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CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 September 2016 Grand Jury

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JIMMY JOSUE MARTINEZ (1),
15 aka Motas,
16 MARIO ALBERTO
17 ECHEVERRIA-IBARRA (2),
18 aka Cifre,
19 HENRY IRENIO PULIDO (3),
20 ALEJANDRO GUZMAN (4),
21 aka Polló,
22 NARCISO ZAMORA BANUELOS (5),
23 aka Chi Chi,
24 ADAN ESTEBAN SANCHEZ AGUIRRE (6),
25 aka Guerito,
26 SALVADOR ISAY CASTILLO (7),
27 aka Guero,
28 REYNALDO RODRIGUEZ (8),
aka Edwin,
aka Ed-Rod,
SEBASTIAN PONCE (9),

Defendants.

Case No. **17 CR 1314 JAH**

I N D I C T M E N T

Title 18, U.S.C., Sec. 371 -
Conspiracy; Title 18, U.S.C.,
Secs. 982(a)(5) and 982(b) -
Criminal Forfeiture

The grand jury charges:

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METHODS AND MEANS

4. In furtherance of this conspiracy, and to accomplish its object, the following manners and means were used, among others:

a. The defendants stole vehicles - typically motorcycles and Jeep Wranglers - within the Southern District of California and transported them to Mexico.

b. The defendants organized themselves into various theft crews. Each defendant was a member of at least one theft crew and acted in at least one of the following roles: leader; thief; transporter; scout; or key cutter.

c. The defendants would follow a multi-step process to steal and transport motorcycles:

i. First, scouts would travel throughout the Southern District of California to identify motorcycles to steal. Scouts would locate motorcycles in the parking structures and parking garages of apartment complexes and shopping centers, among other places.

ii. Second, thieves would turn on the motorcycles without a key by bypassing the ignition switch.

iii. Third, transporters would drive the stolen motorcycles to Mexico without the knowledge or permission of the vehicles' lawful owners.

iv. Fourth, leaders would sell or otherwise dispose of the stolen motorcycles. Leaders would pay - either directly or indirectly - the other individuals who participated in the theft and transportation of the motorcycles.

d. The defendants would follow a similar multi-step process to steal and transport Jeep Wranglers:

1 i. First, scouts would travel throughout the Southern
2 District of California to identify Jeep Wranglers to steal. Upon
3 identifying a Jeep Wrangler, scouts would obtain the Vehicle
4 Identification Number (VIN) from the dashboard or the secondary VIN
5 location.

6 ii. Second, scouts would send the VIN to leaders, who
7 in turn, would send the VIN to key cutters. Key cutters would, without
8 authorization, access a proprietary database containing codes used to
9 create and program duplicate keys for Jeep Wranglers. Key cutters would
10 obtain two codes for the Jeep Wrangler targeted by scouts. Key cutters
11 would use one of the codes to create a duplicate key for the targeted
12 Jeep Wrangler. Key cutters would provide the duplicate key to leaders
13 along with the second code, which thieves would need in order to program
14 the microchip within the key at the time of the theft.
15 Leaders would provide the duplicate key to thieves or transporters.

16 iii. Third, thieves and transporters would return to the
17 targeted Jeep Wrangler with the key and the programming code and would
18 disable certain features of the Jeep Wrangler's alarm system, including
19 the horn and emergency flashers. Thieves would use the duplicate key
20 to access the Jeep Wrangler's passenger compartment and would then use
21 a handheld key programmer and the code received from the key cutters to
22 program the duplicate key to the Jeep Wrangler.

23 iv. Fourth, thieves would exit the Jeep Wrangler's
24 passenger compartment and the transporters would drive the Jeep Wrangler
25 to Tijuana, Mexico without the knowledge or permission of the vehicle's
26 lawful owner.

27 v. Fifth, leaders would sell or otherwise dispose of
28 the stolen Jeep Wranglers. Leaders would pay - either directly or

1 indirectly - the other individuals who participated in the theft and
2 transportation of the Jeep Wranglers.

3 e. At various times, defendants JIMMY JOSUE MARTINEZ,
4 aka Motas, and MARIO ALBERTO ECHEVERRIA-IBARRA, aka Cifre, acted as
5 leaders of theft crews.

6 f. The defendants stole or attempted to steal approximately
7 28 vehicles worth approximately \$800,000.

