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United States of America

FILED
Oct 31, 2024
CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. 1) ALEX MOYANO MORALES, 2) MAITE CELIS SILVA, 3) ERIK OSORIO OLIVAREZ, 4) PABLO ANDRES VALDEZ RODRIGUEZ, 5) ROSA FRANCISCA BASTIAS SERRA, 6) CAMILO ANDRES SEPULVEDA GUZMAN, 7) BASSIL ALEJANDRO DACOSTA FRIAS, 8) CAMILO ALARCON ALARCON, 9) MICHELLE ALONDRA PARADA MUNOZ, 10) ALVARO ADRIAN LAGOS MIERIES, AND 11) HUMBERTO ANIBAL JIMENEZ MORENO, Defendants.	CASE NO. 1:24-CR-00265-KES-BAM 18 U.S.C. § 371 – Conspiracy to Commit Bank Robbery, Bank Larceny, and Possession of Stolen Bank Funds; 18 U.S.C. § 2113(a) – Bank Robbery 18 U.S.C. §§ 981(a)(1)(C), 924(d)(1), and 28 U.S.C. § 2461(c) – Criminal Forfeiture

I N D I C T M E N T

The Grand Jury charges:

At all times material to this Indictment:

1. Wells Fargo Bank, National Association ("Wells Fargo"), was a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

2. The Golden 1 ("Golden 1"), was a credit union, the deposits of which were then insured by the National Credit Union Administration.

3. Tri Counties Bank "Tri Counties"), was a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

4. OnPoint Community ("OnPoint"), was a credit union, the deposits of which were then insured by the National Credit Union Administration.

5. Solarity ("Solarity"), was a credit union, the deposits of which were then insured by the National Credit Union Administration.

COUNT ONE: [18 U.S.C. § 371 – Conspiracy to Commit Bank Robbery, Bank Larceny, and Possession of Stolen Bank Funds]

6. Beginning at a time unknown, but no later than in or about May 2024, and continuing thereafter until on or about October 30, 2024, in the Counties of Fresno, Stanislaus, Placer, Sutter, and Shasta, State and Eastern District of California, and elsewhere, ALEX MOYANO MORALES, MAITE CELIS SILVA, ERIK OSORIO OLIVAREZ, PABLO ANDRES VALDEZ RODRIGUEZ, ROSA FRANCISCA BASTIAS SERRA, CAMILO ANDRES SEPULVEDA GUZMAN, BASSIL ALEJANDRO DACOSTA FRIAS, CAMILO ALARCON ALARCON, MICHELLE ALONDRA PARADA MUNOZ, ALVARO ADRIAN LAGOS MIERIES, and HUMBERTO ANIBAL JIMENEZ MORENO, defendants, did knowingly, combine, conspire, confederate, and agree together, with each other, and with persons known and unknown to the Grand Jury, to commit certain offenses against the United States, to wit:

a) bank robbery, that is, to enter and attempt to enter a building used in whole and in part as a bank and credit union, specifically, buildings used by Wells Fargo, Golden 1, Tri Counties, OnPoint, and Solarity with intent to commit in such building, and part thereof, so used: 1) a larceny; and 2) a felony, specifically bank larceny in violation of Title 18 United States Code Section 2113(b); all in violation of Title 18, United States Code, Section 2113(a);

b) bank larceny, that is, to take and carry away, with intent to steal and purloin, money exceeding $1,000 belonging to and in the care, custody, control, management and possession of any bank and credit union, specifically, Wells Fargo, Golden 1, Tri Counties, OnPoint, and Solarity all in violation of Title 18, United States Code, Section 2113(b); and

c) possession of stolen bank funds, that is, to receive, possess, conceal, and store any property or money or other thing of value which has been taken or stolen from any bank and credit union, specifically, Wells Fargo, Golden 1, Tri Counties, OnPoint, and Solarity in violation of Title 18, United States Code, Section 2113(b), knowing the same to be property which had been stolen, all in violation of Title 18, United States Code, Section 2113(c).

