

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Joel A. Pisano  
 :  
 v. :  
 :  
 LUISA MEDRANO, : Criminal No. 05-  
 NORIS ELVIRA ROSALES MARTINEZ, :  
 a/k/a "Noris Elvira Sandoval," : 18 U.S.C §§ 371, 1589,  
 ANA LUZ ROSALES MARTINEZ, : 1594(a) and 2;  
 NANCY FLORIDALMA ROSALES MARTINEZ, : 8 U.S.C. § 1324  
 a/k/a "Morena," :  
 JOSE DIMAS MAGANA, a/k/a "Pelon", :  
 LOURDES ROSALES MARTINEZ, a/k/a :  
 "Turka," :  
 ZENIA ZUNILDA MARTINEZ, a/k/a :  
 "Dona Sonia," :  
 JOSE ARNALDO ISAULA-MEZA, a/k/a :  
 "Naldo," :  
 ELSA CONSUELO ISAULA-MEZA and :  
 ROSALBA ORTIZ :

S U P E R S E D I N G I N D I C T M E N T

The Grand Jury in and for the District of New Jersey,  
sitting in Newark, charges:

COUNT ONE

CONSPIRACY TO COMMIT FORCED LABOR OFFENSES

**Defendants, Residences and Business Locations**

1. At all times relevant to Count One of this Indictment:
  - a. Defendants NORIS ELVIRA ROSALES MARTINEZ, a/k/a "Noris Elvira Sandoval," ANA LUZ ROSALES MARTINEZ, NANCY FLORIDALMA ROSALES MARTINEZ, a/k/a "Morena," (hereinafter "NANCY ROSALES MARTINEZ"), LOURDES ROSALES MARTINEZ, a/k/a "Turka," (hereinafter "LOURDES ROSALES"), ZENIA ZUNILDA MARTINEZ, a/k/a

"Dona Sonia," (hereinafter "ZENIA ZUNILDA MARTINEZ"), JOSE ARNALDO ISAULA-MEZA (hereinafter "JOSE ISAULA") and ELSA CONSUELO ISAULA-MEZA (hereinafter "ELSA ISAULA") were citizens of Honduras.

b. Defendant JOSE DIMAS MAGANA, a/k/a "Pelon," (hereinafter "JOSE DIMAS MAGANA") was a citizen of El Salvador.

c. Defendant ROSALBA ORTIZ was a citizen of the Dominican Republic.

d. Defendant LUISA MEDRANO, a native of El Salvador and a United States citizen, owned and operated bars in Hudson County, New Jersey, including "El Paisano Bar and Nightclub," located at 509 22<sup>nd</sup> Street, Union City, New Jersey (hereinafter "El Paisano Bar"); "El Puerto de la Union I," located at 6710 Bergenline Avenue, Guttenberg, New Jersey (hereinafter "the 68<sup>th</sup> Street Bar"); and "El Puerto de la Union II," located at 3806 Bergenline Avenue, Union City, New Jersey (hereinafter "El Puerto de la Union Bar") (collectively "the Bars").

e. Defendant LUISA MEDRANO owned and controlled the residence at 509 22<sup>nd</sup> Street, Union City, New Jersey (hereinafter "the 22<sup>nd</sup> Street Apartment") which was located directly above El Paisano Bar.

f. Defendant LUISA MEDRANO owned and controlled the residence located at 2604 New York Avenue, Union City, New Jersey (hereinafter "the New York Avenue Apartment").

g. Defendant LUISA MEDRANO owned and controlled the residence located at 75 68<sup>th</sup> Street, Guttenberg, New Jersey (hereinafter "the 68<sup>th</sup> Street Apartment").

2. From at least as early as in or about April 2003, and continuing until at least as late as on or about January 20, 2005, in Hudson County, in the District of New Jersey and elsewhere, defendants