8 **OVERT ACTS**

9 5. In furtherance of this conspiracy, and to carry out its object,
10 the following overt acts, among others, were committed within the
11 Southern District of California and elsewhere:

12 a. On or about January 14, 2014, defendants JIMMY JOSUE
13 MARTINEZ, aka Motas, and NARCISO ZAMORA BANUELOS, aka Chi Chi,
14 communicated via Facebook about obtaining a key for a 2007 Jeep Wrangler
15 with a VIN ending in -8776.

16 b. On or about January 15, 2014, defendant JIMMY JOSUE
17 MARTINEZ, aka Motas, participated in the theft of a 2007 Jeep Wrangler
18 with a VIN ending in -8776 located in Pacific Beach, San Diego.

19 c. On or about January 19, 2014, defendant JIMMY JOSUE
20 MARTINEZ, aka Motas, participated in the theft of a 2013 Jeep Wrangler
21 with a VIN ending in -4578 located near Serra Mesa, San Diego.

22 d. On or about February 12, 2014, defendant ALEJANDRO
23 GUZMAN, aka Pollo, attempted to steal a 2012 Suzuki GSXR-750 motorcycle
24 located in Chula Vista.

25 e. On or about March 20, 2014, defendant JIMMY JOSUE
26 MARTINEZ, aka Motas, participated in the theft of a 2013 Jeep Wrangler
27 with a VIN ending in -1405 located in Chula Vista.

1 f. On or about April 2, 2014, defendant JIMMY JOSUE
2 MARTINEZ, aka Motas, participated in the theft of a 2014 Jeep Wrangler
3 with a VIN ending in -4496 located in Mission Valley, San Diego.

4 g. On or about May 2, 2014, defendant ALEJANDRO GUZMAN,
5 aka Pollo, stole a 2014 Suzuki GSXR-750 motorcycle with a VIN ending in
6 -2020 located in Mira Mesa, San Diego.

7 h. On or about May 2, 2014, defendant ALEJANDRO GUZMAN, aka
8 Pollo, transported a 2014 Suzuki GSXR-750 motorcycle with a VIN ending
9 in -2020 to Mexico.

10 i. On or about June 10, 2014, defendant JIMMY JOSUE
11 MARTINEZ, aka Motas, participated in the theft of a 2008 Jeep Wrangler
12 with a VIN ending in -0879 located in Ocean Beach, San Diego.

13 j. On or about July 30, 2014, defendant JIMMY JOSUE
14 MARTINEZ, aka Motas, participated in the theft of a 2007 Jeep Wrangler
15 with a VIN ending in -4548 located in Mission Valley, San Diego.

16 k. On or about August 5, 2014, defendants ADAN ESTEBAN
17 SANCHEZ AGUIRRE, aka Guerito, and ALEJANDRO GUZMAN, aka Pollo,
18 communicated via Facebook about stealing a Suzuki GSXR motorcycle.

19 l. On or about August 24, 2014, defendant MARIO ALBERTO
20 ECHEVERRIA-IBARRA, aka Cifre, participated in the theft of a 2012 Jeep
21 Wrangler with a VIN ending in -2791 located in Vista.

22 m. On or about September 13, 2014, defendant JIMMY JOSUE
23 MARTINEZ, aka Motas, participated in the theft of a 2013 Jeep Wrangler
24 with a VIN ending in -3692 located in University Heights, San Diego.

25 n. On or about September 18, 2014, defendant MARIO ALBERTO
26 ECHEVERRIA-IBARRA, aka Cifre, participated in the theft of a 2008 Jeep
27 Wrangler with a VIN ending in -5185 located in Vista.

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1 o. On or about September 20, 2014, defendants JIMMY JOSUE
2 MARTINEZ, aka Motas, and ADAN ESTEBAN SANCHEZ AGUIRRE, aka Guerito,
3 participated in the theft of a 2013 Jeep Wrangler with a VIN ending in
4 -9587 located in Pacific Beach, San Diego.

5 p. On or about September 20, 2014, defendants JIMMY JOSUE
6 MARTINEZ, aka Motas, and ADAN ESTEBAN SANCHEZ AGUIRRE, aka Guerito,
7 participated in the theft of a 2007 Jeep Wrangler with a VIN ending in
8 -1018 located in Pacific Beach, San Diego.

