

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA .
VERSUS . Criminal Action
Luis Alberto Ojeda Medina, . No. H-12-CR-305-10
Houston, Texas
September 24, 2024
10:08 a.m.
Defendant. .
.

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE LEE H. ROSENTHAL
MOTION HEARING

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PROCEEDINGS RECORDED BY STENOGRAPHIC MEANS,
TRANSCRIPT PRODUCED FROM COMPUTER-AIDED TRANSCRIPTION

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1 PROCEEDINGS

2 September 24, 2024

3 THE COURT: All right. Are we ready in United States
4 versus Medina?

10:08:30 5 MR. AHMED: Yes, your Honor.

6 THE COURT: Come on up.

7 THE CASE MANAGER: Ms. Serna is going to be the first
8 witness and Ramon is on Zoom with her --

9 THE COURT: Okay.

10:08:31 10 THE CASE MANAGER: -- so that he can talk to her.

11 THE COURT: We're going to need two interpreters.

12 MR. AHMED: My understanding, Judge, I spoke by email
13 to Mr. Ramon a few weeks ago and he said that he could interpret
14 for both of them.

10:09:13 15 THE COURT: Great.

16 THE DEFENDANT: I don't think so. I mean, I've been
17 understanding everything that she said. So, if she understands
18 me --

19 THE COURT: So, perhaps, Ramon can be available on a
10:09:21 20 stand-by basis as needed.

21 THE DEFENDANT: Yes, that's fine. Thank you, your
22 Honor.

23 THE CASE MANAGER: All right. I'll email him to come
24 up here once he finishes with her, and that way he'll be in the
10:09:31 25 courtroom. Will that work?

1 THE COURT: No. Because if the defendant needs
2 assistance as we proceed through that witness -- well, she's
3 going to be --

10:09:43

4 THE CASE MANAGER: She's going to be the first
5 witness.

6 THE COURT: All right, that's fine. That should work.

7 THE CASE MANAGER: And I'll send him a text to come up
8 here immediately when we're finished.

9 THE COURT: That's fine.

10:09:47

10 THE CASE MANAGER: And she's just going to stay on and
11 watch --

12 THE COURT: That's fine.

13 THE CASE MANAGER: -- when we're done.

14 THE COURT: Okay. Go ahead and state your
15 appearances, please.

10:09:53

16 MR. LIDDLE: Good morning, your Honor. Keith Liddle
17 on behalf of the United States of America. Good morning.

18 MR. IMPERATO: Ted Imperato for the United States,
19 your Honor.

10:10:05

20 MS. WILLIAMSON: Good morning, your Honor. Stephanie
21 Williamson for the United States.

22 MR. NEIDER: Good morning. Harrison Neider for the
23 United States.

24 MR. AHMED: Amr Ahmed for Luis Medina. And we have
25 Jessica Mireles, my paralegal.

10:10:13

1 THE COURT: And Mr. Medina is present -- Mr. Ojeda.

2 All right. We're here on the motion to dismiss
3 the indictment. The issue is the 11-year delay between almost
4 -- between the indictment and the arrest of Mr. Ojeda, whether
10:10:33 5 that violated his Sixth Amendment right to a speedy trial.

6 So, as I understand the case law -- and my law
7 clerk has done a wonderful job of laying it out for me -- I have
8 to balance four factors: the length of the delay, the reason
9 for the delay, whether the defendant has asserted his right to a
10:10:56 10 speedy trial, and prejudice from the delay.

11 There is no issue as to the length of the delay
12 or for the third factor, the assertion of the right. I think
13 we're looking at two factors: the reasons for the delay and
14 prejudice to the defendant from the delay.

10:11:16 15 Anybody have a different understanding of the
16 legal issues we have to resolve today?

17 MR. LIDDLE: Well, your Honor, unless your Honor's
18 position is that the assertion factor goes strongly against the
19 defendant. That's certainly the government's position.

10:11:38 20 THE COURT: All right.

21 MR. LIDDLE: I think it would be hard for us to find
22 facts that indicate more strongly a defendant who wanted to
23 avoid trial than this case.

24 MR. AHMED: And, obviously, Judge, we conceded in some
10:11:55 25 of our writings that that third factor may go against the

1 defendant.

2 THE COURT: Yeah, I agree. I think what we are
3 looking at primarily, though, is the reason for the delay and
4 the prejudice.

10:12:05 5 MR. AHMED: Yes.

6 THE COURT: All right.

7 MR. AHMED: I just need a moment to gather my papers.

8 THE COURT: I'm sorry?

9 MR. AHMED: I just need a moment to gather my papers.

10:12:38 10 THE COURT: So, I think we are ready to hear the
11 evidence that the parties want to present.

12 MR. AHMED: Yes, your Honor. If your Honor would like
13 our witness to go first, I just want to make sure that she is
14 available on Zoom.

10:12:51 15 THE COURT: That's fine.

16 MR. AHMED: She's logged in.

17 THE INTERPRETER: Your Honor, this is the interpreter
18 speaking. I had her available, and she asked me to try a
19 different number. And now, I'm not able to get through with
10:13:06 20 that number; and we haven't had a chance to set it up. So, I
21 can do this in person; but I need to get down to the courtroom
22 -- or up there. If I may just have a moment --

23 THE COURT: Of course.

24 THE INTERPRETER: -- then we'll have it consecutively.

10:13:15 25 THE COURT: That's fine.

1 THE INTERPRETER: And I can do it from there. Because
2 this is going to take too long to set up. Thank you, your
3 Honor. I'm on my way.

4 THE COURT: Thank you.

10:13:20

5 THE INTERPRETER: Sorry.

6 THE COURT: So, in the meantime, perhaps, the parties
7 can tell me what witnesses are going to be testifying and in
8 what order.

10:13:34

9 MR. AHMED: Your Honor, on the defense, we have one
10 witness, which is defendant's wife; and I gave her name to the
11 court reporter. Her name is Raquel Cecilia.

12 THE COURT: And is that going to be the first witness?

13 MR. AHMED: It is.

14 THE COURT: All right.

10:13:54

15 MR. AHMED: That's our only witness.

16 THE COURT: On the government's side?

17 MR. LIDDLE: Your Honor, on the government's side, two
18 witnesses very brief: DEA Special Agent Kedwin Polanco and IRS
19 CI Special Agent Harrison Neider. Both very brief, your Honor.

