

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA DIVISION

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA, GA  
2011 NOV -2 PM 3:05

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 HUGO DIAZ )  
 aka HUGO DIAZ DE LA FUENTE )  
 )  
 BLANCA DIAZ )  
 aka BLANCA ESTELA MIRANDA VARGAS )  
 )  
 ARTURO MENDEZ LUQUENO )  
 )  
 HERIS FRANCISCO MEDINA RAMIRES )  
 aka ERIC MEDINA )  
 )  
 CLEMENTE ALVAREZ MARTINEZ )  
 )  
 RIGOBERTO LOZA MARQUEZ )

INDICTMENT NO. \_\_\_\_\_  
Violations: **CR 111** 360  
8 U.S.C. § 1324(a)(1)(A)(iii)  
Harboring Illegal Aliens  
18 U.S.C. § 1956(h)  
Money Laundering Conspiracy  
18 U.S.C. § 1957  
Money Laundering  
8 U.S.C. § 1325(a)  
Unlawful Entry by an Alien and  
Eluding Immigration Officials

COUNTS ONE THROUGH FOUR  
Harboring Illegal Aliens  
8 U.S.C. § 1324(a)(1)(A)(iii) and (B)(I)

**THE GRAND JURY CHARGES THAT:**

Beginning at a time unknown to the Grand Jury but no later than in or about January 2008 and continuing to the present, in Columbia and Richmond Counties, in the Southern District of Georgia and elsewhere, Defendants **HUGO DIAZ aka HUGO DIAZ DE LA FUENTE** and **BLANCA DIAZ aka BLANCA ESTELA MIRANDA VARGAS** knowingly and in reckless disregard of the fact that the aliens listed below had come to, entered and remained in the United States in violation of law, did conceal, harbor and shield said aliens for the purpose of commercial advantage and private financial gain:

<b>Count</b>	<b>Alien</b>
<b>1</b>	Arturo Mendez Luqueno
<b>2</b>	Heris Francisco Medina Ramires aka Eric Medina
<b>3</b>	Clemente Alvarez Martinez
<b>4</b>	Rigoberto Loza Marquez

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), 1324(a)(1)(B)(i) and Title 18, United States Code, Section 2.

**COUNT FIVE**  
**Money Laundering Conspiracy**  
**18 U.S.C. § 1956(h)**

**THE GRAND JURY FURTHER CHARGES THAT:**

Beginning at a time unknown to the Grand Jury but no later than in or about January 2008 and continuing to the present, in Columbia and Richmond Counties, in the Southern District of Georgia and elsewhere, Defendants **HUGO DIAZ aka HUGO DIAZ DE LA FUENTE** and **BLANCA DIAZ aka BLANCA ESTELA MIRANDA VARGAS** did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to knowingly engage and attempt to engage, in monetary transactions by, through or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, the harboring of illegal aliens, including but not limited to the aliens described in Counts One through Four of this Indictment, in violation of Title 18, United States Code, Section 1957.

**Manner and Means of the Conspiracy**

It was part of the conspiracy and the objects thereof for Defendants **HUGO DIAZ aka**

**HUGO DIAZ DE LA FUENTE** and **BLANCA DIAZ aka BLANCA ESTELA MIRANDA VARGAS** to conduct or cause to be conducted financial transactions involving criminally derived funds of a value greater than \$10,000 that passed through the following SunTrust Bank accounts that were controlled by the defendants: \*\*\*\*\*0260, \*\*\*\*\*2321, \*\*\*\*\*3488, \*\*\*\*\*2339, and \*\*\*\*\*2347.

All in violation of Title 18, United States Code, Section 1956(h).