Overt Acts

7. In furtherance of the conspiracy, and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Eastern District of California and elsewhere:

a) On or about September 17, 2024, MAITE CELIS SILVA rented a short term rental property in Turlock, California (hereinafter Turlock Airbnb) for a stay between September 17, 2024, and September 21, 2024. ALEX MOYANO, MAITE CELIS SILVA, ERIK OSORIO OLIVAREZ, PABLO VALDEZ RODRIGUEZ, ROSA FRANCISCA BASTIAS SERRA, CAMILO ANDRES SEPULVEDA GUZMAN, ALVARO ADRIAN LAGOS MIERIES, HUMBERTO ANIBAL JIMENEZ MORENO, and others, used this short term rental property as a staging point for the robbery of the Wells Fargo automated teller machines (ATMs) at 2401 E. Orangeburg Avenue, Modesto, California, on September 18, 2024.

b) On or about September 18, 2024, ALEX MOYANO, ERIK OSORIO OLIVAREZ, PABLO VALDEZ RODRIGUEZ, ROSA FRANCISCA BASTIAS SERRA, and CAMILO ANDRES SEPULVEDA GUZMAN, canvassed and scouted access to the Wells Fargo ATMs at 2401 E. Orangeburg Avenue, Modesto, California.

c) On or about September 18, 2024, ERIK OSORIO OLIVAREZ and ROSA FRANCISCA BASTIAS SERRA entered a business adjacent to the Wells Fargo ATMs at 2401 E. Orangeburg Avenue, Modesto, California, and distracted employees, while PABLO VALDEZ RODRIGUEZ scouted the cameras and assisted CAMILO ANDRES SEPULVEDA GUZMAN in spray painting the lens of an exterior surveillance camera.

d) On or about September 18, 2024, ALEX MOYANO MORALES, MAITE CELIS SILVA, ERIK OSORIO OLIVAREZ, PABLO ANDRES VALDEZ RODRIGUEZ, ROSA FRANCISCA BASTIAS SERRA, CAMILO ANDRES SEPULVEDA GUZMAN, ALVARO ADRIAN LAGOS MIERIES, AND HUMBERTO ANIBAL JIMENEZ MORENO, in the County of Stanislaus, State and Eastern District of California, did enter a building used in part as a bank, specifically, a building located at 2401 E. Orangeburg Avenue, Modesto, California containing an ATM in the possession of and with deposits belonging to Wells Fargo, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, with the intent to commit in such building, or part thereof, so used, 1) a larceny; and 2) a felony, specifically bank larceny in violation of Title 18 United States Code Section 2113(b); and aided and abetted to commit the same, all in violation of Title 18 United States Code, Section 2113(a) and 2.

e) On or about September 21, 2024, MAITE CELIS SILVA rented a short term rental property in Yuba City, California—which is 38 miles from the Golden 1 ATMs at 6839 Fivestar Blvd #D, Rocklin, California—for a stay between September 21, 2024, and September 25, 2024.

f) On or about September 22, 2024, ERIK OSORIO OLIVAREZ, PABLO VALDEZ RODRIGUEZ, CAMILO ANDRES SEPULVEDA GUZMAN, and others, canvassed and scouted the area in and around a building prior to a robbery at the building used in part as a bank and credit union, to wit—the building at 6839 Fivestar Blvd #D, Rocklin, California, containing the Golden 1 ATMs.

g) On or about September 23, 2024, MAITE CELIS SILVA rented a short term rental property in Mount Shasta, California (hereinafter Mount Shasta Airbnb) for a stay between September 23, 2024, and September 25, 2024. ERIK OSORIO OLIVAREZ, PABLO VALDEZ RODRIGUEZ, ROSA FRANCISCA BASTIAS SERRA, CAMILO ANDRES SEPULVEDA GUZMAN, BASSIL ALEJANDRO DACOSTA FRIAS, CAMILO ALARCON ALARCON, ALVARO ADRIAN LAGOS MIERIES, HUMBERTO ANIBAL JIMENEZ MORENO, and others, used the Mount Shasta Airbnb as a location to store robbery tools.