10:14:18

20 THE COURT: Very good.

21 Do we agree that there's no dispute as to how
22 long the delay was between indictment and arrest? That's
23 undisputed, correct?

24 MR. AHMED: I think so.

10:14:27

25 MR. LIDDLE: I think so, your Honor.

1 THE COURT: All right.

2 MR. AHMED: Your Honor, just a housekeeping issue:
3 Would the Court allow my client to have one hand free so he can
4 write?

10:15:05 5 THE COURT: Certainly.

6 Will the marshals take care of that, please?

7 THE MARSHAL: Yes, your Honor.

8 THE COURT: Thank you.

9 Thank you, Ramon.

10:15:08 10 THE INTERPRETER: Yes, your Honor.

11 THE COURT: Thank you.

12 If I may, the Court understands -- and the
13 parties can correct me if I am wrong -- that there are
14 categories that the reported case law, specifically, the DC
10:16:14 15 Circuit, has proposed to determine who is to blame for the
16 delay.

17 The first category doesn't apply here, cases in
18 which the defendant was unaware of the charges and left the
19 country for unrelated reasons, made no attempts to avoid
10:16:36 20 detection. I don't think that's present here. I think the --
21 as I understand the record, the defendant is not going to say he
22 was unaware of the charges.

23 Is that correct?

24 MR. AHMED: I think he was aware there was an
10:16:48 25 investigation but not charges.

1 THE COURT: All right.

2 MR. LIDDLE: The government disagrees with that, your
3 Honor.

4 THE COURT: So, one of the areas of dispute is whether
10:17:01 5 he was aware of the investigation or that charges --

6 MR. AHMED: Yes.

7 THE COURT: -- were imminent or had resulted?

8 MR. AHMED: Yes.

9 THE COURT: All right. Second category is the
10:17:17 10 defendant who lives under a false name and clearly is attempting
11 to hide. My understanding is that the defendant did not live
12 under an assumed name or fall into the category of that kind of
13 effort to avoid detection.

14 Is that accurate?

10:17:46 15 MR. AHMED: I think so, your Honor.

16 MR. LIDDLE: There is no evidence --

17 THE COURT REPORTER: I'm sorry. I can't hear you.

18 MR. LIDDLE: There is no evidence in the record that
19 the defendant lived under another name.

10:17:56 20 THE COURT: Okay. And so, we are looking at a third
21 category in which the defendant is aware of -- either -- and
22 we'll talk about investigation or charges -- leaves the country
23 and does -- but does not attempt to avoid detection by living
24 under a false name or conducting businesses under false
10:18:35 25 pretenses.

1 And in this circumstance, do the parties agree
2 that it is the burden on -- that the burden is on the government
3 to justify the delay?

4 MR. AHMED: Because of the length of the delay, I
10:18:48 5 think the --

6 THE COURT REPORTER: I'm sorry?

7 MR. AHMED: Because of the length of the delay, I
8 think the burden is on the government to justify that.

9 MR. LIDDLE: The government would agree with that
10:19:04 10 statement literally; but it does not mean that the government's
11 got to come in and show that, you know, it did everything
12 possible.

13 THE COURT: I agree.

14 MR. LIDDLE: The government has to show it acted
10:19:16 15 diligently. And it also doesn't mean that it's irrelevant what
16 the defendant did. This is a balancing test, who is more to
17 blame.

18 THE COURT: All right. And the question of prejudice
19 -- the burden of showing prejudice is on the defendant,
10:19:41 20 correct?

21 MR. AHMED: Unless it's presumed which we argue that
22 it is in this case.

23 THE COURT: All right. Anything beyond the
24 presumption that you speak to, it would be the defendant's
10:19:55 25 obligation to show?

1 MR. AHMED: I believe so, yes.

2 THE COURT: All right.

3 MR. LIDDLE: And, your Honor, if I could be heard on
4 that, you know, the case law is pretty clear all of the factors
10:20:06 5 have to be heavily in favor of defendant. And in this case,
6 again, I think we'd be hard-pressed to find facts showing more
7 strongly the defendant did not want to go to trial.

8 So, it's the government's position that that is
9 heavily against the defendant. So, automatically, the burden is
10:20:26 10 on the defendant to prove prejudice.

11 MR. AHMED: And I would disagree with that, Judge.
12 There are cases that say some of the factors can weigh in favor
13 of the defendant or the government and there's still a
14 presumption. The DC case and the *Laws* case --

15 THE COURT REPORTER: I'm sorry?

16 THE COURT: Let's hear what the evidence says.

17 THE COURT REPORTER: I didn't hear the cases.

18 MR. AHMED: The DC case and the *Laws* case, Fifth
19 Circuit.

10:20:51 20 THE COURT: All right. I will certainly have to
21 decide the details and who has what burden and whether that
22 burden has been satisfied. So, let me hear the evidence that I
23 need in order to make that determination.

24 Call your first witness.

10:21:15 25 MR. AHMED: She is on Zoom, Judge. I will call the

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1 defendant's wife. Her name is Raquel Cecilia Avevalo Serna.

2 THE COURT: Okay. Is she here by Zoom or otherwise?

3 MR. AHMED: May I ask questions while seated, your
4 Honor?

10:21:40 5 THE COURT: Yes, certainly.

6 THE INTERPRETER: The interpreter is speaking. It is
7 important that everyone speak into the mike or the witness will
8 not be able to hear you.

9 (The witness was not sworn at this time and stated her
10:21:54 10 answers on Zoom through an interpreter.)

11 DIRECT EXAMINATION

12 BY MR. AHMED:

13 Q Good morning. Can you hear us?

14 A Yes. Yes. I hear the interpreter.

10:22:04 15 Q Are you able to see me in the courtroom? I'm waving my
16 hand.

17 A No.

18 Q Okay. That's fine. Can you please introduce yourself.
19 What is your name?

10:22:25 20 A I'm sorry. Could the interpreter speak a little more
21 clearly to me because sometimes the sound becomes noisy. I
22 don't know if he can step away a little bit from the mike and
23 perhaps I can hear it better.

24 THE INTERPRETER: I'm going to proceed consecutively
10:22:47 25 from this point on. I'm going to hang up the phone, and we can

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1 take turns speaking one at a time.

2 THE WITNESS: I'm sorry. I lost my communication. I
3 can only hear you through Zoom, not by telephone anymore.

4 THE INTERPRETER: The interpreter is speaking. Yes.

10:23:14 5 We are going to proceed only by Zoom in a consecutive manner.

