



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

RALPH OLARTE,  
HUMBERTO LOPEZ BELMONTE,  
SPORT LA, INC.,  
    dba "H&R Logistics,"  
    dba "HR Logistics,"  
    dba "HRL,"  
    dba "HRGL,"  
H&R LOGISTICS, INC.,  
    dba "HR Logistics," and  
OLARTE TRANSPORT SERVICE, INC.  
    dba "Sport LA, Inc.,"

Defendants.

CR 2:25-cr-00332-MWC

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy to Smuggle Goods from the United States; 18 U.S.C. § 554: Smuggling Goods from the United States; 18 U.S.C. § 1343: Wire Fraud; 18 U.S.C. § 1349: Conspiracy to Commit Wire Fraud; 18 U.S.C. § 1956(h): Conspiracy to Commit Money Laundering; 18 U.S.C. § 1956(a)(2)(A): International Promotional and Concealment Money Laundering; 18 U.S.C. § 1001(a)(3): False Statement to a Government Agency; 18 U.S.C. § 2: Aiding and Abetting; 18 U.S.C. §§ 981(a)(1)(C), 982, and 28 U.S.C. § 2461(c): Criminal Forfeiture]

1 The Grand Jury charges:

2 COUNT ONE

3 [18 U.S.C. § 371]

4 [ALL DEFENDANTS]

5 A. INTRODUCTORY ALLEGATIONS

6 At times relevant to this Indictment:

7 1. Using fraudulent documents, shell companies, bribes to  
8 public officials, and kickbacks to Mexican cartels, defendants RALPH  
9 OLARTE ("OLARTE") and HUMBERTO LOPEZ BELMONTE ("LOPEZ") ran a  
10 billion-dollar shipping enterprise smuggling goods through the United  
11 States and into Mexico.

12 2. From at least 2013 to the present, defendants OLARTE and  
13 LOPEZ operated a lucrative international shipping enterprise.  
14 Through shipping companies they controlled, referred to herein as the  
15 "HRL defendants," defendants OLARTE and LOPEZ smuggled billions of  
16 dollars' worth of goods from and through the United States into  
17 Mexico. Many times, they concealed the nature of the shipped goods,  
18 some of which contained contraband. They hid the true identities of  
19 the customers receiving the goods, in violation of United States law.  
20 They also defrauded Mexico of millions in duties owed.

21 3. To move the goods into and out of the United States,  
22 defendants repeatedly misled, deceived, and lied to United States  
23 Customs and Border Protection ("CBP"), which prohibited CBP from  
24 ensuring the nature and safety of goods passing through United States  
25 ports and borders.

26 4. After receiving payment from their true customers in  
27 Mexico, defendants smuggled large quantities of cash into the United  
28 States, intentionally and unlawfully avoiding cash reporting

1 requirements. To maintain the façade of a legitimate business,  
2 defendants then laundered those funds through Mexican shell  
3 companies, back to the HRL defendants.

4 5. To facilitate their smuggling scheme, defendants OLARTE and  
5 LOPEZ, individually and with and through the HRL defendants, bribed  
6 Mexican customs officials and paid kickbacks to Mexican drug cartels.

7 Individuals and Entities

8 6. Defendant OLARTE was a United States citizen and resident  
9 of Los Angeles, California.

10 7. Defendant LOPEZ was a Mexican citizen and resident of Los  
11 Angeles and Mexico City, Mexico.

12 8. Defendant SPORT LA, INC. ("SLA"), which did business as  
13 "H&R Logistics," "HR Logistics," "HRL," and "HRGL," was incorporated  
14 in or around 2012 in California by defendant LOPEZ. Defendant LOPEZ  
15 was listed as the Chief Executive Officer and Secretary of SLA.  
16 Defendant OLARTE was listed as the Chief Financial Officer. SLA was  
17 a bonded freight carrier, authorized by CBP to receive and transport  
18 in-bond goods between ports of entry, and had a bonded carrier ID  
19 ending in 01900. SLA operated out of offices on East Pico Boulevard  
20 in Los Angeles (the "East Pico office") and in Vernon, California  
21 (the "Vernon office").

22 9. Defendant H&R LOGISTICS, INC. ("H&R"), which did business  
23 as "HR Logistics," was incorporated on or about September 26, 2023,  
24 in Florida. Defendant LOPEZ was listed as the President, defendant  
25 OLARTE as the Vice President, and defendant OLARTE's son as the  
26 Director. Before its incorporation, defendant H&R did business as  
27 SLA and used the business names "HR Logistics," "HR Logistics,"  
28 "HRL," and "HRGL." H&R was a freight forwarder, that is, one who

engages in the business of dispatching shipments on behalf of other persons, handles the formalities incident to such shipments, and is authorized to operate as such by an agency of the United States. Defendant H&R used defendant SLA's bond (and carrier ID number 01900) when shipping bonded goods to Mexico.

10. Defendant OLARTE TRANSPORT SERVICE, INC. ("OLARTE TRANSPORT"), which did business as "Sport LA, Inc.," was originally incorporated in or around 2009 in California by defendant OLARTE. Defendant OLARTE was listed as the General Manager and his spouse as the Chief Executive Officer. Defendant OLARTE TRANSPORT was a freight forwarder. Defendant OLARTE TRANSPORT used defendant SLA's bond (and carrier ID number 01900) when shipping bonded goods to Mexico.

11. Defendants SLA, H&R, and OLARTE TRANSPORT all used the same office locations, namely, the East Pico office and the Vernon Office. All corporate defendants are collectively referred to herein as the "HRL defendants." Defendant H&R is included as an "HRL defendant" following its incorporation date.

12. The Vernon office was also the location of the HRL defendants' California warehouse and served as the HRL defendants' functional headquarters by 2019.

13. Defendants SLA and H&R used the same warehouse in El Paso, Texas (the "El Paso warehouse").

14. Defendants OLARTE and LOPEZ beneficially owned, operated, and controlled defendants SLA and H&R.

15. Defendant OLARTE beneficially owned, operated, and controlled defendant OLARTE TRANSPORT.

1           16. Defendants OLARTE and LOPEZ used the HRL defendants  
2 interchangeably when shipping goods to Mexico.

3           17. Defendants OLARTE and LOPEZ beneficially owned and  
4 controlled the following Mexican entities, among others, that were  
5 shell consignees for goods the HRL defendants smuggled from the  
6 United States to Mexico (collectively, "the shell consignees"):

- 7           a. Comercializadora Suji de Mexico SA de CV ("Suji");
- 8           b. Comercializadora Los Angeles Sports Mexico SA de CV  
9 ("CLA");
- 10           c. Grupo Comercial Bager ("Bager");
- 11           d. Arbol y Almendra, SA de CV ("Arbol");
- 12           e. Kirool Soluciones SA de CV ("Kirool");
- 13           f. Hutzen Mexico SA de CV ("Hutzen");
- 14           g. Comercializadora Infinity International SA de CV  
15 ("Infinity");
- 16           h. Comercializadora La Pastorela SA de CV ("Pastorela");
- 17           i. Grupo Industrial Y Comercial Sparky S De RL De CV  
18 ("Industrial");
- 19           j. Comercializadora Teknori SA de CV ("Teknori");
- 20           k. Consorcio Arameo SA de CV ("Arameo");
- 21           l. Alkanesa SA de CV ("Alkanesa"); and
- 22           m. HRL International ("HRLI").

23           18. The shell consignees were almost exclusively non-  
24 operational shell companies used to mask the identities of the HRL  
25 defendants' true clients in Mexico. Multiple shell consignees were  
26 nominally located at front addresses in Mexico, to make the companies  
27 appear as though they performed legitimate business, but did not  
28 possess the required licenses to import goods into Mexico.

1           19. Unindicted Coconspirator 1 worked in the Vernon office as  
2 the HRL defendants' bulk cash handler.

3           20. Unindicted Coconspirator 2, a former Mexican law  
4 enforcement officer, was the HRL defendants' operations manager in  
5 Mexico.

6           21. Unindicted Coconspirator 3 was the Mexican Port Director of  
7 Juarez, from in or around 2014 through 2018, and the Port Director of  
8 Mexicali, from in or around January 2019 until his termination in or  
9 around August 2019.

10           22. Individual 1 worked in the Vernon office as the HRL  
11 defendants' import coordinator and customs writer.

12           23. Individual 2 was the manager of the HRL defendants' El Paso  
13 warehouse.

14           24. Individual 3 was a truck driver for the HRL defendants.

15           25. Individual 4 was an attorney for the HRL defendants.

16           26. The Jalisco New Generation Cartel ("CJNG") is a drug  
17 trafficking organization that initially operated out of Jalisco but  
18 has since expanded its reach across Mexico. It is involved in major  
19 drug trafficking corridors in states like Guerrero, Michoacán,  
20 Colima, and Veracruz. The cartel has a strong presence in Mexico  
21 City and other major urban areas, as well as in several border towns,  
22 where it controls smuggling routes into the United States.

23 Customs Enforcement in the United States

24           27. CBP was a federal agency of the United States, within the  
25 United States Department of Homeland Security, that was responsible  
26 for enforcing United States customs laws.

1       28. In any given year relevant to this Indictment, hundreds of  
2 billions of dollars' worth of goods passed through the Ports of Los  
3 Angeles and Long Beach.

4       29. All goods imported into the United States were required to  
5 be manifested upon arrival and then entered. Duties are assessed and  
6 collected on goods entered for consumption.

7       30. CBP used the Automated Commercial Environment ("ACE")  
8 system to track the importation and exportation of goods entering and  
9 leaving the United States. The server for this data is housed in  
10 Arlington, Virginia.

11       31. With some limited exclusions, not applicable in this case,  
12 all goods valued over \$2,500 exported from the United States were  
13 required to be reported upon leaving the country.

14       32. "Domestic goods" were goods manufactured in, or that  
15 otherwise entered into, the United States stream of commerce.

16       33. An exporting company was required to declare all goods  
17 valued at more than \$2,500 via the Automated Export System ("AES"), a  
18 component of ACE. The filer of the declaration was required to  
19 include the United States Principal Party in Interest ("USPPI"), also  
20 referred to as the United States Principal Exporter, the USPPI  
21 identification number, the date of export, the ultimate consignee,  
22 the commodity description and classification number, the value of the  
23 goods, the selling price of the goods, the shipping weight, and the  
24 "related party indicator," among other mandatory fields.

25       34. An exporting company was required to disclose "related  
26 party indicator" anytime a transaction involved trade between a USPPI  
27 and an ultimate consignee where either party owned directly or  
28 indirectly 10 percent or more of the other party.

1        35. All parties to the export transactions, including the USPPI  
2 and export carrier, were required to retain records pertaining to the  
3 export shipment for five years from the date of export.