9 q. On or about September 30, 2014, defendant MARIO ALBERTO
10 ECHEVERRIA-IBARRA, aka Cifre, participated in the theft of a 2009 Jeep
11 Wrangler with a VIN ending in -6025 located in Ocean View Hills, San
12 Diego.

13 r. On or about October 3, 2014, defendants JIMMY JOSUE
14 MARTINEZ, aka Motas, and ADAN ESTEBAN SANCHEZ AGUIRRE, aka Guerito,
15 participated in the theft of a 2014 Jeep Wrangler with a VIN ending in
16 -8266 located in Hillcrest, San Diego.

17 s. On or about October 3, 2014, defendant MARIO ALBERTO
18 ECHEVERRIA-IBARRA, aka Cifre, participated in the theft of a 2011 Jeep
19 Wrangler with a VIN ending in -8006 located in Point Loma, San Diego.

20 t. On or about October 16, 2014, defendant MARIO ALBERTO
21 ECHEVERRIA-IBARRA, aka Cifre, participated in the theft of a 2009 Jeep
22 Wrangler VIN ending in -9465 located in Ocean Beach, San Diego.

23 u. On or about October 22, 2014, defendant MARIO ALBERTO
24 ECHEVERRIA-IBARRA, aka Cifre, participated in the theft of a 2013 Jeep
25 Wrangler VIN ending in -9106 located in Scripps Ranch, San Diego.

26 v. On or about October 25, 2014, defendant JIMMY JOSUE
27 MARTINEZ, aka Motas, participated in the theft of a 2007 Jeep Wrangler
28 VIN ending in -7511 located in Escondido.

1 w. On or about October 28, 2014, defendants JIMMY JOSUE
2 MARTINEZ, aka Motas, and ADAN ESTEBAN SANCHEZ AGUIRRE, aka Guerito,
3 participated in the theft of a 2014 Jeep Wrangler VIN ending in -0624
4 located in North Park, San Diego.

5 x. On or about November 5, 2014, defendant NARCISO ZAMORA
6 BANUELOS, aka Chi Chi, attempted to steal a 2008 Jeep Wrangler VIN ending
7 in -6353 located in Otay Mesa West, San Diego.

8 y. On or about November 10, 2014, defendant MARIO ALBERTO
9 ECHEVERRIA-IBARRA, aka Cifre, participated in the theft of a 2013 Jeep
10 Wrangler VIN ending in -7638 located in Lake Murray, San Diego.

11 z. On or about November 13, 2014, defendants JIMMY JOSUE
12 MARTINEZ, aka Motas, and ADAN ESTEBAN SANCHEZ AGUIRRE, aka Guerito,
13 participated in the theft of a 2014 Jeep Wrangler VIN ending in -8256
14 located in Mira Mesa, San Diego.

15 aa. On or about November 18, 2014, defendant MARIO ALBERTO
16 ECHEVERRIA-IBARRA, aka Cifre, participated in the theft of a 2014 Jeep
17 Wrangler VIN ending in -5094 located in Grantville, San Diego.

18 bb. On or about November 20, 2014, defendant MARIO ALBERTO
19 ECHEVERRIA-IBARRA, aka Cifre, attempted to steal a 2007 Jeep Wrangler
20 VIN ending in -0985 located in Golden Hill, San Diego.

21 cc. On or about February 19, 2015, defendant REYNALDO
22 RODRIGUEZ, aka Edwin, aka Ed-Rod, participated in the theft of a 2007
23 Jeep Wrangler VIN ending in -2988 located in Spring Valley.

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1 dd. On or about April 4, 2015, defendant ADAN ESTEBAN SANCHEZ
2 AGUIRRE, aka Guerito, and co-conspirator J.C. communicated via Facebook
3 about a group of Hooligans planning to steal multiple vehicles.
4 Anticipating the response to the thefts, SANCHEZ wrote: "They're going
5 to say 'damn hooligans.'" J.C. responded: "We're a plague. They can't
6 finish us off, dude." SANCHEZ responded: "Mexico vs usa."

7 ee. On or about May 22, 2015, defendant SEBASTIAN PONCE
8 participated in the theft of a 2010 Honda CBR1000 motorcycle with VIN
9 ending in -0037 located on the San Diego State University campus.