6 BY MR. AHMED:

7 Q Please introduce yourself.

8 A My name is Raquel Cecilia Avevalo Serna.

9 Q I'm going to direct your attention to a letter. It's
10:23:36 10 Docket Number 324-2, first page. We're going to try to share
11 the screen so that you're able to see that.

12 MR. AHMED: I think our paralegal just needs
13 permission to share the screen with the witness, your Honor.

14 THE COURT: We'll get Ms. Eddins to help with that.
10:24:23 15 Hang on.

16 BY MR. AHMED:

17 Q You wrote a letter for this hearing; is that correct?

18 A That is correct.

19 Q And you -- how long have you been married to Luis?

10:24:41 20 A Twenty-nine years.

21 Q How many children do you have together?

22 A We have five children.

23 Q And how old are they?

24 A My oldest daughter is 27 years old.

10:25:03 25 Q And the youngest is 14?

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1 **A** That's right.

2 **Q** What do you do for work?

3 **A** Well, first of all, I raised my children; and I take care
4 of my house which is a lot of work; and I also create
5 educational materials.

10:25:31

6 **Q** Where have you and Luis been living before he was arrested?

7 **A** Before he was arrested, we used to live at Obsidiana 2424.

8 **Q** And is that a rented house?

9 **A** That's right.

10:26:07

10 **Q** And is that in the State of Jalisco, Mexico?

11 **A** That's right.

12 **Q** And is that in a municipality called Zapopan?

13 **A** That's right.

14 **Q** And is Zapopan a municipality of Guadalajara?

10:26:40

15 **A** Zapopan is a municipality of Jalisco. It's just next to
16 Guadalajara.

17 **Q** And you have lived in Zapopan with Luis since what year?

18 **A** The majority of our married life, we have lived in Zapopan.

19 **Q** In 2011, did you move to another address?

10:27:12

20 **A** That's right.

21 **Q** And you sent a copy of a lease agreement that has Luis's
22 name?

23 **A** That's right.

24 **Q** And that has the address 2292 in Circuito de las Flores
25 Norte?

10:27:25

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1 **A** That's right.

2 **Q** And that is another rented home?

3 **A** That is right.

4 **Q** And when Luis was arrested in 2023, was that still the home
10:27:53 5 where he was residing?

6 **A** Yes, that's right.

7 **Q** At any point between 2011 and 2023, did Luis live
8 separately from you?

9 **A** Never.

10:28:26 10 **Q** You didn't temporarily go and rent another house in another
11 location?

12 **A** No.

13 **Q** You sent some phone records.

14 MR. AHMED: And I'm referring to Docket Entry 324-5.

10:28:38 15 BY MR. AHMED:

16 **Q** So, you see that in front of you at this time?

17 **A** I do see it.

18 **Q** We just want to be able to share the same screen.

19 That phone record that's in front of you there,

10:29:21 20 is that a phone number ending in 1171?

21 **A** No. It's 1172. 1172.

22 **Q** I apologize.

23 And was that a landline, a phone landline?

24 **A** Yes, it's a landline.

10:30:01 25 **Q** And that phone number -- did you have that same and Luis

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1 have that same home phone number from 2011 to 2023?

2 **A** Yes, that's right.

3 **Q** And the company there says Telmex. Is that the only phone
4 -- landline phone company in Mexico?

10:30:31 5 **A** Yes, that's right.

6 **Q** And that bill has Luis's name and the address that we
7 mentioned; is that true?

8 **A** That's correct.

9 **Q** We're going to look at another phone bill that's three, two
10:30:59 10 -- Docket 324-8, page 5 of that document.

11 You can disregard that document for now.

12 Did you send us another phone record with the
13 same address except in the name of Petrojed?

14 **A** Yes, that's right.

10:31:58 15 **Q** Did that also have the same address on Circuito de las
16 Flores Norte?

17 **A** Yes, that's right.

18 **Q** Okay. Let's talk about Luis's work. Before you met Luis,
19 what kind of work was he doing?

10:32:30 20 **A** He was an elementary school teacher.

21 **Q** And after, let's say, your third child was born in early
22 2000s, what kind of work was he doing?

23 **A** He was working in recovery centers for men and women who
24 had drug addiction and prostitution problems.

10:33:14 25 **Q** And were you working with him at that?

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1 **A** Yes, I also collaborated there.

2 **Q** Is that like a non-profit organization?

3 **A** A company, yes.

4 **Q** Okay. And does Luis have other business? Was he investing
10:33:43 5 or lending money around that time, as well?

6 **A** Yes. He was also doing that because the family -- some of
7 our family members were investing and they invited him to work
8 with them.

9 **Q** Okay. And was that investment and lend -- money lending,
10:34:14 10 was that profitable for the family?

11 **A** Yes, of course.

12 **Q** And did Luis start another company called Intercambios?

13 **A** That's right.

14 **Q** Can you tell us about that? When was that and why did he
10:34:43 15 start it?

16 **A** He started it because my brother-in-law wound up without a
17 job and he tried to help.

18 **Q** What does the company do?

19 **A** What it used to do? Because it doesn't operate anymore.

10:35:16 20 But it was an exchange center.

21 **Q** Explain. What do you mean "an exchange center"?

22 **A** There was an exchange of pesos to dollars or dollars to
23 pesos or euros or whatever currency was requested.

24 **Q** What years did Intercambios operate?

10:35:59 25 **A** I think that was, more or less, between 2007 and 2010.

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1 Q Did they have a physical office?

2 A Yes.

3 Q Did it maintain business records?

4 A Of course.

10:36:15 5 Q What kind of records, permits did that need to be?

6 A The permits that need to be requested from the government.
7 Everything that has to do with employee salaries and their
8 social security benefits. And, also, all of the operations for
9 the month that were carried out, the income and expenses.

10:36:58 10 Q Did it have records of the transactions, the money
11 transfers?

12 A Yes.

13 Q And so, did that physical office close at some point?

14 A Yes. The business closed, and my husband gave or he turned
10:37:29 15 over the location to a friend. And then, he started another
16 type of business.

17 Q What happened to the records of Intercambios after the
18 business closed?

19 A Well, I think a large part of them Luis put them in boxes
10:38:12 20 and brought them home. But over the course of such a long
21 period of time, little by little those records have been lost.