4 Special Customs Rules for In-Bond Goods

5        36. "In-bond" goods were goods that were imported into the  
6 United States for transportation without appraisement. These goods  
7 could be entered for immediate transportation without appraisement to  
8 another port, where consumption or other entries or admissions were  
9 filed or could be entered for transportation and exportation through  
10 the United States for exportation to a foreign destination from a  
11 port of exportation. These goods were not subject to duties if the  
12 terms and conditions of the in-bond transportation were met.

13        37. Entities that were permitted to transport in-bond goods  
14 through the United States to foreign countries, such as defendant  
15 SLA, were known as "bonded carriers." A customs bond was a contract  
16 held among the principal (e.g., importer of a product or a carrier  
17 engaged to transport the product under bond to another destination  
18 with the United States) and surety company, as obligors jointly and  
19 severally liable under the terms and conditions of the bond, and CBP,  
20 as the beneficiary. Customs bonds contractually guaranteed that the  
21 principal and surety would meet all obligations vesting under the  
22 customs laws and regulations governing the entry of merchandise,  
23 which included payment of all duties, taxes, fees, and charges in the  
24 time period and manner required.

25        38. An importing company choosing to move the arriving cargo  
26 under bond was required to engage a bonded carrier to file an  
27 application to transport in-bond shipments by (1) creating a CBP Form  
28



1 7512 ("Form 7512") and/or (2) transmitting an electronic in-bond  
2 application in ACE.

3 39. The Form 7512 and ACE entry disclosed to CBP, among other  
4 things, the type of in-bond entry filed (e.g., a transportation and  
5 exportation entry ("T&E"), the importer, foreign consignee, the value  
6 and type of goods, the method of transport, the intended exit port,  
7 and a declaration that the information was accurate.

8 40. The ultimate consignee was the foreign customer who would  
9 (1) receive the goods once they were exported from the United States  
10 and (2) ultimately owe duties to the foreign country.

11 41. Within 48 hours of export, the United States company was  
12 required to update the ACE system confirming that the goods had left  
13 the United States.

14 42. United States bonded freight carriers worked with customs  
15 brokers or were licensed to act as their own filers and brokers. In  
16 either case, the carrier was required to maintain documentary proof  
17 that each in-bond shipment was exported from the United States.

#### 18 Mexican Customs and Duties

19 43. In Mexico, duties were imposed and collected by a federal  
20 agency called Servicio de Administración Tributaria ("SAT").

21 44. The ultimate customer importing the goods into Mexico, the  
22 consignee, was required to retain a licensed Mexican customs broker  
23 to prepare and file import documentation with SAT and pay duties,  
24 which the broker collected from the consignee. The consignee was  
25 required to pay those duties before the goods entered Mexico.

26 45. A consignee would usually provide the Mexican broker with  
27 the purchase invoice for the goods to be imported. The broker then  
28 would use the invoice to request from SAT a quote for duties to be

1 assessed based on the invoice. With this documentation, the broker  
2 then would prepare and issue the customer a draft "pedimento," which  
3 would display the consignee, shipping entity, name and license number  
4 of the customs broker, description of goods to be imported, value of  
5 the goods, and duties owed to SAT.

6 46. The consignee would pay the duties to the broker, who then  
7 would remit the duties to SAT along with the draft pedimento. Once  
8 SAT received the duties and draft pedimento, it would issue a final  
9 pedimento with a unique serial number and QR code that served as  
10 electronic certification by SAT that the consignee had paid the  
11 duties for the listed goods. The broker then would give the final  
12 certified pedimento to the consignee, which transmitted the pedimento  
13 to the shipping company in the United States for preservation as the  
14 relevant foreign landing certificate. Beginning on or about January  
15 1, 2022, if the goods were also traveling within the country of  
16 Mexico, the shipment had to be accompanied by a "carta porte"  
17 demonstrating the goods had been registered with SAT. The "carta  
18 porte" would be presented in the event local law enforcement or other  
19 authorities stopped the shipment. According to Mexico SAT, beginning  
20 on or about January 1, 2024, Mexican law enforcement began enforcing  
21 the possession of a carta porte and fining shipments that failed to  
22 obtain the required documents.

23 47. When a United States freight company reached the Mexican  
24 land border with the goods, the truck driver carrying the shipment  
25 was required to present the Mexican customs officer with the final,  
26 serialized pedimento. At most Mexican land borders, there were two  
27 separate customs stops: the initial stop where documents are examined  
28 and a second stop to confirm the vehicle is allowed into the country.

1 The Mexican customs officer would scan the QR code to verify (1) the  
2 authenticity of the pedimento and (2) that duties had been paid. If  
3 the consignee had not paid the duties, or if the information on the  
4 pedimento was inaccurate or inconsistent with other shipping  
5 documentation, SAT could impose fines and seize the cargo.

6 48. At the ports used by the HRL defendants, Mexican officials  
7 were required to stop every truck entering Mexico to scan the  
8 pedimento and verify payment of duties before the goods could enter  
9 the country.

10 49. For goods imported to Mexico, the final landing certificate  
11 was the pedimento certified by SAT.

12 50. Companies in Mexico were required to be licensed and  
13 registered with SAT to import goods into the country.

14 51. In 2022, the Mexican government removed the civilian  
15 customs officers, known as Agencia Nacional de Aduanas de Mexico  
16 ("Aduana"), and delegated inspection of imports and verification of  
17 the pedimentos to the Mexican National Guard at land borders and Navy  
18 at seaports.

#### 19 Defendant SLA Bank Accounts

20 52. Wells Fargo Bank, National Association ("Wells Fargo"),  
21 U.S. Bank National Association ("US Bank"), BMO Financial Group, and  
22 Bank of the West were all financial institutions, the deposits of  
23 which were insured by the Federal Deposit Insurance Corporation. BMO  
24 Financial Group acquired Bank of the West in or about February 2023,  
25 retiring the Bank of the West Bank name and converting accounts to  
26 BMO Bank, N.A.

27 53. Between 2016 and 2019, defendants OLARTE and LOPEZ opened  
28 bank accounts in the United States at Wells Fargo, US Bank, and Bank

of the West in the name of defendant SLA doing business as "H&R Logistics," "HRL," and "HRGL," (collectively, the "SLA accounts"), including the following:

a. A US Bank account ending in 3095 ("US Bank 3095 (SLA)"); and

b. A Wells Fargo account ending in 5012 ("Wells Fargo 5012 (SLA)").

54. Defendants OLARTE and LOPEZ had signatory authority over each of the SLA accounts.

#### Shell Consignee Bank Accounts

55. Beginning no later than 2017, defendants OLARTE and LOPEZ opened, or caused to be opened, bank accounts in Mexico in the names of the shell consignees they beneficially owned and controlled (collectively, "the shell consignee accounts"), including the following:

Shell Consignee	Bank	Acct.	Abbreviation
Suji	Banco Nacional de Mexico	4051	Banco Nacional 4051 (Suji)
Suji	BBVA Bancomer SA	6908	BBVA 6908 (Suji)
Suji	Banco Inbursa SA	5845	Banco Inbursa 5845 (Suji)
Suji	Scotiabank	9428	Scotia Bank 9428 (Suji)
Arameo	Banco Inbursa	7242	Banco Inbursa 7242 (Arameo)
Arameo	Banco Inbursa	7567	Banco Inbursa 7567 (Arameo)
CLA	Cibanco	4748	Cibanco 4748 (CLA)
CLA	Banco Mercantil	7400	Banco Mercantil 7400 (CLA)
Infinity	Banco Nacional de Mexico	1839	Banco Nacional 1839 (Infinity)
Infinity	Banco Inbursa SA	2484	Banco Inbursa 2484 (Infinity)

Infinity	BBVA Bancomer SA	2383	BBVA 2383 (Infinity)
Pastorela	Cibanco	0020	Cibanco 0020 (Pastorela)
Pastorela	Banco Inbursa SA	3005	Banco Inbursa 3005 (Pastorela)
Industrial	BBVA Bancomer SA	8600	BBVA 8600 (Industrial)
HRLI	BBVA Bancomer SA	5141	BBVA 5141 (HRLI)
Arbol	Banco Inbursa	7567	Banco Inbursa 7567 (Arbol)
Arbol	BBVA Bancomer SA	5691	BBVA 5691 (Arbol)

#### Currency Reporting Requirements

56. Any person engaged in a trade or business, and who in the course of such trade or business, received more than \$10,000 in currency in one transaction, or two or more related transactions, was required to file a Form 8300 with the United States Department of Treasury within 15 days of receiving the currency.

57. The Form 8300 required detailed information identifying the individual from whom the cash was received, the individual or business on whose behalf the cash was received, the business that received the cash, a description of the transaction, and the method of payment.

58. A person transporting more than \$10,000 in United States currency out of, or into, the United States was required to file a Currency and Monetary Instrument Report ("CMIR").

#### B. THE OBJECTS OF THE CONSPIRACY

59. Beginning in or around 2013 and continuing through the date of this Indictment, in Los Angeles County, California, within the Central District of California, and elsewhere, defendants OLARTE,

LOPEZ, and the HRL defendants, knowingly and willfully conspired with one another, and with others known and unknown to the Grand Jury, to:

a. Enter goods into the United States by means of false statements, in violation of Title 18, United States Code, Section 542; and

b. Smuggle goods from the United States, in violation of Title 18, United States Code, Section 554.

C. MANNER AND MEANS OF THE CONSPIRACY

60. The objects of the conspiracy were to be carried out, in substance, as follows:

a. Defendants OLARTE and LOPEZ would establish, or cause to be established, the shell consignees in Mexico.

b. To cause CBP to permit the HRL defendants to import and export goods, defendants OLARTE, LOPEZ, and the HRL defendants would make false representations and cause the submission of fabricated information to CBP, in violation of Title 13, United States Code, Section 305, inter alia, federal laws, and regulations, as follows:

i. Defendants OLARTE and LOPEZ, as well as employees at the HRL defendants, would create false import declarations through the ACE and AES systems, including by listing the shell consignees owned and operated by defendants as the "consignee" when in fact, as defendants well knew, the shell consignees were not the true customers and would not be paying the required duties to SAT.

ii. Defendants OLARTE and LOPEZ, as well as employees at the HRL defendants, would create false export declarations through the AES, including by listing shell consignees owned and operated by

1 defendants as the "consignees" when in fact, as defendants well knew,  
2 the shell consignees were not the true consignees or customers.

3           iii. Defendants OLARTE and LOPEZ, as well as  
4 employees at the HRL defendants, would create false in-bond  
5 declarations through false 7512 forms and ACE system entries,  
6 including by listing shell consignees owned and operated by  
7 defendants as the "consignee" when in fact, as defendants well knew,  
8 the shell consignee was not the true consignee or customer.

9           iv. Defendants OLARTE, LOPEZ, and the HRL defendants  
10 would mis-manifest goods, that is, they would falsify the import and  
11 export documents to list different items than those actually shipped.

