1), 1028(b)(1), and 2.

COUNT THIRTEEN

25. On or about October 7, 2011, in the Western District of Missouri, **DEBORAH FLORES, MARTIN ALEJANDRO LLANAS-RODRIGUEZ, JULIO CESAR LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly and without lawful authority, produce an identification document, to wit, a Missouri nondriver’s license in the name of Jesse Baldera, the production of the identification document was in or affected interstate or foreign commerce, and the offense involved the production of an identification document that is or appears to be a driver’s license or personal identification card.

All in violation of Title 18, United States Code, Sections 1028(a)(1), 1028(b)(1), and 2.

COUNT FOURTEEN

26. On or about October 11, 2011, in the Western District of Missouri, **DEBORAH FLORES, MARTIN ALEJANDRO LLANAS-RODRIGUEZ, JULIO CESAR LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly and without lawful authority, produce an identification document, to wit, a Missouri

nondriver's license in the name of Rafael Joseph Mendez Alva III, the production of the identification document was in or affected interstate or foreign commerce, and the offense involved the production of an identification document that is or appears to be a driver's license or personal identification card.

All in violation of Title 18, United States Code, Sections 1028(a)(1), 1028(b)(1), and 2.

COUNT FIFTEEN

27. On or about November 9, 2011, in the Western District of Missouri, **JULIO CESAR LLANAS-RODRIGUEZ**, and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a "Flaco,"** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly and without lawful authority, produce identification documents, to wit, Missouri nondriver's licenses in the names of Jasen Anthony Gill and Jesse Bosquez, the production of the identification documents were in or affected interstate or foreign commerce, and the offense involved the production of identification documents that are or appear to be driver's licenses or personal identification cards.

All in violation of Title 18, United States Code, Sections 1028(a)(1), 1028(b)(1), and 2.

COUNT SIXTEEN

28. On or about January 9, 2012, in the Western District of Missouri, **SHERRI GUTIERREZ**, **LUIS ADALBERTO FELIPE-LOPEZ a/k/a "Joel" a/k/a "Jorge Luis Nieves-Rivera"**, and **SHAYNA VANVACTER**, defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly and without lawful authority, produce an identification document, to wit, a Missouri nondriver's license in the name of Roel Aaron Garcia, the production of the identification was in or affected interstate or foreign commerce,

and the offense involved the production of an identification document that is or appears to be a driver's license or personal identification card.

All in violation of Title 18, United States Code, Sections 1028(a)(1), 1028(b)(1), and 2.

COUNTS SEVENTEEN through TWENTY-FIVE

Unlawful Transfer of the Means of Identification of Another

COUNT SEVENTEEN

29. On or about February 22, 2011, in the Western District of Missouri, **LUIS ADALBERTO FELIPE-LOPEZ a/k/a "Joel" a/k/a "Jorge Luis Nieves-Rivera"**, defendant herein, aiding and abetting others, both known and unknown to the grand jury, did knowingly transfer without lawful authority, a means of identification of another person, to wit, a Texas birth certificate in the name of Jennifer Sarah Gutierrez, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, false representation of United States citizenship in violation of 18 U.S.C. § 911, and the means of identification were transported in and affected interstate or foreign commerce, and the offense involved the transfer of an identification document that is or appears to be a birth certificate.

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1), and 2.

COUNT EIGHTEEN

30. On or about July 11, 2011, in the Western District of Missouri, **DEBORAH FLORES** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a "Flaco,"** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer without lawful authority, a means of identification of another person, to wit, a Texas birth certificate in the name of Steven Ray Saucedo, with the intent to commit, or to aid or

abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, false representation of United States citizenship in violation of 18 U.S.C. § 911, and the means of identification were transported in the mail in the course of the transfer, and the offense involved the transfer of identification documents that are or appear to be birth certificates.

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1), and 2.

COUNT NINETEEN

31. On or about July 11, 2011, in the Western District of Missouri, **MARTIN ALEJANDRO LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer without lawful authority, a means of identification of another person, to wit, Texas birth certificates in the names of Tito Alaquinez, James Paul Coronado, Jason Flores, Branden James Garza, Adrian Maurice Ortegon and Elias Andrade III, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, false representation of United States citizenship in violation of 18 U.S.C. § 911, and the means of identification were transported in the mail in the course of the transfer, and the offense involved the transfer of identification documents that are or appear to be birth certificates.