22 Q Do you recall at what point those records were lost or how
23 they were lost?

24 A Well, I remember that there were many boxes at home that
10:38:50 25 were full of papers; and we would occasionally need more time --

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1 more free space.

2 And at some point, a large portion of those boxes
3 were in one of our smaller bedrooms. And my oldest child, the
4 boy, needed more room to sleep in; and we moved them for him.

10:39:30 5 Q When was that?

6 A I don't know. Maybe my son was 16 or 17 years old.

7 Q So, how many years ago was that from today?

8 A Maybe six. Six years, seven.

9 Q And when you said they were moved, what do you mean?

10:40:03 10 A When I say we moved the papers, I mean we destroyed them.
11 We shredded them, and we got rid of them.

12 Q Do you have any records from Intercambios? Do you have
13 access to any of the records?

14 A Yes. I do still have some here at home, a small box.

10:40:34 15 Q Let's talk about Petrojed. Can you tell me about that
16 company.

17 A I think it started, more or less, around 2010.

18 Q What does it do?

19 A Petrojed was devoted to selling equipment for the petroleum
10:41:19 20 industry.

21 Q Why did he start that?

22 A Because he realized that he had a great resource next to
23 his dad. His dad worked for many years in the petroleum
24 industry. His dad was an expert, and he would become a good
10:41:57 25 counselor for that company.

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1 Q Were you involved in encouraging him or helping him to
2 start the business?

3 A Yes. I think so because it sounded like something very
4 solid with the help of his dad. It would be a very good thing.

10:42:33 5 Q Were you be involved in running the business?

6 A No.

7 THE COURT: Can you ask what the name of that business
8 was, please.

9 MR. AHMED: Yes.

10:42:43 10 BY MR. AHMED:

11 Q What is the name of that business?

12 A Petrojed.

13 Q Can you say it again.

14 A Petrojed. Petrojed. It's a conjunction of petroleum plus
10:43:12 15 the last name Ojeda. Petrojed.

16 THE COURT: Can you spell it, please. I got the petro
17 part. The last part.

18 THE WITNESS: P-e-t-r-o-j-e-d.

19 BY MR. AHMED:

10:43:38 20 Q I'm going to ask you to look at a document. It's docket --
21 the docket number is 324-6. And it's page one of that document.

22 Did you send any bank records from Petrojed's
23 operations?

24 A That's right.

10:44:05 25 Q And is that document you see in front of you one of those

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1 bank records?

2 **A** That's right.

3 **Q** And do you see the name of the account? Or is that the
4 name of the company, Petrojed, at the top left?

10:44:26 5 **A** Yes, I do see it.

6 **Q** And what is that address?

7 **A** That address was the old offices Luis had where he also had
8 Intercambios.

9 **Q** And I'm going to ask you to look at 324-7.

10:45:11 10 Did you send bank records from 2013 and 2015?

11 **A** Yes.

12 **Q** The document you're looking at in front of you, can you
13 tell me what that is.

14 **A** Yes. It's my understanding that that is a requisition.

10:45:49 15 That's a petition for some material.

16 **Q** And so, can you explain exactly what Petrojed -- what
17 services Petrojed offered, for example, in the context of this
18 invoice?

10:46:19 19 **A** Yes, of course. Petrojed would sell any type of equipment
20 to the petroleum industry.

21 **Q** And so, is that description one of the petroleum products
22 that was being contracted for?

23 **A** That's right.

10:46:43 24 **Q** And that dollar amount there, is that pesos or is that
25 dollars?

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1 **A** I don't know.

2 THE COURT: Was Mr. Ojeda's name on the bank account?

3 THE WITNESS: I don't know, but I believe that it
4 would -- they should have been under the name of Petrojed.

10:47:10 5 BY MR. AHMED:

6 **Q** Did Luis have -- did Luis have a personal bank account
7 aside from Petrojed's bank account?

8 **A** I think -- I think he did have one, but Luis was Petrojed's
9 legal representative, and he managed Petrojed's account.

10:47:42 10 **Q** Did you have a personal bank account?

11 **A** Yes.

12 **Q** And what bank did you use?

13 **A** Banorte.

14 **Q** Is Banorte one of the large banks in Mexico?

10:48:04 15 **A** That's right.

16 **Q** And your bank account was in your name?

17 **A** Yes.

18 **Q** I'm going to show you another document, 324-7. It's the
19 same document, just page 2.

10:48:37 20 Do you have access to all of Petrojed's invoices
21 and transactions at this time?

22 **A** I think so. I'm not certain.

23 **Q** Did Petrojed stop doing any significant business for a
24 period of time?

10:49:10 25 **A** Yes.

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1 Q Okay. I'll ask you more about that later. The document in
2 front of you now, is that an invoice from 2016?

3 A That's right.

4 Q And if you look at the top left, there's a number that says
5 RFC.

10:49:40

6 Does that mean something to you?

7 A Yes, of course. In Mexico, that's the federal registry of
8 taxpayers.

9 Q And if you look at the -- I guess page 3 of that same
10 document, is that another invoice for 2016?

10:50:05

11 A It appears to be.

12 Q Okay. So, from being married to Luis and seeing him work
13 with Petrojed, do you have any doubt that he was conducting
14 legal business transactions involving petroleum products?

10:50:34

15 A No. He was performing legal business with Petrojed
16 completely.

17 Q Was he filing taxes in the name of Petrojed?

18 A Of course.

19 Q I'm showing you Docket 324-8.

10:51:14

20 THE COURT: Before you get there, I want to ask two
21 questions.

22 You told me that the account at -- for the
23 company was in the name of Petrojed, correct?

24 THE WITNESS: That's right.

10:51:33

25 THE COURT: Was there a separate account in your

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1 husband's name, a personal bank account in his name?

2 THE WITNESS: I do not know.

3 THE COURT: You said that you had a personal bank
4 account. What name was that account in?

10:51:59 5 THE WITNESS: Under my name.

6 THE COURT: Thank you.

7 BY MR. AHMED:

8 Q Was Luis paid through Petrojed? When Petrojed would make
9 profit, was he paid through the business?

10:52:25 10 A Yes. He must have had his salary, yes.

11 Q And so, the document in front of you there is -- is that a
12 tax receipt or proof of a tax filing from 2013?

13 A It would appear to be.

14 Q And you sent me longer documents that include the actual
10:53:17 15 data -- the actual tax return information, the profit, the loss.

