#### Case 1:24-cr-00265-KES-BAM Document 57 Filed 10/31/24 Page 1 of 7

**FILED** PHILLIP A. TALBERT 1 United States Attorney Oct 31, 2024 JUSTIN J. GILIO CLERK, U.S. DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA **ROBERT VENEMAN-HUGHES Assistant United States Attorneys** 2500 Tulare Street, Suite 4401 Fresno, CA 93721 Telephone: (559) 497-4000 Facsimile: (559) 497-4099 5 6 Attorneys for Plaintiff 7 United States of America 8 IN THE UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 CASE NO. 1:24-CR-00265-KES-BAM 11 UNITED STATES OF AMERICA, 12 Plaintiff. 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 13 v. U.S.C. §§ 981(a)(1)(C), 924(d)(1), and 28 U.S.C. § 2461(c) – Criminal Forfeiture 14 1) ALEX MOYANO MORALES, 2) MAITE CELIS SILVA, 15 3) ERIK OSORIO OLIVAREZ, 4) PABLO ANDRES VALDEZ RODRIGUEZ, 5) ROSA FRANCISCA BASTIAS SERRA, 16 6) CAMILO ANDRES SEPULVEDA 17 GUZMAN, 7) BASSIL ALEJANDRO DACOSTA FRIAS, 8) CAMILO ALARCON, 18 9) MICHELLE ALONDRA PARADA 19 MUNOZ, 10) ALVARO ADRIAN LAGOS MIERIES, 20 AND 11) HUMBERTO ANIBAL JIMENEZ 21 MORENO. 22 23 Defendants. 24 25 INDICTMENT 26 The Grand Jury charges: 27 At all times material to this Indictment: 28

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INDICTMENT

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- 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.

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- 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

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INDICTMENT

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).

COUNT TWO: [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

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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

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1	e. has been commingled with other property which cannot be divided without difficult,				
2	it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(a), to				
3	seek forfeiture of any other property of said defendants up to the value of the property subject to				
4	forfeiture.				
5					
6	A TRUE BILL.				
7	/s/ Signature on file w/AUSA				
8					
9	FOREPERSON				
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12	PHILLIP A. TALBERT United States Attorney				
13	KIMBERLY A. SANCHEZ				
14	KIMBERLY A. SANCHEZ Assistant United States Attorney				
15	Chief, Fresno Office				
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No.	

#### UNITED STATES DISTRICT COURT

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

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

### 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,	Foreman.	
Filed in open court this _	day	
of	, A.D. 20	
	Clerk.	
	SLY SET FOR MORALES, SILVA, OLIVENDING TRANSFER FROM WESTERN I	

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AO 257 (CAED rev. 4/2024) Matter in USAO prior to Feb. 7, 2024 (KES conflict)

	YES	1	NO
-1			110

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT ■ INDICTMENT ☐ COMPLAINT ☐ INFORMATION Name of District Court, and/or Judge/Magistrate Judge Location (City) ☐ SUPERSEDING: CASE No. EASTERN DISTRICT OF CALIFORNIA, FRESNO **OFFENSE CHARGED** ☐ Petty **DEFENDANT** -- U.S. vs. ALEX MOYANO MORALES ☐ Minor ☐ Misdemeanor Address Felony Alien Male Birth U.S.C. Citation Place of offense FRESNO, STANISLAUS, Date PLACER. ☐ Female (if applicable) Please see charging documents SUTTER, and SHASTA COUNTY (Optional unless a juvenile) **PROCEEDING** Name of Complainant Agency, or Person (& Title, if any) DEFENDANT IS NOT IN CUSTODY SA ADAM BRUFLAT, FBI 1) Has not been arrested, pending outcome of this proceeding If not detained, give date any prior person is awaiting trial in another Federal or State Court, give name summons was served on above charges Is a Fugitive Is on Bail or Release from (show District) this person/proceeding is transferred from another district per □ 21 FRCrP 20 **4**0. Show District IS IN CUSTODY this is a reprosecution of charges On this charge previously dismissed which On another conviction Awaiting trial on other charges Fed'l ☐ State were dismissed on motion of: SHOW ☐ U.S. Att'y ☐ Defense If answer to (6) is "Yes," show name of institution DOCKET NO. this prosecution relates to a pending case involving this same defendant If "Yes," ☐ Yes prior proceedings or appearance(s) Has detainer give date before U.S. Magistrate Judge MAGISTRATE been filed? regarding this defendant were ☐ No filed JUDGE CASE NO. recorded under Year 1:24-MJ-121 Mo. Day DATE OF ARREST Or . . . if Arresting Agency & Warrant were not Federal Name and Office of Person Furnishing Information on Year Day Mo. DATE TRANSFERRED THIS FORM MELINA ORTIZ TO U.S. CUSTODY U.S. Att'y Other U.S. Agency Name of Asst. U.S. ROBERT VENEMAN-HUGHES Att'y (if assigned) This report amends AO 257 previously submitted FORFEITURE ALLEGATION ADDITIONAL INFORMATION OR COMMENTS