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1), and 2.

COUNT TWENTY

32. On or about July 14, 2011, in the Western District of Missouri, **MARTIN ALEJANDRO LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer without lawful authority, a means of identification of another

person, to wit, Texas birth certificates in the names of Juan Garses, Juan Gallardo Jr., Anthony Cisneros and Christopher Alexander Perez, an Alabama birth certificate in the name of Jeremy Wayne Vargas, and a California birth certificate in the name of Joe Louis Melendez, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, false representation of United States citizenship in violation of 18 U.S.C. § 911, and the means of identification were transported in the mail in the course of the transfer, and the offense involved the transfer of identification documents that are or appear to be birth certificates.

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1), and 2.

COUNT TWENTY-ONE

33. On or about September 12, 2011, in the Western District of Missouri, **DEBORAH FLORES, BRENDA DE LA CRUZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer without lawful authority, a means of identification of another person, to wit, Texas birth certificates in the names of Jesse Morales Jr., John Rene Espinoza-Garcia, George Munoz Jr., and Daniel Thomas Corona, and an Illinois birth certificate in the name of Adrian Garcia, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, false representation of United States citizenship in violation of 18 U.S.C. § 911, and the means of identification were transported in the mail in the course of the transfer, and the offense involved the transfer of identification documents that are or appear to be birth certificates.

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1), and 2.

COUNT TWENTY-TWO

34. On or about September 19, 2011, in the Western District of Missouri, **DEBORAH FLORES, BRENDA DE LA CRUZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer without lawful authority, a means of identification of another person, to wit, Texas birth certificates in the name of Jacob Ramos, Kevin Adrian Diaz, Gilbert Arrendondo, Rodolfo Guerra Jr., Efrain Villarreal-Santos, John Eric Sanchez, and Billy Trinidad Ochoa, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, false representation of United States citizenship in violation of 18 U.S.C. § 911, and the means of identification were transported in the mail in the course of the transfer, and the offense involved the transfer of identification documents that are or appear to be birth certificates.

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1), and 2.

COUNT TWENTY-THREE

35. On or about September 19, 2011, in the Western District of Missouri, **DEBORAH FLORES, MARTIN ALEJANDRO LLANAS-RODRIGUEZ, JULIO CESAR LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer without lawful authority, a means of identification of another person, to wit, Texas birth certificates in the name of Rafael Joseph Mendez Alva III and Jesse Baldera, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, false representation of United States citizenship in violation of 18

U.S.C. § 911, and the means of identification were transported in the mail in the course of the transfer, and the offense involved the transfer of identification documents that are or appear to be birth certificates.

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1), and 2.

COUNT TWENTY-FOUR

36. On or about September 19, 2011, in the Western District of Missouri, **DEBORAH FLORES, JULIO CESAR LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer without lawful authority, a means of identification of another person, to wit, a Texas birth certificate in the name of Paul Anthony Jimenez, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, false representation of United States citizenship in violation of 18 U.S.C. § 911, and the means of identification were transported in the mail in the course of the transfer, and the offense involved the transfer of identification documents that are or appear to be birth certificates.

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1), and 2.

COUNT TWENTY-FIVE

37. On or about October 24, 2011, in the Western District of Missouri, **JULIO CESAR LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer without lawful authority, a means of identification of another person, to wit, Texas birth certificates in the names of Jasen Anthony Gill and Jesse Bosquez, with the intent

to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, false representation of United States citizenship in violation of 18 U.S.C. § 911, and the means of identification were transported in the mail in the course of the transfer, and the offense involved the transfer of identification documents that are or appear to be birth certificates.

All in violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(1), and 2.

COUNTS TWENTY-SIX through THIRTY-FOUR

Social Security Fraud

COUNT TWENTY-SIX

38. On or about February 22, 2011, in the Western District of Missouri, **LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera,”** defendant herein, aiding and abetting others, both known and unknown to the grand jury, did knowingly possess a Social Security card with the intent to sell or alter it, to wit, a Social Security card in the name of Jennifer Sarah Gutierrez, for the purpose of obtaining anything of value from any person or for any other purpose.

All in violation of Title 42, United States Code, Section 408(a)(7)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-SEVEN

39. On or about July 11, 2011, in the Western District of Missouri, **DEBORAH FLORES,** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly possess a Social Security card with the intent to sell or alter it, to wit, a Social Security

card in the name of Steven Ray Saucedo, for the purpose of obtaining anything of value from any person or for any other purpose.

