



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARLOS CORONA,
aka "Charlie,"
aka "Chin,"
aka "charliehustle323,"
JOSE LUIS EDEZA JR.,
aka "tacos088,"
aka "sstacos088,"
aka "twoo_tacos088,"
JOHN WESLEY BESS JR.,
aka "heemfmbsoa,"
aka "jefesosafmb,"
aka "sosa_didit,"
RICARDO OCHOA JR.,
aka "Richie,"
aka "get2amfbag,"
aka "richieget2it,"
SAULO SOLARES,
aka "danger119,"
CARLOS LUIZ ARELLANO,
aka "Carlos Pelon Arrellano,"
aka "masi_palon,"
LUIS ENRIQUE LOPEZ,
aka "no_speed_limits1320,"
SOFIA GENESIS ALVAREZ,
aka "pr3tty_sophiia,"

No. 2:23-cr-00429-JFW

I N D I C T M E N T

[18 U.S.C. § 1349: Conspiracy to Commit Bank Fraud; 18 U.S.C. § 1344(1): Bank Fraud; 18 U.S.C. § 1956(a)(1)(B)(i): Laundering of Monetary Instruments; 18 U.S.C. § 1028A(a)(1): Aggravated Identity Theft; 18 U.S.C. § 1708: Mail Theft and Possession of Stolen Mail; 18 U.S.C. §§ 981(a)(1)(C), 982 and 28 U.S.C. § 2461(c): Criminal Forfeiture

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1 KAREN VANESSA MARTINEZ,
 aka "Nessa,"
 2 aka "_luvvnnessa_,"
 VANESSA CORTES ARZATE,
 3 aka "Vanessa Cortez,"
 aka "Vane,"
 4 aka "vanessa_cortez21," and
 RICARDO WILFREDO NICHOLSON,
 5 aka "veegoinstant,"
 6 aka "freemoneybidnez,"
 aka "flyfreshvideos,"
 7 aka "freshinthenev_,"
 8 Defendants.

9
 10 The Grand Jury charges:

11 INTRODUCTORY ALLEGATIONS

12 At times relevant to this Indictment:

13 1. Bank of America, N.A. ("BOA"), Citibank, N.A. ("Citi"),
 Wells Fargo, N.A. ("WFB"), JP Morgan Chase Bank ("Chase"), U.S.
 14 Bancorp ("USB"), Kinecta Federal Credit Union ("Kinetca"), Navy
 15 Federal Credit Union ("NFCU"), and SchoolsFirst Federal Credit Union
 16 ("SchoolsFirst") (collectively, the "Financial Institutions"), were
 17 federally insured financial institutions.

18 2. The following third-party individuals had the following
 19 bank accounts and debit cards in their names:

NAME	BANK	ACCOUNT(S) ENDING IN	DEBIT CARD(S) ENDING IN
M.S. & C.S.	WFB	0445 ("WFB Account 0445"), 5725 ("WFB Account 5725")	6327 ("WFB Card 6327"), 1872 ("WFB Card 1872")
B.T.	WFB	1491 ("WFB Account 1491")	6502 ("WFB Card 6502")
J.P.	WFB	1587 ("WFB Account 1587")	4272 ("WFB Card 4272")
J.L.P.	WFB	1858 ("WFB Account 1858")	6729 ("WFB Card 6729")
E.F.	WFB	3181 ("WFB Account 3181")	4898 ("WFB Card 4898")
J.R.	WFB	3556 ("WFB Account 3556")	9739 ("WFB Card 9739")
K.A.	WFB	4071 ("WFB Account 4071")	6294 ("WFB Card 6294")
C.C.H.	WFB	4158 ("WFB Account 4158")	2176 ("WFB Card 2176")

NAME	BANK	ACCOUNT(S) ENDING IN	DEBIT CARD(S) ENDING IN
G.M. & J.M.	WFB	4225 ("WFB Account 4225")	7597 ("WFB Card 7597")
F.R.	WFB	4660 ("WFB Account 4660")	2437 ("WFB Card 2437")
D.V.	WFB	4722 ("WFB Account 4722")	4881 ("WFB Card 4881")
M.W.	WFB	5449 ("WFB Account 5449")	8794 ("WFB Card 8794")
M.C.	WFB	5820 ("WFB Account 5820")	4823 ("WFB Card 4823")
D.A.	WFB	6149 ("WFB Account 6149")	1392 ("WFB Card 1392")
J.N.T.	WFB	6295 ("WFB Account 6295")	6862 ("WFB Card 6862")
L.M.	WFB	6668 ("WFB Account 6668")	7819 ("WFB Card 7819")
E.P.	WFB	6740 ("WFB Account 6740")	4140 ("WFB Card 4140")
D.B.	WFB	8290 ("WFB Account 8290")	0627 ("WFB Card 0627")
R.B.	WFB	8769 ("WFB Account 8769")	7041 ("WFB Card 7041")
F.H.	WFB	9243 ("WFB Account 9243")	8469 ("WFB Card 8469")
J.O.	WFB	9844 ("WFB Account 9844")	7536 ("WFB Card 7536")
H.M.	BOA	4387 ("BOA Account 4387")	2003 ("BOA Card 2003")
B.G.	Chase	0766 ("Chase Account 0766")	1747 ("Chase Card 1747")
A.R.	Chase	2777 ("Chase Account 2777")	8589 ("Chase Card 8589")

3. Instagram was a social media platform that the defendants used to share photographs and videos with followers related to the fraudulent scheme and to communicate privately with each other. Instagram users could post an Instagram "story," which was a temporary post visible to the user's Instagram followers that would disappear after 24 hours. Instagram stories could contain photographs, videos, and/or text, and followers could interact with such stories by liking, commenting, or sending an Instagram direct message to the story's creator. An Instagram direct message was a private message that Instagram users could send to one or more other users and could include text, photographs, videos, and voice messages.

COUNT ONE

[18 U.S.C. § 1349]

[ALL DEFENDANTS]

4. The Grand Jury re-alleges and incorporates by reference the allegations set forth in paragraphs 1-3 of this Indictment here.

A. THE OBJECT OF THE CONSPIRACY

5. Beginning on a date unknown to the Grand Jury, but no later than on or about October 14, 2020, and continuing through at least on or about August 18, 2023, in Los Angeles County and Orange County, within the Central District of California, and elsewhere, defendants CARLOS CORONA, also known as ("aka") "Charlie," aka "Chin," aka "charliehustle323," JOSE LUIS EDEZA JR., aka "tacos088," aka "sstacos088," aka "twoo_tacos088," JOHN WESLEY BESS JR., aka "heemfmbsoa," aka "jefesosafmb," aka "sosa_didit," RICARDO OCHOA JR., aka "Richie," aka "get2amfbag," aka "richieget2it," SAULO SOLARES, aka "danger119," CARLOS LUIZ ARELLANO, aka "Carlos Pelon Arrellano," aka "masi_palon," LUIS ENRIQUE LOPEZ, aka "no_speed_limits1320," SOFIA GENESIS ALVAREZ, aka "pr3tty_sophiia," KAREN VANESSA MARTINEZ, aka "Nessa," aka "_luvvnessa_," VANESSA CORTES ARZATE, aka "Vanessa Cortez," aka "Vane," aka "vanessa_cortez21," and RICARDO WILFREDO NICHOLSON, aka "veegoinstant," aka "freemoneybidnez," aka "flyfreshvideos," aka "freshinthenev_," together with others known and unknown to the Grand Jury, conspired to commit bank fraud, in violation of Title 18, United States Code, Section 1344(1).

B. THE MANNER AND MEANS OF THE CONSPIRACY

6. The object of the conspiracy was to be carried out, and was carried out, in substance, as follows:

1 a. Defendant SOLARES, Co-Conspirator 1, and other co-
2 conspirators, would steal checks from the U.S. mail stream, including
3 mailboxes and post office mail collection boxes located outside of
4 United States Post Office locations.

5 b. Defendants CORONA, EDEZA, BESS, and OCHOA, and other
6 co-conspirators, would take possession of the checks that defendant
7 SOLARES, Co-Conspirator 1, and other co-conspirators stole.

8 c. Defendants CORONA, EDEZA, BESS, OCHOA, ARELLANO,
9 LOPEZ, ALVAREZ, MARTINEZ, CORTES ARZATE, and NICHOLSON, and other co-
10 conspirators, would solicit bank account holders through social media
11 to provide their debit cards and bank account information to the co-
12 conspirators, promising these account holders a cut of any fraudulent
13 funds deposited into their accounts in return. To circumvent the
14 fraud protections of the Financial Institutions, the co-conspirators
15 would specifically request bank accounts that had been open for a
16 certain amount of time so the co-conspirators could get access to the
17 stolen funds more quickly.

18 d. Bank account holders would respond to the
19 advertisements via social media and provide defendants CORONA, EDEZA,
20 BESS, OCHOA, ARELLANO, LOPEZ, ALVAREZ, MARTINEZ, CORTES ARZATE, and
21 NICHOLSON, and other co-conspirators, with the information requested
22 on the advertisements, including bank account numbers, PIN numbers,
23 and online banking log-in information, among other personal
24 information. The co-conspirators would also take physical possession
25 of the account holders' debit cards.

26 e. Defendants CORONA, EDEZA, BESS, OCHOA, ARELLANO,
27 LOPEZ, ALVAREZ, MARTINEZ, CORTES ARZATE, and NICHOLSON, and other co-
28 conspirators, would exchange the bank account information obtained

1 from bank account holders and debit cards with each other and other
2 co-conspirators.

3 f. Defendants CORONA, EDEZA, BESS, and OCHOA, and other
4 co-conspirators, would deposit the stolen checks into the bank
5 accounts that had been sourced as described in sub-paragraphs 6.d &
6 6.e. In most cases, the stolen checks were falsely endorsed in the
7 original payee's name. In doing so, the co-conspirators falsely
8 represented that they were the payees on the checks and were entitled
9 to the funds and concealed that they were not the payees on the
10 stolen checks and that they were not authorized to deposit the checks
11 or receive the payees' funds. In some cases, the checks were washed
12 or altered to make the payee the name of the owner of the bank
13 account into which the checks were being deposited.

14 g. Defendants CORONA, EDEZA, BESS, and OCHOA, and other
15 co-conspirators, would then rapidly deplete the fraudulently
16 deposited funds from the account holders' accounts by making cash
17 withdrawals, electronic transfers, and/or debit card purchases.

18 h. To conceal the fraud, the co-conspirators would
19 instruct account holders to claim that their accounts had been
20 compromised if contacted by the Financial Institutions about the
21 fraudulent deposits.

22 7. During their fraudulent scheme, defendants intended to
23 cause at least \$5.5 million in losses to the Financial Institutions.

24 C. OVERT ACTS

25 8. On or about the following dates, in furtherance of the
26 conspiracy and to accomplish its object, defendants CORONA, EDEZA,
27 BESS, OCHOA, SOLARES, ARELLANO, LOPEZ, ALVAREZ, MARTINEZ, CORTES
28 ARZATE, and NICHOLSON, together with others known and unknown to the

1 Grand Jury, committed various overt acts within the Central District
2 of California, and elsewhere, including, but not limited to, the
3 following:

4 **Mail Theft and Transfer of Stolen Checks**

5 Overt Act No. 1: On January 19, 2021, defendant SOLARES stole
6 mail from a USPS collection box outside the Eagle Rock Post Office in
7 Los Angeles, California.