LUISA MEDRANO;  
NORIS ELVIRA ROSALES MARTINEZ,  
a/k/a "Noris Elvira Sandoval;"  
ANA LUZ ROSALES MARTINEZ;  
NANCY FLORIDALMA ROSALES MARTINEZ,  
a/k/a "Morena;"  
JOSE DIMAS MAGANA,  
a/k/a "Pelon;"  
LOURDES ROSALES MARTINEZ,  
a/k/a "Turka;"  
ZENIA ZUNILDA MARTINEZ,  
a/k/a "Dona Sonia;"  
JOSE ARNALDO ISLAULA-MEZA;  
ELSA CONSUELO ISLAULA-MEZA;  
and ROSALBA ORTIZ

did knowingly and willfully conspire, combine, confederate and agree with each other and with others to commit offenses against the United States, that is:

a. to bring aliens to the United States, at a place other than a designated port of entry or at a place other than as designated by the Commissioner of the Immigration and Naturalization Service, knowing the persons were aliens, contrary to Title 8, United States Code, Section 1324(a)(1)(A)(i);

b. to provide and obtain the labor and services of persons by threats of serious harm to and physical restraint against those persons and other persons, and by means of a scheme, plan, and pattern intended to cause those persons to believe that, if those persons did not perform such labor and services, those persons and other persons would suffer serious harm and physical restraint, and by means of the abuse and threatened abuse of law and the legal process, contrary to Title 18, United States Code, Section 1589; and

c. to recruit, harbor, transport, provide and obtain by any means, persons for labor and services in violation of the law, including for forced labor, contrary to Title 18, United States Code, Section 1590.

**Object of the Conspiracy**

3. The object of the conspiracy was for defendants LUISA MEDRANO, NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, NANCY ROSALES MARTINEZ, JOSE DIMAS MAGANA, LOURDES ROSALES, ZENIA ZUNILDA MARTINEZ, JOSE ISAULA, ELSA ISAULA and ROSALBA ORTIZ and others to recruit and smuggle into the United States young Honduran females; to force these females to work in the Bars in the Hudson County, New Jersey area; and to profit from the labor and services rendered by these females as they attempted to satisfy smuggling debts owed to the defendants and

their co-conspirators.

**Manner and Means of the Conspiracy**

4. It was part of the conspiracy that:

a. Recruiters in Honduras, including but not limited to defendants NANCY ROSALES MARTINEZ, LOURDES ROSALES and ZENIA ZUNILDA MARTINEZ, approached females, some as young as fourteen years of age, and persuaded them to illegally enter the United States through false and misleading promises of legitimate jobs as waitresses in restaurants in the United States.

b. Smugglers, commonly known as "coyotes," including but not limited to JOSE ISAULA, were hired by defendants NANCY ROSALES MARTINEZ, LOURDES ROSALES and ZENIA ZUNILDA MARTINEZ and others to illegally smuggle the Honduran females into the United States.

c. Defendant JOSE ISAULA arranged for the Honduran females to be transported to Houston, Texas, where they were temporarily harbored in a safehouse controlled and operated by defendant ELSA ISAULA, before resuming their travel to the Hudson County, New Jersey area where they were to be put to work. At times, defendant NORIS ELVIRA ROSALES MARTINEZ caused money to be sent to ELSA ISUALA to be used to pay for the Honduran females to travel from Texas to the Hudson County, New Jersey area.

d. "Enforcers" in New Jersey, including but not limited to defendants NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, NANCY ROSALES MARTINEZ, JOSE DIMAS MAGANA and others, advised the Honduran females, upon their arrival in New Jersey, that they were required to repay a smuggling fee ranging from approximately \$10,000 to approximately \$20,000.

e. Defendants NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, NANCY ROSALES MARTINEZ, JOSE DIMAS MAGANA and others advised the Honduran females, shortly after their arrival in New Jersey, that they would not be working as waitresses as originally promised but were instead required to work in one of the Bars, owned and controlled by defendant LUISA MEDRANO, for up to seven days per week until such time as their smuggling fees were paid in full. The Honduran females were provided \$240 in salary for approximately 48 hours of work per week. As part of their work, the Honduran females were required to dance and to consume alcohol with the male patrons of the Bars whether or not the Honduran females had attained the age of 21. The juvenile Honduran females were instructed by members of the conspiracy to obtain false identification documents to facilitate their ability to work in the Bars, and to hide from law enforcement officers should any enter the Bars.

f. Defendants NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, NANCY ROSALES MARTINEZ, JOSE DIMAS MAGANA and

others informed the Honduran females that until the smuggling debt was repaid, the Honduran females were required to reside in the 22<sup>nd</sup> Street Apartment, the New York Avenue Apartment or the 68<sup>th</sup> Street Apartment, (collectively "the Apartments") where their activities could be closely monitored.

g. Defendants NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, NANCY ROSALES MARTINEZ, JOSE DIMAS MAGANA and others attempted to restrict the Honduran females' freedom of movement by causing them to be escorted from the Apartments to the Bars and back again.