10 ff. On or about June 13, 2015, defendant ADAN ESTEBAN SANCHEZ
11 AGUIRRE, aka Guerito, wrote to co-conspirator J.C. via Facebook: "What's
12 up, dog? All you do is steal from the Americans. You've already cleaned
13 those poor people up." J.C. responded: "They don't leave me anything
14 outside anymore. Only garage. I have to go around jumping fences and
15 walls." SANCHEZ responded: "Hahaha, even with that they can't stop us."

16 gg. On or about June 19, 2015, defendant SEBASTIAN PONCE
17 participated in the theft of a 2012 Kawasaki Ninja motorcycle with VIN
18 ending in -5562 located in La Mesa.

19 hh. On or about June 28, 2015, defendants HENRY IRENIO
20 PULIDO, and SALVADOR ISAY CASTILLO, aka Guero, attempted to transport a
21 stolen Honda CBR 600RR motorcycle and a stolen Yamaha YZF-RI motorcycle
22 to Mexico, with VINs ending in -0031 and -3133, respectively.

23 ii. On or about November 18, 2015, defendants MARIO ALBERTO
24 ECHEVERRIA-IBARRA, aka Cifre, and SEBASTIAN PONCE communicated via
25 Facebook about paying another individual to assist in stealing a vehicle.
26 All in violation of Title 18, United States Code, Section 371.

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1 FORFEITURE ALLEGATIONS

2 12. The allegations contained in Count 1 of this Indictment are
3 re-alleged and incorporated by reference for the purpose of alleging
4 forfeiture to the United States pursuant to Title 18, United States
5 Code, Sections 982(a)(5) and 982(b).

6 13. Upon conviction of the offense of conspiracy to commit
7 transportation of stolen vehicles in foreign commerce, in violation of
8 Title 18, United States Code, Section 371, as set forth in Count 1,
9 defendants JIMMY JOSUE MARTINEZ, aka Motas, MARIO ALBERTO ECHEVERRIA-
10 IBARRA, aka Cifre, HENRY IRENIO PULIDO, ALEJANDRO GUZMAN, aka Pollo,
11 NARCISO ZAMORA BANUELOS, aka Chi Chi, ADAN ESTEBAN SANCHEZ AGUIRRE,
12 aka Guerito, SALVADOR ISAY CASTILLO, aka Guero, REYNALDO RODRIGUEZ,
13 aka Edwin, aka Ed-Rod, and SEBASTIAN PONCE, shall forfeit to the United
14 States any property, real and personal, which represents or is traceable
15 to the gross proceeds obtained directly and indirectly, from the
16 violation. The property to be forfeited includes, but not limited to a
17 sum of money equal to the total amount of gross proceeds obtained
18 directly or indirectly as a result of the offense.

19 14. If any of the above-described forfeited property, as a result
20 of any act or omission of defendants JIMMY JOSUE MARTINEZ, aka Motas,
21 MARIO ALBERTO ECHEVERRIA-IBARRA, aka Cifre, HENRY IRENIO PULIDO,
22 ALEJANDRO GUZMAN, aka Pollo, NARCISO ZAMORA BANUELOS, aka Chi Chi, ADAN
23 ESTEBAN SANCHEZ AGUIRRE, aka Guerito, SALVADOR ISAY CASTILLO, aka Guero,
24 REYNALDO RODRIGUEZ, aka Edwin, aka Ed-Rod, or SEBASTIAN PONCE, cannot
25 be located upon the exercise of due diligence; has been transferred or
26 sold to, or deposited with, a third person; has been placed beyond the
27 jurisdiction of the Court; has been substantially diminished in value;
28 or has been commingled with other property which cannot be subdivided

1 without difficulty, it is the intent of the United States, pursuant to
2 Title 18, United States Code, Section 982(b), to seek forfeiture of any
3 other property of the defendants up to the value of the property
4 described above as subject to forfeiture.


5 All pursuant to Title 18, United States Code, Sections 982(a)(5)
6 and 982(b).


7 DATED: May 23, 2017.

8 A TRUE BILL:

9
10 
Foreperson

11 ALANA W. ROBINSON
12 Acting United States Attorney

13 By: 
14 ANDREW J. GALVIN
Assistant U.S. Attorney

15
16 By: 
17 FOR JOSEPH S. GREEN
Assistant U.S. Attorney

I hereby attest and certify on 5-23-2017
That the foregoing document is a full, true and correct
copy of the original on file in my office and in my legal
custody.

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

By: 
Deputy