16 Is that correct?

17 A Yes.

18 Q And so, going to the top of that page in the tax filing,
19 you see an RFC number noted?

10:53:53 20 A Yes, I do see it.

21 Q And the -- is that the same RFC number that was on the
22 invoice?

23 A I don't remember. I don't recall. The number is very
24 long.

10:54:17 25 THE COURT: Were any of these tax documents, did they

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1 have your husband's name on them as opposed to just the name of
2 the company?

3 THE WITNESS: I don't think so because the company's
4 documents, his name appears as the owner and the legal
10:54:58 5 representative.

6 THE COURT: Are those separate from the tax filing
7 documents?

8 THE WITNESS: Yes. That's called the company charter.

9 MR. AHMED: If I may just have a moment, please,
10:55:22 10 Judge.

11 THE COURT: Thank you.

12 BY MR. AHMED:

13 Q I'm going to ask you to turn to page -- to the Document
14 319-9.

10:55:48 15 Earlier, we were -- we looked at the phone
16 records that was in Luis's name and the address where you lived.
17 And you told us that that was the phone number that he had from
18 2011 until his arrest.

19 Is that correct?

10:56:08 20 A That is right.

21 Q Did you -- I think I may have asked you this. But just to
22 try to find the actual name of -- the number of the document,
23 did you give me a phone record for the company Petrojed?

24 A Yes.

10:57:06 25 Q Is that what you see in front of you now?

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1 **A** Yes, that is right.

2 **Q** And that's 322-9.

3 Is that the same company, Telmex, that the
4 personal phone line was in?

10:57:34 5 **A** That's right.

6 **Q** And the address there, is that the same address where you
7 lived?

8 **A** That's right.

9 **Q** But this was in the same company -- in the name of the
10:57:54 10 company Petrojed?

11 **A** Yes.

12 **Q** As part of the business practice that Luis had, did he
13 claim business losses on his taxes?

14 **A** Business losses? I didn't understand that.

10:58:29 15 **Q** His business expenses, what he expends, for example, this
16 phone bill.

17 **A** Of course. The expenses, the operating expenses, of
18 course.

19 THE COURT: Can I ask a question here?

10:58:52 20 Was there a telephone line into your house?

21 THE WITNESS: Yes, there was a telephone line in my
22 house.

23 THE COURT: And was the phone number for that line the
24 same for the business and for just the house number?

10:59:20 25 THE WITNESS: At that moment, yes. Because at that

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1 moment, my husband's office moved to my home.

2 THE COURT: Was there a phone number in your husband's
3 or your name?

4 THE WITNESS: That number previously was under my
11:00:05 5 husband's name. But when he moved the office to my home, he put
6 it under the company's name.

7 MR. AHMED: I'm just going to ask the prior phone
8 record be shown again.

9 BY MR. AHMED:

11:00:32 10 Q You testified earlier that you had a landline that was in
11 Luis's name.

12 A That's right.

13 Q And that number ended in 1172?

14 A Yes.

11:00:55 15 Q And how long was this landline operational?

16 A The entire time that we lived at that home, from 2011 up
17 until 2023.

18 Q That phone number did not change during that whole time?

19 A No.

11:01:22 20 THE COURT: And was the account for that phone number
21 in Mr. Ojeda's name the entire time?

22 THE WITNESS: I don't remember if it was under his
23 name. But it was either under his or Petrojed's name, which is
24 the same because he's the legal representative of Petrojed.

11:02:00 25 //

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1 BY MR. AHMED:

2 Q But Petrojed had a separate number?

3 A Well, back then, we had two telephone lines.

4 Q But both bills were registered with Telmex and the same
11:02:18 5 address, correct?

6 A That's right.

7 Q Were you able to find an older bill from this same line?

8 A Apart from the other one we saw already?

9 Q The one in front you is dated 2022.

11:02:58 10 A Yes, I do have older ones.

11 Q Okay. Let me ask you a little bit more about Petrojed.

12 Did the company have employees?

13 A Previously, yes. Later, when things were not going well,
14 no.

11:03:27 15 Q And did the employees get benefits? Did they have any
16 company benefits?

17 A Yes. They must have been whatever benefits were legal.

18 Q Did they -- some of them get housing as a benefit?

19 A Yes, at one time. At one time, the secretaries that work
11:04:17 20 for us were living in an apartment that we were paying.

21 Q Okay. I'm going to ask you about that later.

22 But I'm going to change now and ask you about
23 some of your travel and Luis's travel history.

24 Before Petrojed, before 2011, let's say, did Luis
11:04:52 25 travel to the United States?

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1 **A** Yes, many times.

2 **Q** Would he ever travel alone?

3 **A** When we were married, no. We used to travel together.

4 **Q** What was the purpose of traveling to the United States
5 before 2011?

6 **A** Just vacations.

7 **Q** And did something change in 2011?

8 **A** Yes. We began to travel because Luis was interested in
9 taking Petrojed to the United States.

10 **Q** Before I ask that, can you tell just a little bit more
11 about the type -- you said vacations. What kind of vacations?
12 Where would you go?

13 **A** Well, we have five children. They used to be small back
14 then. We used to like to go to Disneyland.

15 **Q** And did you go to -- well, did you come to the United
16 States in 2011 with Luis for a business purpose?

17 **A** I accompanied him on some occasion to an annual conference
18 for things that have to do with the petroleum business.

19 **Q** And you testified earlier that you helped Luis and
20 motivated him to start Petrojed; is that correct?

21 **A** That's right.

22 THE COURT: Is this still before 2011?

23 MR. AHMED: We're in 2011 now.

24 BY MR. AHMED:

25 **Q** And you mentioned then a conference. When was that and

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1 what was that for?

2 **A** That was in 2011, and there were many -- there were lots of
3 companies exposing their product at a very large convention
4 center. I don't remember which one it was.

11:08:00 5 **Q** And where was that?

6 **A** In Houston. Houston, Texas.

7 MR. AHMED: Judge, I have some additional physical
8 exhibits; and I gave the government a copy this morning. I have
9 a copy for the Court. I can put it on the screen.

11:08:18 10 THE COURT: Thank you.

11 Do you have another copy to put on the screen?

12 MR. AHMED: I do.

13 BY MR. AHMED:

14 **Q** I'm going to show you what is marked at this point as
11:08:30 15 Defense Exhibit 1.

16 Do you recognize that?

17 **A** Yes.