h. Defendants NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, NANCY ROSALES MARTINEZ, JOSE DIMAS MAGANA and others would, on various occasions, threaten the Honduran females and their families with physical harm if the women attempted to leave the Bars prior to paying off their smuggling debts in full. On other occasions, defendants ANA LUZ ROSALES MARTINEZ, NANCY ROSALES MARTINEZ, JOSE DIMAS MAGANA and others, physically assaulted women who violated the rules they had established for the Honduran females living in the Apartments as a means of intimidating the women and preventing them from attempting to leave. In addition, the Honduran females were threatened that they would be captured and deported by Immigration authorities if they failed to follow the rules established by the conspirators.

i. On several occasions, defendants NORIS ELVIRA

ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, NANCY ROSALES MARTINEZ, JOSE DIMAS MAGANA and others forced certain of the Honduran females who were pregnant to take abortion-inducing medication for the purpose of maximizing their earning potential as employees at the Bars, and made them return to work in the Bars within days of having taken the medication.

j. Defendant ROSALBA ORTIZ collected money on a weekly basis for the "Sociedad" - a system by which the Honduran females were forced to pool the money which they had earned at the Bars to help pay off the debt of one of the Honduran females who had been working at the Bars for the longest period of time - to be used to repay their smuggling debts.

k. Defendant LUISA MEDRANO owned and controlled the Apartments where the Honduran females were forced to reside and the Bars where they were forced to work. MEDRANO received rent monies from the Honduran females for the Apartments and profited from their labor at the Bars.

#### Overt Acts

5. In furtherance of this conspiracy and to effect the object thereof, the defendants and their co-conspirators committed and caused to be committed the following overt acts, among others, within the District of New Jersey and elsewhere:

a. In or about April 2003, defendants NANCY ROSALES MARTINEZ, LOURDES ROSALES, and others arranged for a 14-year old

undocumented Honduran female (hereinafter "S.R.R."), to be smuggled into the United States from the Republic of Honduras.

b. In or about May 2003, defendants LUISA MEDRANO, NANCY ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ and NORIS ELVIRA ROSALES MARTINEZ, and others, provided employment for S.R.R. at a bar in the Union City, New Jersey area.

c. In or about February 2004, defendant ZENIA ZUNILDA MARTINEZ turned over another 14-year old undocumented Honduran female (hereinafter "I.R.T.") to defendant JOSE ISAULA to be smuggled from the Republic of Honduras into the United States.

d. In or about March 2004, defendant NANCY ROSALES MARTINEZ advised I.R.T. that she owed a \$15,000 smuggling fee.

e. In or about April 2004, defendants NANCY ROSALES MARTINEZ and NORIS ELVIRA ROSALES MARTINEZ forced I.R.T. to work at El Paisano Bar, six days a week from 6:00 p.m. to 2:00 a.m., until such time as I.R.T. could pay off her smuggling debt.

f. In or about April 2004, defendant LUISA MEDRANO told I.R.T. to obtain a false identification to be used at El Paisano Bar, which listed I.R.T.'s age as 21 years old instead of 14 years old, to be produced to authorities if necessary to falsely represent to authorities that I.R.T. was of legal drinking age.

g. In or about June 2004, defendant ZENIA ZUNILDA MARTINEZ turned over a 17-year old undocumented Honduran female (hereinafter "A.A.H.") to defendant JOSE ISAULA to be smuggled from the Republic of Honduras into the United States.

h. In or about June 2004, defendant ZENIA ZUNILDA MARTINEZ turned over a 15-year old undocumented Honduran female (hereinafter "P.R.M.") to defendant JOSE ISAULA to be smuggled from the Republic of Honduras into the United States.

i. In or about June 2004, defendant JOSE ISAULA arranged for A.A.H., P.R.M. to be smuggled from the Republic of Honduras into the United States.

j. In or about June 2004, while being smuggled from the Republic of Honduras to the United States by defendant JOSE ISAULA, P.R.M. was sexually assaulted by ISAULA.

k. In or about July 2004, defendants NANCY ROSALES MARTINEZ, NORIS ELVIRA ROSALES MARTINEZ and JOSE DIMAS MAGANA forced A.A.H. to go to work at El Paisano Bar.

l. In or about July 2004, defendant NANCY ROSALES MARTINEZ struck P.R.M. in the face, resulting in a black eye and burst blood vessels in P.R.M.'s eyeball.