h) On or about September 27, 2024, PABLO VALDEZ RODRIGUEZ, CAMILO

ANDRES SEPULVEDA GUZMAN, BASSIL ALEJANDRO DACOSTA FRIAS, CAMILO ALARCON ALARCON, and others, entered a bank and building used in whole or in part as a bank and credit union, to wit— Tri Counties bank building at 43308 Hwy 299 E, Fall River Mills, California—with intent to commit in such building, and part thereof, so used, a felony in violation of Title 18 United States Code Section 2113(b) and a larceny.

i) On or about October 13, 2024, CAMILO ANDRES SEPULVEDA GUZMAN, and others, entered a building used as a bank and credit union, to wit—the Solarity building at 2412 West Nob Hill Blvd, Yakima, Washington, 98902, containing Solarity ATMs—with intent to commit in such building, and part thereof, so used, a felony in violation of Title 18 United States Code Section 2113(b) and a larceny.

j) On or about October 18, 2024, PABLO ANDRES VALDEZ RODRIGUEZ, ROSA FRANCISCA BASTIAS SERRA, CAMILO ANDRES SEPULVEDA GUZMAN, BASSIL ALEJANDRO DACOSTA FRIAS, CAMILO ALARCON ALARCON, MICHELLE ALONDRA PARADA MUNOZ, and others used a short term rental property in Welches, Oregon as a location to store robbery tools.

k) On or about October 30, 2024, ALVARO ADRIAN LAGOS MIERIES, HUMBERTO ANIBAL JIMENEZ MORENO, and others used a short-term rental property in Baring, Washington as a location to store robbery tools.

All in violation of Title 18, United States Code, Sections 371, 2113(a), 2113(b), and 2113(c).

<u>COUNT TWO</u>: [18 U.S.C. § 2113(a), 2 – Bank Robbery and aiding and abetting]

The Grand Jury further charges: T H A T

ALEX MOYANO MORALES,
MAITE CELIS SILVA,
ERIK OSORIO OLIVAREZ,
PABLO ANDRES VALDEZ RODRIGUEZ,
ROSA FRANCISCA BASTIAS SERRA
CAMILO ANDRES SEPULVEDA GUZMAN,
ALVARO ADRIAN LAGOS MIERIES, AND
HUMBERTO ANIBAL JIMENEZ MORENO,

defendants herein, on or about September 18, 2024, in the County of Stanislaus, State and Eastern District of California, did enter a building used in part as a bank, specifically, a building located at 2401

E. Orangeburg Avenue, Modesto, California containing an ATM in the possession of and with deposits belonging to Wells Fargo, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, with the intent to commit in such building, or part thereof, so used, 1) a larceny; and 2) a felony, specifically bank larceny in violation of Title 18 United States Code Section 2113(b);and aided and abetted to commit the same, all in violation of Title 18 United States Code, Section 2113(a), 2.

FORFEITURE ALLEGATION: [18 U.S.C. §§ 981(a)(1)(C), 924(d)(1), and 28 U.S.C. § 2461(c) – Criminal Forfeiture]

1. Upon conviction of the offense alleged in Count One of this Indictment, defendants ALEX MOYANO MORALES, MAITE CELIS SILVA, ERIK OSORIO OLIVAREZ, PABLO ANDRES VALDEZ RODRIGUEZ, ROSA FRANCISCA BASTIAS SERRA, CAMILO ANDRES SEPULVEDA GUZMAN, BASSIL ALEJANDRO DACOSTA FRIAS, CAMILO ALARCON ALARCON, MICHELLE ALONDRA PARADA MUNOZ, ALVARO ADRIAN LAGOS MIERIES, and HUMBERTO ANIBAL JIMENEZ MORENO shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2861(c), any property, real or personal, constituting or derived from proceeds traceable to said violation, including, but not limited to:

a. A sum of money equal to the amount of proceeds traceable to such offense, for which defendants are convicted.