8 Overt Act No. 2: On January 30, 2021, Co-Conspirator 1 sent
9 defendant CORONA an Instagram direct message stating that Co-
10 Conspirator 1 had three small checks but was going to go back out at
11 night to steal more checks.

12 Overt Act No. 3: On February 16, 2021, defendant SOLARES
13 stole mail from a USPS collection box at the Griffith Post Office in
14 Los Angeles, California.

15 Overt Act No. 4: On February 17, 2021, in response to
16 defendant CORONA's Instagram direct message asking for washed checks,
17 defendant SOLARES confirmed he had "a lot."

18 Overt Act No. 5: On February 21, 2021, in Instagram direct
19 messages, defendant SOLARES sent defendant CORONA four photographs
20 depicting approximately 23 stolen checks.

21 Overt Act No. 6: On February 27, 2021, defendant SOLARES told
22 defendant CORONA over Instagram direct message that defendant SOLARES
23 was going to fish for checks in the mail that evening.

24 Overt Act No. 7: On February 28, 2021, in response to
25 defendant SOLARES's Instagram direct message with a photograph
26 depicting ten stolen checks, including check no. 1192 addressed to
27 R.A., defendant CORONA arranged for a co-conspirator to get eight of
28 the checks from defendant SOLARES, including check no. 1192.

1 Overt Act No. 8: On March 4, 2021, using Instagram direct
2 messages, defendant CORONA told defendant SOLARES that the last
3 checks from defendant SOLARES did not work and arranged to get
4 additional stolen checks from defendant SOLARES.

5 Overt Act No. 9: On March 16, 2021, in response to defendant
6 CORONA's Instagram direct message asking defendant SOLARES if he had
7 Chase checks, defendant SOLARES said that he had washed checks and
8 that he was in the alley.

9 Overt Act No. 10: On March 17, 2021, defendant SOLARES stole
10 mail from a USPS collection box at the Griffith Post Office located
11 in Los Angeles, California.

12 Overt Act No. 11: On March 17, 2021, using Instagram direct
13 messages, defendants CORONA and SOLARES arranged to meet so that
14 defendant SOLARES could hand off stolen checks to defendant CORONA.

15 Overt Act No. 12: On March 20, 2021, defendant SOLARES stole
16 mail from a USPS collection box at the Griffith Post Office in Los
17 Angeles, California.

18 Overt Act No. 13: On March 23, 2021, in response to defendant
19 SOLARES's Instagram direct message with a photograph depicting
20 approximately eight stolen checks, defendant CORONA arranged to meet
21 defendant SOLARES.

22 Overt Act No. 14: On March 29, 2021, in response to defendant
23 CORONA's Instagram direct message that he needed washed checks,
24 defendant SOLARES sent a photograph depicting approximately 22 stolen
25 checks.

26 Overt Act No. 15: On April 2, 2021, in response to defendant
27 SOLARES's Instagram direct message sending a photograph depicting
28

1 approximately 14 stolen checks, defendant CORONA arranged to meet
2 defendant SOLARES.

3 Overt Act No. 16: On April 11, 2021, using Instagram direct
4 messages, defendant CORONA agreed to lend defendant SOLARES a car for
5 defendant SOLARES to go "fishing" and steal checks from the U.S.
6 mail.

7 Overt Act No. 17: On April 21, 2021, in response to defendant
8 SOLARES's Instagram direct message that he was going to go fishing
9 that night and give the stolen checks to defendant OCHOA, defendant
10 OCHOA told defendant SOLARES to reach out to him in the morning.

11 Overt Act No. 18: On May 6, 2021, in response to defendant
12 OCHOA's Instagram direct message that he needed stolen checks,
13 defendant SOLARES said he was going to go "fishing."

14 Overt Act No. 19: On June 17, 2021, in response to defendant
15 SOLARES's Instagram direct messages with two photographs depicting
16 approximately 11 stolen checks, defendant OCHOA arranged to meet
17 defendant SOLARES.

18 Overt Act No. 20: On June 28, 2021, defendant SOLARES sent
19 defendant CORONA an Instagram direct message that defendant SOLARES
20 was going to go fishing for checks in the mail and give the checks to
21 defendant CORONA.

22 Overt Act No. 21: On August 1, 2021, using Instagram direct
23 messages, Co-Conspirator 1 told defendant CORONA that he was fishing
24 for checks in Orange County.

25 Overt Act No. 22: On August 2, 2021, Co-Conspirator 1 sent
26 defendant CORONA an Instagram direct message that Co-Conspirator 1
27 had stolen checks for defendant CORONA and three photographs
28 depicting WFB ATM withdrawal receipts.

1 Overt Act No. 23: On August 10, 2021, Co-Conspirator 1 sent
2 defendant CORONA an Instagram direct message that Co-Conspirator 1
3 had stolen checks and materials for washing the checks.

4 Overt Act No. 24: On August 11, 2021, defendant SOLARES
5 possessed approximately 34 pieces of stolen mail.

6 Overt Act No. 25: On August 29, 2021, in response to defendant
7 SOLARES's Instagram direct messages with three photographs depicting
8 approximately 29 stolen checks, defendant OCHOA said he needed the
9 WFB checks and arranged to meet defendant SOLARES.

10 Overt Act No. 26: On September 21, 2021, using Instagram
11 direct messages, defendant CORONA directed Co-Conspirator 1 to wash
12 stolen checks and arranged to meet Co-Conspirator 1 that day for
13 defendant CORONA to take possession of the washed checks.

14 Overt Act No. 27: On September 24, 2021, in response to
15 defendant SOLARES's Instagram direct message asking if defendant BESS
16 needed stolen checks in amounts over \$20,000, defendant BESS
17 confirmed that he did.

18 Overt Act No. 28: On September 28, 2021, in response to
19 defendant SOLARES's Instagram direct message with two photographs
20 depicting approximately 19 stolen checks, including checks issued by
21 the United States and the State of California, defendant BESS said he
22 wanted the "state checks."

23 Overt Act No. 29: On October 23, 2021, in response to
24 defendant SOLARES's Instagram direct message that said "bangers
25 alert" with two photographs depicting approximately 11 stolen checks,
26 defendant OCHOA arranged to meet defendant SOLARES.

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1 **Soliciting Accountholders**

2 Overt Act No. 30: On February 18, 2021, defendant BESS
3 directed defendant EDEZA to post to his Instagram story a photograph
4 depicting a WFB ATM receipt dated February 18, 2021, documenting a
5 check deposit in the amount of \$21,936.00, which would be available
6 on February 19, 2021, a WFB debit card, and a logo for "2021."

7 Overt Act No. 31: On April 27, 2021, defendant CORONA directed
8 defendant ALVAREZ to post to her Instagram story a photograph
9 depicting a Wells Fargo ATM receipt showing a deposit of a check in
10 the amount of \$20,400 with a deposit credit date of April 27, 2021.

11 Overt Act No. 32: On May 5, 2021, defendant CORONA directed
12 defendant LOPEZ to post to his Instagram story two photographs, one
13 depicting bands of cash and asking followers if they wanted to make
14 between \$3,000 and \$6,000 and another depicting four debit cards with
15 the caption "ALL BANKS WELCOME PICKING UP CARDS TAP IN."

16 Overt Act No. 33: On June 7, 2021, defendant ALVAREZ posted an
17 Instagram story depicting four debit cards with the caption "picking
18 up cards," and inviting followers to direct message defendant ALVAREZ
19 if they were interested in giving her their debit cards.

20 Overt Act No. 34: On June 10, 2021, defendant CORONA posted an
21 Instagram story depicting many \$100 bills fanned out with the caption
22 "NEXT DAY FUNDS," inviting followers to join in on the opportunity to
23 make money by direct messaging defendant CORONA.

24 Overt Act No. 35: On June 14, 2021, defendant BESS posted an
25 Instagram story entitled "Money Monday," depicting a stack of debit
26 cards with the caption "ALL BANKS WELCOME TAP IN," and inviting
27 followers to send defendant BESS a direct message if they were
28 interested in making money.

1 Overt Act No. 36: On June 14, 2021, defendant CORONA posted an
2 Instagram story with a photograph depicting a stack of \$100 bills and
3 asking followers to send defendant CORONA a direct message if they
4 had any bank account, including from BOA, Chase, or Wells Fargo, and
5 stating that "if you don't have an account bring me someone who does
6 I'll pay you."

7 Overt Act No. 37: On June 22, 2021, defendant BESS posted an
8 Instagram story that invited followers with BOA or WFB accounts to
9 direct message him.

10 Overt Act No. 38: On July 1, 2021, defendant CORONA directed
11 defendant LOPEZ to post to his Instagram story a photograph depicting
12 a WFB ATM withdrawal receipt dated July 1, 2021, showing an available
13 balance of over \$21,335 and a stack of \$50 bills.

14 Overt Act No. 39: On July 8, 2021, defendant ARRELLANO posted
15 an Instagram story depicting a WFB ATM receipt dated July 8, 2021,
16 documenting a check deposit of \$44,348.70, and inviting followers to
17 message defendant ARRELLANO if they were interested in having a
18 similar amount of money deposited into their bank accounts.

19 Overt Act No. 40: On July 16, 2021, defendant OCHOA posted an
20 Instagram story depicting a WFB ATM receipt dated July 15, 2021,
21 showing the deposit of a \$81,559.87 check and an available balance of
22 \$18.38 with the full amount of the deposit available on July 16,
23 2021, with the caption "18\$ into 81k," and inviting followers to
24 direct message defendant OCHOA if they were interested in making a
25 similar amount of money.

26 Overt Act No. 41: On July 18, 2021, defendant OCHOA posted an
27 Instagram story inviting WFB, BOA, and Chase customers who had
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1 accounts since 2019 or older to direct message defendant OCHOA to
2 learn more about the fraudulent scheme.

3 Overt Act No. 42: On July 19, 2021, defendant ARRELLANO posted
4 an Instagram story stating that he was "picking cards up today" and
5 inviting followers with accounts at BOA, Chase, WFB, and "all other
6 banks" to direct message defendant ARRELLANO if they were interested
7 in making quick money.

8 Overt Act No. 43: On August 19, 2021, defendant NICHOLSON
9 posted an Instagram story depicting a Wells Fargo ATM screen showing
10 a checking account balance of \$20,444.73 and a savings account
11 balance of \$26,871.28 and inviting followers to direct message
12 defendant NICHOLSON if they were interested in achieving such
13 balances.

14 Overt Act No. 44: On August 19, 2021, defendant CORONA posted
15 an Instagram story depicting the same ATM screen described in Overt
16 Act No. 43.

17 Overt Act No. 45: On November 9, 2021, defendant NICHOLSON
18 posted an Instagram story depicting multiple envelopes containing
19 cash, WFB ATM receipts, and debit cards, inviting followers to direct
20 message him if they were interested in the same opportunity.