12           c. Defendants OLARTE, LOPEZ, and the HRL defendants would  
13 import and export, and attempt to import and export, various  
14 contraband, including: (1) counterfeit goods, such as counterfeit  
15 medical devices and cell phone batteries, and (2) restricted goods,  
16 such as handguns, stun guns, ammunition magazines, ammunition,  
17 marijuana, and electronic cigarettes, without the required licenses.

18           d. To circumvent Mexican customs law:

19           i. Defendants OLARTE and LOPEZ would create, and  
20 cause the creation of, false SAT documents, including false  
21 pedimentos and carta portes.

22           ii. Defendants LOPEZ and OLARTE would bribe, and  
23 facilitate bribes to, Mexican customs officials, including Unindicted  
24 Coconspirator 3. The bribes would consist of cash and in-kind  
25 payments to members of the Aduana and Mexican National Guard.

26           iii. Defendants LOPEZ and OLARTE, the HRL defendants  
27 by and through their employees, and others known and unknown to the  
28 Grand Jury, including Individual 2, would use WhatsApp to direct the

1 HRL defendants' truck drivers into specific Mexican customs lanes  
2 knowing defendants OLARTE and LOPEZ had facilitated bribery payments  
3 to the customs officials assigned to those lanes. When the HRL  
4 defendants' truck drivers, including Individual 3, drove into the  
5 designated lanes, the corrupt Mexican customs officials would allow  
6 the HRL defendants' trucks through customs and into Mexico's interior  
7 without the payment of any duties.

8           iv. At the direction of defendants OLARTE, LOPEZ, and  
9 the HRL defendants, the HRL defendants' trucking operators, including  
10 Individual 2, would provide the false and fraudulent SAT documents to  
11 Mexican officials, claiming that duties had been paid, when as  
12 defendants well knew, no duties had been paid.

13           v. Defendants OLARTE, LOPEZ, and the HRL defendants  
14 would facilitate the payment of kickbacks to the CJNG Cartel, and  
15 other cartels, to allow the HRL defendants to operate.

16           vi. Unindicted Coconspirator 2 would handle the HRL  
17 defendants' operations in Mexico and, using his contacts with Mexican  
18 law enforcement officers, would ensure that the HRL defendants'  
19 shipments reached their final destinations.

20           e. Once the HRL defendants' trucks were smuggled past  
21 customs authorities in Mexico, the goods would be delivered to the  
22 HRL defendants' true clients, not the shell consignees whom  
23 defendants OLARTE and LOPEZ falsely reported or caused to be falsely  
24 reported to CBP as the ultimate recipients of the goods.

25           f. To conceal the true nature and origin of the payments,  
26 defendants OLARTE and LOPEZ directed the HRL defendants' true clients  
27 to pay the HRL defendants in cash or through deposits into the shell  
28 consignee bank accounts in Mexico.



1           i.    If the HRL defendants' true client elected to pay  
2 by cash, defendants OLARTE, LOPEZ, and the HRL defendants dispatched  
3 money couriers, often to a particular hotel in Juarez, Mexico, to  
4 collect the currency and smuggle it to the HRL defendants in the  
5 United States without filing Form 8300 or CMIRs.

6           ii.   If the HRL defendants' true client deposited  
7 payment into a shell consignee bank account, defendants OLARTE and  
8 LOPEZ would cause that money to be wired from the shell consignee  
9 bank account to a bank account in the Central District of California  
10 belonging to the HRL defendants, such as US Bank 3095 (SLA) or Wells  
11 Fargo 5012 (SLA). Throughout the conspiracy, defendants OLARTE and  
12 LOPEZ wired, and caused to be wired, tens of millions of dollars from  
13 the shell consignee accounts to the HRL defendants.

14           iii.   When CBP officials attempted to verify certain  
15 details about the HRL defendants' shipments from the United States to  
16 Mexico, defendants OLARTE and LOPEZ made misrepresentations and  
17 provided fraudulent documents to CBP, including by directing that  
18 false pedimentos and other fraudulent foreign landing certificates be  
19 given to CBP officers.

20           g.    Defendants OLARTE and LOPEZ would transport, and cause  
21 to be transported, bulk cash without filing necessary currency  
22 reports, including Form 8300 and CMIRs. For instance:

23           i.    Defendants OLARTE and LOPEZ would accept, and  
24 cause to be accepted, bulk cash payments in amounts greater than  
25 \$10,000 without issuing Form 8300.

26           ii.   Defendants OLARTE and LOPEZ would transport, and  
27 cause to be transported, bulk cash to and from Mexico concealed in  
28 the HRL defendants' trucks without filing CMIRs.

1           h. Defendants OLARTE and LOPEZ would destroy, and cause  
2 to be destroyed, documents and communications related to the  
3 conspiracy.

4           61. As a result of the conspiracy, defendants OLARTE, LOPEZ,  
5 and the HRL defendants smuggled billions of dollars' worth of  
6 domestic and in-bond goods from the United States to the HRL  
7 defendants' true clients in Mexico in order to evade duties owed to  
8 SAT and, as a result, received millions of U.S. dollars from the  
9 execution of the scheme.

10 D. OVERT ACTS

11           62. In furtherance of the conspiracy, and to accomplish its  
12 objects, defendants OLARTE, LOPEZ, and the HRL defendants, and others  
13 known and unknown to the Grand Jury, on or about the dates set forth  
14 below, committed and caused to be committed the following overt acts,  
15 among others, in the Central District of California and elsewhere:

16           Overt Act No. 1: On August 28, 2013, defendant LOPEZ accepted  
17 delivery of \$100,000 in bulk cash from a person who LOPEZ believed  
18 was a courier, but who, in fact, was a confidential informant, and  
19 failed to issue a Form 8300.

20           Overt Act No. 2: On September 24, 2013, defendant LOPEZ  
21 accepted delivery of \$160,000 in bulk cash from a person who LOPEZ  
22 believed was a courier, but who, in fact, was a confidential  
23 informant, and failed to issue a Form 8300.

24           Overt Act No. 3: On July 14, 2014, the HRL defendants  
25 attempted to smuggle from the United States to Mexico 400 stun guns  
26 hidden within woven white plastic by falsely claiming to CBP that  
27 the shipment was clothing, shoes, and CD/MP3 players destined for  
28 defendant Sport LA in Mexico.

1        Overt Act No. 4: On April 18, 2017, in a text message using  
2 coded language, defendants OLARTE and LOPEZ discussed using "in-  
3 bond" marketing language to alert customers that the HRL defendants  
4 were doing business under the table.

5        Overt Act No. 5: On October 12, 2017, the HRL defendants  
6 attempted to ship, without the required license, 1,110 rounds of  
7 mixed caliber ammunition, 29 magazines, and four handguns, falsely  
8 claiming the shipment was in-bond children's clothing and destined  
9 for "Sport LA."

10       Overt Act No. 6: On June 26, 2018, at the direction of  
11 defendant OLARTE, Individual 2 emailed CBP a falsified pedimento  
12 bearing a serial number ending in 1556.

13       Overt Act No. 7: On June 26, 2018, at the direction of  
14 defendant OLARTE, Individual 2 emailed CBP a falsified pedimento  
15 bearing a serial number ending in 1558.

16       Overt Act No. 8: On July 30, 2018, defendants OLARTE, LOPEZ,  
17 and the HRL defendants knowingly caused the following false  
18 information to be inputted into the AES system: that the US  
19 Principal Exporter Sport LA was exporting "fabric" to "ultimate  
20 consignee" "GRUPO COM.BAGER S.DE.R.L.DE CV" when, in fact, the true  
21 consignee or customer was Unindicted Customer 1; defendants also  
22 knowingly misled CBP by failing to disclose that defendants owned  
23 more than 10% of Bager.

24       Overt Act No. 9: On August 16, 2018, in a text message,  
25 defendant OLARTE sent defendant LOPEZ a list of the HRL defendants'  
26 true clients.

27       Overt Act No. 10: On August 21, 2018, defendants OLARTE,  
28 LOPEZ, and the HRL defendants knowingly caused the following false

1 information to be inputted into the AES system: that the US  
2 Principal Exporter Sport LA was exporting "fabric" to "ultimate  
3 consignee" "GRUPO COM.BAGER S.DE.R.L.DE CV" when, in fact, the true  
4 consignee or customer was Unindicted Customer 2; and defendants  
5 also knowingly misled CBP by failing to disclose that defendants  
6 owned more than 10% of Bager.

7 Overt Act No. 11: On August 21, 2018, defendants OLARTE,  
8 LOPEZ, and the HRL defendants knowingly caused the following false  
9 information to be inputted into the AES system: that Sport LA had  
10 imported an in-bond shipment of "ladies vests" via "H&R Logistics"  
11 for "consignee" "Arbol Y Almendra, SA" when, in fact, the true  
12 consignee or customer was Unindicted Customer 3.

13 Overt Act No. 12: On September 10, 2018, defendants OLARTE,  
14 LOPEZ, and the HRL defendants knowingly caused the following false  
15 information to be inputted into the AES system: that the US  
16 Principal Exporter Sport LA was exporting "clothing" to "ultimate  
17 consignee" "GRUPO COM.BAGER S.DE.R.L.DE CV" when, in fact, the true  
18 consignee or customer was Unindicted Customer 4; and defendants  
19 also knowingly misled CBP by failing to disclose that defendants  
20 owned more than 10% of Bager.

21 Overt Act No. 13: On September 20, 2018, defendants OLARTE,  
22 LOPEZ, and the HRL defendants knowingly caused the following false  
23 information to be inputted into the AES system: that Hutzen Mexico  
24 SA had imported an in-bond shipment of "fabrics" via "H&R  
25 Logistics" for "consignee" "Hutzen Mexico SA" when, in fact, the  
26 true consignee or customer was Unindicted Customer 5.

27 Overt Act No. 14: On October 4, 2018, defendants OLARTE,  
28 LOPEZ, and the HRL defendants caused the creation of false SAT

documents for presentation to Mexican customs officials to erroneously suggest that duties had been paid on each shipment.

Overt Act No. 15: On October 4, 2018, defendants OLARTE, LOPEZ, and the HRL defendants caused goods from the United States to be smuggled to "Tigre 2" in Mexico by falsely claiming to CBP that the shipment was going to shell consignee Hutzen.

Overt Act No. 16: On November 16, 2018, in text messages using coded language, defendant LOPEZ reassured a client that defendant LOPEZ could ship goods from the United States to Mexico faster than prior shipments because of defendant LOPEZ's relationship with the Aduana.

Overt Act No. 17: On November 28 and 29, 2018, in a series of text messages using coded language, defendant LOPEZ told one of the HRL defendants' client he needed to get paid, preferably in "cash," to pay the Aduana to facilitate the export of goods from the United States to Mexico.