2. Upon conviction of the offenses alleged in Count Two of this Indictment, defendants ALEX MOYANO MORALES, MAITE CELIS SILVA, ERIK OSORIO OLIVAREZ, PABLO ANDRES VALDEZ RODRIGUEZ, ROSA FRANCISCA BASTIAS SERRA CAMILO ANDRES SEPULVEDA GUZMAN, ALVARO ADRIAN LAGOS MIERIES, and HUMBERTO ANIBAL JIMENEZ MORENO shall forfeit to the United States pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2861(c), any firearms and ammunition involved in or used in the knowing commission of the offense.

3. If any property subject to forfeiture, as a result of the offenses alleged in this Indictment

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 difficult, it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(a), to seek forfeiture of any other property of said defendants up to the value of the property subject to forfeiture.

A TRUE BILL.

/s/ Signature on file w/AUSA

FOREPERSON

PHILLIP A. TALBERT
United States Attorney

KIMBERLY A. SANCHEZ

KIMBERLY A. SANCHEZ
Assistant United States Attorney
Chief, Fresno Office

No. __________

FILED
Oct 31, 2024
CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT

Eastern District of California
Criminal Division

THE UNITED STATES OF AMERICA
vs.
ALEX MOYANO MORALES,
MAITE CELIS SILVA,
ERIK OSORIO OLIVAREZ,
PABLO ANDRES VALDEZ RODRIGUEZ,
ROSA FRANCISCA BASTIAS SERRA,
CAMILO ANDRES SEPULVEDA GUZMAN,
BASSIL ALEJANDRO DACOSTA FRIAS,
CAMILO ALARCON ALARCON,
MICHELLE ALONDRA PARADA MUNOZ,
ALVARO ADRIAN LAGOS MIERIES, AND
HUMBERTO ANIBAL JIMENEZ MORENO

1:24-CR-00265-KES-BAM

INDICTMENT

VIOLATION(S): 18 U.S.C. § 371 – Conspiracy to Commit Bank Robbery, Bank Larceny, and Possession of Stolen Bank Funds; 18 U.S.C. § 2113(a) – Bank Robbery 18 U.S.C. §§ 981(a)(1)(C), 924(d)(1), and 28 U.S.C. § 2461(c) – Criminal Forfeiture

A true bill,

/s/
Foreman.

Filed in open court this ______________ *day*

of ______________, *A.D. 20* _____

Clerk.

Bail, $ PREVIOUSLY SET FOR MORALES, SILVA, OLIVAREZ; REMAINING DEFENDANTS PENDING TRANSFER FROM WESTERN DISTRICT OF WA

GPO 863 525

AO 257
(CAED rev. 4/2024)

Matter in USAO prior to Feb. 7, 2024 (KES conflict) ☐ YES ☑ NO

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING: CASE No.

OFFENSE CHARGED

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

Place of offense
FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY

U.S.C. Citation
Please see charging documents

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EASTERN DISTRICT OF CALIFORNIA, FRESNO

DEFENDANT -- U.S. vs.
ALEX MOYANO MORALES

Address

Birth Date

(Optional unless a juvenile)

☒ Male ☐ Alien
☐ Female (if applicable)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
SA ADAM BRUFLAT, FBI

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per FRCrP ☐ 20 ☐ 21 ☐ 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

☒ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.
1:24-MJ-121

DEFENDANT

IS *NOT* IN CUSTODY

1) ☐ Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
2) ☐ Is a Fugitive
3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☒ On this charge
5) ☐ On another conviction
6) ☐ Awaiting trial on other charges ☐ Fed'l ☐ State
If answer to (6) is "Yes," show name of institution