**COUNTS SIX THROUGH FIFTEEN**

**Money Laundering**

**18 U.S.C. § 1957**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, in Columbia and Richmond Counties, in the Southern District of Georgia and elsewhere, Defendant **HUGO DIAZ aka HUGO DIAZ DE LA FUENTE**, aided and abetted by others, did knowingly engage in, attempt to engage in, and cause others to engage in the following monetary transactions by, through, and to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is, as listed below, such property having been derived from a specified unlawful activity, to wit, the harboring of illegal aliens, including but not limited to the aliens described in Counts One through

Four of this Indictment, the defendant thereafter conducted or caused to be conducted the following financial transactions involving the following accounts that he controlled at SunTrust Bank:

<u>Count</u>	<u>Date of Offense</u>	<u>Account Number</u>	<u>Financial Transaction</u>
6	January 18, 2008	*****0260	\$24,700.00 check made payable to Satcher Motor Company for a 2008 Ford F-350 truck
7	March 11, 2008	*****3488	\$173,380.00 over-the-counter withdrawal to an Augusta, Georgia law firm handling a real estate transaction for Defendant Hugo Diaz
8	April 16, 2008	*****3488	\$45,000.00 wire transfer to Mexico to an individual with the last name of Diaz De La Fuente
9	July 10, 2008	*****0260	\$25,326.00 check made payable to Gerald Jones Honda
10	July 28, 2008	*****3488	\$50,000.00 over-the-counter withdrawal to Pete Alewine Pool Company
11	April 16, 2009	*****2339	\$11,965.74 check made payable to Sumerville Shutters for blinds
12	December 3, 2010	*****2347	\$12,000.00 check made payable to Defendant Hugo Diaz
13	December 30, 2010	*****2347	\$28,000.00 check made payable to Defendant Hugo Diaz
14	January 14, 2011	*****2347	\$38,500.00 check made payable to London Auto Sales and Salvage for a 2008 Chevrolet truck
15	March 2, 2011	*****2347	\$20,000.00 check made payable to Jim Hudson Lexus for a 2008 Lexus

All in violation of Title 18, United States Code, Sections 1957 and 2.

**COUNT SIXTEEN**

**Unlawful Entry by an Alien and Eluding Immigration Officials  
8 U.S.C. § 1325(a)**

**THE GRAND JURY FURTHER CHARGES THAT:**

Beginning in or about November 2006 and continuing to the present, in the Southern District of Georgia and elsewhere, Defendant **ARTURO MENDEZ LUQUENO** entered the United States at a time and place other than as designated by immigration officers, and eluded examination and inspection by immigration officers, in violation of Title 8, United States Code, Section 1325(a).

**COUNT SEVENTEEN**

**Unlawful Entry by an Alien and Eluding Immigration Officials  
8 U.S.C. § 1325(a)**

**THE GRAND JURY FURTHER CHARGES THAT:**

Beginning in or about November 2006 and continuing to the present, in the Southern District of Georgia and elsewhere, Defendant **HERIS FRANCISCO MEDINA RAMIRES aka ERIC MEDINA** entered the United States at a time and place other than as designated by immigration officers, and eluded examination and inspection by immigration officers, in violation of Title 8, United States Code, Section 1325(a).

**COUNT EIGHTEEN**

**Unlawful Entry by an Alien and Eluding Immigration Officials  
8 U.S.C. § 1325(a)**

**THE GRAND JURY FURTHER CHARGES THAT:**

Beginning in or about November 2006 and continuing to the present, in the Southern District of Georgia and elsewhere, Defendant **CLEMENTE ALVAREZ MARTINEZ** entered the United States at a time and place other than as designated by immigration officers, and eluded examination and inspection by immigration officers, in violation of Title 8, United States Code, Section 1325(a).

**COUNT NINETEEN**

**Unlawful Entry by an Alien and Eluding Immigration Officials  
8 U.S.C. § 1325(a)**

**THE GRAND JURY FURTHER CHARGES THAT:**

Beginning in or about November 2006 and continuing to the present, in the Southern District of Georgia and elsewhere, Defendant **RIGOBERTO LOZA MARQUEZ** entered the United States at a time and place other than as designated by immigration officers, and eluded examination and inspection by immigration officers, in violation of Title 8, United States Code, Section 1325(a).

**FORFEITURE ALLEGATIONS**

1. The allegations in Counts One through Fifteen of this Indictment are hereby realleged and incorporated by reference for purposes of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(6) and 982(a)(1), and Title 8, United States Code, Section 1324(b).

