

INDICTMENT

THE GRAND JURY CHARGES THAT:

At all times material herein:

COUNT ONE

(CONSPIRACY TO TRANSPORT STOLEN MERCHANDISE IN INTERSTATE
COMMERCE AND TO STRUCTURE, 18 U.S.C. Section 371)

The Grand Jury for the Southern District of Texas charges that:

A. INTRODUCTION

1. A “booster” is a person that steals goods and merchandise, particularly, over-the-counter merchandise (OTC) from retail stores. A “booster” often re-sells the stolen merchandise to a “fence” at a fraction of the retail value.

2. A “fence” is a person that receives stolen goods and merchandise from “boosters.” The “fence” re-sells the stolen goods and merchandise in bulk to third parties.

3. **MOHAMMED ZAINALDIN**, was the owner of Quick Gas and Lube, located at 8621 Westheimer Road, Houston, Texas. **ZAINLADIN** was born in the Palestinian territory.

ZAINLADIN is a high level “fence” in the Houston area that receives stolen OTC from “boosters.”

4. **CARLOS REYES-ROQUE**, is a citizen of the Republic of Honduras. **REYES-ROQUE** was a high level “booster” in **ZAINLADIN**’s organization.

5. **MARCOS ASCENCIO-PERDOMO**, is a citizen of the Republic of El Salvador.

ASENCIO-PERDOMO was both a high level “booster” and a middleman between the “boosters” and **ZAINLADIN**.

6. **INNESSA STAFEYEVA**, is a citizen of the Republic of Kazakhstan. **STEFYEVA** is **ZAINLADIN**’s girlfriend and works at the warehouse where **ZAINLADIN** stores stolen OTC.

7. **IRMA HERNANDEZ**, is a citizen of the Republic of Honduras. HERNANDEZ was a “booster” that delivered stolen OTC to ZAINALDIN for payment.

8. **ANA RAMOS**, is a citizen the Republic of Honduras. RAMOS was a “booster” that delivered stolen OTC to ZAINALDIN for payment.

9. **CLAUDIA FLORES**, is a citizen of the Republic of Honduras. FLORES was a “booster” that delivered stolen OTC to ZAINALDIN for payment.

B. THE CONSPIRACY AND ITS OBJECTS

Beginning on or about July 2009, the exact date of which is unknown to the Grand Jury, through the date of the return of this indictment, in the Houston Division of the Southern District of Texas and elsewhere, the defendants,

**MOHAMMED ZAINALDIN,
CARLOS REYES ROQUE,
MARCOS ASECIO-PERDOMO,
INNESSA STAFEYEVA,
IRMA HERNANDEZ,
ANA RAMOS, and
CLAUDIA FLORES**

did knowingly, combine, conspire, confederate and agree, with each other and with others known with each other and with others known and unknown to the Grand Jury to commit the following offenses against the United States, that is:

- (a) transport and cause to be transported in interstate commerce stolen goods, wares, and merchandise having a value of \$5,000 or more, knowing that the goods, wares, and merchandise had been stolen, in violation of Title 18, United States Code, Section 2314;
- (b) receive, possess, conceal, store, sell and dispose goods, wares and merchandise of the value of \$5,000 or more, which have crossed a State after being stolen, unlawfully converted or taken, knowing the same to have been stolen, unlawfully converted or taken, in violation of Title 18 United States Code, Section 2315; and

- (c) structuring and attempting to structure and assisting in structuring transactions for the purpose of evading the reporting requirements in Title 31 United States Code, Section 5313(a) and the regulations promulgated thereunder, in violation of Title 31 United States Code, Section 5324(a)(1) and (a)(3).