Has detainer been filed? ☐ Yes ☐ No
If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or . . . if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

Name and Office of Person Furnishing Information on THIS FORM MELINA ORTIZ

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned) ROBERT VENEMAN-HUGHES

☐ This report amends AO 257 previously submitted

☑ **FORFEITURE ALLEGATION**

ADDITIONAL INFORMATION OR COMMENTS

Preliminary Examination set for 11/6/2024 at 02:00 PM in Courtroom 8 (BAM)

AO 257
(CAED rev. 4/2024)

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OFFENSE CHARGED

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☐ Misdemeanor
☒ Felony

Place of offense
FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY

U.S.C. Citation
Please see charging documents

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EASTERN DISTRICT OF CALIFORNIA, FRESNO

DEFENDANT -- U.S. vs.
MAITE CELIS SILVA

Address

Birth Date
(Optional unless a juvenile)

☒ Male ☐ Alien
☐ Female (if applicable)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
SA ADAM BRUFLAT, FBI

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Mo. Day Year

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OFFENSE CHARGED

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☐ Minor
☐ Misdemeanor
☒ Felony

Place of offense
FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY

U.S.C. Citation
Please see charging documents

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EASTERN DISTRICT OF CALIFORNIA, FRESNO

DEFENDANT – – U.S. vs.

ERIK OSORIO OLIVAREZ

Address

Birth Date

(Optional unless a juvenile)

☒ Male ☐ Alien
☐ Female (if applicable)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA ADAM BRUFLAT, FBI

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per FRCrP ☐ 20 ☐ 21 ☐ 40. Show District

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Name of Asst. U.S. Att'y (if assigned): ROBERT VENEMAN-HUGHES

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Mo. Day Year

DATE OF ARREST

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Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

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☑ **FORFEITURE ALLEGATION**

ADDITIONAL INFORMATION OR COMMENTS

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PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION – – IN U.S. DISTRICT COURT

BY ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING: CASE No.

OFFENSE CHARGED

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

Place of offense
FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY

U.S.C. Citation
Please see charging documents

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EASTERN DISTRICT OF CALIFORNIA, FRESNO

DEFENDANT – – U.S. vs.
PABLO ANDRES VALDEZ RODRIGUEZ

Address

Birth Date

☒ Male ☐ Alien
☐ Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
SA ADAM BRUFLAT, FBI

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☐ this prosecution relates to a pending case involving this same defendant

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1:24-MJ-121

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Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

Name and Office of Person Furnishing Information on THIS FORM: MELINA ORTIZ

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned): ROBERT VENEMAN-HUGHES

☐ This report amends AO 257 previously submitted

☑ **FORFEITURE ALLEGATION**

ADDITIONAL INFORMATION OR COMMENTS

PENDING DISTRICT TRANSFER FROM WDWA.

AO 257
(CAED rev. 4/2024)

Matter in USAO prior to Feb. 7, 2024 (KES conflict) ☐ YES ☑ NO

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION – – IN U.S. DISTRICT COURT

BY ☐ COMPLAINT ☐ INFORMATION ■ INDICTMENT
☐ SUPERSEDING: CASE No.

OFFENSE CHARGED

☐ Petty
☐ Minor
☐ Misdemeanor
■ Felony

Place of offense
FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY

U.S.C. Citation
Please see charging documents

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EASTERN DISTRICT OF CALIFORNIA, FRESNO

DEFENDANT – – U.S. vs.
ROSA FRANCISCA BASTIAS SERRA

Address

Birth Date

☐ Male ☐ Alien
■ Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
SA ADAM BRUFLAT, FBI

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4) ■ On this charge
5) ☐ On another conviction
6) ☐ Awaiting trial on other charges ☐ Fed'l ☐ State
If answer to (6) is "Yes," show name of institution

Has detainer been filed? ☐ Yes ☐ No
If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or . . . if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

Name and Office of Person Furnishing Information on THIS FORM
MELINA ORTIZ

■ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)
ROBERT VENEMAN-HUGHES

☐ This report amends AO 257 previously submitted

☑ **FORFEITURE ALLEGATION**

ADDITIONAL INFORMATION OR COMMENTS

PENDING TRANSFER FROM WDWA.