21 Overt Act No. 46: On March 25, 2022, defendant MARTINEZ posted
22 an Instagram story depicting WFB debit cards and inviting followers
23 to direct message her if they had WFB debit cards to use in the
24 fraudulent scheme.

25 Overt Act No. 47: On May 25, 2022, defendant CORTES ARZATE
26 posted an Instagram story asking followers to direct message her if
27 they had bank accounts with WFB, Citi, BOA, Union Bank, or Chase and
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1 stating that she would give followers a cut if they found someone who
2 had one of the requested accounts.

3 Overt Act No. 48: On June 5, 2023, defendant EDEZA posted an
4 Instagram story inviting followers to direct message him if they were
5 interested in making \$5,000 to \$25,000 for WFB accounts, \$7,000 to
6 \$10,000 for BOA accounts, \$3,000 to \$8,000 for Chase accounts, or
7 \$8,000 to \$15,000 for NFCU accounts.

8 Overt Act No. 49: On June 7, 2023, defendant MARTINEZ posted
9 an Instagram story stating that she was "picking up cards all day"
10 and would split proceeds "50/50" and inviting followers to direct
11 message her if they had debit cards from WFB, Chase, BOA, Bank of the
12 West, Citi, USB, any credit union, or any bank account for at least
13 six months.

14 Overt Act No. 50: On June 9, 2023, defendant EDEZA posted an
15 Instagram story inviting followers to direct message him if they were
16 interested in making "some money" and had a bank account, including
17 from Chase, BOA, or WFB.

18 Overt Act No. 51: On June 15, 2023, defendant MARTINEZ posted
19 an Instagram story depicting a stack of cash and inviting followers
20 to direct message her if they "want to make some cash and have a bank
21 account over 2 years" or if they brought her an account.

22 Overt Act No. 52: On July 17, 2023, defendant CORTES ARZATE
23 posted an Instagram story stating that she was "picking up accounts
24 later" and inviting followers to direct message her if they had a
25 bank account with BOA, WFB, or Chase that was one year or older.

26 Overt Act No. 53: On August 18, 2023, defendant ALVAREZ posted
27 an Instagram story depicting five debit cards, stating that defendant
28

1 ALVAREZ was "picking up cards," and inviting followers to direct
2 message her if they were interested in participating in the scheme.

3 **General Operation of the Scheme**

4 Overt Act No. 54: On December 17, 2020, defendant MARTINEZ
5 sent defendant BESS an Instagram direct message stating that she was
6 going to give the bank accounts that she had recruited to defendant
7 BESS to deposit checks into because defendant CORONA was on vacation.

8 Overt Act No. 55: On December 23, 2020, in Instagram direct
9 messages to co-conspirators including defendants CORONA, EDEZA, and
10 BESS, defendant OCHOA sent a photograph depicting approximately 19
11 ATM receipts each wrapped around a debit card and explained that ten
12 of the check deposits needed to clear the following day so there
13 would be "money for all of us."

14 Overt Act No. 56: On January 28, 2021, in Instagram direct
15 messages, defendant ARRELLANO sent defendant BESS three PIN numbers
16 for debit cards that defendant ARRELLANO had caused to be delivered
17 to defendant BESS and indicated that the PIN number for the fourth
18 debit card was written on the card.

19 Overt Act No. 57: On January 31, 2021, in response to
20 defendant ARRELLANO's Instagram direct message asking if Citi or
21 Capital One accounts worked in the scheme, defendant BESS said that
22 Citi accounts worked, but he wasn't sure about Capital One accounts.

23 Overt Act No. 58: On March 9, 2021, in response to defendant
24 MARTINEZ's Instagram direct message stating that it was "time to
25 start scamming," defendant BESS said that he "hate[d] regular jobs."

26 Overt Act No. 59: On March 11, 2021, defendant MARTINEZ sent
27 defendant BESS an Instagram direct message stating, "Free Money Babes
28 for me."

1 Overt Act No. 60: On April 20, 2021, using Instagram direct
2 messages, defendant CORONA sent a photograph to co-conspirators
3 including defendants EDEZA, BESS, OCHOA, ARRELLANO, and NICHOLSON
4 that depicted a stack of debit cards each wrapped in an ATM receipt.

5 Overt Act No. 61: On April 21, 2021, in response to defendant
6 OCHOA's Instagram direct message asking if defendant CORONA had
7 deposited checks into defendant OCHOA's Chase accounts, defendant
8 CORONA said "yeah" and sent seven photographs each depicting a Chase
9 debit card and ATM deposit receipt dated April 20, 2021.

10 Overt Act No. 62: On June 9, 2021, in response to Co-
11 Conspirator 4's Instagram direct message that they were interested in
12 participating in the scheme, defendant NICHOLSON told Co-Conspirator
13 4 to contact defendant BESS, which Co-Conspirator 4 did.

14 Overt Act No. 63: On June 18, 2021, defendant ALVAREZ asked
15 defendant ARRELLANO if he would deposit checks into bank accounts
16 that defendant ALVAREZ had recruited.

17 Overt Act No. 64: On July 10, 2021, in response to defendant
18 EDEZA's Instagram direct message to co-conspirators including
19 defendants CORONA, BESS, OCHOA, ARRELLANO, and NICHOLSON, that
20 stated, "Fmb all day," defendant OCHOA said, "FMB."

21 Overt Act No. 65: On July 22, 2021, defendant BESS arranged to
22 pick up Co-Conspirator 4's debit card.

23 Overt Act No. 66: On August 27, 2021, in response to defendant
24 CORONA's Instagram direct message asking if defendant OCHOA was
25 having luck depositing checks into Chase accounts, defendant OCHOA
26 answered in the affirmative.

27 Overt Act No. 67: On October 8, 2021, in response to defendant
28 BESS's Instagram direct message to co-conspirators including

1 defendants CORONA, EDEZA, OCHOA, ARRELLANO, and NICHOLSON, stating
2 that defendant BESS needed BOA or WFB accounts and was "ready for a
3 new week" and "new money," defendant EDEZA said that he needed WFB
4 accounts too.

5 Overt Act No. 68: On October 14, 2021, defendant EDEZA sent
6 defendant BESS five photographs depicting a total of approximately 26
7 stolen checks.

8 **Accountholder UC-1**

9 Overt Act No. 69: On June 15, 2021, in response to an
10 Instagram direct message from an undercover law enforcement agent
11 purporting to be a bank account holder ("UC-1") stating that UC-1 had
12 a Wells Fargo account, defendant CORONA asked UC-1 how long the
13 account had been open.

14 Overt Act No. 70: On June 24, 2021, using Instagram direct
15 messages, defendant CORONA explained to UC-1 that the co-conspirators
16 would deposit checks into UC-1's account, wait for the checks to
17 clear, which would be the next day in the case of a Wells Fargo
18 account, and withdraw cash up until the account's limit and that UC-1
19 would receive one-third of whatever funds were deposited into UC-1's
20 account while the co-conspirators would split the remainder among
21 four people.

22 Overt Act No. 71: On July 2, 2021, in response to UC-1's
23 Instagram direct message stating that UC-1 had been banking with WFB
24 for about five years and had a checking account that had been open
25 for seven months, defendant NICHOLSON said, "Okay cool. I deposit a
26 check in your account and then when it clears we split the money up
27 me you and the check plug."
28

1 Overt Act No. 72: On July 28, 2021, in response to UC-1's
2 Instagram direct message that UC-1 was interested, defendant
3 ARRELLANO explained that a "friend would deposit a check with funds"
4 into UC-1's bank account and UC-1 would receive one-third of what was
5 deposited and that the bank might close UC-1's account after the
6 checks were deposited.

7 Overt Act No. 73: On August 9, 2021, defendant CORONA sent UC-
8 1 an Instagram direct message asking if UC-1 still wanted to
9 participate in the scheme and provide UC-1's bank account to
10 defendant CORONA.

11 Overt Act No. 74: On November 9, 2021, in response to UC-1's
12 Instagram direct message stating that UC-1 had a WFB account that was
13 six years old, defendant MARTINEZ explained that "it's basically
14 about depositing checks into accounts and when it's done we split the
15 money" and that, for example, UC-1 would make \$6,000 if the co-
16 conspirators deposited a \$20,000 check into UC-1's account.

17 Overt Act No. 75: On November 15, 2021, in Instagram direct
18 messages, defendant MARTINEZ arranged for a co-conspirator to meet
19 UC-1 to get UC-1's WFB debit card on November 17, 2021, at 2:00 p.m.,
20 at a meeting location on North Alameda Street in Los Angeles,
21 California ("Alameda Street Address").

22 Overt Act No. 76: On November 17, 2021, defendant MARTINEZ
23 sent UC-1 an Instagram direct message stating that UC-1 would be
24 meeting a man driving a light green Toyota Prius.

25 Overt Act No. 77: On November 17, 2021, defendant MARTINEZ
26 sent UC-1 an Instagram direct message stating that the man was
27 outside the Alameda Street Address.

28

1 Overt Act No. 78: On November 17, 2021, Co-Conspirator 2
2 arrived at the Alameda Street Address in a light green Toyota Prius,
3 and UC-1 gave Co-Conspirator 2 an undercover WFB debit card ending in
4 3320 ("WFB Card 3320").

5 Overt Act No. 79: On November 17, 2021, defendant MARTINEZ
6 asked UC-1 why WFB Card 3320 said "customer since 2021," and
7 requested the PIN number for the card.

8 Overt Act No. 80: On November 17, 2021, defendant CORONA tried
9 to use WFB Card 3320 at a WFB ATM in Gardena, California.

10 Overt Act No. 81: On November 18, 2021, defendant MARTINEZ
11 sent UC-1 an Instagram direct message asking UC-1 to confirm the PIN
12 number for WFB Card 3320.

13 Overt Act No. 82: On November 18, 2021, defendant MARTINEZ
14 told UC-1 in an Instagram direct voice message that "he" tried to use
15 WFB Card 3320 the previous day, noting that the card did not work and
16 that "he" would try to use WFB Card 3320 again that night.

17 Overt Act No. 83: On November 18, 2021, defendant CORONA
18 attempted to use WFB Card 3320 at a WFB ATM in Gardena, California.

19 Overt Act No. 84: On November 18, 2021, defendant MARTINEZ
20 sent UC-1 an Instagram direct message with a photograph of a WFB ATM
21 screen, which defendant MARTINEZ explained "sa[id] invalid card."

22 **Accountholder B.T. (WFB Account 1491)**

23 Overt Act No. 85: On January 8, 2021, defendant BESS sent
24 defendant CORONA a photograph depicting three debit cards, including
25 one bearing the name of B.T.

26 Overt Act No. 86: On January 11, 2021, in response to
27 defendant CORONA's Instagram direct message asking if defendant BESS
28

1 had business accounts because defendant CORONA had business checks,
2 defendant BESS said, "hot shit."

3 Overt Act No. 87: On January 12, 2021, defendant CORONA
4 deposited check no. 10030 from D.M.G.C., Inc. payable to the Law
5 Office of L.A.R. in the amount of \$8,000 into WFB Account 1491 at an
6 ATM in Gardena, California.