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AO 257 (CAED rev. 4/2024) Matter in USAO prior to Feb. 7, 2024 (KES conflict)

1	YES	1	NO
			110

DEFENDANT INFORMATION RELATIVE TO A CR	RIMINAL ACTION IN U.S. DISTRICT COURT
BY COMPLAINT INFORMATION INDICTMENT SUPERSEDING: CASE No.  OFFENSE CHARGED	Name of District Court, and/or Judge/Magistrate Judge Location (City) EASTERN DISTRICT OF CALIFORNIA, FRESNO
☐ Petty	DEFENDANT — U.S. vs.
☐ Minor	MAITE CELIS SILVA
☐ Misdemeanor	Address
Place of offense FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY  U.S.C. Citation Please see charging documents	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:  SHOW  U.S. Att'y Defense DOCKET NO.  this prosecution relates to a pending case involving this same 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'1  State         If answer to (6) is "Yes," show name of institution
prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under  MAGISTRATE JUDGE CASE NO. 1:24-MJ-121	Has detainer been filed?  No filed  Mo. Day Year  DATE OF  ARREST
Name and Office of Person Furnishing Information on THIS FORM  MELINA ORTIZ  U.S. Att'y Other U.S. Agency	Or if Arresting Agency & Warrant were not Federal  Mo. Day Year  DATE TRANSFERRED TO U.S. CUSTODY
Name of Asst. U.S. Att'y (if assigned) ROBERT VENEMAN-HUGHES  FORFEITURE ALLEGATION	TION OR COMMENTS

## Case 1:24-cr-00265-KES-BAM Document 57-1 Filed 10/31/24 Page 4 of 13

AO 257 Matter in USAO prior to Feb. 7, 2024 (KES conflict) YES NO

PER 18 U.S.C. 3170

PER 18 U.S.C. 3170

DEFENDANT — U.S. vs.  ERIK OSORIO OLIVAREZ  ddress  The Male Alien  Alien  Alien  The Female (if applicable)  DEFENDANT  IS NOT IN CUSTODY  Has not been arrested, pending outcome of this proceeding  If not detained, give date any prior  summons was served on above charges  Is a Fugitive  Is on Bail or Release from (show District)
male Alien    Male   Alien   Female (if applicable)   DEFENDANT     IS NOT IN CUSTODY     Has not been arrested, pending outcome of this proceeding   If not detained, give date any prior   summons was served on above charges
male Alien    Female (if applicable)   DEFENDANT
ptional unless a juvenile)  DEFENDANT  IS NOT IN CUSTODY  Has not been arrested, pending outcome of this proceeding  If not detained, give date any prior  summons was served on above charges  Is a Fugitive
DEFENDANT  IS NOT IN CUSTODY  Has not been arrested, pending outcome of this proceeding If not detained, give date any prior summons was served on above charges  Is a Fugitive
IS NOT IN CUSTODY  Has not been arrested, pending outcome of this proceeding  If not detained, give date any prior summons was served on above charges  Is a Fugitive
IS IN CUSTODY  On this charge On another conviction
Awaiting trial on other charges Fed'l State  If answer to (6) is "Yes," show name of institution  Yes If "Yes,"
Has detainer been filed?  No 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

ADDITIONAL INFORMATION OR COMMENTS

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AO 257 Matter in USAO prior to Feb. 7, 2024 (KES conflict) YES

