

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF SOUTH CAROLINA
 GREENWOOD DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO. <u>8:23-cr-7</u>
)	8 U.S.C. § 1324(a)(1)(A)(ii).
)	8 U.S.C. § 1324(b)(1)
)	18 U.S.C. § 1201(a)(1)
)	18 U.S.C. § 1201(g)
)	18 U.S.C. § 981(a)(1)(C)
)	18 U.S.C. § 981(a)(6)(A)
BERNANDINO DE JESUS)	28 U.S.C. § 2461(c)
RAMIREZ RAMIREZ,)	
a/k/a “Carlos Mendoza”)	<u>INDICTMENT</u>

COUNT 1

(Kidnapping)

THE GRAND JURY CHARGES:

Beginning on or about April 5, 2023 and continuing through April 6, 2023, in the District of South Carolina and elsewhere, the defendant, **BERNANDINO DE JESUS RAMIREZ RAMIREZ, a/k/a “Carlos Mendoza,”** did unlawfully and willfully seize, confine, inveigle, decoy, kidnap, abduct, carry away and hold Minor Victim 1 for reward and any other reason, and, in committing or in furtherance of the commission of the offense, Minor Victim 1 was willfully transported and travelled in interstate commerce from the state of South Carolina to the state of Missouri; all while Minor Victim 1 had not attained the age of eighteen years old and **BERNANDINO DE JESUS RAMIREZ RAMIREZ, a/k/a “Carlos Mendoza,”** had attained the age of eighteen years old and was not the parent, grandparent, brother, sister, aunt, uncle or other persona having legal custody of Minor Victim 1;

In violation of Title 18, United States Code, Sections 1201(a)(1) and (g).

COUNT 2

(Transporting Alien)

THE GRAND JURY FURTHER CHARGES:

Beginning on or about April 5, 2023 and continuing through April 6, 2023, in the District of South Carolina and elsewhere, the defendant, **BERNANDINO DE JESUS RAMIREZ RAMIREZ, a/k/a “Carlos Mendoza,”** knowing and in reckless disregard of the fact that a certain alien, Minor Victim 1, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States by means of transportation and otherwise in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain;

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

FORFEITURE

TRANSPORTING ALIEN:

Upon conviction for violation of Title 8, United States Code, Section 1324 as charged in this Indictment, the Defendant, **BERNANDINO DE JESUS RAMIREZ RAMIREZ, a/k/a "Carlos Mendoza,"** shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendant obtained directly or indirectly as a result of such offense, and any property, real or personal, that was used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense.

KIDNAPPING:

Upon conviction for violation of Title 18, United States Code, Section 1201 as charged in this Indictment, the Defendant, **BERNANDINO DE JESUS RAMIREZ RAMIREZ, a/k/a "Carlos Mendoza,"** shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendant obtained directly or indirectly as a result of such offense.

PROPERTY:

Pursuant to 8 U.S.C. § 1324(b)(1), 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(6)(A), and 28 U.S.C. § 2461(c), the property which is subject to forfeiture upon conviction of the Defendant, includes, but is not limited to, the following:

Forfeiture/Proceeds Judgment:

A sum of money equal to all proceeds the Defendant obtained, directly or indirectly, from the offenses charged in this Indictment, in an amount to be determined, and all interest and proceeds traceable thereto as the result of his violations of Title 18.

SUBSTITUTE ASSETS:

If any of the property described above, as a result of any act or omission of the Defendant:

- 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.

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the Defendant up to an amount equivalent to the value of the forfeitable property;

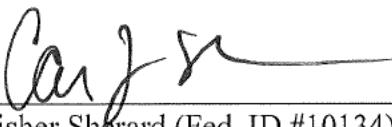
Pursuant to Title 8, United States Code, Section 1324(b)(1), Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(6)(A), and Title 28, United States Code, Section 2461(c).

A TRUE Bill



FOREPERSON

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