18 **Q** What is it?

19 **A** It's a drawing that was done for he and I at that fair.

11:09:01 20 **Q** What does it say at the top?

21 **A** Luis and "Ceci," 2011.

22 **Q** And "Ceci" is your nickname?

23 **A** That's right.

24 MR. AHMED: If you can scroll to the bottom of that
11:09:26 25 document.

1 BY MR. AHMED:

2 Q Do you know what that says on the bottom right?

3 A Yes. I imagine that's the company name that was sponsoring
4 the artist that drew the drawing for us.

11:09:49 5 Q Where did the drawing happen? Was it at the conference?

6 A Yes.

7 Q Was it, like, at a booth by one of the vendors there?

8 A Yes. He was sitting in a chair offering -- offering free
9 drawings, and we said to have a drawing.

11:10:20 10 Q So, after this conference when you returned -- how long
11 were you there in Houston for this trip?

12 A Perhaps, we were on that trip for three or four days, I
13 think.

14 Q And so, after this trip, did Luis start to come to the
11:10:47 15 United States alone in 2011?

16 A That is right. That is correct.

17 Q And what was the purpose of his travel when he started
18 coming alone?

19 A He was trying to have relationships with clients or with
11:11:18 20 providers to make his business work.

21 Q And did he apply for something called Global Entry?

22 A Yes.

23 Q Can you tell me what you understand that to be?

24 A I think that was an arrangement with Immigration so that he
11:12:00 25 could go across faster on his air travel trips.

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1 Q I'm going to --

2 A So, he wouldn't have to wait -- wouldn't have to wait in
3 the long lines to show his passport.

4 Q And did you provide me with a document that is proof of his
11:12:26 5 application for Global Entry?

6 A That's right.

7 Q We're going to show you a document. Let me know if you
8 recognize it.

9 MR. AHMED: Before we do that, Judge, I'd ask to admit
11:12:51 10 Defendant's Exhibit Number 1 which is the drawing.

11 THE COURT: Any objection?

12 MR. LIDDLE: No objection, your Honor.

13 THE COURT: Admitted.

14 Are you also moving to admit Exhibit 2?

11:13:08 15 MR. AHMED: Yes.

16 THE COURT: Any objection?

17 MR. LIDDLE: No objection, your Honor.

18 THE COURT: All right. I do have a question about
19 Exhibit 2: The address shown for a Mr. Luis Ojeda is a street
11:13:19 20 in Katy, Texas. Why -- do you know anything about this address?

21 THE WITNESS: I didn't hear the interpreter. Could
22 you repeat that for me.

23 (Interpreter complies.)

24 THE WITNESS: No, I don't know.

11:13:49 25 //

1 BY MR. AHMED:

2 Q I'm going to -- looking at that first page there, is there
3 -- do you see a date of June 2011 at the top?

4 A That's right.

11:14:04 5 Q And was this application made to -- on the first line of
6 the -- under -- under Dear Luis Ojeda, does it say US Customs
7 and Border Protection?

8 A Yes.

9 Q And are you familiar with the requirements of this program?

11:14:41 10 A No.

11 Q Do you know if this program requires a US address in
12 addition to a Mexican address?

13 A No, I did not know.

14 Q Okay. I'm going to ask to go to page 6 of this document.

11:15:08 15 And the top right there might be a little small
16 to read. You see it says email address?

17 A Yes.

18 Q And is that a valid email address that Luis would use for
19 business?

11:15:29 20 A Yes. luis.ojeda@petrojed.

21 Q And looking at the next page -- I think it's page 7 -- do
22 you see a driver's license number there, the second paragraph
23 towards the top?

24 A Yes.

11:16:09 25 Q And then, under that, do you see a current address?

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1 **A** Yes.

2 **Q** And if you read that address -- can you read it for us.

3 **A** Avenida Obsidiana 2030, Interior 7.

4 **Q** Is that the same address that you wrote in your letter
11:16:44 5 where you and Luis resided?

6 **A** No.

7 **Q** Why is that a different address?

8 **A** Because we were not living there, but we also paid for that
9 apartment.

11:17:09 10 **Q** Did you testify earlier that you had secretaries that got
11 residence when they worked for Petrojed?

12 **A** That's right.

13 **Q** So, is that where they resided?

14 **A** That's right.

11:17:31 15 **Q** And physically speaking, how close is this address to your
16 actual home address?

17 **A** It's very close by. I would say it was six, seven feet
18 away from our house.

19 **Q** And the address -- the US contact that's written under
11:18:01 20 there, do you see a name and an address.

21 **A** Yes, I do see it.

22 **Q** And do you know who that person Maria is?

23 **A** Yes, I think so. I think I do know.

24 **Q** Did you know someone who was from Colombia named Maria?

11:18:36 25 **A** Yes.

1 Q Who is that?

2 A She was a friend of the family.

3 Q And then going down below that, do you see it says current
4 employment status?

11:19:10 5 A Yes, I see it.

6 Q And do you see the company Ciro there?

7 A Yes.

8 Q What is that company?

9 A That's a different company that Luis also launched at the
11:19:32 10 same time as Petrojed.

11 Q What did that company do?

12 A It provided logistical support, deliveries, training.

13 Q And going to the last page of that document, do you see an
14 RFC number there?

11:20:07 15 A Yes.

16 Q And is that what you testified earlier is like a tax ID?

17 A That's right.

18 Q And then, to the right of that, do you see another number
19 that says C-U-R-P?

11:20:35 20 A That's right.

21 Q And what is a CURP?

22 A That is the identification number for Mexicans.

23 Q Like a Social Security number?

24 A I don't know if that would be the equivalent in the United
11:21:10 25 States; but in Mexico, we all have a number that is called CURP.

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1 THE COURT: Is it a personal identifier?

2 THE WITNESS: That's correct.

3 THE COURT: And does everybody have a different CURP?

4 THE WITNESS: That's right. Unique.

11:21:34 5 THE COURT: Thank you.

6 BY MR. AHMED:

7 Q And I don't know if you remember his CURP. But do you --
8 does that look like his legitimate -- his true personal
9 identifier?

11:22:01 10 A Yes, it does appear to be because the first letters are the
11 letters having to do with his name.