YES	<b>/</b>	NO
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Y COMPLAINT INFORMA SUPERSEDING: CASE Y OFFENSE CHARGED		Name of District Court, and/or Judge/Magistrate Judge Location (City)  EASTERN DISTRICT OF CALIFORNIA, FRESNO
	Petty	<b>DEFENDANT</b> — U.S. vs.
	☐ Minor	PABLO ANDRES VALDEZ RODRIGUEZ
	☐ Misdemeanor	Address
	Felony	
Place of offense FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY	U.S.C. Citation  Please see charging documents	Birth Date    Male
PROCEEDIN	NG	(Optional unless a juvenile)
Name of Complainant Agency, or Person		DEFENDANT
SA ADAM BRUFLAT, FBI  person is awaiting trial in another Fe of court	deral or State Court, give name	IS NOT IN CUSTODY  1)  Has not been arrested, pending outcome of this proceeding
this person/proceeding is transferred FRCrP 20 21  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	from another district per 40. Show District  SHOW DOCKET NO.	IS IN CUSTODY  4) On this charge 5) On another conviction 6) Awaiting trial on other charges Fed'1 State If answer to (6) is "Yes," show name of institution
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	Has detainer been filed?  Yes If "Yes," give date filed  No filed  Mo. Day Year  DATE OF
Name and Office of Person Furnishing Information on THIS FORM MELINA U.S.		Or if Arresting Agency & Warrant were not Federal  Mo. Day Year  DATE TRANSFERRED TO U.S. CUSTODY
Name of Asst. U.S.  htt'y (if assigned) ROBERT VENEM.  FORFEITURE ALLEGATION		☐ This report amends AO 257 previously submitted

## Case 1:24-cr-00265-KES-BAM Document 57-1 Filed 10/31/24 Page 6 of 13

AO 257 Matter in USAO prior to Feb. 7, 2024 (KES conflict) PER 18 U.S.C. 3170 (CAED rev. 4/2024) DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT ☐ COMPLAINT ☐ INFORMATION ■ INDICTMENT Name of District Court, and/or Judge/Magistrate Judge Location (City) SUPERSEDING: CASE No. EASTERN DISTRICT OF CALIFORNIA, FRESNO OFFENSE CHARGED ☐ Petty DEFENDANT -- U.S. vs. ROSA FRANCISCA BASTIAS SERRA ☐ Minor Misdemeanor Address Felony ☐ Alien ☐ Male Birth Place of offense U.S.C. Citation Date FRESNO, STANISLAUS, PLACER, Female (if applicable) Please see charging documents SUTTER, and SHASTA COUNTY (Optional unless a juvenile) **PROCEEDING** Name of Complainant Agency, or Person (& Title, if any) **DEFENDANT** IS NOT IN CUSTODY 1) Has not been arrested, pending outcome of this proceeding SA ADAM BRUFLAT, FBI If not detained, give date any prior person is awaiting trial in another Federal or State Court, give name summons was served on above charges of court Is a Fugitive Is on Bail or Release from (show District) this person/proceeding is transferred from another district per FRCrP ☐ 20 21 **4**0. Show District IS IN CUSTODY this is a reprosecution of charges On this charge 4) previously dismissed which On another conviction were dismissed on motion of: Awaiting trial on other charges Fed'1 SHOW ☐ State U.S. Att'y Defense If answer to (6) is "Yes," show name of institution DOCKET NO. this prosecution relates to a pending case involving this same defendant If "Yes," prior proceedings or appearance(s) ☐ Yes Has detainer before U.S. Magistrate Judge give date **MAGISTRATE** been filed? regarding this defendant were ☐ No filed JUDGE CASE NO. recorded under 1:24-MJ-121 Mo. Day Year DATE OF ARREST Name and Office of Person Or . . . if Arresting Agency & Warrant were not Federal Furnishing Information on Day Year Mo.

ADDITIONAL INFORMATION OR COMMENTS

Other U.S. Agency

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

PENDING TRANSFER FROM WDWA.

FORFEITURE ALLEGATION

THIS FORM

Name of Asst. U.S.