Overt Act No. 18: On February 4, 2019, defendants OLARTE, LOPEZ, and the HRL defendants knowingly caused the following false information to be inputted into the AES system: that the US Principal Exporter Sport LA was exporting "fabric" to "ultimate consignee" "GRUPO COM.BAGER S.DE.R.L.DE CV" when, in fact, the true consignee or customer was Unindicted Customer 6; and defendants also knowingly misled CBP by failing to disclose that defendants owned more than 10% of Bager.

Overt Act No. 19: On March 28, 2019, in a text message using coded language, defendant LOPEZ and a client of the HRL defendants arranged for a bulk cash transaction consistent with a prior transaction.

1        Overt Act No. 20: On April 5, 2019, in a text message using  
2 coded language, defendant LOPEZ told an unknown person that  
3 defendant LOPEZ "can't let customs down" and had to pay customs  
4 "every day."

5        Overt Act No. 21: From May 12, 2019 through June 12, 2019,  
6 defendants OLARTE, LOPEZ, and the HRL defendants smuggled  
7 approximately 312 separate shipments for which Suji was falsely  
8 listed as the consignee, but which were instead delivered to the  
9 HRL defendants' true customers. In connection with these  
10 shipments, defendants OLARTE, LOPEZ, and the HRL defendants caused  
11 the creation of false SAT documents, which were presented to  
12 Mexican customs officials, claiming that duties had been paid, when  
13 they had not.

14        Overt Act No. 22: On May 14, 2019, the HRL defendants  
15 attempted to ship counterfeit Los Angeles Dodgers gear to Mexico.

16        Overt Act No. 23: On June 21, 2019, in a text message using  
17 coded language, a client of the HRL defendants told defendant LOPEZ  
18 that he had his "other 10K" and asked defendant LOPEZ to send  
19 someone to Monte Tauro, in Mexico City, to pick up the cash.  
20 Defendant LOPEZ confirmed in response that the cash was United  
21 States currency and then said he would send a courier.

22        Overt Act No. 24: On July 23, 2019, in a text message using  
23 coded language, defendant LOPEZ directed one of the HRL defendants'  
24 true clients in Mexico to make a deposit into Banco Inbursa 5845  
25 (Suji).

26        Overt Act No. 25: On September 10, 2019, the HRL defendants  
27 attempted to ship counterfeit Gucci clothing to Mexico.

1           Overt Act No. 26: On October 8, 2019, defendants OLARTE,  
2 LOPEZ, and the HRL defendants knowingly caused the following false  
3 information to be inputted into the AES system: that the US  
4 Principal Exporter Sport LA was exporting "bales of clothing" to  
5 "ultimate consignee" "COMERCIALIZADORA SUJI DE MEXICO" when, in  
6 fact, the true consignee or customer was Unindicted Customer 8; and  
7 defendants also knowingly misled CBP by failing to disclose that  
8 defendants owned more than 10% of Suji.

9           Overt Act No. 27: On October 10, 2019, the HRL defendants  
10 smuggled goods from the United States to Unindicted Customer 1 in  
11 Mexico by falsely claiming to CBP that the shipment was going to  
12 shell consignee Suji; in doing so, the HRL defendants intended and  
13 facilitated the avoidance of any duties or tax to SAT.

14           Overt Act No. 28: On October 11, 2019, in a text messages  
15 using coded language, a client of the HRL defendants told defendant  
16 LOPEZ that he would send defendant LOPEZ a surprise in Los Angeles  
17 of "20," code for \$20,000, and would bring more later.

18           Overt Act No. 29: On November 26, 2019, in text messages using  
19 coded language, a client of the HRL defendants told defendant LOPEZ  
20 to check with his Los Angeles employees about a \$20,000 cash  
21 payment the client delivered to the HRL defendants that day. The  
22 client provided a screenshot of a conversation with a courier who  
23 stated that \$7,500 had been dropped off to the HRL defendants'  
24 employees. Defendant LOPEZ confirmed that the money had been  
25 dropped off.

26           Overt Act No. 30: On June 2, 2020, in text messages using  
27 coded language, defendant LOPEZ asked a client of the HRL  
28 defendants for verification of a deposit. The client then sent

1 defendant LOPEZ a confirmation reflecting that he deposited  
2 approximately \$9,829 into Banco Inbursa 7567 (Arbol).

3 Overt Act No. 31: On July 15, 2020, defendants OLARTE, LOPEZ,  
4 and the HRL defendants knowingly caused the following false  
5 information to be inputted into the AES system: that the US  
6 Principal Exporter Sport LA was exporting "TV" to "ultimate  
7 consignee" "COMERCIALIZADORA SUJI DE MEXICO" when, in fact, the  
8 true consignee or customer was Unindicted Customer 10; and  
9 defendants also knowingly misled CBP by failing to disclose that  
10 defendants owned more than 10% of Suji.

11 Overt Act No. 32: From July 16, 2020 to August 18, 2020,  
12 defendants OLARTE, LOPEZ, and the HRL defendants smuggled  
13 approximately 1,529 separate shipments purportedly to Suji, but  
14 actually delivered to one of the HRL defendants' true customers,  
15 intentionally facilitating the avoidance of any duty payments to  
16 SAT. In connection with these shipments, defendants OLARTE, LOPEZ,  
17 and the HRL defendants caused the creation of false SAT documents,  
18 which were presented to Mexican customs officials, claiming that  
19 duties had been paid, when they had not.

20 Overt Act No. 33: On August 18, 2020, in text messages using  
21 coded language, defendant LOPEZ directed one of the HRL defendants'  
22 clients to make a deposit into Banco Inbursa 7242, an account  
23 opened in the name of Arameo in Mexico. The client then sent  
24 defendant LOPEZ verification that the client deposited  
25 approximately \$12,978 into Banco Inbursa 7242 (Arameo).

26 Overt Act No. 34: From August 18, 2020 to September 18, 2020,  
27 defendants OLARTE, LOPEZ, and the HRL defendants smuggled  
28 approximately 1,370 separate shipments purportedly to Suji, but



1 which were actually delivered to one of the HRL defendants' true  
2 customers, intentionally facilitating the avoidance of any duty  
3 payments to SAT. In connection with these shipments, defendants  
4 OLARTE, LOPEZ, and the HRL defendants caused the creation of false  
5 SAT documents, which were presented to Mexican customs officials,  
6 claiming that duties had been paid, when they had not.

7 Overt Act No. 35: On September 29, 2020, in text messages  
8 using coded language, one of the HRL defendants' client sent  
9 defendant LOPEZ a confirmation that he had deposited approximately  
10 \$17,718 into Scotiabank 9428 (Suji) that day.

11 Overt Act No. 36: On January 4, 2021, defendants OLARTE,  
12 LOPEZ, and the HRL defendants knowingly caused the following false  
13 information to be inputted into the AES system: that the US  
14 Principal Exporter Sport LA was exporting "shoes" to "ultimate  
15 consignee" "COMERCIALIZADORA SUJI DE MEXICO" when, in fact, the  
16 true consignee or customer was Unindicted Customer 11; and  
17 defendants also knowingly misled CBP by failing to disclose that  
18 defendants owned more than 10% of Suji.

19 Overt Act No. 37: On January 18, 2021, defendants OLARTE,  
20 LOPEZ, and the HRL defendants knowingly caused the following false  
21 information to be inputted onto a CBP Form 7512: "H&R Logistics"  
22 had imported an in-bond shipment of "rolls of fabric" via "H&R  
23 Logistics" for "consignee" "COMERCIALIZADORA SUJI DE MEXICO" when,  
24 in fact, the true consignee or customer was Unindicted Customer 17.

25 Overt Act No. 38: From December 28, 2020, through January 27,  
26 2021, defendants OLARTE, LOPEZ, and the HRL defendants smuggled  
27 approximately 1,221 separate shipments purportedly to Suji but  
28 actually delivered the shipments to one of the HRL defendants' true

1 customers, intentionally avoiding tax payments to SAT. In  
2 connection with these shipments, defendants OLARTE, LOPEZ, and the  
3 HRL defendants caused the creation of false SAT documents, which  
4 were presented to Mexican customs officials, claiming that duties  
5 had been paid, when they had not.

6 Overt Act No. 39: On February 2, 2021, in text messages using  
7 coded language, defendant LOPEZ discussed one of the HRL  
8 defendants' client's failure to pay and explained that if defendant  
9 LOPEZ did not pay Aduana, they were not going to provide their  
10 services.

11 Overt Act No. 40: On March 11, 2021, defendants OLARTE, LOPEZ,  
12 and the HRL defendants knowingly caused the following false  
13 information to be inputted onto a CBP Form 7512: that "H&R  
14 Logistics" had imported an in-bond shipment of "ladies pants,  
15 ladies jackets" via "H&R Logistics" for "consignee"  
16 "COMERCIALIZADORA SUJI DE MEXICO" when, in fact, the true consignee  
17 or customer was Unindicted Customer 7.

18 Overt Act No. 41: On May 3, 2021, defendants OLARTE, LOPEZ,  
19 and the HRL defendants knowingly caused the following false  
20 information to be inputted onto a CBP Form 7512: that "H&R  
21 Logistics" had imported an in-bond shipment of "ROL fabric" via  
22 "H&R Logistics" for "consignee" "COMERCIALIZADORA SUJI DE MEXICO"  
23 when, in fact, the true consignee or customer was Unindicted  
24 Customer 18.

25 Overt Act No. 42: On May 5, 2021, defendants OLARTE, LOPEZ,  
26 and the HRL defendants smuggled goods from the United States to  
27 Unindicted Customer 18 in Mexico by falsely claiming to CBP that  
28 the shipment was going to shell consignee Suji, intentionally

1 facilitating the avoidance of any duty payments to SAT. Defendants  
2 OLARTE, LOPEZ, and the HRL defendants also caused the creation of  
3 false SAT documents, which were presented to Mexican customs  
4 officials, claiming that duties had been paid, when they had not.

5 Overt Act No. 43: On June 18, 2021, in text messages using  
6 coded language, one of the HRL defendants' clients sent defendant  
7 LOPEZ confirmation reflecting that the same day the client had  
8 deposited \$14,838 into Banco Nacional 4051 (Suji).

9 Overt Act No. 44: On August 17, 2021, defendants OLARTE,  
10 LOPEZ, and the HRL defendants knowingly caused the following false  
11 information to be inputted onto a CBP Form 7512: that "H&R  
12 Logistics" had imported an in-bond shipment of "ladies woven pants"  
13 via "H&R Logistics" for "consignee" "COMERCIALIZADORA SUJI DE  
14 MEXICO" when, in fact, the true consignee or customer was  
15 Unindicted Customer 16.

16 Overt Act No. 45: On August 29, 2021, in text messages using  
17 coded language, defendant LOPEZ told a client that defendant LOPEZ  
18 had been slow for weeks because the Aduana had changed, meaning  
19 particular customs officials had been replaced, but defendant LOPEZ  
20 had since made the same deal with other officials.