7 Overt Act No. 88: On January 12, 2021, defendant BESS sent
8 defendant CORONA a photograph depicting an ATM receipt that
9 documented the check deposit described in Overt Act No. 87 and
10 indicated that the funds would be available on January 13, 2021.

11 Overt Act No. 89: On January 15, 2021, defendant BESS withdrew
12 \$2,500 in cash from WFB Account 1491 at an ATM in Lynwood,
13 California.

14 **Accountholder K.A. (WFB Account 4071)**

15 Overt Act No. 90: On December 4, 2020, using Instagram direct
16 messages, defendant ALVAREZ asked K.A. whether she had a bank account
17 and explained to K.A. that K.A. could make money by letting a co-
18 conspirator deposit checks into K.A.'s bank account.

19 Overt Act No. 91: On December 7, 2020, using Instagram direct
20 messages, defendant ALVAREZ arranged to meet K.A. in Los Angeles,
21 California, to get WFB Card 6294 and told K.A. that defendant CORONA
22 was doing deposits that day.

23 Overt Act No. 92: On December 7, 2020, defendant ALVAREZ
24 caused WFB Card 6294 to be delivered to defendant CORONA.

25 Overt Act No. 93: On December 7, 2020, defendant CORONA
26 deposited check no. 4169 from N. Co. payable to A.R.M.C., Inc. in the
27 amount of \$19,042.15 into WFB Account 4071 using WFB Card 6294 at an
28 ATM in Lynwood, California.

1 Overt Act No. 94: On January 26, 2021, defendant ALVAREZ sent
2 defendant CORONA the PIN number for WFB Card 6294.

3 Overt Act No. 95: On January 26, 2021, defendant CORONA caused
4 check no. 99252 from H.P., LLC payable to V.P., Inc. in the amount of
5 \$10,601.85 to be deposited into WFB Account 4071 using WFB Card 6294
6 at an ATM in Compton, California.

7 Overt Act No. 96: On January 27, 2021, in response to K.A.'s
8 Instagram direct message with a screenshot showing an available
9 balance of \$10,603.16 in WFB Account 4071, defendant ALVAREZ said,
10 "time to withdraw."

11 Overt Act No. 97: On January 27, 2021, in response to
12 defendant ALVAREZ's Instagram direct message with the same screenshot
13 described in Overt Act No. 96, defendant CORONA asked if defendant
14 ALVAREZ "like[d] that number," and defendant ALVAREZ confirmed she
15 did.

16 Overt Act No. 98: On January 27, 2021, defendant CORONA
17 withdrew \$2,500 in cash from WFB Account 4071 at an ATM in Compton,
18 California.

19 Overt Act No. 99: On March 23, 2021, in response to K.A.'s
20 Instagram direct message that WFB had informed K.A. that there was a
21 criminal investigation based on the checks deposited into WFB Account
22 4071, defendant ALVAREZ told K.A. to call her.

23 Overt Act No. 100: On March 23, 2021, defendant ALVAREZ sent
24 defendant CORONA a screenshot of the Instagram direct message from
25 K.A. described in Overt Act No. 99.

26 **Accountholder M.C. (WFB Account 5820)**

27 Overt Act No. 101: On January 30, 2021, in response to Co-
28 Conspirator 3's Instagram direct message that he had a WFB debit card

1 for defendant BESS, defendant BESS said he could try to deposit some
2 stolen checks in the account on Monday.

3 Overt Act No. 102: On Monday, February 1, 2021, using Instagram
4 direct messages and voice calls, defendant BESS arranged to get WFB
5 Card 4832 from Co-Conspirator 3.

6 Overt Act No. 103: On February 1, 2021, defendant BESS caused
7 check no. 143 from S.C.T. payable to R.T. in the amount of \$2,350 to
8 be deposited into WFB Account 5820 using WFB Card 4832 at an ATM in
9 Gardena, California.

10 Overt Act No. 104: On February 2, 2021, defendant BESS sent Co-
11 Conspirator 3 a photograph depicting an ATM receipt that documented
12 the check deposit described in Overt Act No. 103 and that the account
13 had a balance of -\$233.06 until the check funds cleared and said,
14 "This to see what that Negative do."

15 **Accountholder C.C.H. (WFB Account 4158)**

16 Overt Act No. 105: On February 1, 2021, defendant BESS caused
17 check no. 4025 from T.G., LLC payable to A.B.I. in the amount of
18 \$20,530.23 to be deposited into WFB Account 4158 using WFB Card 2176
19 at an ATM in Gardena, California.

20 Overt Act No. 106: On February 2, 2021, in response to
21 defendant EDEZA's Instagram direct message asking whether the deposit
22 described in Overt Act No. 105 cleared, defendant BESS told defendant
23 EDEZA to tell C.C.H. not to try to withdraw any money from WFB
24 Account 4158 yet.

25 Overt Act No. 107: On February 5, 2021, in Instagram direct
26 messages, defendant EDEZA asked defendant BESS how it was going with
27 WFB Account 4158 that defendant EDEZA "got" for defendant BESS and
28

1 how many more days it would take to withdraw the full amount of the
2 stolen checks deposited into WFB Account 4158.

3 Overt Act No. 108: On February 6, 2021, defendant BESS caused a
4 cash withdrawal of \$700 from WFB Account 4158 at an ATM in Los
5 Angeles, California.

6 Overt Act No. 109: On February 6, 2021, in response to
7 defendant EDEZA's Instagram direct message that C.C.H. was asking how
8 long it would take to withdraw the full amount of the stolen checks
9 deposited into WFB Account 4158, defendant BESS sent a photograph
10 depicting a portion of a WFB ATM receipt showing the cash withdrawal
11 described in Overt Act No. 108 and a remaining balance of \$6,233.28
12 in WFB Account 4158.

13 Overt Act No. 110: On February 8, 2021, defendant BESS withdrew
14 \$1,000 in cash from WFB Account 4158 at an ATM in Westchester,
15 California.

16 Overt Act No. 111: On February 8, 2021, in response to
17 defendant EDEZA's Instagram direct message asking if defendant BESS
18 had gotten more cash out of WFB Account 4158 that day, defendant BESS
19 said he had taken out all \$100 bills and that defendant BESS would
20 likely complete the withdrawals by Wednesday, February 10, 2021.

21 **Accountholder R.B. (WFB Account 8769)**

22 Overt Act No. 112: On February 10, 2021, defendant BESS
23 deposited check no. 40146 from J.P.T., Inc. payable to N.C.C.B., Inc.
24 in the amount of \$31,143.75 into WFB Account 8769 using WFB Card 7041
25 at an ATM in Gardena, California.

26 Overt Act No. 113: On February 11, 2021, defendant BESS
27 withdrew \$2,500 in cash from WFB Account 8769 at an ATM in
28 Westchester, California.

1 Overt Act No. 114: On February 11, 2021, defendant BESS
2 withdrew \$800 in cash from WFB Account 8769 at an ATM in Westchester,
3 California.

4 Overt Act No. 115: On February 11, 2021, in response to
5 defendant ARRELLANO's Instagram direct message asking if defendant
6 BESS was "cashing out," defendant BESS told defendant ARRELLANO that
7 he had gotten \$3,300 out of WFB Account 8769 and sent a photograph of
8 a portion of the ATM receipt documenting the withdrawal described in
9 Overt Act No. 114 in front of a stack of \$100 and \$20 bills.

10 **Accountholder E.P. (WFB Account 6740)**

11 Overt Act No. 116: On February 28, 2021, using Instagram direct
12 messages, defendants CORONA and SOLARES arranged for a co-conspirator
13 to get stolen checks from defendant SOLARES to give to defendant
14 CORONA, which included check no. 1162 from B.A.P. payable to R.A. in
15 the amount of \$6,767.

16 Overt Act No. 117: On March 3, 2021, in response to defendant
17 MARTINEZ's Instagram direct message stating that she was going to
18 bring debit cards to him, defendant CORONA confirmed he was around.

19 Overt Act No. 118: On March 3, 2021, defendant MARTINEZ
20 delivered WFB Card 4140 to defendant CORONA.

21 Overt Act No. 119: On March 3, 2021, using Instagram direct
22 messages, defendant MARTINEZ sent defendant CORONA the name of E.P.,
23 "Wells," and the four-digit PIN number for WFB Card 4140.

24 Overt Act No. 120: On March 3, 2021, defendant CORONA caused
25 the check described in Overt Act No. 116 to be deposited into WFB
26 Account 6740 using WFB Card 4140 at an ATM in Compton, California.

27 Overt Act No. 121: On March 4, 2021, in response to defendant
28 MARTINEZ's Instagram direct message requesting it, defendant CORONA

1 sent a photograph depicting an ATM receipt documenting the check
2 deposit described in Overt Act No. 120.

3 Overt Act No. 122: On March 9, 2021, using Instagram direct
4 messages, defendant MARTINEZ sent defendant CORONA a screenshot from
5 the WFB app showing that WFB Account 6740 had a balance of
6 -\$6,761.57.

7 **Accountholder J.P. (WFB Account 1587)**

8 Overt Act No. 123: On January 26, 2021, in response to J.P.'s
9 Instagram direct message that J.P. had a WFB account that she used
10 constantly for more than four years, defendant ALVAREZ explained that
11 defendant CORONA "gets checks with funds and he deposit on to ur
12 account and the checks usually clear same day or next day and
13 depending on the check it splits 3 ways" and instructed J.P. to take
14 all the money out of her account except for \$50.

15 Overt Act No. 124: On March 4, 2021, using Instagram direct
16 messages, defendant ALVAREZ arranged to meet J.P. at an address on
17 West Cedar Street in Compton, California ("Cedar Street Address") to
18 pick up WFB Card 4272.

19 Overt Act No. 125: On March 4, 2021, defendant ALVAREZ caused
20 WFB Card 4272 to be delivered to defendant CORONA.

21 Overt Act No. 126: On March 4, 2021, defendant ALVAREZ sent
22 J.P. an Instagram direct message asking for the PIN number for WFB
23 Card 4272, which J.P. provided, and defendant ALVAREZ said that
24 defendant CORONA was "going to do it today."

25 Overt Act No. 127: On March 4, 2021, defendant CORONA caused
26 Chase cashier's check no. 1159959145 remitted by G.M.R. payable to
27 L.K. in the amount of \$4,000 to be deposited into WFB Account 1587
28 using WFB Card 4272 at an ATM in Compton, California.

1 Overt Act No. 128: On March 5, 2021, in response to J.P.'s
2 Instagram direct message that the "checks cleared" and a screenshot
3 from the WFB app for WFB Account 1587, defendant ALVAREZ said, "Okay
4 once they get the money out I'll let u know so I can give u ur part."

5 Overt Act No. 129: On March 5, 2021, using Instagram direct
6 messages, defendant ALVAREZ notified defendant CORONA that the check
7 deposit described in Overt Act No. 127 had cleared and gave defendant
8 CORONA the same PIN number for WFB Card 4272 described in Overt Act
9 No. 126.