Att'y (if assigned)

MELINA ORTIZ

U.S. Att'y

ROBERT VENEMAN-HUGHES

## Case 1:24-cr-00265-KES-BAM Document 57-1 Filed 10/31/24 Page 7 of 13

AO 257 (CAED rev. 4/2024) Matter in USAO prior to Feb. 7, 2024 (KES conflict)

٦	<b>37</b> 100		BIO
П	YES	<b>√</b>	INO

SY COMPLAINT INFORMATION INDICTMENT SUPERSEDING: CASE No.  OFFENSE CHARGED	Name of District Court, and/or Judge/Magistrate Judge Location (City)  EASTERN DISTRICT OF CALIFORNIA, FRESNO
☐ Petty ☐ Minor ☐ Misdemeanor	DEFENDANT — U.S. vs.  CAMILO ANDRES SEPULVEDA GUZMAN  Address
Place of offense FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY  U.S.C. Citation Please see charging documents	Birth Date  Male Alien  Alien  (Optional unless a juvenile)
PROCEEDING  Name of Complainant Agency, or Person (& Title, if any)  SA ADAM BRUFLAT, FBI	DEFENDANT  IS NOT IN CUSTODY  1) Has not been arrested, pending outcome of this proceeding
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 21 40. Show District	If not detained, give date any prior summons was served on above charges  2)
this is a reprosecution of charges previously dismissed which were dismissed on motion of:  U.S. Att'y Defense DOCKET NO.  this prosecution relates to a pending	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
prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under  MAGISTRATE JUDGE CASE NO. 1:24-MJ-121	Has detainer been filed?  No filed  Mo. Day Year  DATE OF
Name and Office of Person Furnishing Information on THIS FORM  MELINA ORTIZ  U.S. Att'y  Other U.S. Agency	Or if Arresting Agency & Warrant were not Federal  Mo. Day Year  DATE TRANSFERRED TO U.S. CUSTODY
Name of Asst. U.S. Att'y (if assigned) ROBERT VENEMAN-HUGHES  FORFEITURE ALLEGATION  ADDITIONAL INFORMA	TION OR COMMENTS

## Case 1:24-cr-00265-KES-BAM Document 57-1 Filed 10/31/24 Page 8 of 13

AO 257 (CAED rev. 4/2024) Matter in USAO prior to Feb. 7, 2024 (KES conflict)

VEC	7	NO
YES	I ✔	NO

DEFENDANT INFORMA	FION RELATIVE TO A CE	RIMINAL ACTION IN U.S. DISTRICT COURT
BY COMPLAINT INFORMA' SUPERSEDING: CASE N OFFENSE CHARGED		Name of District Court, and/or Judge/Magistrate Judge Location (City)  EASTERN DISTRICT OF CALIFORNIA, FRESNO
	☐ Petty	DEFENDANT U.S. vs.
	☐ Minor	BASSIL ALEJANDRO DACOSTA FRIAS
	☐ Misdemeanor	Address
	■ Felony	
Place of offense FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY	U.S.C. Citation  Please see charging documents	Birth Date Male Alien  Female (if applicable)
PROCEEDIN	VG.	(Optional unless a juvenile)
Name of Complainant Agency, or Person		DEFENDANT
SA ADAM BRUFLAT, FBI		IS NOT IN CUSTODY  1) Has not been arrested, pending outcome of this proceeding  If not detained, give date any prior
person is awaiting trial in another Fedoric of court this person/proceeding is transferred		summons was served on above charges  2)  Is a Fugitive 3) Is on Bail or Release from (show District)
	40. Show District	IS IN CUSTODY
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.	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
prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under	MAGISTRATE JUDGE CASE NO. 1:24-MJ-121	Has detainer been filed?  No filed  Mo. Day Year  DATE OF ARREST
Name and Office of Person Furnishing Information on		Or if Arresting Agency & Warrant were not Federal  Mo. Day Year
THIS FORM MELINA		DATE TRANSFERRED TO U.S. CUSTODY
Name of Asst. U.S. Att'y (if assigned)   ROBERT VENEMA FORFEITURE ALLEGATION	AN-HUGHES	☐ This report amends AO 257 previously submitted
	ADDITIONAL INFORMA	ATION OR COMMENTS

## Case 1:24-cr-00265-KES-BAM Document 57-1 Filed 10/31/24 Page 9 of 13

AO 257 Matter in USAO prior to Feb. 7, 2024 (KES conflict)