All in violation of Title 42, United States Code, Section 408(a)(7)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-EIGHT

40. On or about July 11, 2011, in the Western District of Missouri, **MARTIN ALEJANDRO LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly possess Social Security cards with the intent to sell or alter the cards, to wit, Social Security cards in the names of Tito Alaquinez, James Paul Coronado, Jason Flores, Branden James Garza, Adrian Maurice Ortegon and Elias Andrade III, for the purpose of obtaining anything of value from any person or for any other purpose.

All in violation of Title 42, United States Code, Sections 408(a)(7)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-NINE

41. On or about July 14, 2011, in the Western District of Missouri, **MARTIN ALEJANDRO LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly possess Social Security cards with the intent to sell or alter the cards, to wit, Social Security cards in the names of Juan Garses, Juan Gallardo Jr., Anthony Cisneros, Christopher Alexander Perez, Jeremy Wayne Vargas, and Joe Louis Melendez, for the purpose of obtaining anything of value from any person or for any other purpose.

All in violation of Title 42, United States Code, Section 408(a)(7)(C) and Title 18, United States Code, Section 2.

COUNT THIRTY

42. On or about September 12, 2011, in the Western District of Missouri, **DEBORAH FLORES, BRENDA DE LA CRUZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly possess Social Security cards with the intent to sell or alter the cards, to wit, Social Security cards in the names of Jesse Morales Jr., John Rene Garcia, George Munoz Jr., Daniel Thomas Corona, and Adrian Garcia, for the purpose of obtaining anything of value from any person or for any other purpose.

All in violation of Title 42, United States Code, Section 408(a)(7)(C) and Title 18, United States Code, Section 2.

COUNT THIRTY-ONE

43. On or about September 19, 2011, in the Western District of Missouri, **DEBORAH FLORES, BRENDA DE LA CRUZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly possess Social Security cards with the intent to sell or alter the cards, to wit, Social Security cards in the names of Jacob Ramos, Kevin Adrian Diaz, Gilbert Arrendondo, Rodolfo Guerra Jr., Efrain Villarreal-Santos, John Eric Sanchez, and Billy Trinidad Ochoa, for the purpose of obtaining anything of value from any person or for any other purpose.

All in violation of Title 42, United States Code, Section 408(a)(7)(C) and Title 18, United States Code, Section 2.

COUNT THIRTY-TWO

44. On or about September 19, 2011, in the Western District of Missouri, **DEBORAH FLORES, MARTIN ALEJANDRO LLANAS-RODRIGUEZ, JULIO CESAR LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly possess Social Security cards with the intent to sell or alter the cards, to wit, Social Security cards in the names of Rafael Joseph Mendez Alva III and Jesse Baldera, for the purpose of obtaining anything of value from any person or for any other purpose.

All in violation of Title 42, United States Code, Section 408(a)(7)(C) and Title 18, United States Code, Section 2.

COUNT THIRTY-THREE

45. On or about October 24, 2011, in the Western District of Missouri, **JULIO CESAR LLANAS-RODRIGUEZ,** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly possess Social Security cards with the intent to sell or alter the cards, to wit, Social Security cards in the names of Jasen Anthony Gill and Jesse Bosquez, for the purpose of obtaining anything of value from any person or for any other purpose.

All in violation of Title 42, United States Code, Section 408(a)(7)(C) and Title 18, United States Code, Section 2.

COUNT THIRTY-FOUR

46. On or about January 4, 2012, in the Western District of Missouri, **SHERRI GUTIERREZ,** defendant herein, aiding and abetting others, both known and unknown to the grand

jury, did knowingly possess a Social Security card with the intent to sell or alter it, to wit, a Social Security card in the name of Jeremiah Kriebs, for the purpose of obtaining anything of value from any person or for any other purpose.

All in violation of Title 42, United States Code, Section 408(a)(7)(C) and Title 18, United States Code, Section 2.