21 Overt Act No. 46: On October 15, 2021, in text messages using  
22 coded language, one of the HRL defendants' clients wrote to  
23 defendant OLARTE "it's gonna be cash" and asked defendant OLARTE to  
24 provide an address so he could send his courier. Defendant OLARTE  
25 provided the East Pico address along with a phone number for one of  
26 the HRL defendants' employees and sent a picture of the exchange  
27 rate.

1           Overt Act No. 47: On November 12, 2021, at the direction of  
2 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
3 bearing a serial number ending in 3503 and reflecting that the  
4 corresponding goods were destined for shell consignee Kirool.

5           Overt Act No. 48: On November 12, 2021, defendants OLARTE,  
6 LOPEZ, and the HRL defendants knowingly caused the following false  
7 information to appeal on CBP Form 7512: that "H&R Logistics" had  
8 imported an in-bond shipment of "polyester fabric" via "H&R  
9 Logistics" for "consignee" "COMERCIALIZADORA SUJI DE MEXICO" when,  
10 in fact, the true consignee or customer was Unindicted Customer 9.

11           Overt Act No. 49: On November 13, 2021, defendants OLARTE,  
12 LOPEZ, and the HRL defendants smuggled goods from the United States  
13 to Unindicted Customer 9 in Mexico by falsely claiming to CBP that  
14 the shipment was going to shell consignee Suji, intentionally  
15 facilitating the avoidance of any duty payments to SAT. Defendants  
16 OLARTE, LOPEZ, and the HRL defendants caused the creation of false  
17 SAT documents, which were presented to Mexican customs officials,  
18 claiming that duties had been paid, when they had not.

19           Overt Act No. 50: On December 2, 2021, at the direction of  
20 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
21 bearing a serial number ending in 3550 and reflecting that the  
22 corresponding goods were destined for shell consignee Kirool.

23           Overt Act No. 51: On December 3, 2021, at the direction of  
24 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
25 bearing a serial number ending in 3551 and reflecting that the  
26 corresponding goods were destined for shell consignee Kirool.

27           Overt Act No. 52: On December 3, 2021, at the direction of  
28 defendant OLARTE, Individual 1 emailed CBP a false pedimento

1 bearing a serial number ending in 3552 and reflecting that the  
2 corresponding goods were destined for shell consignee Kirool.

3 Overt Act No. 53: On December 6, 2021, at the direction of  
4 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
5 bearing a serial number ending in 3553 and reflecting that the  
6 corresponding goods were destined for shell consignee Kirool.

7 Overt Act No. 54: On December 8, 2021, in text messages using  
8 coded language, defendant LOPEZ asked Unindicted Coconspirator 1 to  
9 send him the instructions. In response, Unindicted Coconspirator 1  
10 sent defendant LOPEZ a screenshot of the HRL defendants'  
11 instruction sheet directing clients to list Suji as the consignee.

12 Overt Act No. 55: On December 9, 2021, at the direction of  
13 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
14 bearing a serial number ending in 3556 and reflecting that the  
15 corresponding goods were destined for shell consignee Kirool.

16 Overt Act No. 56: On December 9, 2021, at the direction of  
17 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
18 bearing a serial number ending in 3557 and reflecting that the  
19 corresponding goods were destined for shell consignee Kirool.

20 Overt Act No. 57: On December 10, 2021, at the direction of  
21 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
22 bearing a serial number ending in 3558 and reflecting that the  
23 corresponding goods were destined for shell consignee Kirool.

24 Overt Act No. 58: On December 10, 2021, at the direction of  
25 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
26 bearing a serial number ending in 3559 and reflecting that the  
27 corresponding goods were destined for shell consignee Kirool.

1        Overt Act No. 59: On December 17, 2021, at the direction of  
2 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
3 bearing a serial number ending in 3561 and reflecting that the  
4 corresponding goods was destined for shell consignee Kirool.

5        Overt Act No. 60: On December 17, 2021, at the direction of  
6 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
7 bearing a serial number ending in 3562 and reflecting that the  
8 corresponding goods were destined for shell consignee Kirool.

9        Overt Act No. 61: On December 17, 2021, at the direction of  
10 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
11 bearing a serial number ending in 3563 and reflecting that the  
12 corresponding goods were destined for shell consignee Kirool.

13        Overt Act No. 62: On December 17, 2021, at the direction of  
14 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
15 bearing a serial number ending in 3564 and reflecting that the  
16 corresponding goods were destined for shell consignee Kirool.

17        Overt Act No. 63: On December 21, 2021, at the direction of  
18 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
19 bearing a serial number ending in 3565 and reflecting that the  
20 corresponding goods were destined for shell consignee Kirool.

21        Overt Act No. 64: On December 21, 2021, at the direction of  
22 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
23 bearing a serial number ending in 3567 and reflecting that the  
24 corresponding goods were destined for shell consignee Kirool.

25        Overt Act No. 65: On December 30, 2021, at the direction of  
26 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
27 bearing a serial number ending in 3568 and reflecting that the  
28 corresponding goods were destined for shell consignee Kirool.

1        Overt Act No. 66: On December 30, 2021, at the direction of  
2 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
3 bearing a serial number ending in 3569 and reflecting that the  
4 corresponding goods were destined for shell consignee Kirool.

5        Overt Act No. 67: On January 24, 2022, at the direction of  
6 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
7 bearing a serial number ending in 2004 and reflecting that the  
8 corresponding goods were destined for shell consignee Kirool.

9        Overt Act No. 68: On January 24, 2022, at the direction of  
10 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
11 bearing a serial number ending in 2005 and reflecting that the  
12 corresponding goods were destined for shell consignee Kirool.

13        Overt Act No. 69: On January 24, 2022, at the direction of  
14 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
15 bearing a serial number ending in 2006 and reflecting that the  
16 corresponding goods was destined for shell consignee Kirool.

17        Overt Act No. 70: On January 28, 2022, at the direction of  
18 defendant OLARTE, Individual 4 emailed CBP a false pedimento  
19 bearing a serial number ending in 2100 and reflecting that the  
20 corresponding goods were destined for shell consignee Kirool.

21        Overt Act No. 71: On February 8, 2022, at the direction of  
22 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
23 bearing a serial number ending in 2008 and reflecting that the  
24 corresponding goods were destined for shell consignee Kirool.

25        Overt Act No. 72: On February 8, 2022, at the direction of  
26 defendant OLARTE, Individual 1 emailed CBP a false pedimento  
27 bearing a serial number ending in 2009 and reflecting that the  
28 corresponding goods were destined for shell consignee Kirool.

1        Overt Act No. 73: From January 24, 2022 through February 24,  
2 2022, defendants OLARTE, LOPEZ, and the HRL defendants smuggled  
3 approximately 2,916 separate shipments purportedly to Suji, but  
4 which were actually delivered to the HRL defendants' true  
5 customers, intentionally facilitating the avoidance of any duty  
6 payments to SAT. In connection with this shipment, defendants  
7 OLARTE, LOPEZ, and the HRL defendants caused the creation of false  
8 SAT documents, which were presented to Mexican customs officials,  
9 claiming that duties had been paid, when they had not.

10        Overt Act No. 74: On February 24, 2022, one of the HRL  
11 defendants' clients sent defendant LOPEZ confirmation that he  
12 deposited approximately \$12,365 into BBVA 5141 (HRLI).

13        Overt Act No. 75: On May 2, 2022, in a text message using  
14 coded language, defendant LOPEZ asked Unindicted Coconspirator 1 to  
15 send him the instructions for two of the HRL defendants' clients.  
16 Unindicted Coconspirator 1 sent defendant LOPEZ an HRL instruction  
17 sheet directing clients to list Arbol as the consignee.

18        Overt Act No. 76: On May 10, 2022, the HRL defendants  
19 attempted to smuggle cannabis oil electronic cigarette cartridges  
20 into Mexico.

21        Overt Act No. 77: On June 20, 2022, defendants OLARTE, LOPEZ,  
22 and the HRL defendants knowingly caused the following false  
23 information to be inputted onto a CBP Form 7512: that "H&R  
24 Logistics" had imported an in-bond shipment of "Audio Adapter" via  
25 "H&R Logistics" for "consignee" "COMERCIALIZADORA SUJI DE MEXICO"  
26 when, in fact, the true consignee or customer was Unindicted  
27 Customer 19.



1        Overt Act No. 78: On June 21, 2022, defendants OLARTE, LOPEZ,  
2 and the HRL defendants smuggled goods from the United States to  
3 Unindicted Customer 19, in Mexico, by falsely claiming to CBP that  
4 the shipment was going to shell consignee Suji, intentionally  
5 facilitating the avoidance of any duty payments to SAT. In  
6 connection with this shipment, defendants OLARTE, LOPEZ, and the  
7 HRL defendants caused the creation of false SAT documents, which  
8 were presented to Mexican customs officials, claiming that duties  
9 had been paid, when they had not.

10       Overt Act No. 79: On June 22, 2022, defendants OLARTE, LOPEZ,  
11 and the HRL defendants knowingly caused the following false  
12 information to be inputted into the AES system: that the US  
13 Principal Exporter Sport LA was exporting "BEAUTY PRODUCTS/  
14 COSMETICS" to "ultimate consignee" "COMERCIALIZADORA SUJI DE  
15 MEXICO" when, in fact, the true consignee or customer was  
16 Unindicted Customer 13; defendants also knowingly misled CBP by  
17 failing to disclose that defendants owned more than 10% of Suji.

18       Overt Act No. 80: On August 28, 2022, defendants OLARTE,  
19 LOPEZ, and the HRL defendants, knowingly caused the following false  
20 information to be inputted into the AES system: that the US  
21 Principal Exporter Sport LA, was exporting "LINGERIE" to "ultimate  
22 consignee" "COMERCIALIZADORA SUJI DE MEXICO" when, in fact, the  
23 true consignee or customer was Unindicted Customer 14; defendants  
24 also knowingly misled CBP by failing to disclose that defendants  
25 owned more than 10% of Suji.

26       Overt Act No. 81: On August 29, 2022, defendants OLARTE,  
27 LOPEZ, and the HRL defendants knowingly caused the following false  
28 information to be inputted onto a CBP Form 7512: that "H&R

1 Logistics" had imported an in-bond shipment of "ladies jeans" via  
2 "H&R Logistics" for "consignee" "COMERCIALIZADORA SUJI DE MEXICO"  
3 when, in fact, the true consignee or customer was Unindicted  
4 Customer 5.

5 Overt Act No. 82: On August 30, 2022, defendants OLARTE,  
6 LOPEZ, and the HRL defendants smuggled goods from the United States  
7 to Unindicted Customer 5 in Mexico by falsely claiming to CBP that  
8 the shipment was going to shell consignee Suji, intentionally  
9 facilitating the avoidance of any duty payments to SAT. Defendants  
10 OLARTE, LOPEZ, and the HRL defendants also caused the creation of  
11 false SAT documents, which were presented to Mexican customs  
12 officials, claiming that duties had been paid, when they had not.