2. Upon conviction of the offenses in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) set forth in this Indictment, Defendants **HUGO DIAZ aka HUGO DIAZ DE LA FUENTE** and **BLANCA DIAZ aka BLANCA ESTELA MIRANDA VARGAS** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6) and Title 8, United States Code, Section 1324(b), all right, title and interest in any conveyance, including any vessel, vehicle, or aircraft, used in the commission of the offenses, any and all property, real and personal, that constitutes or is derived from or is traceable to proceeds obtained directly or indirectly from the commission of the offenses, and all property, real or personal, that was used to facilitate, or was intended to facilitate the commission of the offenses.

3. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1956(h) and 1957 set forth in this Indictment, Defendant **HUGO DIAZ aka HUGO DIAZ DE LA**

**FUENTE and BLANCA DIAZ aka BLANCA ESTELA MIRANDA VARGAS** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such violations of Title 18, United States Code, Sections 1956(h) and 1957, and any property traceable to such property.

4. The property to be forfeited includes, but is not limited to, the following:

**A. REAL PROPERTY**

1. 2021 Grace Avenue, Evans, Georgia
2. 2909 Aylesbury Drive, Augusta, Georgia
3. 109 Clark Street, Augusta, Georgia
4. Lots 8-13 and 16-19 in Green Acres Subdivision on Metz Drive,  
North Augusta, South Carolina

**B. PERSONAL PROPERTY**

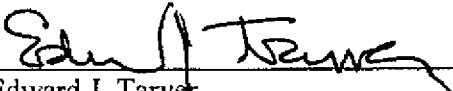
1. 2008 Lexus LS460 sedan, VIN: JTHBL46F785060759, Georgia Plate  
Number: BRK6048
2. 2008 Chevrolet C2500HD Silverado truck, VIN:  
1GCHC23638F151770, South Carolina Plate Number: GVH277
3. 2008 Ford F-250 truck, VIN: 1FTSW21R48EB04280, South Carolina  
Plate Number: GNL673
4. 2006 Nissan Armada SUV, VIN: 5N1AA08A26N740252, South  
Carolina Plate Number: ACK675
5. 2005 Hummer SUV, VIN: 5GRGN23UO5H117417, South Carolina  
Plate Number: CRC532

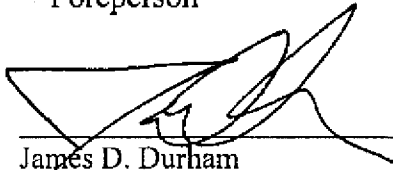
6. 2003 Chrevolet Express Van, VIN: 1GBJG31UX31102394, South Carolina Plate Number: CRC533
7. 1999 Isuzu truck, VIN: 4KLC4B1R5XJ000672, South Carolina Plate Number: GYV242
8. 1999 Chevrolet C-Series truck, VIN: 1GDJ6H1D9XJ853371, South Carolina Plate Number: P430043
9. 1999 Ford DRWF5D truck, VIN: 1FDAF56S1XEC55161, South Carolina Plate Number: P391982
10. 1995 Ford E-350, VIN: 1FDKE37H6SHA39246, South Carolina Plate Number: BKB331


5. If any of the property described above, as a result of any act or omission of a defendant
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

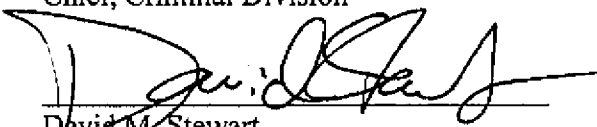
\_\_\_\_\_  
A True Bill  
Foreperson

  
\_\_\_\_\_  
Edward J. Tarver  
United States Attorney

  
\_\_\_\_\_  
James D. Durham  
First Assistant United States Attorney

  
\_\_\_\_\_  
Brian T. Rafferty  
Assistant United States Attorney  
Chief, Criminal Division

\_\_\_\_\_  
Nancy C. Greenwood  
Assistant United States Attorney  
Deputy Chief, Criminal Division

  
\_\_\_\_\_  
David M. Stewart  
Assistant United States Attorney  
Lead Counsel