COUNTS THIRTY-FIVE through FORTY-FOUR

Aggravated Identity Theft

COUNT THIRTY-FIVE

47. On or about February 22, 2011, in the Western District of Missouri, **SHERRI GUTIERREZ** and **LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer, possess and use without lawful authority, a means of identification of another person, to wit, a Missouri nondriver’s license in the name of Jennifer Sarah Gutierrez, during and in relation to a felony offense, that being the unlawful production of an identification document as alleged in Count Eight herein.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT THIRTY-SIX

48. On or about February 22, 2011, in the Western District of Missouri, **LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera,”** defendant herein, aiding and abetting others, both known and unknown to the grand jury, did knowingly transfer, possess and use without lawful authority, a means of identification of another person, to

wit, a Social Security Card in the name of Jennifer Sarah Gutierrez, during and in relation to a felony offense, that being social security fraud as alleged in Count Twenty-Six herein.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT THIRTY-SEVEN

49. On or about July 11, 2011, in the Western District of Missouri, **DEBORAH FLORES**, and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer, possess and use without lawful authority, a means of identification of another person, to wit, a Social Security card in the name of Steven Ray Saucedo, during and in relation to a felony offense, that being social security fraud as alleged in Count Twenty-Seven herein.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT THIRTY-EIGHT

50. On or about July 11, 2011, in the Western District of Missouri, **MARTIN ALEJANDRO LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer, possess and use without lawful authority, a means of identification of another person, to wit, Social Security cards in the names of Tito Alaqueinez, James Paul Coronado, Jason Flores, Branden James Garza, Adrian Maurice Ortegon and Elias Andrade III, during and in relation to a felony offense, that being social security fraud as alleged in Count Twenty-Eight herein.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT THIRTY-NINE

51. On or about July 14, 2011, in the Western District of Missouri, **MARTIN ALEJANDRO LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer, possess and use without lawful authority, a means of identification of another person, to wit, Social Security Cards in the names of Juan Garses, Juan Gallardo Jr., Anthony Cisneros, Christopher Alexander Perez, Jeremy Wayne Vargas, and Joe Louis Melendez, during and in relation to a felony offense, that being social security fraud as alleged in Count Twenty-Nine herein.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT FORTY

52. On or about September 12, 2011, in the Western District of Missouri, **DEBORAH FLORES, BRENDA DE LA CRUZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer, possess and use without lawful authority, a means of identification of another person, to wit, Social Security cards in the names of Jesse Morales Jr., John Rene Garcia, George Munoz Jr., Daniel Thomas Corona, and Adrian Garcia, during and in relation to a felony offense, that being social security fraud as alleged in Count Thirty herein.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT FORTY-ONE

53. On or about September 19, 2011, in the Western District of Missouri, **DEBORAH FLORES, BRENDA DE LA CRUZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a**

“**Flaco**,” defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer, possess and use without lawful authority, a means of identification of another person, to wit, Social Security Cards in the names of Jacob Ramos, Kevin Adrian Diaz, Gilbert Arrendondo, Rodolfo Guerra Jr., Efrain Villarreal-Santos, John Eric Sanchez, and Billy Trinidad Ochoa, during and in relation to a felony offense, that being social security fraud as alleged in Count Thirty-One herein.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT FORTY-TWO

54. On or about September 19, 2011, in the Western District of Missouri, **DEBORAH FLORES, MARTIN ALEJANDRO LLANAS-RODRIGUEZ, JULIO CESAR LLANAS-RODRIGUEZ** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer, possess and use without lawful authority, a means of identification of another person, to wit, Social Security Cards in the names of Rafael Joseph Mendez Alva III and Jesse Baldera, during and in relation to a felony offense, that being social security fraud as alleged in Count Thirty-Two herein.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT FORTY-THREE

55. On or about October 24, 2011, in the Western District of Missouri, **JULIO CESAR LLANAS-RODRIGUEZ,** and **ELDER ENRIQUE ORDONEZ-CHANAS a/k/a “Flaco,”** defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer, possess and use without lawful authority, a means of identification of another person, to wit, Social Security cards in the names of Jasen Anthony Gill and Jesse Bosquez,

during and in relation to a felony offense, that being social security fraud as alleged in Count Thirty-Three herein.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT FORTY-FOUR

56. On or about January 9, 2012, in the Western District of Missouri, **SHERRI GUTIERREZ, LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera,”** and **SHAYNA VANVACTER**, defendants herein, aiding and abetting each other and others, both known and unknown to the grand jury, did knowingly transfer, possess and use without lawful authority, a means of identification of another person, to wit, a Missouri nondriver’s license in the name of Roel Aaron Garcia, during and in relation to a felony offense, that being the unlawful production of an identification document as alleged in Count Sixteen herein.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNT FORTY-FIVE