m. In or about August 2004, defendant NANCY ROSALES MARTINEZ beat I.R.T. with a belt, causing welts on I.R.T.'s body from where the belt had struck her.

n. In or about August 2004, defendant ROSALBA ORTIZ collected money for the "Sociedad" from A.A.H. to be used to repay the smuggling debt of A.A.H..

o. In or about November 2004, defendant JOSE DIMAS MAGANA traveled from New Jersey to Honduras and visited the home of defendant NANCY ROSALES MARTINEZ where he met a 38-year old undocumented Honduran female (hereinafter "A.M.V."), who he learned would be in the group traveling to the United States that month. MAGANA patted A.M.V. on the shoulder and told her she could make a lot of money with her body if she lost a little weight.

p. In or about November 2004, defendant NANCY ROSALES MARTINEZ, JOSE DIMAS MAGANA, and others arranged for A.M.V., and a 17-year old undocumented Honduran female (hereinafter "W.H.A."), and others to be smuggled by defendant JOSE ISAULA from the Republic of Honduras into the United States.

q. In or about December 2004, defendant ELSA ISAULA met W.H.A. in Houston, Texas, and arranged for her to be transported to New York, New York.

r. In or about December 2004, defendant ELSA ISAULA also met a 23-year old undocumented Honduran female (hereinafter "M.H.A.") in Houston, Texas, and arranged for her to be transported to the New York area.

s. In or about December 2004, defendants NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ and JOSE DIMAS MAGANA met W.H.A. and M.H.A. upon their arrival at a bus station in New York, New York.

t. In or about December 2004, defendants NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ and JOSE DIMAS MAGANA met a 24-year old undocumented Honduran female who had been smuggled into the United States from Honduras (hereinafter "R.R.F.") upon her arrival at a bus station in New York, New York, and transported her to the 68<sup>th</sup> Street Apartment.

u. In or about December 2004, defendants NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, JOSE DIMAS MAGANA, and others informed R.R.F. that she owed a smuggling fee of \$20,000, which would have to be repaid at a rate of \$500 a week over a 10-month period. R.R.F. was informed that she was required to begin working at the 68<sup>th</sup> Street Bar immediately in order to satisfy this smuggling debt.

v. In or about December 2004, defendant JOSE DIMAS MAGANA told a coconspirator, in the presence of R.R.F., that if "any of these bitches get out of line, you should beat them."

w. In or about December 2004, defendant JOSE DIMAS MAGANA instructed a coconspirator, in the presence of R.R.F., to make sure that the rules of the house were followed.

x. From in or about December 2004 until on or about January 20, 2005, defendants ELVIRA ROSALES MARTINEZ and JOSE DIMAS MAGANA forced a 32-year old undocumented Honduran female who had been smuggled from Honduras into the United States (hereinafter "A.M.R.") to reside at the 68<sup>th</sup> Street Apartment.

y. From in or about December 2004 until on or about January 20, 2005, defendants ELVIRA ROSALES MARTINEZ and JOSE DIMAS MAGANA forced M.H.A., W.H.A., A.M.R. and a 21-year old undocumented Honduran female who had been smuggled into the United States from Honduras (hereinafter "L.D.N.") to work at least six days per week at the 68<sup>th</sup> Street Bar, until such time as they had satisfied their smuggling debts.

z. From in or about December 2004 until on or about January 20, 2005, defendant JOSE DIMAS MAGANA escorted W.H.A. and M.H.A., on a daily basis, from the New York Avenue Apartment to work at El Paisano Bar, thereby minimizing their exposure to members of the public and reducing the chance that the conspiracy would be detected.

aa. In or about December 2004, defendant JOSE DIMAS MAGANA struck W.H.A. in the head and pushed her into the front door, after he observed W.H.A. talking with a man on the street to whom she had not been given permission to speak by MAGANA and who was not patronizing one of the Bars.

bb. In or about January 2005, defendant ANA LUZ ROSALES MARTINEZ threatened to strike A.M.V. in the future if A.M.V. failed to obey the rules that had been established by the conspirators at the New York Avenue Apartment.