13 Overt Act No. 83: On September 9, 2022, defendants OLARTE,  
14 LOPEZ, and the HRL defendants knowingly caused the following false  
15 information to be inputted onto a CBP Form 7512: that "H&R  
16 Logistics" had imported an in-bond shipment of "day goods for  
17 department stores" via "H&R Logistics" for "consignee"  
18 "COMERCIALIZADORA SUJI DE MEXICO" when, in fact, the true consignee  
19 or customer was Unindicted Customer 20.

20 Overt Act No. 84: On September 22, 2022, defendants OLARTE,  
21 LOPEZ, and the HRL defendants smuggled goods from the United States  
22 to Unindicted Customer 20 in Mexico by falsely claiming to CBP that  
23 the shipment was going to shell consignee Suji, intentionally  
24 facilitating the avoidance of any duty payments to SAT. In  
25 connection with this shipment, defendants OLARTE, LOPEZ, and the  
26 HRL defendants caused the creation of false SAT documents, which  
27 were presented to Mexican customs officials, claiming that duties  
28 had been paid, when they had not.

1           Overt Act No. 85: On September 22, 2022, defendants OLARTE,  
2 LOPEZ, and the HRL defendants attempted to ship counterfeit medical  
3 devices worth an estimated \$379,000, claiming the shipment was in-  
4 bond "beauty instruments" worth \$14,391, destined for Suji in  
5 Mexico; the shipment was stopped by CBP in Los Angeles.

6           Overt Act No. 86: On December 29, 2022, in a text message,  
7 defendant LOPEZ sent a client a screenshot of the HRL defendants'  
8 instruction sheets directing the client to list the HRL defendants'  
9 shell companies in Mexico as the consignees.

10          Overt Act No. 87: On January 23, 2023, in text messages using  
11 coded language, an employee of the HRL defendants instructed the  
12 HRL defendants' truck drivers via WhatsApp to use certain customs  
13 lanes at the Mexican border.

14          Overt Act No. 88: On January 26, 2023, in a text message using  
15 coded language, one of the HRL defendants' truck drivers said the  
16 driver was "ready with the papers," and one of the HRL defendants'  
17 employees told the driver to take customs lanes 2 and 1.

18          Overt Act No. 89: On or May 31, 2023, an unindicted  
19 coconspirator delivered \$45,700 in United States currency to the  
20 HRL defendants.

21          Overt Act No. 90: From October 16, 2023 through November 14,  
22 2022, defendants OLARTE, LOPEZ, and the HRL defendants smuggled  
23 approximately 1,541 separate shipments purportedly to Suji, but  
24 which were delivered to the HRL defendants' true customers,  
25 intentionally facilitating the avoidance of any duty payments to  
26 SAT. In connection with these shipments, defendants OLARTE, LOPEZ,  
27 and the HRL defendants also caused the creation of false SAT  
28

documents, which were presented to Mexican customs officials, claiming that duties had been paid, when they had not.

Overt Act No. 91: On December 27, 2023, defendants OLARTE, LOPEZ, and the HRL defendants knowingly caused the following false information to be inputted into the AES system: that the US Principal Exporter Sport LA was exporting "Woman Clothing" to "ultimate consignee" "COMERCIALIZADORA SUJI DE MEXICO" when, in fact, the true consignee or customer was Unindicted Customer 15; defendants also knowingly misled CBP by failing to disclose that defendants owned more than 10% of Suji.

Overt Act No. 92: On March 24, 2025, defendants OLARTE, LOPEZ, and the HRL defendants attempted to smuggle 200 units of THC vape pens and 10,000, (6.8 kilograms) of marijuana "rolled joints," claiming the shipment was in-bond "clothing/garments/plastic toys" destined for Suji in Mexico; the shipment was stopped by CBP in Columbus, New Mexico.

COUNT TWO

[18 U.S.C. §§ 554(a), 2(b)]

[Defendants OLARTE, LOPEZ, and SLA]

63. The Grand Jury realleges paragraphs 1 through 58 and 60 through 61 of this Indictment here.

64. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendants RALPH OLARTE, HUMBERTO LOPEZ BELMONTE, and SPORT LA, INC., which did business as "H&R Logistics," "HR Logistics," "HRL," and "HRGL," and others known and unknown to the Grand Jury, aiding and abetting each other, knowingly attempted to export goods contrary to Title 13, United States Code, Section 305, that is, knowingly submitting false and misleading export information through AES.

Count	Date	Attempted Export
TWO	03/24/2025	200 units of THC vape pens and 10,000, (6.8 kilograms) of marijuana "rolled joints," claiming the shipment was "women's clothing" destined for Suji in Mexico.

COUNTS THREE THROUGH FIVE

[18 U.S.C. §§ 554(a), 2(b)]

[DEFENDANTS OLARTE, LOPEZ, and SLA]

65. The Grand Jury realleges paragraphs 1 through 58 and 60 through 61 of this Indictment here.

66. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendants RALPH OLARTE, HUMBERTO LOPEZ BELMONTE, and SPORT LA, INC., which did business as "H&R Logistics," "HR Logistics," "HRL," and "HRGL," and others known and unknown to the Grand Jury, aiding and abetting each other, knowingly and willfully caused the exportation of goods contrary to Title 13, United States Code, Section 305, that is, knowingly submitting false and misleading export information through AES.

Count	Date	Export
THREE	07/15/2020	"TV" to "ultimate consignee" "COMERCIALIZADORA SUJI DE MEXICO," from El Paso, Texas, to Mexico, when, in fact, the true consignee or customer receiving the goods was Unindicted Customer 10.
FOUR	06/22/2022	"BEAUTY PRODUCTS/ COSMETICS" to "ultimate consignee" "COMERCIALIZADORA SUJI DE MEXICO," from El Paso, Texas, to Mexico, when, in fact, the true consignee or customer that was receiving the goods was Unindicted Customer 13.
FIVE	08/28/2022	"LINGERIE" to "ultimate consignee" "COMERCIALIZADORA SUJI DE MEXICO," from El Paso, Texas, to Mexico when, in fact, the true consignee or customer receiving the goods was Unindicted Customer 14.

COUNTS SIX THROUGH TEN

[18 U.S.C. §§ 1343, 2(a)]

[DEFENDANTS OLARTE, LOPEZ, and SLA]

67. The Grand Jury hereby realleges paragraphs 1 through 58 and 60 through 61 of this Indictment here.

A. SCHEME TO DEFRAUD

68. Beginning in or around 2017 and continuing to at least the date of this Indictment, within the Central District of California, and elsewhere, defendants RALPH OLARTE ("OLARTE"), HUMBERTO LOPEZ BELMONTE ("LOPEZ"), and SPORT LA, INC. ("SLA"), which did business as "H&R Logistics," "HR Logistics," "HRL," and "HRGL," and others known and unknown to the Grand Jury, aiding and abetting each other, knowingly and with intent to defraud, devised, participated in, executed, and attempted to execute a scheme to defraud United States Customs and Border Protection ("CBP"), and to induce CBP to not impose United States duties and penalties and to release property held by CBP, by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

B. USE OF INTERSTATE WIRES

69. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, for the purpose of executing the scheme to defraud described above, defendants OLARTE, LOPEZ, and SLA, and others known and unknown to the Grand Jury, transmitted and caused the transmission of the following wire communications in interstate commerce:

Count	Date	Interstate Wiring
SIX	11/12/2021	The email submission to CBP of a false pedimento bearing serial number 21-07-3419-1003503 sent by means of interstate wire.
SEVEN	12/02/2021	The email submission to CBP of a false pedimento bearing serial number 21-07-3419-1003550 sent by means of interstate wire.
EIGHT	12/03/2021	The email submission to CBP of a false pedimento bearing serial number 21-07-3419-1003552 sent by means of interstate wire.
NINE	12/03/2021	The email submission to CBP of a false pedimento bearing serial number 21-07-3419-1003551 sent by means of interstate wire.
TEN	01/28/2022	The email submission to CBP of a false pedimento bearing serial number 21-07-3419-1002100 sent by means of interstate wire.



COUNT ELEVEN

[18 U.S.C. § 1349]

[ALL DEFENDANTS]

70. The Grand Jury hereby realleges paragraphs 1 through 58 of this Indictment here.

A. THE OBJECT OF THE CONSPIRACY

71. Beginning in or around 2013 and continuing to at least the date of this Indictment, in Los Angeles County, within the Central District of California, and elsewhere, defendants RALPH OLARTE ("OLARTE"), HUMBERTO LOPEZ BELMONTE ("LOPEZ"), SPORT LA, INC. ("SLA"), which did business as "H&R Logistics," "HR Logistics," "HRL," and "HRGL," H&R LOGISTICS, INC. ("H&R"), which did business as "HR Logistics," and OLARTE TRANSPORT SERVICE, INC. ("OLARTE TRANSPORT," and collectively with defendants SLA and H&R, "the HRL defendants"), which did business as "Sport LA, Inc.," conspired with one another, and with others known and unknown to the Grand Jury, to commit wire fraud, in violation Title 18, United States Code, Section 1343.

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

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

a. Defendants OLARTE and LOPEZ would establish, or cause to be established, shell consignees in Mexico.

b. Defendants OLARTE and LOPEZ, as well as employees and workers at the HRL defendants, would create false import declarations through the ACE and AES systems, including by listing the shell consignees owned and operated by defendants as the "consignee" when,

1 in fact, as defendants well knew, the shell consignees were not the  
2 true customers and would not be paying the required duties to SAT.

3 c. In making these false representations and submitting  
4 this fabricated information, defendants OLARTE, LOPEZ, and the HRL  
5 defendants intended that CBP would permit the HRL defendants to  
6 import and export goods.

7 d. Defendants OLARTE, LOPEZ, and the HRL defendants would  
8 create, or cause to be created, false documents hiding the nature of  
9 the goods being shipped into Mexico, which at times included  
10 contraband and counterfeit goods, to be shown to both CBP and Mexican  
11 customs officials.

12 e. Defendants OLARTE, LOPEZ, and the HRL defendants would  
13 create, or cause to be created, false "pedimento" documents  
14 purporting to show that duties had been paid to SAT on the shipped  
15 goods, when, in fact, the records were false and created to  
16 facilitate entry into Mexico and avoid payment of duties owed.

17 f. Defendants OLARTE, LOPEZ, and the HRL defendants would  
18 create, or cause to be created, false "carta porte" documents  
19 purporting to show the HRL defendants' shipments had been registered  
20 with SAT, when, in fact, the records were false and created in case  
21 the shipments were stopped by Mexican law enforcement.

22 g. Defendants OLARTE and LOPEZ would bribe and facilitate  
23 bribes to Mexican customs officials, including Unindicted  
24 Coconspirator 3, to allow the shipment of goods without the payment  
25 of duties to SAT. The bribes would consist of cash and in-kind  
26 payments to members of the Aduana and Mexican National Guard.