12 Q All right. I'm going to ask you to -- just about that
13 address before, the 2430 address.

14 Did you provide me with the lease agreement and
11:22:32 15 some proof-of-rent payment for that address?

16 A I did do so.

17 Q Is that the document that you see in front of you? It's
18 marked at Defendant's Exhibit 3.

19 Is that a lease agreement for the 2430 address?

11:23:16 20 A That's right.

21 Q And the next page, is that a proof-of-rent payment from
22 2007?

23 A That's right.

24 Q And the last page, is that rent payment from 2008?

11:23:31 25 A That's right.

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1 Q Moving on to --

2 MR. AHMED: Judge, I'd ask to admit Defendant's
3 Exhibit 3.

4 THE COURT: Exhibit 3?

11:23:56

5 MR. AHMED: Yes.

6 THE COURT: Any objection?

7 MR. LIDDLE: No objection, your Honor.

8 THE COURT: Admitted.

9 BY MR. AHMED:

11:24:00

10 Q Moving on to Luis's travel in 2012.

11 Before I ask you about a flight in 2012, do you
12 know who Enrique Morales is?

13 A Yes.

14 Q Who is he? Or when did you first become aware of him?

11:24:43

15 A He is one of Luis's childhood friends.

16 Q Have you met him before?

17 A Yes. I met him in person a little bit after he and I got
18 married.

19 Q So, that was almost 30 years ago?

11:25:09

20 A Yes.

21 Q And since then, have Enrique Morales and Luis been close
22 friends? Does he come visit you at the house? Do they hang out
23 together?

24 A No.

11:25:33

25 Q When you met him after you were first married, what was

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1 that occasion?

2 **A** Luis and I were walking along in a commercial plaza. We
3 ran into him. He introduced him to me, and that was all.

4 **Q** And did Luis have some communication and business dealings
11:26:04 5 about 14 years ago, maybe 13 years ago in 2011 with Enrique
6 Morales?

7 **A** Yes.

8 **Q** Would Luis talk to you about that?

9 **A** He told me that they were going to do some things together
11:26:43 10 in Petrojed, and I don't know any other details.

11 **Q** Was that -- was that communication about -- between Enrique
12 Morales regarding doing business with Petrojed, was that before
13 Petrojed was started or was that after?

14 **A** No. It was after. Petrojed already existed.

11:27:26 15 **Q** Did Enrique Morales have any role in the establishment or
16 idea of Petrojed as a company?

17 **A** No, not that I know of.

18 **Q** Do you know if Enrique Morales was aware that Luis was in
19 the money exchange business before?

11:27:45 20 **A** I think so.

21 **Q** Let's talk about the flight in May -- on May 29th of 2012.

22 Was Luis supposed to come to the United States
23 that day but he didn't go?

24 **A** That's right.

11:28:19 25 **Q** Why not?

1 **A** Because I was in the hospital very sick.

2 **Q** Did you provide me with some medical records from your
3 illness in 2012?

4 **A** That's right.

11:28:42 5 **Q** And I'm showing you a document that is going to be labeled
6 Defendant's Exhibit Number 4.

7 MR. AHMED: And just for the record, your Honor, this
8 is a corrected document with one change, the discharge date. It
9 was incorrectly translated in a previous filing.

11:29:16 10 The Spanish version is also there.

11 THE COURT: All right. Any objection to the admission
12 of Exhibit 4 as corrected?

13 MR. LIDDLE: No, your Honor.

14 THE COURT: Admitted. Thank you.

11:29:28 15 BY MR. AHMED:

16 **Q** Can you tell us how long you were in the hospital?

17 **A** Yes. It was from May 28th until June 6th -- June 5th.

18 **Q** And so, the day that you went into the hospital, was that
19 the day before Luis's planned flight?

11:30:09 20 **A** That's right.

21 **Q** And did you have a conversation with Luis about whether he
22 should go to the United States or not?

23 **A** Yes. We had prepared his trip way ahead of time. So, I
24 began to feel very bad; and I was hospitalized in the hospital.

11:30:51 25 And I said to Luis, "Go on the trip. I can stay behind in the

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1 hospital. I'm well taken care of. You can go on your trip."

2 But he did not want to leave me because I was in
3 a very serious state.

11:31:22

4 Q Was he there with you in the hospital during that next
5 week?

6 A He was there every day 24/7.

7 Q What were you diagnosed with?

8 A It was a type Guillain-Barre syndrome with a Miller Fisher
9 variant.

11:31:50

10 Q What are the symptoms of that?

11 A It's an autoimmune disease that destroys the nerves myelin.
12 I started out not being able to see. I could not walk. I was
13 not able to orient myself. I could not eat. And little by
14 little, I was not able to breath.

11:32:33

15 Q So, it affected your ability to do day-to-day tasks?

16 A Yes, completely.

17 Q How long did those severe symptoms last?

18 A When I left the hospital, I still had the symptoms very
19 severely; and they lasted, more or less, six months.

11:33:11

20 Q Did they start to improve after that?

21 A They began improving but very slowly.

22 Q At what point would you say you were fully recovered?

23 A I would say that two years -- more or less, two years had
24 to go by.

11:33:40

25 Q And so, did that affect Luis's work habits and travel

1 habits?

2 **A** Completely.

3 **Q** What changed with his work?

4 **A** He couldn't go on travels because he was taking care of me;

11:34:11 5 and furthermore, we had five kids who were little back then, as
6 well.

7 **Q** Did he continue to work in an office or did he start
8 working from home?

9 **A** Sorry?

11:34:27 10 **Q** Did he start working from home once you were recovered?

11 **A** Yes. He moved his office and brought it home after that.

12 **Q** Did he ever go back to working at an office for Petrojed
13 after 2012?

14 **A** Outside the home, no.

11:35:09 15 **Q** But he did continue doing business as we discussed with
16 Petrojed?

17 **A** Yes.

18 **Q** And did he ever travel back to the United States to do
19 business in the United States?

11:35:26 20 **A** No. He never returned. No. He never returned.

21 **Q** Was there some change in the industry that affected his
22 travel to the United States?

23 In the petroleum industry.

24 **A** There was a big change in Mexico. There was a big change.

11:36:10 25 The political situation changed drastically. They stopped

1 supporting the petroleum industry in Mexico.

2 **Q** "They," meaning the government?

3 **A** That's right.

4 **Q** Continue.

11:36:36 5 **A** There stopped being support on behalf of the government to
6 increase the petroleum business.

7 **Q** So, did that limit the potential for transactions for
8 Petrojed in the United States?