AO 257 (CAED rev. 4/2024) **Matter in USAO prior to Feb. 7, 2024 (KES conflict)** [ ] **YES** [✓] **NO** PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION – – IN U.S. DISTRICT COURT

BY [ ] COMPLAINT [ ] INFORMATION [X] INDICTMENT
[ ] SUPERSEDING: CASE No.

OFFENSE CHARGED

[ ] Petty
[ ] Minor
[ ] Misdemeanor
[X] Felony

Place of offense
FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY

U.S.C. Citation
Please see charging documents

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EASTERN DISTRICT OF CALIFORNIA, FRESNO

DEFENDANT – – U.S. vs.
CAMILO ANDRES SEPULVEDA GUZMAN

Address

Birth Date
(Optional unless a juvenile)

[X] Male [ ] Alien
[ ] Female (if applicable)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
SA ADAM BRUFLAT, FBI

[ ] person is awaiting trial in another Federal or State Court, give name of court

[ ] this person/proceeding is transferred from another district per FRCrP [ ] 20 [ ] 21 [ ] 40. Show District

[ ] this is a reprosecution of charges previously dismissed which were dismissed on motion of: [ ] U.S. Att'y [ ] Defense
[ ] this prosecution relates to a pending case involving this same defendant
SHOW DOCKET NO.

[X] prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under
MAGISTRATE JUDGE CASE NO. 1:24-MJ-121

DEFENDANT

IS *NOT* IN CUSTODY

1) [ ] Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
2) [ ] Is a Fugitive
3) [ ] Is on Bail or Release from (show District)

IS IN CUSTODY

4) [X] On this charge
5) [ ] On another conviction
6) [ ] Awaiting trial on other charges [ ] Fed'l [ ] State
If answer to (6) is "Yes," show name of institution

Has detainer been filed? [ ] Yes [ ] No If "Yes," give date filed

DATE OF ARREST Mo. Day Year

Or . . . if Arresting Agency & Warrant were not Federal

DATE TRANSFERRED TO U.S. CUSTODY Mo. Day Year

Name and Office of Person Furnishing Information on THIS FORM: MELINA ORTIZ
[X] U.S. Att'y [ ] Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned): ROBERT VENEMAN-HUGHES

[ ] This report amends AO 257 previously submitted

[✓] **FORFEITURE ALLEGATION**

ADDITIONAL INFORMATION OR COMMENTS

PENDING DISTRICT TRANSFER FROM WDWA.

AO 257
(CAED rev. 4/2024)

Matter in USAO prior to Feb. 7, 2024 (KES conflict) ☐ YES ☑ NO

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION – – IN U.S. DISTRICT COURT

BY ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING: CASE No.

OFFENSE CHARGED

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

Place of offense
FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY

U.S.C. Citation
Please see charging documents

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EASTERN DISTRICT OF CALIFORNIA, FRESNO

DEFENDANT – – U.S. vs.
BASSIL ALEJANDRO DACOSTA FRIAS

Address

Birth Date

(Optional unless a juvenile)

☒ Male ☐ Alien
☐ Female (if applicable)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
SA ADAM BRUFLAT, FBI

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per FRCrP ☐ 20 ☐ 21 ☐ 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. Att'y ☐ Defense

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

☒ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.
1:24-MJ-121

Name and Office of Person Furnishing Information on THIS FORM: MELINA ORTIZ

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned): ROBERT VENEMAN-HUGHES

☑ **FORFEITURE ALLEGATION**

DEFENDANT

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1) ☐ Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
2) ☐ Is a Fugitive
3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☒ On this charge
5) ☐ On another conviction
6) ☐ Awaiting trial on other charges ☐ Fed'l ☐ State
If answer to (6) is "Yes," show name of institution

Has detainer been filed? ☐ Yes ☐ No
If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or . . . if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PENDING DISTRICT TRANSFER FROM WDWA.

