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	1	CASE UNSEALED	PER ORDER OF COURT	18 AUG -9 PM 2:48			
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	, 8	UNITED STATES DISTRICT COURT					
	9	SOUTHERN DISTRIC	CT OF CALIFORNIA	Ĩ			
	10	June 2017	Grand Jury	s j			
	11	UNITED STATES OF AMERICA,	Case No. 18CR 35	54 H			
	12	Plaintiff,	<u>I N D I C T M E N T</u>	, R			
	13	v.	Title 18, U.S.C., Se				
	14	JACOB BURRELL CAMPOS,	Unlicensed Money Tra Business; Title 31, Sec. 5318(h) - Faili	U.S.C.,			
	15	Defendant.	Anti-Money Launderin Title 18, U.S.C., Se	g Program;			
	16		Money Laundering; Ti Sec. 371, and Title	tle 18, U.S.C.,			
	17		Sec. 5324(c) - Consp Structure; Title 18,				
~	18		Sec. 982(a)(1) and (Title 31, U.S.C., Se	c. 5317(c)(1)(A)			
L'A	19		and (B) - Criminal F	orfeiture			
Petrix	20 21	The grand jury charges:					
CC:	22	Count 1					
3	23	From on or about January 2015 to on or about April 2016, within					
	24	the Southern District of California and elsewhere, defendant JACOB					
	25	BURRELL CAMPOS did knowingly conduct, control, manage, supervise, direct					
	26	and own at least part of a money transmitting business affecting					
	27	interstate and foreign commerce which failed to comply with the money					
	28		0.1.1				
			KMC				
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1 transmitting business registration requirements under Title 31, United 2 States Code, Section 5330, and the regulations prescribed thereunder. 3 All in violation of Title 18, United States Code, Section 1960(a).

<u>Count 2</u>

From on or about January 2015 to on or about April 2016, within the 5 Southern District of California and elsewhere, defendant JACOB BURRELL 6 a money service business within the meaning of 31 7 CAMPOS, CFR 1010.100(ff), and a financial institution within the meaning of 18 USC 8 5312(a)(2)(R), did knowingly and willfully fail to develop, implement 9 10 and maintain an effective anti-money laundering program, including the development of internal policies, procedures and controls, reasonably 11 designed to prevent money laundering and the financing of terrorist 12 activities, as part of a pattern of illegal activity involving more than 13 \$100,000 in a twelve-month period. 14

15 All in violation of Title 31, United States Code, Sections 5318(h) and16 5322(b), and Title 31, Code of Federal Regulations, Section 1022.210.

Counts 3-30

On or about the dates listed below, according to each count, within 18 the Southern District of California and elsewhere, defendant JACOB 19 BURRELL CAMPOS did transmit and transfer monetary instruments, that is, 20 United States currency, from a place in the United States to a place 21 outside the United States, with the intent to promote the carrying on 22 of specified unlawful activity, that is, conducting an unlicensed money 23 24 transmitting business in violation of Title 18, United States Code, Section 1960: 25

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1	COUNT	DATE	FROM	ТО	AMOUNT
2 3	3	February 26, 2015	Jacob Julio Burrell Campos, Mission Federal Credit	Ifinex Inc. (Bitfinex), Cathay United Bank,	\$13,200.00
4			Union, United States of America	Taiwan	
5 6 7	4	March 10, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$11,500.00
8 9	5	March 16, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$20,460.00
10 11 12	6	March 23, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$14,000.00
13 14 15	7	March 25, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$20,100.00
16 17	8	March 30, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$27,800.00
18 19 20	9	April 1, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$15,500.00
21 22	10	April 6, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$15,600.00
23 24 25	11	April 9, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$23,600.00
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COUNT	DATE	FROM	ТО	AMOUNT
12	April 15, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$32,790.00
13	April 20, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$28,990.00
14	April 24, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$26,390.00
15	April 28, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$19,190.00
16	April 30, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$25,190.00
17	May 5, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$27,245.03
18	May 8, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$32,690.00
19	May 12, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$29,390.00
20	May 19, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$47,390.00
21	May 21, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$32,190.00