27 h. At the direction of defendants LOPEZ and OLARTE, the  
28 HRL defendants' employees, workers, and others known and unknown to

1 the Grand Jury, including Individual 2, would use WhatsApp to direct  
2 HRL truck drivers into specific Mexican customs lanes knowing that  
3 defendants OLARTE and LOPEZ had facilitated bribery payments to the  
4 customs officials assigned to those lanes. When the HRL defendants'  
5 truck drivers, including Individual 3, would drive into the  
6 designated lanes, the corrupt Mexican customs officials would allow  
7 the truck through customs and into Mexico's interior without the  
8 payment of any duties to SAT.

9 i. At the direction of defendants OLARTE, LOPEZ, and the  
10 HRL defendants, the HRL defendants' trucking operators, including  
11 Individual 2, would provide the false and fraudulent SAT documents to  
12 Mexican officials, claiming that duties had been paid when, as  
13 defendants well knew, no duties had been paid.

14 i. Defendant OLARTE, LOPEZ, and the HRL defendants  
15 would facilitate the payment of kickbacks to the CJNG Cartel and  
16 other cartels to allow the HRL defendants to operate.

17 ii. Unindicted Coconspirator 2 would handle the HRL  
18 defendants' operations in Mexico and, using his contacts with Mexican  
19 law enforcement officers, ensured that the HRL defendants' shipments  
20 reached their final destinations.

21 j. If CBP inquired about the representations or goods  
22 being imported and exported, defendants OLARTE and LOPEZ would  
23 provide additional false and fraudulent information, including  
24 fraudulent pedimentos claiming that the HRL defendants' customers had  
25 paid import duties, when, in fact, they had not.

26 k. Once the HRL defendants' trucks were smuggled past  
27 customs authorities in Mexico, the goods would be delivered to the  
28 HRL defendants' true clients, not the shell consignees.

1           1. Defendants OLARTE and LOPEZ would direct the HRL  
2 defendants' true clients to pay the HRL defendants by cash, or by  
3 depositing money into the shell consignee bank accounts in Mexico, in  
4 order to conceal origin of the payments.

5           i. If the HRL defendants' true client elected to pay  
6 by cash, defendant OLARTE and LOPEZ would dispatch money couriers,  
7 often to a particular hotel in Juarez, Mexico, to collect the  
8 currency and smuggle it to the HRL defendants in the United States  
9 without filing Form 8300 or CMIRs.

10           ii. If the HRL defendants' true client deposited  
11 payment into a shell consignee bank account, defendants OLARTE and  
12 LOPEZ would cause that money to be wired from the shell consignee  
13 bank account to a bank account for one of the HRL defendants in the  
14 Central District of California, for example, US Bank 3095 (SLA) or  
15 Wells Fargo 5012 (SLA). Throughout the conspiracy, defendants OLARTE  
16 and LOPEZ wired, and caused to be wired, tens of millions of dollars  
17 from the shell consignee accounts to the HRL defendants.

18           73. As a result of the conspiracy, Mexico SAT and the Mexican  
19 government lost millions (in U.S. dollars) in revenue.

20           74. As a result of the conspiracy, defendants OLARTE, LOPEZ,  
21 and the HRL defendants smuggled billions of dollars' worth of  
22 domestic and in-bond goods from the United States to the HRL  
23 defendants' true clients in Mexico by making false representations to  
24 Mexican Customs Authorities, in order to evade duties owed to SAT,  
25 and as a result, defendants OLARTE and LOPEZ personally received  
26 millions of U.S. dollars from the execution of the scheme.

COUNT TWELVE

[18 U.S.C. § 1956(h)]

[ALL DEFENDANTS]

75. The Grand Jury realleges paragraphs 1 through 58 of this Indictment here.

A. OBJECTS OF THE CONSPIRACY

76. Beginning no later than in or around 2013, and continuing until at least on or about the date of this Indictment, in Los Angeles County, within the Central District of California, and elsewhere, defendants RALPH OLARTE ("OLARTE"), HUMBERTO LOPEZ BELMONTE ("LOPEZ"), SPORT LA, INC. ("SLA"), which did business as "H&R Logistics," "HR Logistics," "HRL," and "HRGL," H&R LOGISTICS, INC. ("H&R"), which did business as "HR Logistics," and OLARTE TRANSPORT SERVICE, INC. ("OLARTE TRANSPORT," and collectively with defendants SLA and H&R, "the HRL defendants"), which did business as "Sport LA, Inc.," and others known and unknown to the Grand Jury, knowingly conspired and agreed with each other to commit an offense against the United States, namely:

a. Transport, transmit, and transfer monetary instruments and funds from a place outside the United States, that is, Mexico, to a place in the United States, intending that each of the transactions, in whole or in part, promote the carrying on of a specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343; and

b. Transport, transmit, and transfer monetary instruments and funds from an account at a financial institution outside the United States, that is, an account in Mexico, to an account at a financial institution inside the United States, knowing that the

1 monetary instruments and funds involved in the financial transaction  
2 represented the proceeds of some form of unlawful activity, that is,  
3 wire fraud, in violation of Title 18, United States Code, Section  
4 1343, and knowing that the transaction was designed in whole or in  
5 part: (i) to conceal and disguise the nature, location, source,  
6 ownership, and the control of the proceeds of said specified unlawful  
7 activity, and (ii) to avoid a transaction reporting requirement under  
8 federal law, in violation of Title 18, United States Code, Sections  
9 1956(a)(2)(B)(i), (ii).

10 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE  
11 ACCOMPLISHED

12 77. The objects of the conspiracy were to be accomplished, in  
13 substance, as follows:

14 a. Defendants OLARTE, LOPEZ, and the HRL defendants,  
15 together with others known and unknown to the Grand Jury, would  
16 smuggle goods out of the United States and into Mexico, thereby  
17 intentionally avoiding the payment of any duties by providing false  
18 information to CBP, concealing the identity of the true customers,  
19 creating and presenting false SAT documents, and bribing Mexican  
20 officials.

21 b. At the direction of defendants OLARTE, LOPEZ, and the  
22 HRL defendants, the true customers would make payments to the HRL  
23 defendants through shell consignee accounts in order to promote and  
24 further the HRL defendants' smuggling activities.

25 c. At the directly of defendants OLARTE, LOPEZ, and the  
26 HRL defendants, the true customers would not pay the HRL defendants  
27 directly and would instead make payment through the shell consignee  
28 accounts to conceal the source of the funds.

1           d. Defendants OLARTE and LOPEZ would transfer, or cause  
2 the transfer of, payments in shell consignee accounts into the HRL  
3 defendants' bank accounts in the United States by means of foreign  
4 wire communication.

5           e. Defendants OLARTE, LOPEZ, and the HRL defendants would  
6 receive cash payments in excess of \$10,000 in United States currency  
7 from the true customers based in Mexico as payment for the smuggling  
8 of goods into Mexico and avoiding payment of import duties.

9           f. To conceal the nature of the conspiracy, defendants  
10 OLARTE, LOPEZ, and the HRL defendants would not file Form 8300  
11 despite the receipt of payments requiring the filing of Form 8300.  
12 Rather, defendants OLARTE, LOPEZ, and the HRL defendants would cause  
13 the HRL defendants' employees and others to transport United States  
14 currency from Mexico into the United States in amounts less than  
15 \$10,000 to avoid federal currency reporting requirements.

16 C. OVERT ACTS

17           78. In furtherance of the conspiracy, and to accomplish its  
18 objects, defendants OLARTE, LOPEZ, and the HRL defendants, and others  
19 known and unknown to the Grand Jury, on or about the dates set forth  
20 below, committed and caused to be committed the following overt acts,  
21 among others, in the Central District of California and elsewhere:

22           Overt Act No. 93: On August 28, 2013, defendant LOPEZ accepted  
23 delivery of \$100,000 in bulk cash from a person who LOPEZ believed  
24 was a courier, but who, in fact, was a confidential informant, and,  
25 subsequently, LOPEZ failed to issue a Form 8300.

26           Overt Act No. 94: On September 24, 2013, defendant LOPEZ  
27 accepted delivery of \$160,000 in bulk cash from a person who LOPEZ  
28

1 believed was a courier, but who, in fact, was a confidential  
2 informant, and, subsequently, LOPEZ failed to issue a Form 8300.

3 Overt Act No. 95: On February 12, 2018, defendants OLARTE,  
4 LOPEZ, and the HRL defendants caused a wire in the amount of  
5 approximately \$50,000 to be transmitted from Cibanco 4748 (CLA) in  
6 Mexico to US Bank 3095 (SLA) in the United States.

7 Overt Act No. 96: On June 12, 2019, defendants OLARTE, LOPEZ,  
8 and the HRL defendants caused a wire in the amount of approximately  
9 \$15,000 to be transmitted from Banco Inbursa 5845 (Suji) in Mexico  
10 to US Bank 3095 (SLA) in the United States.

11 Overt Act No. 97: On July 18, 2019, defendants OLARTE, LOPEZ,  
12 and the HRL defendants caused a wire in the amount of approximately  
13 \$19,595 to be transmitted from Cibanco 0020 (Pastorela) in Mexico  
14 to Wells Fargo 5012 (SLA) in the United States.

15 Overt Act No. 98: On July 23, 2019, defendant LOPEZ directed  
16 one of the HRL defendants' true clients in Mexico to make a deposit  
17 into Banco Inbursa 5845 (Suji).

18 Overt Act No. 99: On July 23, 2019, defendants OLARTE, LOPEZ,  
19 and the HRL defendants caused a wire in the amount of approximately  
20 \$11,240 to be transmitted from Banco Inbursa 2484 (Infinity) in  
21 Mexico to Wells Fargo 5012 (SLA) in the United States.

22 Overt Act No. 100: On August 9, 2019, defendants OLARTE,  
23 LOPEZ, and the HRL defendants caused a wire in the amount of  
24 approximately \$16,027 to be transmitted from Banco Inbursa 7567  
25 (Arbol) in Mexico to Wells Fargo 5012 (SLA) in the United States.

26 Overt Act No. 101: On May 21, 2020, defendants OLARTE, LOPEZ,  
27 and the HRL defendants caused a wire in the amount of approximately  
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1 \$10,000 to be transmitted from Banco Inbursa 7567 (Arbol) in Mexico  
2 to Wells Fargo 5012 (SLA) in the United States.

3 Overt Act No. 102: On June 2, 2020, in text messages using  
4 coded language, defendant LOPEZ asked a client of the HRL  
5 defendants for verification of a deposit. The client then sent  
6 defendant LOPEZ a confirmation reflecting that the client had  
7 deposited approximately \$9,829 into Banco Inbursa 7567 (Arbol).

8 Overt Act No. 103: On June 6, 2020, defendants OLARTE, LOPEZ,  
9 and the HRL defendants caused a wire in the amount of approximately  
10 \$29,360 to be transmitted from Cibanco 4407 (CLA) in Mexico to  
11 Wells Fargo 5012 (SLA) in the United States.