AO 257
(CAED rev. 4/2024)

Matter in USAO prior to Feb. 7, 2024 (KES conflict) ☐ YES ☑ NO

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION – – IN U.S. DISTRICT COURT

BY ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING: CASE No.

OFFENSE CHARGED

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

Place of offense
FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY

U.S.C. Citation
Please see charging documents

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EASTERN DISTRICT OF CALIFORNIA, FRESNO

DEFENDANT – – U.S. vs.

CAMILO ALARCON ALARCON

Address

Birth Date

☒ Male ☐ Alien
☐ Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA ADAM BRUFLAT, FBI

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per FRCrP ☐ 20 ☐ 21 ☐ 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. Att'y ☐ Defense

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

☒ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.
1:24-MJ-121

DEFENDANT

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1) ☐ Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
2) ☐ Is a Fugitive
3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☒ On this charge
5) ☐ On another conviction
6) ☐ Awaiting trial on other charges ☐ Fed'l ☐ State
If answer to (6) is "Yes," show name of institution

Has detainer been filed? ☐ Yes ☐ No
If "Yes," give date filed

DATE OF ARREST Mo. Day Year

Or . . . if Arresting Agency & Warrant were not Federal

DATE TRANSFERRED TO U.S. CUSTODY Mo. Day Year

Name and Office of Person Furnishing Information on THIS FORM
MELINA ORTIZ

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)
ROBERT VENEMAN-HUGHES

☐ This report amends AO 257 previously submitted

☑ **FORFEITURE ALLEGATION**

ADDITIONAL INFORMATION OR COMMENTS

PENDING DISTRICT TRANSFER FROM WDWA.

AO 257
(CAED rev. 4/2024)

Matter in USAO prior to Feb. 7, 2024 (KES conflict) ☐ YES ☑ NO

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION – – IN U.S. DISTRICT COURT

BY ☐ COMPLAINT ☐ INFORMATION ■ INDICTMENT
☐ SUPERSEDING: CASE No.

OFFENSE CHARGED

☐ Petty
☐ Minor
☐ Misdemeanor
■ Felony

Place of offense
FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY

U.S.C. Citation
Please see charging documents

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EASTERN DISTRICT OF CALIFORNIA, FRESNO

DEFENDANT – – U.S. vs.
MICHELLE ALONDRA PARADA MUNOZ

Address

Birth Date

☐ Male ☐ Alien
■ Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
SA ADAM BRUFLAT, FBI

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per FRCrP ☐ 20 ☐ 21 ☐ 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. Att'y ☐ Defense

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

■ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.
1:24-MJ-121

DEFENDANT

IS *NOT* IN CUSTODY

1) ☐ Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
2) ☐ Is a Fugitive
3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ■ On this charge
5) ☐ On another conviction
6) ☐ Awaiting trial on other charges ☐ Fed'l ☐ State
If answer to (6) is "Yes," show name of institution

Has detainer been filed? ☐ Yes ☐ No
If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or . . . if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

Name and Office of Person Furnishing Information on THIS FORM: MELINA ORTIZ

■ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned): ROBERT VENEMAN-HUGHES

☐ This report amends AO 257 previously submitted

☑ **FORFEITURE ALLEGATION**

ADDITIONAL INFORMATION OR COMMENTS

PENDING DISTRICT TRANSFER FROM WDWA.

AO 257 (CAED rev. 4/2024)

Matter in USAO prior to Feb. 7, 2024 (KES conflict) ☐ YES ☑ NO

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION – – IN U.S. DISTRICT COURT

BY ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT

☐ SUPERSEDING: CASE No.