C. MANNER AND MEANS

Acquisition of Stolen Merchandise by Boosters and Fences

1. It was a part of the plan and purpose of the conspiracy that one or more of the conspirators would travel to pharmacies both in Texas and other states for the purpose of stealing OTC.
 2. It was a further part of the plan and purpose of the conspiracy that conspirators would use undocumented aliens, from Central America, to steal the OTC from pharmacies and retail stores by concealing the OTC in aluminum foil lined bags.
 3. It was a further part of the plan and purpose of the conspiracy that conspirators would use rental cars to travel to other states to steal OTC.
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4. It was a further part of the plan and purpose of the conspiracy that conspirators would ship the stolen OTC via FedEx or UPS back to Mohammed Zainladin in Houston, Texas. Conspirators would ship the OTC so that they could avoid detection from law enforcement during routine traffic stops while traveling back to Texas.
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5. It was a further part of the plan and purpose of the conspiracy that the boosters would sell the stolen OTC at a fraction of its retail value to Mohammed Zainladin. Mohammed Zainladin paid the boosters in cash for the stolen OTC.

Sale, Cleansing, Transfer, Transportation and Storage of Stolen Merchandise from Fence to

Wholesaler

6. It was a further part of the plan and purpose of the conspiracy that conspirators would remove the security stickers and tags from the stolen OTC at Mohammed Zainladin's warehouse(s) to conceal the fact that the OTC had been stolen.
7. It was a further part of the plan and purpose of the conspiracy that once Mohammed Zainladin received the stolen OTC, and after having conspirators clean it, he would then ship the stolen OTC to out-of-state wholesalers via FedEx or UPS.

Payment for the Stolen Merchandise

8. It was a further part of the plan and purpose of the conspiracy that wholesalers would pay Mohammed Zainladin by wire transfer once the stolen OTC were delivered to the wholesaler.
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Structuring Transactions

9. It was a further part of the plan and purpose of the conspiracy that Mohammed Zainladin and others established multiple bank accounts under different names for the purpose of withdrawing cash in the amount of \$10,000 and under to evade the reporting requirements at banks for cash transactions of greater than \$10,000.
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D. OVERT ACTS

In furtherance of the conspiracy described herein, one or more of the co-conspirators committed, in the Southern District of Texas and elsewhere, among others, the overt acts set forth in Counts 3-29 of this Indictment, hereby re-alleged and incorporated as if fully set forth in this Count of the Indictment and the following overt acts:

10. On or about April 26, 2010, one of Mohammed Zainladin's booster's and an un-indicted co-conspirator possessed \$13,000 worth of stolen OTC medicine in a hotel room in Nebraska.
 11. On or about May 6, 2010, Carlos Reyes-Roque went to Quick Gas and Lube at 2:10 p.m.
 12. On or about May 6, 2010, Carlos Reyes-Roque went to Quick Gas and Lube, at 2:50 p.m. after leaving a Western Union.
 13. On or about May 6, 2010, Carlos Reyes-Roque met with Marcos Ascencio-Perdomo after he left Quick Gas and Lube.
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14. On or about May 20, 2010, Carlos Reyes-Roque and two un-indicted co-conspirators, stole OTC from ten Walgreens and two CVS pharmacies in and around Dallas, Texas.
 15. On or about May 20, 2010 Carlos Reyes Roque and two un-indicted co-conspirators, left a Walgreens located at 7080 Virginia Parkway in McKinney, Texas.
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16. On or about July 2, 2010, Mohammed Zainladin called an un-indicted co-conspirator and told him/her that he would pay the un-indicted co-conspirator \$100.00 for each "booster" that the un-indicted co-conspirator recruited.
 17. On or about July 30, 2010, an un-indicted co-conspirator met with Mohammed

Zainaldin and Carlos Reyes Roque at Quick Gas and Lube, to discuss prices and shipment of stolen OTC medicine.