10 Overt Act No. 130: On March 5, 2021, defendant CORONA withdrew
11 \$2,500 in cash from WFB Account 1587 using WFB Card 4272 at an ATM in
12 South Gate, California.

13 **Accountholders G.M. & J.M. (WFB Account 4225)**

14 Overt Act No. 131: On March 29, 2021, in response to defendant
15 EDEZA's Instagram direct message that defendant EDEZA still needed to
16 get the PIN numbers because he forgot to the previous night,
17 defendant BESS said, "Hahah need those."

18 Overt Act No. 132: On March 29, 2021, using Instagram direct
19 messages, defendant EDEZA told defendant BESS that defendant EDEZA's
20 "homie" was "still at work" and would send the PIN numbers "in a
21 bit."

22 Overt Act No. 133: On March 29, 2021, defendant BESS deposited
23 check no. 1159 from H., LLC payable to WFB in the amount of \$4,000
24 into WFB Account 4225 using WFB Card 7597 at an ATM in Compton,
25 California.

26 Overt Act No. 134: On March 29, 2021, defendant BESS deposited
27 check no. 1031 from S.A., LLC payable to G.M.E., Inc. in the amount
28 of \$5,000 into WFB Account 4225 at an ATM in Compton, California.

1 Overt Act No. 135: On March 30, 2021, defendant BESS caused
2 \$700 in cash to be withdrawn from WFB Account 4225 at an ATM in
3 Gardena, California.

4 Overt Act No. 136: On March 30, 2021, defendant BESS sent
5 defendant EDEZA an Instagram direct message that the stolen checks
6 deposited into WFB Account 4225 had cleared.

7 Overt Act No. 137: On March 30, 2021, using Instagram direct
8 messages, defendant BESS sent defendant EDEZA a photograph that
9 depicted a WFB ATM receipt documenting the cash withdrawal described
10 in Overt Act No. 135 as well as a stack of \$50 bills covering a WFB
11 debit card.

12 Overt Act No. 138: On March 30, 2021, using Instagram direct
13 messages, defendant BESS sent defendant EDEZA a version of the same
14 photograph described in Overt Act No. 137 with the bank account
15 information redacted and directed defendant EDEZA to post the
16 photograph to his Instagram story to recruit more accountholders to
17 participate in the scheme.

18 **Accountholder J.N.T. (WFB Account 6295)**

19 Overt Act No. 139: On April 7, 2021, using Instagram direct
20 messages, defendants MARTINEZ and CORONA arranged for a co-
21 conspirator to pick up WFB Card 6862 from J.N.T.

22 Overt Act No. 140: On April 7, 2021, defendant MARTINEZ sent an
23 Instagram direct message to defendant CORONA with the four-digit PIN
24 number for WFB Card 6862.

25 Overt Act No. 141: On April 7, 2021, defendant CORONA caused
26 check no. 210895 from F.K. payable to V., Inc. in the amount of
27 \$18,967.50 to be deposited into WFB Account 6295 using WFB Card 6862
28 at an ATM in Compton, California.

1 Overt Act No. 142: On April 7, 2021, using Instagram direct
2 messages, defendant CORONA sent defendant MARTINEZ a photograph
3 depicting an ATM receipt documenting the check deposit described in
4 Overt Act No. 141 and WFB Card 6862.

5 Overt Act No. 143: On April 8, 2021, using Instagram direct
6 messages, defendant MARTINEZ sent defendant CORONA a screenshot from
7 WFB Account 6295 showing an available balance of \$18,573.66, which
8 indicated that the check deposit described in Overt Act No. 141 had
9 cleared.

10 Overt Act No. 144: On April 8, 2021, defendant CORONA withdrew
11 \$2,500 in cash from WFB Account 6295 at an ATM in South Gate,
12 California.

13 Overt Act No. 145: On April 8, 2021, in response to defendant
14 CORONA's Instagram direct message with a photograph depicting, among
15 other things, a partially redacted ATM receipt documenting the
16 withdrawal described in Overt Act No. 144 and a stack of \$100 bills,
17 defendant MARTINEZ said, "Sheeesh good day."

18 **Accountholder H.M. (BOA Account 4387)**

19 Overt Act No. 146: On or before April 9, 2021, defendant
20 ARRELLANO caused BOA Card 2003 to be delivered to defendant OCHOA.

21 Overt Act No. 147: On April 9, 2021, using Instagram direct
22 messages, defendant ARRELLANO sent defendant OCHOA the six-digit PIN
23 number for BOA Card 2003.

24 Overt Act No. 148: On April 15, 2021, defendant OCHOA caused
25 check no. 239 from J.R.C. payable to K.C. in the amount of \$4,200 to
26 be deposited into BOA Account 4387 using BOA Card 2003 at an ATM in
27 Gardena, California.

28

1 Overt Act No. 149: On April 15, 2021, using Instagram direct
2 messages, defendant OCHOA sent a photograph to defendant ARRELLANO
3 depicting a BOA ATM receipt documenting the deposit described in
4 Overt Act No. 148 and the back of BOA Card 2003 with the same six-
5 digit PIN number described in Overt Act No. 147 handwritten on it.

6 **Accountholder B.G. (Chase Account 0766)**

7 Overt Act No. 150: On March 12, 2021, in response to B.G.'s
8 Instagram direct message that her friend had told her "what's up
9 about money," defendant ALVAREZ said "let me know when u want me to
10 pass for ur card" and explained that the check deposited in B.G.'s
11 account would clear in one or two days.

12 Overt Act No. 151: On April 14, 2021, using Instagram direct
13 messages, defendant ALVAREZ arranged to pick up Chase Card 1747 from
14 B.G.

15 Overt Act No. 152: On or before April 16, 2021, defendant
16 ALVAREZ caused Chase Card 1747 to be delivered to defendant CORONA.

17 Overt Act No. 153: On April 16, 2021, defendant CORONA caused
18 check no. 1242 from O.T., which had been altered to be made payable
19 to B.G. in the amount of \$3,500 to be deposited into Chase Account
20 0766 using Chase Card 1747 at an ATM in Lynwood, California.

21 Overt Act No. 154: On April 16, 2021, defendant CORONA caused
22 check no. 427 from L.S., which had been altered to be made payable to
23 B.G. in the amount of \$3,500 to be deposited into Chase Account 0766
24 using Chase Card 1747 at an ATM in Lynwood, California.

25 Overt Act No. 155: On April 16, 2021, in response to B.G.'s
26 Instagram direct message stating, "I think they deposit 2 checks
27 today," and a screenshot from the Chase app for Chase Account 0766
28 showing that two \$3,500 checks were pending, defendant ALVAREZ said

1 that once the checks cleared, defendant CORONA would let her know, or
2 B.G. could keep defendant ALVAREZ posted.

3 Overt Act No. 156: On April 19, 2021, in response to B.G.'s
4 Instagram direct message with a screenshot from the Chase app of a
5 notice of delayed deposit availability showing that the funds from
6 the check deposit described in Overt Act No. 154 would be available
7 on April 20, 2021, defendant ALVAREZ told B.G. the check would clear
8 tomorrow.

9 Overt Act No. 157: On April 20, 2021, in response to B.G.'s
10 Instagram direct message with a screenshot from the Chase app for
11 Chase Account 0766, which showed that one check had been returned and
12 a screenshot of an email from Chase Customer Service, which advised
13 B.G. that Chase Account 0766 had been blocked and would soon be
14 closed, defendant ALVAREZ said, "Let me know show him this and I'll
15 let u know what he says."

16 Overt Act No. 158: On April 20, 2021, using Instagram direct
17 messages, defendant ALVAREZ sent defendant CORONA the screenshots
18 described in Overt Act No. 157 and said defendant CORONA could not
19 withdraw anything from Chase Account 0766 because Chase had blocked
20 the account.

21 Overt Act No. 159: On April 20, 2021, using Instagram direct
22 messages, defendant ALVAREZ told B.G. to report her card lost to
23 Chase and claim that B.G. did not authorize the check deposits.

24 **Accountholder D.V. (WFB Account 4722)**

25 Overt Act No. 160: On or before April 19, 2021, defendant
26 ARRELLANO caused WFB Card 4881 to be delivered to defendant OCHOA.

27 Overt Act No. 161: On April 19, 2021, defendant ARRELLANO sent
28 defendant OCHOA the four-digit PIN number for WFB Card 4881.

1 Overt Act No. 162: On April 19, 2021, defendant OCHOA caused
2 check no. 114 from V.B. payable to the United States Treasury in the
3 amount of \$58,000 to be deposited into WFB Account 4722 using WFB
4 Card 4881 at an ATM in Gardena, California.

5 Overt Act No. 163: On April 19, 2021, using Instagram direct
6 messages, defendant OCHOA sent defendant ARRELLANO a photograph
7 depicting an ATM receipt documenting the deposit described in Overt
8 Act No. 162.

9 Overt Act No. 164: On April 20, 2021, defendant OCHOA sent
10 defendant ARRELLANO an Instagram direct message that the check
11 deposit described in Overt Act No. 162 was on hold until April 28,
12 2021.

13 Overt Act No. 165: On April 28, 2021, defendant OCHOA withdrew
14 \$300 in cash from WFB Account 4722 at an ATM in Torrance, California.

15 Overt Act No. 166: On April 29, 2021, using Instagram direct
16 messages, defendant OCHOA sent defendant ARRELLANO a photograph
17 depicting the back of WFB Card 4881, which had the same PIN number
18 described in Overt Act No. 161 handwritten on the back, and a
19 partially obscured ATM withdrawal receipt documenting the cash
20 withdrawal described in Overt Act No. 165.

21 **Accountholder J.L.P. (WFB Account 1858)**

22 Overt Act No. 167: On or before June 2, 2021, defendant
23 MARTINEZ caused WFB Card 6729 to be delivered to defendant CORONA.

24 Overt Act No. 168: On June 11, 2021, using Instagram direct
25 messages, defendant MARTINEZ sent defendant CORONA a list of PIN
26 numbers including the name of J.L.P., "Wells," and the four-digit PIN
27 number for WFB Card 6729.

28

1 Overt Act No. 169: On June 14, 2021, defendant CORONA deposited
2 check no. 1249 from A.C. payable to H.W. in the amount of \$16,025.53
3 into WFB Account 1858 using WFB Card 6729 at an ATM in Inglewood,
4 California.

5 Overt Act No. 170: On June 14, 2021, using Instagram direct
6 messages, defendant CORONA sent defendant MARTINEZ a photograph
7 depicting the check deposit described in Overt Act No. 169.

8 Overt Act No. 171: On June 25, 2021, defendant CORONA withdrew
9 \$2,500 in cash from WFB Account 1858 at an ATM in Downey, California.

10 **Accountholder J.O. (WFB Account 9844)**

11 Overt Act No. 172: On or before June 9, 2021, defendant CORTES
12 ARZATE caused WFB Card 7536 to be delivered to defendant CORONA.

13 Overt Act No. 173: On June 23, 2021, in response to defendant
14 CORTES ARZATE's Instagram direct message asking if WFB Account 9844
15 "still work[ed]," defendant CORONA said he was going to try to
16 deposit a stolen check into the account that day.