OFFENSE CHARGED

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

Place of offense
FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY

U.S.C. Citation
Please see charging documents

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EASTERN DISTRICT OF CALIFORNIA, FRESNO

DEFENDANT – – U.S. vs.

ALVARO ADRIAN LAGOS MIERIES

Address

Birth Date

☒ Male ☐ Alien
☐ Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA ADAM BRUFLAT, FBI

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per FRCrP ☐ 20 ☐ 21 ☐ 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. Att'y ☐ Defense

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

☒ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.
1:24-MJ-125

DEFENDANT

IS *NOT* IN CUSTODY

1) ☐ Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
2) ☐ Is a Fugitive
3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☒ On this charge
5) ☐ On another conviction
6) ☐ Awaiting trial on other charges ☐ Fed'l ☐ State
If answer to (6) is "Yes," show name of institution

Has detainer been filed? ☐ Yes ☐ No
If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or . . . if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

Name and Office of Person Furnishing Information on THIS FORM
MELINA ORTIZ

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)
ROBERT VENEMAN-HUGHES

☐ This report amends AO 257 previously submitted

☑ **FORFEITURE ALLEGATION**

ADDITIONAL INFORMATION OR COMMENTS

PENDING DISTRICT TRANSFER FROM WDWA.

AO 257 (CAED rev. 4/2024)

Matter in USAO prior to Feb. 7, 2024 (KES conflict) ☐ YES ☑ NO

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION – – IN U.S. DISTRICT COURT

BY ☐ COMPLAINT ☐ INFORMATION ■ INDICTMENT

☐ SUPERSEDING: CASE No.

OFFENSE CHARGED

☐ Petty

☐ Minor

☐ Misdemeanor

■ Felony

Place of offense
FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY

U.S.C. Citation
Please see charging documents

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EASTERN DISTRICT OF CALIFORNIA, FRESNO

DEFENDANT – – U.S. vs.

HUMBERTO ANIBAL JIMENEZ MORENO

Address

Birth Date

(Optional unless a juvenile)

■ Male ☐ Alien

☐ Female (if applicable)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA ADAM BRUFLAT, FBI

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per FRCrP ☐ 20 ☐ 21 ☐ 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of: ☐ U.S. Att'y ☐ Defense

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

■ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO. 1:24-MJ-125

DEFENDANT

IS *NOT* IN CUSTODY

1) ☐ Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ■ On this charge

5) ☐ On another conviction

6) ☐ Awaiting trial on other charges ☐ Fed'l ☐ State
If answer to (6) is "Yes," show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or . . . if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

Name and Office of Person Furnishing Information on THIS FORM: MELINA ORTIZ

■ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned): ROBERT VENEMAN-HUGHES

☐ This report amends AO 257 previously submitted

☑ **FORFEITURE ALLEGATION**

ADDITIONAL INFORMATION OR COMMENTS

PENDING DISTRICT TRANSFER FROM WDWA.

United States v. ALEX MOYANO, et al.
Penalties for Indictment

COUNT 1:	**ALL DEFENDANTS**
VIOLATION:	18 USC § 371 Conspiracy to Commit Bank Robbery
PENALTIES:	Maximum of 5 years in prison, Fine of up to $250,000; or both fine and imprisonment 3 years supervised release

SPECIAL ASSESSMENT: $100 (mandatory)

COUNT 2:	**MOYANO, CELIS, OSORIO, VALDEZ, BASTIAS, SEPULVEDA, JOHN DOE 2, LAGOS, JIMENEZ**
VIOLATION:	18 USC §§ 2113(a) and 2 Bank Robbery and Aiding and Abetting
PENALTIES:	Maximum of 20 years in prison, Fine of up to $250,000; or both fine and imprisonment 3 years supervised release

SPECIAL ASSESSMENT: $100 (mandatory)

FORFEITURE ALLEGATION: **ALL DEFENDANTS**

VIOLATION:	18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c) - Criminal Forfeiture
PENALTIES:	As stated in the charging document