18. On or about August 3, 2010, Carlos Reyes met with an un-indicted co-conspirator. At this meeting Carlos Reyes Roque showed the un-indicted co-conspirator how to fill out FedEx labels and directed him/her where to ship the stolen OTC medicine.
19. On or about August 5, 2010, Mohammed Zainaldin texted an un-indicted co-conspirator his mailing address for a shipment of stolen OTC.
20. On or about August 5, 2010, Mohammed Zainaldin communicated with an un-indicted co-conspirator both over-the-phone and via text message about two shipments of stolen OTC from Louisiana.
21. On or about August 5, 2010, Mohammed Zainaldin sent a text message to an un-indicted co-conspirator saying, "thx" for the shipment of OTC medicine from Louisiana that was valued at \$6,722.67.
22. On or about August 10, 2010, Mohammed Zainaldin met with an un-indicted co-conspirator at Quick Gas and Lube. At this meeting, Zainaldin paid the un-indicted co-conspirator \$4,456.00 in U.S. currency as payment for the stolen OTC sent from Louisiana.
23. On or about September 1, 2010, Mohammed Zainaldin sent an un-indicted co-conspirator a text message saying, "thanx bro" after the un-indicted co-conspirator sent Mohammed Zainaldin a text message with tracking # 468650415006878 for a shipment of \$14,409.41 worth of OTC shipped from Oklahoma.
24. On or about September 2, 2010, Carlos Reyes-Roque communicated with an un-indicted co-conspirator both over the phone and via text message about a Western

Union transfer.

25. On or about September 8, 2010, Mohammed Zainaldin met with an un-indicted co-conspirator at Quick Gas and Lube where Mohammed Zainaldin paid the un-indicted co-conspirator \$4,663.00 in U.S. currency as payment for the stolen OTC shipped from Oklahoma.
26. On or about September 30, 2010, Mohammed Zainaldin met with an un-indicted co-conspirator and paid the un-indicted co-conspirator \$700.00 in U.S. currency for the stolen OTC.
27. On or about October 7, 2010, Mohammed Zainaldin met with an un-indicted co-conspirator at the Quick Gas and Lube and Mohammed Zainaldin provided the un-indicted co-conspirator with a verbal list of prices for stolen OTC.
28. On or about October 26, 2010, Irma Hernandez, Ana Ramos and Claudia Flores were observed in a Walgreens in Indianapolis, Indiana.
29. On or about October 26, 2010, Irma Hernandez, Ana Ramos and Claudia Flores attempted to ship two boxes of stolen OTC medicine valued at approximately \$8,000.00 from Indianapolis, Indiana to Houston, Texas via FedEx.
30. On or about January 26, 2011, Mohammed Zainaldin sent stolen OTC medicine (valued at \$29,460.97) from Houston, Texas to an un-indicted co-conspirator in Boca, Raton, Florida.

In violation of Title 18, United States Code Section 371.

COUNT TWO
(CONSPIRACY TO LAUNDER FUNDS, 18 U.S.C. Section 1956(h))

A. THE CONSPIRACY AND ITS OBJECTS

Beginning on or about July 2009, the exact date of which is unknown to the Grand Jury, through the date of the return of this indictment, in the Houston Division of the Southern District of Texas and elsewhere, the defendants,

**MOHAMMED ZAINALDIN,
CARLOS REYES ROQUE,
MARCOS ASECIO-PERDOMO,
INNESSA STAFEYEVA,
IRMA HERNANDEZ,
ANA RAMOS, and
CLAUDIA FLORES**

did knowingly combine, conspire, confederate and agree with each other and with others known and unknown to the Grand Jury, to knowingly engage, attempt to engage, and cause others to engage in monetary transactions, in and affecting interstate commerce, in criminally derived property that was of a value greater than \$10,000, and was derived from specified unlawful activities: that is, interstate transportation of stolen property, in violation of 18 U.S.C. § 2314; and engaging in monetary transactions in property derived from specified unlawful activity in violation of 18 U.S.C. § 1957 all in violation of Title 18, United States Code Section 1956(h).

B. THE MANNER AND MEANS OF THE CONSPIRACY

Among the deceitful and dishonest means by which the defendants and their co-conspirators sought to accomplish and did accomplish the purpose of the conspiracy were the acts set forth in paragraphs 1 through 9 of the manner and means contained in Count One of the Indictment, hereby re-alleged and incorporated as if fully set forth in this Count of the Indictment.