17 Overt Act No. 174: On June 23, 2021, defendant CORONA deposited
18 check no. 4774 from S.L.C., which had been altered to be made payable
19 to J.O. in the amount of \$6,900 into WFB Account 9844 using WFB Card
20 7536 at an ATM in Downey, California.

21 Overt Act No. 175: On June 24, 2021, defendant CORTES ARZATE
22 sent an Instagram direct message to defendant CORONA that the deposit
23 described in Overt Act No. 174 had cleared.

24 Overt Act No. 176: On June 24, 2021, defendant CORONA caused
25 \$2,500 in cash to be withdrawn from WFB Account 9844 at an ATM in Los
26 Angeles, California.

27 Overt Act No. 177: On June 24, 2021, in response in defendant
28 CORTES ARZATE's Instagram direct message asking about the payout

1 split from the check deposit described in Overt Act No. 174,
2 defendant CORONA directed defendant CORTES ARZATE to give \$2,000 to
3 J.O. and said defendant CORTES ARZATE would receive \$2,300.

4 **Accountholder D.B. (WFB Account 8290)**

5 Overt Act No. 178: On July 3, 2021, in response to an Instagram
6 solicitation posted by defendant NICHOLSON, D.B. said that he had a
7 WFB account.

8 Overt Act No. 179: On July 6, 2021, using Instagram direct
9 messages, defendant NICHOLSON explained to D.B. that he would
10 "deposit a check in your account and then when it clears we split the
11 money up me you and the check plug" and arranged to pick up WFB Card
12 0627 from D.B. at an address on South Main Street in Los Angeles,
13 California.

14 Overt Act No. 180: On July 7, 2021, a co-conspirator deposited
15 check no. 10336 from V.P. payable to S. Co. in the amount of \$14,217
16 into WFB Account 8290 using WFB Card 0627 at an ATM in Carson,
17 California.

18 Overt Act No. 181: On July 7, 2021, defendant NICHOLSON sent
19 D.B. an Instagram direct message that defendant NICHOLSON's "plug"
20 had "just deposit[ed] a check in [D.B.'s] account" and that defendant
21 NICHOLSON would send D.B. a picture when he got it from his "plug."

22 Overt Act No. 182: On July 7, 2021, using Instagram direct
23 messages, defendant NICHOLSON sent D.B. a photograph depicting a WFB
24 ATM receipt documenting the deposit described in Overt Act No. 180
25 and WFB Card 0627.

26 Overt Act No. 183: On July 8, 2021, defendant NICHOLSON told
27 D.B. over Instagram direct messages that defendant NICHOLSON's "plug"

28

1 needed to "take the money out" and when his plug had finished doing
2 so, defendant NICHOLSON would pay D.B. his cut.

3 **Accountholder D.A. (WFB Account 6149)**

4 Overt Act No. 184: On or before July 14, 2021, defendant CORTES
5 ARZATE caused WFB Card 1392 to be delivered to defendant CORONA.

6 Overt Act No. 185: On July 14, 2021, defendant CORONA caused
7 check no. 77830 from S.T.F.C., Inc. payable to M.S.I., Inc. in the
8 amount of \$15,980.33 to be deposited into WFB Account 6149 using WFB
9 Card 1392 at an ATM in Gardena, California.

10 Overt Act No. 186: On July 14, 2021, using Instagram direct
11 messages, defendant CORONA sent defendant CORTES ARZATE a photograph
12 depicting a partially redacted ATM receipt that documented the check
13 deposit described in Overt Act No. 185 and WFB Card 1392 with a four-
14 digit PIN number written on a sticker affixed to it.

15 Overt Act No. 187: On July 15, 2021, defendant CORTES ARZATE
16 sent defendant CORONA a screenshot from the WFB mobile app showing
17 that WFB Account 6149 had an available balance of \$15,420.97.

18 Overt Act No. 188: On July 15, 2021, defendant CORONA caused
19 \$1,000 in cash to be withdrawn from WFB Account 6149 at an ATM in
20 South Gate, California.

21 Overt Act No. 189: On July 15, 2021, defendant CORONA caused
22 \$2,500 in cash to be withdrawn from WFB Account 6149 at an ATM in
23 South Gate, California.

24 Overt Act No. 190: On July 20, 2021, using Instagram direct
25 messages, defendant CORTES ARZATE sent defendant CORONA a screenshot
26 from the WFB app for WFB Account 6149 showing the ATM withdrawals
27 described in Overt Acts Nos. 188 and 189.

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1 **Accountholder E.F. (WFB Account 3181)**

2 Overt Act No. 191: On or before July 22, 2021, defendant LOPEZ
3 caused WFB Card 4898 to be delivered to defendant CORONA.

4 Overt Act No. 192: On July 22, 2021, in Instagram direct
5 messages, defendant LOPEZ sent defendant CORONA a photograph of WFB
6 Card 4898, gave defendant CORONA the four-digit PIN number, and said
7 that E.F. "deposits big so his bank is good."

8 Overt Act No. 193: On July 22, 2021, in response to defendant
9 CORONA's Instagram direct message that the PIN number described in
10 Overt Act No. 192 for WFB Card 4898 didn't work, defendant LOPEZ said
11 that he was on the phone with E.F. and gave defendant CORONA a new
12 PIN number.

13 Overt Act No. 194: On July 22, 2021, defendant CORONA deposited
14 check no. 24780 from E.W.C. LLC payable to C.D. in the amount of
15 \$16,020 into WFB Account 3181 using WFB Card 4898 at an ATM in
16 Gardena, California.

17 Overt Act No. 195: On July 22, 2021, in Instagram direct
18 messages, defendant CORONA told defendant LOPEZ that the PIN number
19 described in Overt Act No. 193 "worked" and sent a photograph of an
20 ATM receipt documenting the check deposit described in Overt Act No.
21 194.

22 Overt Act No. 196: On July 31, 2021, using Instagram direct
23 messages, defendant LOPEZ told defendant CORONA that the check
24 deposit described in Overt Act No. 194 had cleared and the two
25 discussed the payouts.

26 Overt Act No. 197: On August 3, 2021, defendant CORONA withdrew
27 \$2,500 in cash from WFB Account 3181 at an ATM in South Gate,
28 California.

1 Overt Act No. 198: On August 3, 2021, defendant CORONA withdrew
2 \$1,000 in cash from WFB Account 3181 at an ATM in South Gate,
3 California.

4 Overt Act No. 199: On August 3, 2021, defendant CORONA sent
5 defendant LOPEZ a photograph depicting two ATM receipts documenting
6 the withdrawals described in Overt Acts Nos. 197 and 198 and a stack
7 of \$50 and \$100 bills.

8 **Accountholder L.M. (WFB Account 6668)**

9 Overt Act No. 200: On July 26, 2021, defendant BESS deposited
10 stolen check no. 6814 from C.G.G.M. payable to F.K. LLC in the amount
11 of \$6,688.60 into WFB Account 6668 at an ATM in Inglewood,
12 California.

13 Overt Act No. 201: On July 27, 2021, defendant BESS withdrew
14 \$2,500 in cash from WFB Account 6668 at an ATM in Westchester,
15 California.

16 Overt Act No. 202: On July 27, 2021, defendant BESS posted to
17 his Instagram story a partially redacted photograph depicting an ATM
18 receipt documenting the withdrawal described in Overt Act No. 201 and
19 a stack of \$100 bills with the caption, "same shit different day we
20 gotta get FMB."

21 **Accountholders M.W. (WFB Account 5449) & F.R. (WFB Account 4660)**

22 Overt Act No. 203: On September 20, 2021, defendant LOPEZ
23 delivered three WFB debit cards to defendant CORONA, including WFB
24 Card 8794 belonging to M.W. and WFB Card 2437 belonging to F.R.

25 Overt Act No. 204: On September 20, 2021, defendant LOPEZ sent
26 defendant CORONA an Instagram direct message with the name of M.W.,
27 "Wells Fargo," "5 years," and the four-digit PIN number for WFB Card
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1 8794 as well as the name of F.R., "Wells Fargo," "6 years," and the
2 four-digit PIN number for WFB Card 2437.

3 Overt Act No. 205: On September 21, 2021, defendant CORONA
4 deposited check no. 426 from M.T. LLC payable to L.I.D. LLC in the
5 amount of \$55,700 into WFB Account 4660 using WFB Card 2437 at an ATM
6 in South Gate, California.

7 Overt Act No. 206: On September 21, 2021, two minutes after
8 Overt Act No. 205, defendant CORONA deposited check no. 434 from M.T.
9 LLC payable to W.C. Co. in the amount of \$12,930 into WFB Account
10 5449 using WFB Card 8794 at the same ATM in South Gate, California.

11 Overt Act No. 207: On September 21, 2021, defendant CORONA sent
12 defendant LOPEZ an Instagram direct message with the first name of
13 M.W. and a partially redacted photograph of a WFB ATM receipt
14 documenting the deposit described in Overt Act No. 206 and the first
15 name of F.R. and a partially redacted photograph of a WFB ATM receipt
16 documenting the deposit described in Overt Act No. 205 and told
17 defendant LOPEZ to post the photographs to defendant LOPEZ's
18 Instagram story to recruit more accountholders.

19 Overt Act No. 208: On September 22, 2021, defendant LOPEZ sent
20 defendant CORONA an Instagram direct message that the checks
21 deposited in WFB Account 5449 had already cleared and asked defendant
22 CORONA to send a picture of the ATM receipt when defendant CORONA
23 made the cash withdrawals from WFB Account 5449, so defendant LOPEZ
24 could "post it" to his Instagram story "with the available balance so
25 more people come thru."

26 Overt Act No. 209: On September 22, 2021, defendant CORONA
27 withdrew \$2,500 in cash from WFB Account 5449 at an ATM in South
28 Gate, California.

1 Overt Act No. 210: On September 30, 2021, using Instagram
2 direct messages, defendant LOPEZ sent defendant CORONA a photograph
3 of the back of WFB Card 2437 and said the check deposit into WFB
4 Account 4660 described in Overt Act No. 205 had cleared and was
5 "ready for withdraw[a]l."

6 Overt Act No. 211: On September 30, 2021, in response to
7 defendant CORONA asking for the PIN number for WFB Card 2437,
8 defendant LOPEZ provided the four-digit PIN number.

9 Overt Act No. 212: On September 30, 2021, defendant CORONA
10 caused \$2,500 in cash to be withdrawn from WFB Account 4660 at an ATM
11 in Gardena, California.

12 Overt Act No. 213: On September 30, 2021, using Instagram
13 direct messages, defendant CORONA sent defendant LOPEZ a photograph
14 depicting an ATM receipt documenting the cash withdrawal described in
15 Overt Act No. 212.

16 **Accountholder A.R. (Chase Account 2777)**

17 Overt Act No. 214: On or before October 20, 2021, defendant
18 NICHOLSON caused Chase Card 8589 to be delivered to defendant CORONA.

19 Overt Act No. 215: On October 20, 2021, defendant CORONA caused
20 check no. 3221 from A.W.F., which was altered to be made payable to
21 A.R. in the amount of \$10,900, to be deposited into Chase Account
22 2777 using Chase Card 8589 at an ATM in Inglewood, California.