_		
YES	<b>√</b>	NO

PER 18 U.S.C. 3170

COMPLAINT INFORMA SUPERSEDING: CASE I OFFENSE CHARGED		Name of District Court, and/or Judge/Magistrate Judge Location (City)  EASTERN DISTRICT OF CALIFORNIA, FRESNO
	☐ Petty	DEFENDANT — U.S. vs.  CAMILO ALARCON ALARCON
	☐ Misdemeanor	Address
	■ Felony	
Place of offense FRESNO, STANISLAUS, PLACER, SUTTER, and SHASTA COUNTY	U.S.C. Citation  Please see charging documents	Birth Date  Male Alien  Female (if applicable)
PROCEEDI	NG	(Optional unless a juvenile)
Name of Complainant Agency, or Person		DEFENDANT IS NOT IN CUSTODY
SA ADAM BRUFLAT, FBI  □ person is awaiting trial in another Fe of court □ this person/proceeding is transferred FRCrP □ 20 □ 21 □	from another district per	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)
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 prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under	SHOW DOCKET NO.  MAGISTRATE JUDGE CASE NO. 1:24-MJ-121	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?  No filed  Mo. Day Year  DATE OF
Name and Office of Person Furnishing Information on THIS FORM MELINA		Or if Arresting Agency & Warrant were not Federal  Mo. Day Year  DATE TRANSFERRED  TO U.S. CUSTODY
U.S.  lame of Asst. U.S.  .tt'y (if assigned) ROBERT VENEM  FORFEITURE ALLEGATION		☐ This report amends AO 257 previously submitted

PENDING DISTRICT TRANSFER FROM WDWA.

## Case 1:24-cr-00265-KES-BAM Document 57-1 Filed 10/31/24 Page 10 of 13

Matter in USAO prior to Feb. 7, 2024 (KES conflict) AO 257 PER 18 U.S.C. 3170 (CAED rev. 4/2024) DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT ☐ COMPLAINT ☐ INFORMATION **■ INDICTMENT** Name of District Court, and/or Judge/Magistrate Judge Location (City) ☐ SUPERSEDING: CASE No. EASTERN DISTRICT OF CALIFORNIA, FRESNO **OFFENSE CHARGED** ☐ Petty **DEFENDANT** -- U.S. vs. MICHELLE ALONDRA PARADA MUNOZ ☐ Minor ☐ Misdemeanor Address Felony ☐ Male Alien Birth U.S.C. Citation Place of offense Date FRESNO, STANISLAUS, PLACER, Female (if applicable) Please see charging documents SUTTER, and SHASTA COUNTY (Optional unless a juvenile) **PROCEEDING** Name of Complainant Agency, or Person (& Title, if any) DEFENDANT IS NOT IN CUSTODY 1) Has not been arrested, pending outcome of this proceeding SA ADAM BRUFLAT, FBI If not detained, give date any prior person is awaiting trial in another Federal or State Court, give name summons was served on above charges Is a Fugitive of court 3) 🔲 Is on Bail or Release from (show District) this person/proceeding is transferred from another district per FRCrP 20 □ 21 **4**0. Show District IS IN CUSTODY this is a reprosecution of charges On this charge On another conviction previously dismissed which 5) Awaiting trial on other charges Fed'l SHOW were dismissed on motion of: If answer to (6) is "Yes," show name of institution ☐ U.S. Att'y ☐ Defense DOCKET NO. this prosecution relates to a pending case involving this same defendant ☐ Yes If "Yes," prior proceedings or appearance(s) Has detainer give date before U.S. Magistrate Judge been filed? **MAGISTRATE** ☐ No filed regarding this defendant were JUDGE CASE NO. recorded under 1:24-MJ-121 Day Year Mo. DATE OF ARREST

THIS FORM

FORFEITURE ALLEGATION

Name and Office of Person Furnishing Information on

**MELINA ORTIZ** 

U.S. Att'y

Other U.S. Agency

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

☐ This report amends AO 257 previously submitted

DATE TRANSFERRED

TO U.S. CUSTODY

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

Year

ADDITIONAL INFORMATION OR COMMENTS

PENDING DISTRICT TRANSFER FROM WDWA.