C. OVERT ACTS

In furtherance of the conspiracy described herein, one or more of the co-conspirators

committed, in the Southern District of Texas and elsewhere, among others, the overt acts set forth in Counts 3-29 of this Indictment, hereby re-alleged and incorporated as if fully set forth in this Count of the Indictment.

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

COUNTS 3-7
(TRANSPORTATION OF STOLEN GOODS, 18 U.S.C. Section 2314)

On or about the dates set forth below, in the Southern District of Texas, and elsewhere, the defendants,

**MOHAMMED ZAINALDIN,
CARLOS REYES ROQUE,
MARCOS ASENCIO-PERDOMO,
INNESSA STAFEYEVA,
IRMA HERNANDEZ,
ANA RAMOS, and
CLAUDIA FLORES**

did cause goods, wares, and merchandise with a value of \$5,000 or more to be transported, transmitted, and transferred in interstate commerce, knowing the same to have been stolen, converted, and taken by fraud at the time they crossed state lines and intending to deprive the owner

of the use of the property as described in the counts below:

Count	Shipment Date	Description of Interstate Shipment
3	August 5, 2010	Shipment of stolen merchandise worth \$5,000 or more from Louisiana to Texas
4	August 5, 2010	Shipment of stolen merchandise worth \$5,000 or more from Louisiana to Texas
5	September 1, 2010	Shipment of stolen merchandise worth \$5,000 or more from Oklahoma to Texas
6	September 2, 2010	Shipment of stolen merchandise worth \$5,000 or more from Oklahoma to Texas
7	January 26, 2011	Shipment of stolen merchandise worth \$5,000 or more from Texas to Florida

All in violation of Title 18 U.S.C. Sections 2314 and 2.

COUNTS 8-29

(STRUCTURING TRANSACTIONS TO EVADE REPORTING REQUIREMENTS, 31 United States Code Section 5324(a)(3))

On or about the dates set forth below, in the Southern District of Texas, and elsewhere, the defendants,

**MOHAMMED ZAINALDIN,
CARLOS REYES ROQUE,
MARCOS ASENCIO-PERDOMO,
INNESSA STAFEYEVA,
IRMA HERNANDEZ,
ANA RAMOS, and
CLAUDIA FLORES**

did knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, structure and assist in structuring, and attempt to structure and assist in structuring, the following transactions with domestic financial institutions, and did so as part of a pattern of illegal activity involving more than \$100,000 in a 12 month period as described in the counts below:

Count	Date of Transaction	Description of Withdrawals
8	November 2, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
9	November 2, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
10	November 2, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
11	November 13, 2009	Cash withdrawal of \$5,000 from Bank of America account number ending in 4227
12	November 13, 2009	Cash withdrawal of \$5,000 from Bank of America account number ending in 4227

13	December 1, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
14	December 3, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
15	December 7, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
16	December 8, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
17	December 9, 2009	Cash withdrawal of \$3,000 from Bank of America account number ending in 4227
18	December 10, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
19	December 11, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
20	December 14, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
21	December 15, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
22	December 16, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
23	December 18, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
24	December 21, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
25	December 21, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
26	December 23, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
27	December 28, 2009	Cash withdrawal of \$500 from Bank of America account number ending in 4227
28	December 30, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227
29	December 31, 2009	Cash withdrawal of \$10,000 from Bank of America account number ending in 4227

	Total 2009	\$193,500.00
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All in violation of Title 31, U.S.C., Section 5324(a)(3); 31 U.S.C. Sections 5313(a) and the regulations promulgated thereunder; and Title 18 U.S.C. and 2.