23 Overt Act No. 216: On October 21, 2021, in response to
24 defendant CORONA's Instagram direct message with a photograph
25 depicting a Chase ATM receipt documenting the check deposit described
26 in Overt Act No. 215 and the caption "ur account," defendant
27 NICHOLSON said, "sheesh."

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1 **Accountholder J.R. (WFB Account 3556)**

2 Overt Act No. 217: On December 20, 2021, defendant EDEZA caused
3 check no. 26525600 from L.A.U.S.D. payable to M.J.R. in the amount of
4 \$46,461.40 to be deposited into WFB Account 3556 using WFB Card 9739
5 at an ATM in San Pedro, California.

6 Overt Act No. 218: On December 21, 2021, defendant EDEZA
7 withdrew \$1,500 in cash from WFB Account 3556 using WFB Card 9739 at
8 an ATM in South Gate, California.

9 Overt Act No. 219: On January 13, 2022, J.R. filed a report
10 with WFB claiming that WFB Card 9739 was compromised.

11 **Accountholder F.H. (WFB Account 9243)**

12 Overt Act No. 220: On April 20, 2022, defendant EDEZA caused
13 check no. 10450 from M.E., LLC payable to N.I.S., Inc. in the amount
14 of \$83,191 to be deposited into WFB Account 9243 using WFB Card 8469
15 at an ATM in San Pedro, California.

16 Overt Act No. 221: On April 26, 2022, defendant EDEZA withdrew
17 \$1,000 in cash from WFB Account 9243 using WFB Card 8469 at an ATM in
18 Huntington Park, California.

19 **Accountholders M.S. & C.S. (WFB Account 0445 & WFB Account 5725)**

20 Overt Act No. 222: On September 28, 2022, defendant EDEZA
21 caused check no. 8937 from A.R., LLC payable to C.R. in the amount of
22 \$31,471.58 to be deposited into WFB Account 0445 using WFB Card 6327
23 at an ATM in Carson, California.

24 Overt Act No. 223: On September 28, 2022, defendant EDEZA
25 caused check no. 1707 from E.C., Inc. payable to J.C., Inc. in the
26 amount of \$38,951.50 to be deposited into WFB Account 5725 using WFB
27 Card 1872 at an ATM in Carson, California.

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1 Overt Act No. 224: On September 29, 2022, defendant EDEZA
2 withdrew \$2,500 in cash from WFB Account 0445 using WFB Card 6327 at
3 an ATM in Huntington Park, California.

4 Overt Act No. 225: On September 29, 2022, three minutes after
5 Overt Act No. 224, defendant EDEZA withdrew \$2,500 in cash from WFB
6 Account 5725 using WFB Card 1872 at an ATM in Huntington Park,
7 California.

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COUNTS TWO THROUGH TWENTY-SIX

[18 U.S.C. § 1344(1), 2(a)]

[ALL DEFENDANTS]

9. The Grand Jury re-alleges and incorporates by reference the allegations set forth in paragraphs 1-3 and 6-7 of this Indictment here.

A. THE SCHEME TO DEFRAUD

10. Beginning on a date unknown to the Grand Jury, but no later than on or about October 14, 2020, and continuing through at least on or about August 18, 2023, in Los Angeles County and Orange County, within the Central District of California, and elsewhere, defendants CARLOS CORONA, also known as ("aka") "Charlie," aka "Chin," aka "charliehustle323," JOSE LUIS EDEZA JR., aka "tacos088," aka "sstacos088," aka "twoo_tacos088," JOHN WESLEY BESS JR., aka "heemfmbsoa," aka "jefesosafmb," aka "sosa_didit," RICARDO OCHOA JR., aka "Richie," aka "get2amfbag," aka "richieget2it," SAULO SOLARES, aka "Lil Danger," aka "danger119," CARLOS LUIZ ARELLANO, aka "Carlos Pelon Arrellano," aka "masi_palon," LUIS ENRIQUE LOPEZ, aka "no_speed_limits1320," SOFIA GENESIS ALVAREZ, aka "pr3tty_sophiia," KAREN VANESSA MARTINEZ, aka "Nessa," aka "_luvvnessa_," VANESSA CORTES ARZATE, aka "Vanessa Cortez," aka "Vane," aka "vanessa_cortez21," and RICARDO WILFREDO NICHOLSON, aka "veegoinstant," aka "freemoneybidnez," aka "flyfreshvideos," aka "freshinthenev_," and others known and unknown to the Grand Jury, each aiding and abetting the others, knowingly and with intent to defraud, executed a scheme to defraud financial institutions, including the Financial Institutions, as to material matters.

11. The fraudulent scheme was operated and was carried out, in substance, as set forth in paragraph 6 of this Indictment.

B. EXECUTIONS OF THE FRAUDULENT SCHEME

12. On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, defendants, together with others known and unknown to the Grand Jury, committed the following acts, each of which constituted an execution of the fraudulent scheme:

COUNT	DATE	DEFENDANTS	ACT
TWO	January 12, 2021	CORONA, BESS	Deposit of a stolen check in the amount of \$8,0000 into WFB Account 1491 at an ATM in Gardena, California
THREE	January 26, 2021	CORONA, ALVAREZ	Deposit of a stolen check in the amount of \$10,601.85 into WFB Account 4071 at an ATM in Compton, California
FOUR	February 1, 2021	BESS	Deposit of a stolen check in the amount of \$2,350 into WFB Account 5820 at an ATM in Gardena, California
FIVE	February 1, 2021	BESS, EDEZA	Deposit of a stolen check in the amount of \$20,530.23 into WFB Account 4158 at an ATM in Gardena, California
SIX	February 10, 2021	BESS, ARRELLANO	Deposit of a stolen check in the amount of \$31,143.75 into WFB Account 8769 at an ATM in Gardena, California
SEVEN	March 3, 2021	CORONA, SOLARES, MARTINEZ	Deposit of a stolen check in the amount of \$6,767 into WFB Account 6740 at an ATM in Compton, California
EIGHT	March 4, 2021	CORONA, ALVAREZ	Deposit of a stolen check in the amount of \$4,000 into WFB Account 1587 at an ATM in Compton, California
NINE	March 29, 2021	BESS, EDEZA	Deposit of a stolen check in the amount of \$5,000 into WFB Account 4225 at an ATM in Compton, California

COUNT	DATE	DEFENDANTS	ACT
TEN	April 7, 2021	CORONA, MARTINEZ	Deposit of a stolen check in the amount of \$18,967.50 into WFB Account 6295 at an ATM in Compton, California
ELEVEN	April 15, 2021	OCHOA, ARRELLANO	Deposit of a stolen check in the amount of \$4,200 into BOA Account 4387 at an ATM in Gardena, California
TWELVE	April 16, 2021	CORONA, ALVAREZ	Deposit of an altered check in the amount of \$3,500 into Chase Account 0766 at an ATM in Lynwood, California
THIRTEEN	April 19, 2021	OCHOA, ARRELLANO	Deposit of a stolen check in the amount of \$58,000 into WFB Account 4722 at an ATM in Gardena, California
FOURTEEN	June 14, 2021	CORONA, MARTINEZ	Deposit of a stolen check in the amount of \$16,025.53 into WFB Account 1858 at an ATM in Gardena, California
FIFTEEN	June 23, 2021	CORONA, CORTES ARZATE	Deposit of an altered check in the amount of \$6,900 into WFB Account 9844 at an ATM in Downey, California
SIXTEEN	July 7, 2021	NICHOLSON	Deposit of a stolen check in the amount of \$14,217 into WFB Account 8290 at an ATM in Carson, California
SEVENTEEN	July 14, 2021	CORONA, CORTES ARZATE	Deposit of a stolen check in the amount of \$15,980.33 into WFB Account 6149 at an ATM in Gardena, California
EIGHTEEN	July 22, 2021	CORONA, LOPEZ	Deposit of a stolen check in the amount of \$16,020 into WFB Account 3181 at an ATM in Gardena, California
NINETEEN	July 26, 2021	BESS	Deposit of a stolen check in the amount of \$6,688.60 into WFB Account 6668 at an ATM in Inglewood, California
TWENTY	September 21, 2021	CORONA, LOPEZ	Deposit of a stolen check in the amount of \$55,700 into WFB Account 4660 at an ATM in South Gate, California

COUNT	DATE	DEFENDANTS	ACT
TWENTY-ONE	September 21, 2021	CORONA, LOPEZ	Deposit of a stolen check in the amount of \$12,930 into WFB Account 5449 at an ATM in South Gate, California
TWENTY-TWO	October 20, 2021	CORONA, NICHOLSON	Deposit of a stolen check in the amount of \$10,900 into Chase Account 2777 at an ATM in Inglewood, California
TWENTY-THREE	December 20, 2021	EDEZA	Deposit of a stolen check in the amount of \$46,461.40 into WFB Account 3556 at an ATM in San Pedro, California
TWENTY-FOUR	April 20, 2022	EDEZA	Deposit of a stolen check in the amount of \$83,191 into WFB Account 9243 at an ATM in San Pedro, California
TWENTY-FIVE	September 28, 2022	EDEZA	Deposit of a stolen check in the amount of \$31,471.58 into WFB Account 0445 at an ATM in Carson, California
TWENTY-SIX	September 28, 2022	EDEZA	Deposit of a stolen check in the amount of \$38,951.50 into WFB Account 5725 at an ATM in Carson, California

COUNTS TWENTY-SEVEN THROUGH FORTY-FIVE

[18 U.S.C. §§ 1956(a)(1)(B)(i), 2(a), 2(b)]

[DEFENDANTS CORONA, EDEZA, BESS, OCHOA, SOLARES, ARRELLANO, LOPEZ,
ALVAREZ, MARTINEZ, AND CORTES ARZATE]

13. The Grand Jury realleges and incorporates by reference paragraphs 1-3 and 10-11 of this Indictment here.

14. On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, defendants CARLOS CORONA, also known as ("aka") "Charlie," aka "Chin," aka "charliehustle323," JOSE LUIS EDEZA JR., aka "tacos088," aka "sstacos088," aka "twoo_tacos088," JOHN WESLEY BESS JR., aka "heemfmbsoa," aka "jefesosafmb," aka "sosa_didit," RICARDO OCHOA JR., aka "Richie," aka "get2amfbag," aka "richieget2it," SAULO SOLARES, aka "danger119," CARLOS LUIZ ARELLANO, aka "Carlos Pelon Arrellano," LUIS ENRIQUE LOPEZ, aka "no_speed_limits1320," SOFIA GENESIS ALVAREZ, aka "pr3tty_sophiia," KAREN VANESSA MARTINEZ, aka "Nessa," aka "_lurvvnessa_," and VANESSA CORTES ARZATE, aka "Vanessa Cortez," aka "Vane," aka "vanessa_cortez21," and others known and unknown to the Grand Jury, each aiding and abetting the others, conducted and willfully caused others to conduct the following financial transactions affecting interstate and foreign commerce, knowing that the property involved in each of the financial transactions represented the proceeds of some form of unlawful activity, and which property was, in fact, the proceeds of specified unlawful activity, namely, bank fraud, in violation of Title 18, United States Code, Section 1344, knowing that each of the transactions was designed in whole and in part to conceal and