cc. In or about January 2005, upon learning that A.A.H. was pregnant, defendant NORIS ELVIRA ROSALES MARTINEZ informed A.A.H. that she would be required to have an abortion so that she would be able to continue to work at El Paisano Bar and pay off her smuggling debt. Defendant NORIS ELVIRA ROSALES MARTINEZ provided A.A.H. with the name of an abortion clinic as well as \$300 to pay for the abortion. The clinic refused to perform the procedure because A.A.H.'s pregnancy was too far advanced, and A.A.H. was required to return the \$300 to defendant NORIS ELVIRA ROSALES MARTINEZ.

dd. On or about January 9, 2005, defendant NORIS ELVIRA ROSALES MARTINEZ forced L.D.N. to take a pregnancy test, and upon learning that L.D.N. was pregnant, informed L.D.N. that she would be required to have an abortion so that they would be able to continue to work at the Bar and pay off her smuggling debt.

ee. On or about January 9, 2005 and again on or about January 10, 2005, defendant NORIS ELVIRA ROSALES MARTINEZ forced L.D.N. to ingest pills designed to induce a spontaneous abortion.

ff. On or about January 10, 2005, defendants NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, JOSE DIMAS MAGANA and others attempted to conceal the fact that L.D.N. had given birth to a live, female infant who died shortly after being born. Among other things, these conspirators coerced L.D.N. to falsely misrepresent the circumstances of the birth to admission personnel at Meadowlands Hospital Medical Center by threatening L.D.N. that she would be imprisoned by U.S. authorities if she revealed the actual facts about the birth.

gg. On or about January 20, 2005, upon learning of a law enforcement investigation into the defendants' activities, defendant LUISA MEDRANO provided temporary shelter for S.R.R., defendant NORIS ELVIRA ROSALES MARTINEZ and others. Defendant LUISA MEDRANO provided S.R.R. with \$100 and defendant NORIS ELVIRA ROSALES MARTINEZ with \$1,000 and instructed both to leave New Jersey to avoid being imprisoned.

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

COUNTS TWO THROUGH ELEVEN  
(Forced Labor)

1. Paragraphs 1, 3, 4 and 5 of Count One of this Indictment are realleged as if set forth in full herein.

2. Beginning at least as early as in or about May 2003 and continuing until at least as late as on or about January 20, 2005, in Hudson County, in the District of New Jersey and elsewhere, defendants

LUISA MEDRANO;  
NORIS ELVIRA ROSALES MARTINEZ,  
a/k/a "Noris Elvira Sandoval;"  
ANA LUZ ROSALES MARTINEZ;  
NANCY FLORIDALMA ROSALES MARTINEZ,  
a/k/a "Morena;"  
JOSE DIMAS MAGANA,  
a/k/a "Pelon;"  
and ROSALBA ORTIZ

and others, did knowingly and willfully provide and obtain and attempt to provide and obtain the labor and services of the Honduran females listed below for each of Counts Two through Eleven, by threats of serious harm to and physical restraint against those persons and other persons, and by means of a scheme, plan and pattern intended to cause those persons to believe that, if those persons did not perform such labor and services, those persons and other persons would suffer serious harm and physical restraint, and by means of the abuse and threatened abuse of the law and the legal process:

<b>Count</b>	<b>Victim</b>	<b>Approximate Dates</b>	<b>Defendants</b>
2	S.R.R.	May 2003 - January 2005	NANCY ROSALES MARTINEZ, NORIS ELVIRA ROSALES MARTINEZ, JOSE DIMAS MAGANA and ANA LUZ ROSALES MARTINEZ
3	I.R.T.	March 2004 - January 2005	NANCY ROSALES MARTINEZ, NORIS ELVIRA ROSALES MARTINEZ, JOSE DIMAS MAGANA and ANA LUZ ROSALES MARTINEZ
4	A.A.H.	July 2004 - January 2005	LUISA MEDRANO, NANCY ROSALES MARTINEZ, NORIS ELVIRA ROSALES MARTINEZ, JOSE DIMAS MAGANA and ANA LUZ ROSALES MARTINEZ
5	P.R.M.	July 2004 - January 2005	LUISA MEDRANO, NANCY ROSALES MARTINEZ, NORIS ELVIRA ROSALES MARTINEZ, JOSE DIMAS MAGANA and ANA LUZ ROSALES MARTINEZ
6	A.M.V.	December 2004- January 2005	LUISA MEDRANO, NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, JOSE DIMAS MAGANA and ROSALBA ORTIZ
7	M.H.A.	December 2004 - January 2005	LUISA MEDRANO, NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, JOSE DIMAS MAGANA and ROSALBA ORTIZ