FORFEITURE

A.. Pursuant to 28 U.S.C. § 2461(c), and 18 U.S.C. § 981(a)(1)(C), the United States gives notice that upon conviction of Counts 1, 3, 4, 5, 6, 7, or any combination of convictions, the defendants

**MOHAMMED ZAINALDIN,
CARLOS REYES ROQUE,
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INNESSA STAFEYEVA,
IRMA HERNANDEZ,
ANA RAMOS, and
CLAUDIA FLORES**

shall jointly and severally forfeit all property which constitutes or is derived from proceeds traceable to a Conspiracy to violate 18 U.S.C. §§ 2314, 2315, or both, as charged in Count One, Interstate Transportation of Stolen Property in violation of 18 U.S.C. § 2314, as charged in

Counts 3 - 7, or any combination of counts.

B. Pursuant to 31 U.S.C. § 5317(c)(1), the United States gives notice that upon conviction of Count 1, Counts 8 - 29, or any combination of counts, the defendants

**MOHAMMED ZAINALDIN,
CARLOS REYES ROQUE,
MARCOS ASECIO-PERDOMO,
INNESSA STAFEYEVA,
IRMA HERNANDEZ,
ANA RAMOS, and
CLAUDIA FLORES**

shall jointly and severally forfeit all property, real or personal, involved in violations of 31

U.S.C. §§ 5313 and 5324 as charged in Counts 1, 8 - 29, or any combination of counts.

C. Pursuant to 18 U.S.C. § 982(a)(1), the United States gives notice that upon conviction of Conspiracy to Commit Money Laundering, 18 U.S.C. § 1956(h), as charged in Count 2, the defendants

**MOHAMMED ZAINALDIN,
CARLOS REYES ROQUE,
MARCOS ASECIO-PERDOMO,
INNESSA STAFEYEVA,
IRMA HERNANDEZ,
ANA RAMOS, and
CLAUDIA FLORES**

shall jointly and severally forfeit all property all property, real or personal, involved in a violation of Conspiracy to Commit Money Laundering, 18 U.S.C. § 1956(h), as charged in Count 2.

D. Forfeitable property includes but is not limited to:

1. All of the funds in the following financial accounts:

a. Bank of America Account Number xxxx-xxxx-3282, account name Overstock

Liquidation, Inc., Wire Account;

b. Bank of America Account Number xxxx-xxx0-3279, account name Overstock

Liquidation, Inc., General Account;

c. Bank of America Account Number xxxx-xxxx-3554, account name Overstock

Liquidation, Inc., General Account;

d. Bank of America Account Number xxxx-xxxx-2530, account name Quick Gas

& Lube, Inc., General Account;

e. Bank of America Account Number xxxx-xxxx-4793, account name

Mohammed Zainaldin, DBA I Roadrunner;

f. Bank of America Account Number xxxx-xxxx-2556, account name Quick Gas & Lube, Inc., Merchant Account;

g. Bank of America Account Number xxxx-xxxx-2843, account name Quick Gas LLC.;

h. Bank of America Account Number xxxx-xxxx-6179, account name Mohammed Zainaldin checking;

i. Bank of America Account Number xxxx-xxxx-6218, account name Mohammed S. Zainaldin;

j. Bank of America Account Number xxxx-xxxx-8616, account name Mohammed Zainaldin checking;

k. Bank of America Account Number xxxx-xxxx-9192, account name Innessa Stafeyeva checking;

l. Bank of America Account Number xxxx-xxxx-6589, account name Innessa Stafeyeva savings;

m. Bank of America Account Number xxxx-xxxx-0994, account name Quick Gas & Lube, Inc.; and

n. Texas Gulf Bank Account Number xxxxxx0294, account name Quick Gas LLC.

2. Money judgments in the amounts of \$193,500.00 and \$5.6 million.

SUBSTITUTE ASSETS

E. If any of the property described above, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

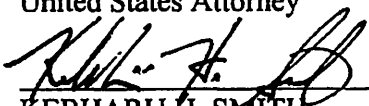
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE
~~_____
FOREPERSON OF THE GRAND JURY~~

JOSE ANGEL MORENO
United States Attorney

By:  _____
KEBHARU H. SMITH
Assistant United States Attorney
(713)567-9000