1 disguise the nature, location, source and ownership of such proceeds
 2 of said specified unlawful activity:

COUNT	DATE	DEFENDANTS	FINANCIAL TRANSACTION
TWENTY-SEVEN	January 15, 2021	CORONA, BESS	Cash withdrawal of \$2,500 from WFB Account 1491 at an ATM in Lynwood, California
TWENTY-EIGHT	January 27, 2021	CORONA, ALVAREZ	Cash withdrawal of \$2,500 from WFB Account 4071 at an ATM in Compton, California
TWENTY-NINE	February 8, 2021	BESS, EDEZA	Cash withdrawal of \$1,000 from WFB Account 4158 at an ATM in Westchester, California
THIRTY	February 11, 2021	BESS, ARRELLANO	Cash withdrawal of \$800 from WFB Account 8769 at an ATM in Westchester, California
THIRTY-ONE	March 30, 2021	BESS, EDEZA	Cash withdrawal of \$700 from WFB Account 4225 at an ATM in Gardena, California
THIRTY-TWO	March 5, 2021	CORONA, ALVAREZ	Cash withdrawal of \$2,500 from WFB Account 1587 at an ATM in South Gate, California
THIRTY-THREE	April 8, 2021	CORONA, MARTINEZ	Cash withdrawal of \$2,500 from WFB Account 6295 at an ATM in South Gate, California
THIRTY-FOUR	April 28, 2021	OCHOA, ARRELLANO	Cash withdrawal of \$300 from WFB Account 4722 at an ATM in Torrance, California
THIRTY-FIVE	June 24, 2021	CORONA, CORTES ARZATE	Cash withdrawal of \$2,500 from WFB Account 9844 at an ATM in Los Angeles, California
THIRTY-SIX	June 25, 2021	CORONA, MARTINEZ	Cash withdrawal of \$2,500 from WFB Account 1858 at an ATM in Downey, California
THIRTY-SEVEN	July 15, 2021	CORONA, CORTES ARZATE	Cash withdrawal of \$2,500 from WFB Account 6149 at an ATM in South Gate, California
THIRTY-EIGHT	July 27, 2021	BESS	Cash withdrawal of \$2,500 from WFB Account 6668 at an ATM in Westchester, California
THIRTY-NINE	August 3, 2021	CORONA, LOPEZ	Cash withdrawal of \$2,500 from WFB Account 3181 at an ATM in South Gate, California
FORTY	September 22, 2021	CORONA, LOPEZ	Cash withdrawal of \$2,500 from WFB Account 5449 at an ATM in South Gate, California

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COUNT	DATE	DEFENDANTS	FINANCIAL TRANSACTION
FORTY-ONE	September 30, 2021	CORONA, LOPEZ	Cash withdrawal of \$2,500 from WFB Account 4660 at an ATM in Gardena, California
FORTY-TWO	December 21, 2021	EDEZA	Cash withdrawal of \$1,500 from WFB Account 3556 at an ATM in South Gate, California
FORTY-THREE	April 26, 2022	EDEZA	Cash withdrawal of \$1,000 from WFB Account 9243 at an ATM in Huntington Park, California
FORTY-FOUR	September 29, 2022	EDEZA	Cash withdrawal of \$2,500 from WFB Account 0445 at an ATM in Huntington Park, California
FORTY-FIVE	September 29, 2022	EDEZA	Cash withdrawal of \$2,500 from WFB Account 5725 at an ATM in Huntington Park, California

COUNT FORTY-SIX

[18 U.S.C. §§ 1028A(a)(1), 2(a)]

[DEFENDANTS CORONA AND BESS]

15. On or about January 12, 2021, in Los Angeles County, within the Central District of California, defendants CARLOS CORONA, aka "Charlie," aka "Chin," aka "charliehustle323," and JOHN WESLEY BESS JR., aka "heemfmbsoa," aka "jefesosafmb," aka "soa_didit," each aiding and abetting the other, knowingly possessed and used, without lawful authority, means of identification that defendants CORONA and BESS knew belonged to another person, namely, the name of victim L.A.R., during and in relation to the offense of Conspiracy to Commit Bank Fraud, a felony violation of Title 18, United States Code, Section 1349, as charged in Count One of this Indictment, and Bank Fraud, a felony violation of Title 18, United States Code, Section 1344(1), as charged in Count Two of this Indictment.

COUNT FORTY-SEVEN

[18 U.S.C. § 1028A(a)(1)]

[DEFENDANT SOLARES]

16. On or about February 28, 2021, in Los Angeles County, within the Central District of California, defendant SAULO SOLARES, aka "danger119," knowingly possessed and transferred, without lawful authority, means of identification that defendant SOLARES knew belonged to another person, namely, the name of victim R.A., during and in relation to the offense of Conspiracy to Commit Bank Fraud, a felony violation of Title 18, United States Code, Section 1349, as charged in Count One of this Indictment, and Bank Fraud, a felony violation of Title 18, United States Code, Section 1344(1), as charged in Count Seven of this Indictment.

COUNT FORTY-EIGHT

[18 U.S.C. § 1028A(a)(1)]

[DEFENDANT CORONA]

17. On or about March 4, 2021, in Los Angeles County, within the Central District of California, defendant CARLOS CORONA, aka "Charlie," aka "Chin," aka "charliehustle323," knowingly possessed and used, without lawful authority, means of identification that defendant CORONA knew belonged to another person, namely, the name and signature of victim L.K., during and in relation to the offense of Conspiracy to Commit Bank Fraud, a felony violation of Title 18, United States Code, Section 1349, as charged in Count One of this Indictment, and Bank Fraud, a felony violation of Title 18, United States Code, Section 1344(1), as charged in Count Eight of this Indictment.

COUNT FORTY-NINE

[18 U.S.C. § 1028A(a)(1)]

[DEFENDANT OCHOA]

18. On or about April 15, 2021, in Los Angeles County, within the Central District of California, defendant RICARDO OCHOA JR., aka "Richie," aka "get2amfbag," aka "richieget2getit," knowingly possessed and used, without lawful authority, means of identification that defendant OCHOA knew belonged to another person, namely, the name and signature of victim K.C., during and in relation to the offense of Conspiracy to Commit Bank Fraud, a felony violation of Title 18, United States Code, Section 1349, as charged in Count One of this Indictment, and Bank Fraud, a felony violation of Title 18, United States Code, Section 1344(1), as charged in Count Eleven of this Indictment.

COUNT FIFTY

[18 U.S.C. § 1028A(a)(1)]

[DEFENDANT EDEZA]

19. On or about December 20, 2021, in Los Angeles County, within the Central District of California, defendant JOSE LUIS EDEZA JR., aka "tacos088," aka "sstacos088," aka "twoo_tacos088," knowingly possessed and used, without lawful authority, means of identification that defendant EDEZA knew belonged to another person, namely, the name and signature of victim M.J.R., during and in relation to the offense of Conspiracy to Commit Bank Fraud, a felony violation of Title 18, United States Code, Section 1349, as charged in Count One of this Indictment, and Bank Fraud, a felony violation of Title 18, United States Code, Section 1344(1), as charged in Count Twenty-Three of this Indictment.

COUNTS FIFTY-ONE THROUGH FIFTY-SEVEN

[18 U.S.C. § 1708]

[DEFENDANT SOLARES]

20. On or about the following dates, in Los Angeles County, within the Central District of California, defendant SAULO SOLARES, aka "danger119," stole, took, and abstracted mail and mail matter from and out of a post office, postal station, letter box, mail receptacle, and authorized depository for mail matter, namely, post office collection boxes located outside the following United States Postal Service Offices, with the intent to deprive the owners of the mail and mail matter, temporarily and permanently, of its use and benefit:

COUNT	DATE	POST OFFICE LOCATION
FIFTY-ONE	1/19/2021	Eagle Rock Post Office located at 7435 North Figueroa Street in Los Angeles, California ("Eagle Rock Post Office")
FIFTY-TWO	1/27/2021	Eagle Rock Post Office
FIFTY-THREE	2/16/2021	Griffith Post Office located at 3370 Glendale Boulevard in Los Angeles, California ("Griffith Post Office")
FIFTY-FOUR	3/17/2021	Griffith Post Office
FIFTY-FIVE	3/18/2021	Griffith Post Office
FIFTY-SIX	3/20/2021	Griffith Post Office
FIFTY-SEVEN	5/18/2021	Eagle Rock Post Office

COUNT FIFTY-EIGHT

[18 U.S.C. § 1708]

[DEFENDANT SOLARES]

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4 21. On or about August 11, 2021, in Los Angeles County, within
5 the Central District of California, defendant SAULO SOLARES, aka
6 "danger119," unlawfully possessed mail and mail matter that had been
7 stolen and taken from the United States mail, namely, approximately
8 34 pieces of mail and mail matter addressed to victims D.B., H.K.,
9 A.M., and other individuals within Los Angeles County and elsewhere,
10 and at that time and place, defendant SOLARES knew that said mail and
11 mail matter were stolen.
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FORFEITURE ALLEGATION ONE

[18 U.S.C. § 982]

22. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982(a)(2), in the event of any defendant's conviction of the offenses set forth in any of Counts One through Twenty-Six or Counts Forty-Six through Fifty of this Indictment.

23. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

24. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), any defendants so convicted shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

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FORFEITURE ALLEGATION TWO

[18 U.S.C. § 982]

25. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982(a)(1), in the event of any defendant's conviction of the offenses set forth in any of Counts Twenty-Seven through Forty-Five of this Indictment.

26. Any defendant so convicted shall forfeit to the United States of America the following:

(a) Any property, real or personal, involved in such offense, and any property traceable to such property; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

27. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 18, United States Code, Section 982(b)(2), any defendant so convicted shall forfeit substitute property, if, by any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, 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 that cannot be divided without difficulty. Substitution of assets shall not be ordered, however, where the convicted defendant(s) acted merely as an intermediary who handled but did not retain the property in the

1 course of the money laundering offense unless the defendant(s), in
2 committing the offense or offenses giving rise to the forfeiture,
3 conducted three or more separate transactions involving a total of
4 \$100,000.00 or more in any twelve-month period.

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FORFEITURE ALLEGATION THREE

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

28. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of any defendant's convictions of the offenses set forth in any of Counts Fifty-One through Fifty-Eight of this Indictment.

29. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offenses; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

30. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), any defendants so convicted shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

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1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3
4 A TRUE BILL

5 /s/

6 _____
7 Foreperson

8 E. MARTIN ESTRADA
9 United States Attorney

10 MACK E. JENKINS
11 Assistant United States Attorney
12 Chief, Criminal Division



13 SCOTT M. GARRINGER
14 Assistant United States Attorney
15 Deputy Chief, Criminal Division

16 IAN V. YANNIELLO
17 Assistant United States Attorney
18 Deputy Chief, General Crimes Section

19 JULIA HU
20 Assistant United States Attorney
21 Major Frauds Section