8	W.H.A.	December 2004 - January 2005	LUISA MEDRANO, NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, JOSE DIMAS MAGANA and ROSALBA ORTIZ
9	R.R.F.	December 2004 - January 2005	LUISA MEDRANO, NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, JOSE DIMAS MAGANA and ROSALBA ORTIZ
10	A.M.R.	December 2004 - January 2005	LUISA MEDRANO, NORIS ELVIRA ROSALES MARTINEZ, JOSE DIMAS MAGANA and ROSALBA ORTIZ
11	L.D.N.	December 2004- January 2005	LUISA MEDRANO, NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ MARTINEZ ROSALES, JOSE DIMAS MAGANA and ROSALBA ORTIZ

All in violation of Title 18, United States Code, Sections  
1589 and 1594(a).

COUNTS TWELVE THROUGH TWENTY-ONE  
(Alien Smuggling)

1. Paragraphs 1, 3, 4 and 5 of Count One of this Indictment are realleged as if set forth in full herein.

2. On or about the dates listed below, in Hudson County, in the District of New Jersey and elsewhere, the defendants listed below as to each count, while aiding and abetting one another, did bring and attempt to bring into the United States, aliens, at a place other than a designated port of entry or at a place other than as designated by the Commissioner of the Immigration and Naturalization Service, knowing the persons were aliens, as follows:

<b>Count</b>	<b>Alien</b>	<b>Dates</b>	<b>Defendants</b>
12	S.R.R.	April 2003 - January 2005	JOSE ISAULA, NANCY ROSALES MARTINEZ and NORIS ELVIRA ROSALES MARTINEZ
13	I.R.T.	February 2004 - January 2005	ZENIA ZUNILDA ROSALES, LOURDES ROSALES, JOSE ISAULA, ELSA ISAULA and NANCY ROSALES MARTINEZ
14	P.R.M.	June 2004 - January 2005	ZENIA ZUNILDA ROSALES, JOSE ISAULA, ELSA ISAULA, NANCY ROSALES MARTINEZ and NORIS ELVIRA ROSALES MARTINEZ
15	A.A.H.	June 2004 - January 2005	LOURDES ROSALES, JOSE ISAULA, ELSA ISAULA and NANCY ROSALES MARTINEZ

16	A.M.V	November 15, 2004- January 2005	LUISA MEDRANO, NANCY ROSALES MARTINEZ and JOSE DIMAS MAGANA
17	M.H.A.	November 15, 2004 - January 2005	NANCY ROSALES MARTINEZ, JOSE ISAULA, ELSA ISAULA, NORIS ELVIRA ROSALES MARTINEZ and JOSE DIMAS MAGANA
18	W.H.A.	November 15, 2004 - January 2005	NANCY ROSALES MARTINEZ, JOSE ISAULA, ELSA ISAULA, NORIS ELVIRA ROSALES MARTINEZ and JOSE DIMAS MAGANA
19	R.R.F.	November 15, 2004 - January 2005	NANCY ROSALES MARTINEZ, NORIS ELVIRA ROSALES MARTINEZ and JOSE DIMAS MAGANA
20	A.M.R	November 15, 2004 - January 2005	ZENIA ZUNILDA ROSALES, NANCY ROSALES MARTINEZ, JOSE ISAULA, ELSA ISAULA and NORIS ELVIRA ROSALES MARTINEZ
21	L.D.N.	November 15, 2004- January 2005	ZENIA ZUNILDA ROSALES, NANCY ROSALES MARTINEZ, JOSE ISAULA, ELSA ISAULA and NORIS ELVIRA ROSALES MARTINEZ

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

COUNTS TWENTY-TWO THROUGH THIRTY ONE  
(Harboring Illegal Aliens)

1. Paragraphs 1, 3, 4 and 5 of Count One of this Indictment are realleged as if set forth in full herein.

2. On or about the dates listed below, in Hudson County, in the District of New Jersey and elsewhere, the defendants listed below as to each count, while aiding and abetting one another, for the purpose of commercial advantage and private financial gain, did conceal, harbor, and shield aliens from detection, and attempt to conceal, harbor, and shield aliens from detection in places within the United States, knowing and in reckless disregard of the fact that the aliens had come to, entered, and remained within the United States in violation of law, as follows:

<b>Count</b>	<b>Alien</b>	<b>Dates</b>	<b>Defendants</b>
22	S.R.R.	May 2003 - January 2005	NANCY ROSALES MARTINEZ, NORIS ELVIRA ROSALES MARTINEZ, JOSE DIMAS MAGANA and ANA LUZ ROSALES MARTINEZ
23	I.R.T.	March 2004 - January 2005	NANCY ROSALES MARTINEZ, NORIS ELVIRA ROSALES MARTINEZ, JOSE DIMAS MAGANA and ANA LUZ ROSALES MARTINEZ
24	P.R.M.	July 2004 - January 2005	LUISA MEDRANO, NANCY ROSALES MARTINEZ, NORIS ELVIRA ROSALES MARTINEZ, JOSE DIMAS MAGANA and ANA LUZ ROSALES MARTINEZ

25	A.A.H.	July 2004 - January 2005	LUISA MEDRANO, NANCY ROSALES MARTINEZ, NORIS ELVIRA ROSALES MARTINEZ, JOSE DIMAS MAGANA, ANA LUZ ROSALES MARTINEZ and ROSALBA ORTIZ
26	A.M.V	December 2004 - January 2005	LUISA MEDRANO, NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ, ELSA ISAULA and JOSE DIMAS MAGANA
27	M.H.A.	December 2004 - January 2005	LUISA MEDRANO, NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ and JOSE DIMAS MAGANA
28	W.H.A.	December 2004 - January 2005	LUISA MEDRANO, NORIS ELVIRA ROSALES MARTINEZ, ANA LUZ ROSALES MARTINEZ and JOSE DIMAS MAGANA
29	R.R.F.	December 2004 - January 2005	LUISA MEDRANO, NORIS ELVIRA ROSALES MARTINEZ, JOSE DIMAS MAGANA and ROSALBA ORTIZ
30	A.M.R	December 2004 - January 2005	LUISA MEDRANO, NORIS ELVIRA ROSALES MARTINEZ, JOSE DIMAS MAGANA and ROSALBA ORTIZ
31	L.D.N.	December 2004- January 2005	LUISA MEDRANO, NORIS ELVIRA ROSALES MARTINEZ, ELSA ISAULA, JOSE DIMAS MAGANA and ROSALBA ORTIZ

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

FIRST FORFEITURE ALLEGATION

1. The Grand Jury realleges and incorporates by reference the allegations contained in this Indictment for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 1594(b).

2. As the result of committing one or more of the offenses in violation of 18 U.S.C. § 1589, alleged in Count 1 and Counts 4 through 11 of this Indictment, defendant LUISA MEDRANO shall forfeit to the United States pursuant to 18 U.S.C. § 1594(b) her interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation, and any property, real or personal, constituting or derived from, any proceeds she obtained, directly or indirectly, as a result of such violation, including but not limited to the following:

**A. Proceeds of Criminal Activity**

A sum of money equal to the amount of proceeds obtained as a result of the offense for which the defendant is liable.

**B. Real Property**

- a) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 75 68<sup>th</sup> Street West New York, New Jersey 07093 in Hudson County, New Jersey, more particularly described as: Lot number 8, Block 33; District: 10.

- b) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 2604 New York Avenue, Union City, New Jersey 07087 in Hudson County, New Jersey, more particularly described as: Lot number 3, Block 150; District: 10.
- c) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 509 22<sup>nd</sup> Street, Union City, New Jersey 07087 in Hudson County, New Jersey, more particularly described as: Lot number 9, Block 114; District: 10.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 1589, to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

Pursuant to Title 18, United States Code, Section 1594(b).

SECOND FORFEITURE ALLEGATION

1. The Grand Jury realleges and incorporates by reference the allegations contained in this Indictment for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 1594(b).

2. As the result of committing one or more of the offenses in violation of 18 U.S.C. § 1589, alleged in Counts 1 through 11 of this Indictment, defendant JOSE DIMAS MAGANA shall forfeit to the United States pursuant to 18 U.S.C. § 1594(b) his interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation, and any property, real or personal, constituting or derived from, any proceeds he obtained, directly or indirectly, as a result of such violation, including but not limited to United States currency in the amount of \$4,113.93, which was seized on or about February 9, 2005.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 1589, to seek forfeiture of any property of said defendant up to the value of the above forfeitable property.

Pursuant to Title 18, United States Code, Section 1594(b).

A TRUE BILL

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FOREPERSON

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CHRISTOPHER J. CHRISTIE  
United States Attorney