**Unlawful Re-Entry Into the United States
by a Previously Deported or Removed Alien**

57. On or about January 10, 2012, in the Western District of Missouri, **LUIS ADALBERTO FELIPE-LOPEZ a/k/a “Joel” a/k/a “Jorge Luis Nieves-Rivera,”** defendant herein, an alien who had been previously deported and removed on or about June 20, 2008, from the United States, knowingly and unlawfully was found in the United States at Kansas City, Missouri, the defendant without having obtained the consent of the Attorney General of the United States for re-application by the defendant for admission into the United States.

All in violation of Title 8, United States Code, Section 1326.

FORFEITURE ALLEGATION

58. The allegations of Counts One through Twenty-Five of this indictment are re-alleged and by this reference and fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants have an interest, pursuant to the provisions of Title 8, United States Code, Section 1324(b); Title 18, United States Code, Sections 1028(b)(5) and (g), Title 18, United States Code, Sections 982(a)(2)(B) and 982(a)(6)(A); and the procedures outlined in Title 21, United States Code, Section 853.

59. Upon conviction of any violation of Title 8, United States Code, Section 1324(a), each defendant shall forfeit to the United States any conveyance used to commit such violation, the gross proceeds of such violation, and any property traceable to such conveyance or proceeds pursuant to Title 8, United States Code, Section 1324(b).

60. Upon conviction of any violation of Title 8, United States Code, Section 1324(a), or conspiracy to violate this statute, each defendant shall forfeit to the United States any conveyance used to commit such violation and any property real or personal that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of such violation and is used to facilitate and is intended to be used to facilitate the commission of such violation pursuant to Title 18, United States Code, Section 982(a)(6)(A).

61. Upon conviction of any violation of Title 18, United States Code, Section 1028, each defendant shall forfeit to the United States any personal property used or intended to be used to commit such violation, the gross proceeds of such violation, and any property traceable to such conveyance or proceeds pursuant to Title 18, United States Code, Sections 1028(b)(5) and (g).

62. Upon conviction of any violation of Title 18, United States Code, Section 1028, or conspiracy to violate these statutes, each defendant shall forfeit to the United States any property

constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of such violation. pursuant to Title 18, United States Code, Section 982(a)(2)(B).

63. The property subject to forfeiture includes, but is not limited to, the following:

A. MONEY JUDGMENT

The sum of at least \$5,250,000.

B. PROCEEDS CONTAINED IN THE FOLLOWING BANK ACCOUNTS

All proceeds contained in the following accounts:

1. Bank account 5860 2385 4236 in the name of **Martin Alejandro LLANAS-Rodriguez** and located at Bank of America, 1210 W. 135th Street, Kansas City, Missouri.
2. Bank account 61192957 in the name of **Elder Enrique ORDONEZ-Chanas** and Berta Olga LOPEZ-Piedrasanta and located at Arvest Bank, 127 W. 10th Street, Kansas City, Missouri.
3. Bank account 42841395 in the name of Blair Lisbeth ORDONEZ-Chanas and **Elder Enrique ORDONEZ-Chanas** and located at Arvest Bank, 127 W. 10th Street, Kansas City, Missouri.
4. Bank account 42825052 in the name of **Elder Enrique ORDONEZ-Chanas** and Berta Olga LOPEZ-Piedrasanta and located at Arvest Bank, 127 W. 10th Street, Kansas City, Missouri.

SUBSTITUTE ASSETS

64. If the property described above as being subject to forfeiture, as a result of any act or omission of any defendant,

- (1) cannot be located upon the exercise of due diligence;

- (2) has been transferred or sold to, or deposited with a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b) to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property or to seek return of the property to the jurisdiction of the Court so that the property may be seized and forfeited.

All pursuant to the provisions of 8 U.S.C. § 1324(b); 18 U.S.C. §§ 1028(b)(5) and (g); 18 U.S.C. §§ 982(a)(2)(B) and 982(a)(6)(A); and the procedures outlined in 21 U.S.C. § 853(p).

A TRUE BILL.

9/25/12
DATE

/s/ Albert J. Byrd
FOREPERSON OF THE GRAND JURY

/s/ Jess E. Michaelsen
Jess E. Michaelsen, #52253
Assistant United States Attorney
Western District of Missouri