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1	COUNT	DATE	FROM	TO	AMOUNT
2 3 4	22	May 26, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$57,870.84
4 5 6	23	May 28, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$39,725.00
7 8	24	June 3, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$55,940.00
9 10 11	25	June 9, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$50,281.00
12 13	26	June 16, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$53,256.24
14 15	27	June 22,2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$82,227.73
16 17 18	28	June 26, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$52,099.38
19 20	29	November 3, 2015	Jacob Julio Burrell Campos, San Diego County Credit Union, United	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$24,550.00
21 22 23 24	30	February 12, 2016	States of America Jacob Julio Burrell Campos, San Diego County Credit Union, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$23,199.60
25 26	All in	violation c	of Title 18, United St	ates Code, Section 1	956(a)(2)(A).

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Count 31

From on or about December 2016, to on or about March 2018, within 2 the Southern District of California and elsewhere, defendant JACOB 3 BURRELL CAMPOS did combine, conspire, confederate and agree with others 4 known and unknown to the Grand Jury to commit an offense against the 5 United States, that is, to structure and assist in the structuring the 6 7 importation of monetary instruments for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5316; 8 in violation of Title 31, United States Code, Section 5324(c). 9

Overt Acts

In furtherance of this conspiracy and to effect the objects thereof,the following overt acts, among others, were committed:

On or about February 8, 2017, at approximately 12:10 a.m.,
 defendant JACOB BURRELL CAMPOS entered the United States from Mexico in
 possession of \$9,500 in U.S. currency.

2. On or about February 8, 2017, at approximately 10:29 p.m.,
 defendant JACOB BURRELL CAMPOS entered the United States from Mexico in
 possession of \$9,580 in U.S. currency.

3. On or about February 9, 2017, at approximately 8:17 p.m.,
defendant JACOB BURRELL CAMPOS entered the United States from Mexico in
possession of \$9,746 in U.S. currency.

4. On or about February 10, 2017, at approximately 11:52 p.m.,
defendant JACOB BURRELL CAMPOS entered the United States from Mexico in
possession of \$9,580 in U.S. currency.

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25 All in violation of Title 18, United States Code, Section 371.

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Criminal Forfeiture

Upon conviction of the offense alleged in Count 1 (conducting
 an unlicensed money transmitting business) or any of the offenses
 alleged in Counts 3 through 30 (money laundering) of this indictment,
 defendant JACOB BURRELL CAMPOS shall forfeit to the United States of
 America, pursuant to Title 18, United States Code, Section 982(a)(1),
 any property, real and personal, involved in such offenses, and any
 property traceable to such property.

9 2. In the event that any of the property described above, as a10 result of any act or omission of the defendant:

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

18 the United States of America shall be entitled to forfeit substitute 19 property pursuant to Title 21, United States Code, Section 853(p), as 20 incorporated by Title 18, United States Code, Section 982(b)(1). 21 All in violation of Title 18, United States Code, Sections 982(a)(1) 22 and (b)(1).

23 3. Upon conviction of the offense alleged in Count 31 of this indictment (conspiracy to structure the importation of 24 monetary instruments), defendant JACOB BURRELL CAMPOS shall forfeit to the United 25 States of America, pursuant to Title 31, United States Code, 26 Section 5317(c)(1)(A), any property, real and personal, involved in such 27 offense, and any property traceable to such property. 28

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1	4. In the event that any of the property described above, as a				
2	result of any act or omission of the defendant:				
3	a. cannot be located upon the exercise of due diligence;				
4	b. has been transferred or sold to, or deposited with, a				
5	third party;				
6	c. has been placed beyond the jurisdiction of the court;				
7	d. has been substantially diminished in value; or				
8	e. has been commingled with other property which cannot be				
9	divided without difficulty,				
10	the United States of America shall be entitled to forfeit substitute				
11	property pursuant to Title 21, United States Code, Section 853(p), as				
12	incorporated by Title 31, United States Code, Section 5317(c)(B).				
13	All in violation of Title 31, United States Code, Sections 5317(c)(1)(A)				
14	and (B).				
15	DATED: August 9, 2018.				
16	A TRUE BILL:				
17	Munget				
18	Foreperson				
19	ADAM L. BRAVERMAN				
20	United States Attorney				
21	Abut Cialle				
22	By: ROBERT CIAFFA				
23	Assistant U.S. Attorney				
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