(CAED rev. 4/2024)

#### DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT BY COMPLAINT INFORMATION **INDICTMENT** Name of District Court, and/or Judge/Magistrate Judge Location (City) ☐ SUPERSEDING: CASE No. EASTERN DISTRICT OF CALIFORNIA, FRESNO **OFFENSE CHARGED** ☐ Petty **DEFENDANT** -- U.S. vs. ALVARO ADRIAN LAGOS MIERIES ☐ Minor Address Felony Male ☐ Alien Birth U.S.C. Citation Place of offense Date FRESNO, STANISLAUS, PLACER, ☐ Female (if applicable) Please see charging documents SUTTER, and SHASTA COUNTY (Optional unless a juvenile) **PROCEEDING** Name of Complainant Agency, or Person (& Title, if any) **DEFENDANT** IS NOT IN CUSTODY 1) Has not been arrested, pending outcome of this proceeding SA ADAM BRUFLAT, FBI If not detained, give date any prior person is awaiting trial in another Federal or State Court, give name summons was served on above charges of court Is a Fugitive Is on Bail or Release from (show District) this person/proceeding is transferred from another district per FRCrP 20 $\square$ 21 ☐ 40. Show District IS IN CUSTODY this is a reprosecution of charges On this charge previously dismissed which On another conviction were dismissed on motion of: SHOW Awaiting trial on other charges Fed'l State ☐ U.S. Att'y ☐ Defense If answer to (6) is "Yes," show name of institution DOCKET NO. this prosecution relates to a pending case involving this same defendant ☐ Yes If "Yes," prior proceedings or appearance(s) Has detainer before U.S. Magistrate Judge give date **MAGISTRATE** been filed? regarding this defendant were ☐ No filed JUDGE CASE NO. recorded under 1:24-MJ-125 Year Mo. Day DATE OF ARREST Or . . . if Arresting Agency & Warrant were not Federal Name and Office of Person Furnishing Information on Mo. Day Year **MELINA ORTIZ** THIS FORM DATE TRANSFERRED TO U.S. CUSTODY U.S. Att'y Other U.S. Agency Name of Asst. U.S. ROBERT VENEMAN-HUGHES

ADDITIONAL INFORMATION OR COMMENTS

☐ This report amends AO 257 previously submitted

FORFEITURE ALLEGATION

Att'y (if assigned)

(CAED rev. 4/2024)

#### DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT ☐ COMPLAINT ☐ INFORMATION **■** INDICTMENT Name of District Court, and/or Judge/Magistrate Judge Location (City) ☐ SUPERSEDING: CASE No. EASTERN DISTRICT OF CALIFORNIA, FRESNO **OFFENSE CHARGED** ☐ Petty **DEFENDANT** -- U.S. vs. ☐ Minor HUMBERTO ANIBAL JIMENEZ MORENO Misdemeanor Address Felony Male Alien Birth Place of offense U.S.C. Citation Date FRESNO, STANISLAUS, PLACER, ☐ Female (if applicable) Please see charging documents SUTTER, and SHASTA COUNTY (Optional unless a juvenile) **PROCEEDING** Name of Complainant Agency, or Person (& Title, if any) DEFENDANT IS NOT IN CUSTODY 1) Has not been arrested, pending outcome of this proceeding SA ADAM BRUFLAT, FBI If not detained, give date any prior person is awaiting trial in another Federal or State Court, give name summons was served on above charges of court Is a Fugitive Is on Bail or Release from (show District) this person/proceeding is transferred from another district per FRCrP 20 $\square$ 21 **40**. Show District IS IN CUSTODY this is a reprosecution of charges On this charge previously dismissed which On another conviction were dismissed on motion of: SHOW Awaiting trial on other charges Fed'l State U.S. Att'y Defense If answer to (6) is "Yes," show name of institution DOCKET NO. this prosecution relates to a pending case involving this same defendant If "Yes," ☐ Yes prior proceedings or appearance(s) Has detainer before U.S. Magistrate Judge give date **MAGISTRATE** been filed? regarding this defendant were ☐ No filed JUDGE CASE NO. recorded under 1:24-MJ-125 Mo. Day Year DATE OF ARREST Or . . . if Arresting Agency & Warrant were not Federal Name and Office of Person Furnishing Information on Year Mo. Day MELINA ORTIZ THIS FORM DATE TRANSFERRED TO U.S. CUSTODY U.S. Att'y Other U.S. Agency Name of Asst. U.S.

ADDITIONAL INFORMATION OR COMMENTS

This report amends AO 257 previously submitted

PENDING DISTRICT TRANSFER FROM WDWA.

✓ FORFEITURE ALLEGATION

Att'y (if assigned)

ROBERT VENEMAN-HUGHES

# 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