12 Overt Act No. 104: On August 18, 2020, in text messages using  
13 coded language, defendant LOPEZ directed one of the HRL defendants'  
14 client to make a deposit into Banco Inbursa 7242, an account opened  
15 in the name of Arameo in Mexico. The client then sent defendant  
16 LOPEZ verification that he deposited approximately \$12,978 into  
17 Banco Inbursa 7242 (Arameo).

18 Overt Act No. 105: On August 18, 2020, defendants OLARTE,  
19 LOPEZ, and the HRL defendants caused a wire in the amount of  
20 approximately \$5,600 to be transmitted from Banco Inbursa 7567  
21 (Arameo) in Mexico to Wells Fargo 5012 (SLA) in the United States.

22 Overt Act No. 106: On August 20, 2020, defendants OLARTE,  
23 LOPEZ, and the HRL defendants caused a wire in the amount of  
24 approximately \$9,800 to be transmitted from Banco Inbursa 7567  
25 (Arameo) in Mexico to Wells Fargo 5012 (SLA) in the United States.

26 Overt Act No. 107: On September 18, 2020, defendants OLARTE,  
27 LOPEZ, and the HRL defendants caused a wire in the amount of  
28

1 approximately \$13,973 to be transmitted from Scotiabank 9428 (Suji)  
2 in Mexico to Wells Fargo 5012 (SLA) in the United States.

3 Overt Act No. 108: On September 18, 2020, defendants OLARTE,  
4 LOPEZ, and the HRL defendants caused a wire in the amount of  
5 approximately \$14,973 to be transmitted from Scotiabank 9428 (Suji)  
6 in Mexico to Wells Fargo 5012 (SLA) in the United States.

7 Overt Act No. 109: On September 29, 2020, defendants OLARTE,  
8 LOPEZ, and the HRL defendants caused a wire in the amount of  
9 approximately \$22,670 to be transmitted from Scotiabank 9428 (Suji)  
10 in Mexico to Wells Fargo 5012 (SLA) in the United States.

11 Overt Act No. 110: On January 6, 2021, defendants OLARTE,  
12 LOPEZ, and the HRL defendants caused a wire in the amount of  
13 approximately \$20,000 to be transmitted from Banco Inbursa 7242  
14 (Arameo) in Mexico to Wells Fargo 5012 (SLA) in the United States.

15 Overt Act No. 111: On January 27, 2021, defendants OLARTE,  
16 LOPEZ, and the HRL defendants caused a wire in the amount of  
17 approximately \$28,988 to be transmitted from Banco Mercantil 7400  
18 (CLA) in Mexico to Wells Fargo 5012 (SLA) in the United States.

19 Overt Act No. 112: On January 28, 2021, defendants OLARTE,  
20 LOPEZ, and the HRL defendants caused a wire in the amount of  
21 approximately \$49,970 to be transmitted from Scotiabank 9428 (Suji)  
22 in Mexico to Wells Fargo 5012 (SLA) in the United States.

23 Overt Act No. 113: On June 14, 2021, defendants OLARTE, LOPEZ,  
24 and the HRL defendants caused a wire in the amount of approximately  
25 \$12,490 to be transmitted from BBVA 5691 (Arbol) in Mexico to Wells  
26 Fargo 5012 (SLA) in the United States.

27 Overt Act No. 114: On June 18, 2021, in text messages using  
28 coded language, a client of the HRL defendants sent defendant LOPEZ

1 confirmation reflecting that the client had deposited \$14,838 into  
2 Banco Nacional 4051 (Suji) that day.

3 Overt Act No. 115: On June 18, 2021, defendants OLARTE, LOPEZ,  
4 and the HRL defendants caused a wire in the amount of approximately  
5 \$6,700 to be transmitted from Banco Nacional 5041 (Suji) in Mexico  
6 to Wells Fargo 5012 (SLA) in the United States.

7 Overt Act No. 116: On February 24, 2022, a client of the HRL  
8 defendants sent defendant LOPEZ confirmation that the client  
9 deposited approximately \$12,365 into BBVA 5141 (HRLI) the prior  
10 day.

11 Overt Act No. 117: On February 24, 2022, defendants OLARTE,  
12 LOPEZ, and the HRL defendants caused a wire in the amount of  
13 approximately \$19,990 to be transmitted from BBVA 5141 (HRLI) in  
14 Mexico to Wells Fargo 5012 (SLA) in the United States.

15 Overt Act No. 118: On May 4, 2023, defendants OLARTE, LOPEZ,  
16 and the HRL defendants caused a wire in the amount of approximately  
17 \$15,390 to be transmitted from BBVA 6908 (Suji) in Mexico to Wells  
18 Fargo 5012 (SLA) in the United States.

19 Overt Act No. 119: On May 31, 2023, an unindicted  
20 coconspirator delivered \$45,700 in United States currency to the  
21 HRL defendants.

22 Overt Act No. 120: On November 15, 2023, defendants OLARTE,  
23 LOPEZ, and the HRL defendants caused a wire in the amount of  
24 approximately \$19,990 to be transmitted from BBVA 5141 (HRLI) in  
25 Mexico to Wells Fargo 5012 (SLA) in the United States.

26 Overt Act No. 121: On January 19, 2024, defendants OLARTE,  
27 LOPEZ, and the HRL defendants caused a wire in the amount of  
28

1 approximately \$19,990 to be transmitted from BBVA 6908 (Suji) in  
2 Mexico to Wells Fargo 5012 (SLA) in the United States.

3 Overt Act No. 122: On June 18, 2024, defendants OLARTE, LOPEZ,  
4 and the HRL defendants caused a wire in the amount of approximately  
5 \$19,990 to be transmitted from Banco Inbursa (2484) (Infinity) in  
6 Mexico to Bank of the West/BMO 3184 (SLA) in the United States.

COUNTS THIRTEEN THROUGH NINETEEN

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

[DEFENDANTS OLARTE, LOPEZ, and SLA]

79. The Grand Jury realleges paragraphs 1 through 58 and paragraph 77.

80. On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, defendants RALPH OLARTE, HUMBERTO LOPEZ BELMONTE, and SPORT LA, INC., which did business as "H&R Logistics," "HR Logistics," "HRL," and "HRGL," and others known and unknown to the Grand Jury, aiding and abetting each other, knowing that the monetary instruments and funds involved in the financial transactions represented the proceeds of some form of unlawful activity, transported, transmitted, and transferred monetary instruments and funds, namely, the amounts set forth below, from accounts at a financial institution outside the United States, that is, accounts in Mexico, to accounts at financial institutions inside the United States, and caused to be done, knowing that each of the transactions was designed in whole or in part: (i) to conceal and disguise the nature, location, source, ownership and the control of the proceeds of the specified unlawful activity, namely, wire fraud, in violation of Title 18, United States Code, Section 1343, and (ii) to avoid a transaction reporting requirement under federal law, through the following transactions:

Count	Date	Transaction
THIRTEEN	5/21/2020	An international wire transfer of \$10,000 from Banco Inbursa 7567 (Arbol) in Mexico to Wells Fargo 5012 (SLA).

Count	Date	Transaction
FOURTEEN	8/18/2020	An international wire transfer of \$5,600 from Banco Inbursa 7242 (Arameo) in Mexico to Wells Fargo 5012 (SLA) in the United States.
FIFTEEN	8/20/2020	An international wire transfer of \$9,800 from Banco Inbursa 7242 (Arameo) in Mexico to Wells Fargo 5012 (SLA) in the United States.
SIXTEEN	9/18/2020	An international wire transfer of \$13,973 from Scotiabank 9428 (Suji) in Mexico to Wells Fargo 5012 (SLA) in the United States.
SEVENTEEN	9/29/2020	An international wire transfer of \$22,670 from Scotiabank 9428 (Suji) in Mexico to Wells Fargo 5012 (SLA) in the United States.
EIGHTEEN	2/24/2022	An international wire transfer of \$19,990 from BBVA 5141 (HRLI) in Mexico to Wells Fargo 5012 (SLA) in the United States.
NINETEEN	2/1/2024	An international wire transfer of \$9,510 from BBVA Bancomer (6908) (Suji) in Mexico to Bank of the West/BMO 3184 (SLA) in the United States.

COUNTS TWENTY THROUGH TWENTY-TWO

[18 U.S.C. §§ 1001(a)]

[DEFENDANT SLA]

81. The Grand Jury realleges paragraphs 1 through 58 of this Indictment here.

82. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, in a matter within the jurisdiction of the executive branch of the government of the United States, namely, United States Customs and Border Protection ("CBP"), defendant SPORT LA, INC. ("SLA"), which did business as "H&R logistics," "HR Logistics," "HRL," and "HRGL," knowingly and willfully made, and caused to be made, materially false, fictitious, and fraudulent statements and representations to CBP knowing that such statements and representations to CBP were untrue.

Count	Date	Statement
TWENTY	07/15/2020	In AES entry - shipment ID 9425962042 defendant SLA falsely claimed the US Principal Exporter Sport LA was exporting "TV" to "ultimate consignee" "COMERCIALIZADORA SUJI DE MEXICO" when, in fact, as defendant SLA well knew, the true consignee or customer was Unindicted Customer 10.
TWENTY-ONE	06/22/2022	In AES entry - shipment ID 15982298687 - defendant SLA falsely claimed the US Principal Exporter Sport LA was exporting "BEAUTY PRODUCTS/COSMETICS" to "ultimate consignee" "COMERCIALIZADORA SUJI DE MEXICO" when, in fact, as defendant SLA well knew, the true consignee or customer was Unindicted Customer 13.

Count	Date	Statement
TWENTY-TWO	05/25/2023	In CBP Form 7512 - reference number 879453455 - defendant SLA falsely claimed in-bond shipment imported by H&R Logistics was transporting "boy jackets" to "consignee" "COMERCIALIZADORA SUJI DE MEXICO" when, in fact, as defendant SLA well knew, the true consignee or customer was Unindicted Customer 5.



FORFEITURE ALLEGATION ONE

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

83. 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 conviction of the offenses set forth in any of Counts One through Eleven of this Indictment.

84. 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).

85. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), any defendant 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 substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 982]

86. 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 Twelve through Nineteen of this Indictment.

87. 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).

88. 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 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, 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.

5  
6 A TRUE BILL

7  
8 /s/  
Foreperson

9 BILAL A. ESSAYLI  
United States Attorney

10 *Lindsey Greer Dotson*

11  
12 LINDSEY GREER DOTSON  
Assistant United States Attorney  
Chief, Criminal Division

13  
14 J. MARK CHILDS  
Assistant United States Attorney  
Chief, Transnational Organized Crime  
15 Section

16 LANA MORTON OWENS  
Assistant United States Attorney  
17 Transnational Organized Crime Section