9 **A** In the United States and in Mexico, in both places, because
11:37:13 10 we were a small company. We were not able to -- we cannot
11 sustain the large expenses that we had.

12 **Q** At some point, did Petrojed really boost business and stop
13 operating?

14 **A** Yes. It was decreasing little by little.

11:37:52 15 **Q** And at what point would you say that Petrojed no longer was
16 operating, no longer in business?

17 **A** I cannot recall when the last time was Luis sold something;
18 but it was before the pandemic, of course.

19 **Q** So, I guess the question I'm getting to here is why didn't
11:38:35 20 you travel to -- you and Luis travel back to the United States
21 for vacations like you used to?

22 **A** I'm sorry. It cut off. Could you repeat the question for
23 me.

24 **Q** After your health improved in, I guess, 2014, 2015, why
11:39:07 25 didn't you come back to the United States for vacations?

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1 **A** We did not return, first off, because of my illness.
2 Later, because we also started to have a great need of money.
3 And later, we tried to go to the United States; but we were
4 denied. They took our visas.

11:39:53 5 **Q** Were your children older at this time than when you used to
6 go before in 2010?

7 **A** Yes, of course.

8 **Q** So, they didn't want to go to Disneyland anymore?

9 **A** Yeah. They still did. Though they were grown, they still
11:40:22 10 wanted to go to Disneyland.

11 **Q** Did Luis find another job?

12 **A** Yes. He sought work in many places, of course.

13 **Q** And what was his main employment around the time he was
14 arrested?

11:40:41 15 **A** He was an administrator at an online art school.

16 **Q** And was that, like, an employee, not a business that he
17 started?

18 **A** No. He was an employee.

19 **Q** So, his income was limited?

11:41:11 20 **A** Yes.

21 **Q** So, at the time of his arrest, did you, as a family, have
22 significant assets? Did you own any homes?

23 **A** No assets.

24 **Q** Have you been renting your entire marriage?

11:41:39 25 **A** Yes.

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1 Q Did Luis or you have any bank accounts with, let's say,
2 over \$10,000 in it?

3 A I don't think so.

4 Q Any large investments or other assets over \$10,000?

11:42:13 5 A In the latter years, no.

6 Q Okay. Last section of questions. Let me ask you about
7 from your perspective.

8 Before Luis was arrested, did he know that he had
9 a criminal charge in the United States?

11:42:45 10 A He did not know he had a criminal charge. He knew there
11 was something wrong with Enrique Morales, but he did not know he
12 had a criminal charge.

13 Q Do you remember any conversations back in 2012 with Luis
14 about a reporter calling him from the United States?

11:43:22 15 A Yes. Luis told me about that event. And this person told
16 me something with respect to that; however, it was nothing
17 official. It was a reporter. That was all.

18 Q What was the conversation like? What did Luis say to you?
19 What was he worried about?

11:44:07 20 A He was very worried about Enrique Morales's situation
21 knowing he had been arrested. He was worried that the
22 authorities might confuse him as well as having been involved.

23 Q And did you see or did Luis, to your knowledge, see or read
24 any articles, news articles, about him in 2012?

11:45:09 25 A I think that Luis -- I think Luis read this reporter's

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1 article is all. I didn't.

2 **Q** And did Luis -- did he tell you after reading that article
3 that he believed he was wanted in the United States?

11:45:53

4 **A** No. He told me that he didn't think that he was wanted but
5 that he was also waiting to have some notification from an
6 authority.

7 **Q** And did anyone ever -- any authority or government ever
8 contact him?

9 **A** No one ever.

11:46:13

10 **Q** To your knowledge, did any -- how many times did a reporter
11 call Luis?

12 **A** I don't know, but it was not difficult to get in touch with
13 Luis.

11:46:36

14 **Q** And so, you mentioned earlier that you tried to come back
15 to the United States.

16 Did you provide me with a document related to
17 applying for a visa in 2018?

18 **A** Yes, that's right.

19 **Q** And we're getting that up on the screen now.

11:47:02

20 Is that a document that shows that you paid or
21 Luis paid money to apply for a visa?

22 **A** Yes, that's right.

23 **Q** And that cost \$160 for each visa?

24 **A** That's right.

11:47:28

25 **Q** And that was paid in July of 2018?

Avevalo Serna - Direct/Ahmed

1 **A** That's right.

2 **Q** And is that document that you're looking at whatever you
3 provided to me?

4 **A** Yes.

11:47:51 5 MR. AHMED: Ask to admit Defense 5.

6 THE COURT: Objection?

7 MR. LIDDLE: No objection, your Honor.

8 THE COURT: Admitted.

9 BY MR. AHMED:

11:47:59 10 **Q** Looking at the bottom of the second page of that document,
11 do you see an appointment on the right there that says September
12 4, 2018?

13 **A** I do see it.

14 **Q** What was that appointment for and did you and Luis both go
11:48:26 15 together there?

16 **A** That was an appointment to get ahold of -- no. That was an
17 appointment to go to the consulate to get the visa.

18 **Q** Before you went to the consulate, did you have to go and
19 get pictures taken for your visa?

11:48:56 20 **A** Yes. They give you two appointments, one to get your
21 pictures taken and the other one so that you can turn in your
22 documents and talk to the consulate.

23 **Q** So, the next day, did you and Luis both go to the consular
24 in -- the consulate in Guadalajara?

11:49:33 25 **A** That is right. He and I went and two of my younger

1 children.

2 **Q** And what happened that day?

3 **A** Luis was taking all of the documents that were requested.

4 We awaited for the process that everybody waited for.

11:50:05 5 **Q** Was there an interview?

6 **A** Yes. The consulate asked us many questions.

7 **Q** And did they ask about any future plans to go to the United
8 States?

9 **A** Yes.

11:50:26 10 **Q** And do you remember what Luis said?

11 **A** He said something like we are planning to go to the United
12 States on vacation as a family.

13 **Q** Was there any concrete plan at that point?

14 **A** I don't remember whether we had any concrete plan, but we
11:50:59 15 were certainly going to go to Disneyland.

16 **Q** And did you end up going?

17 **A** No.

18 **Q** Why not?

19 **A** Because, even though we were getting our visas at that
11:51:27 20 moment, some months later our visas were canceled.

21 **Q** And did your daughter have to go to the same consulate the
22 next year?

23 **A** Yes. The following year, she went to request her visa at
24 the consulate.

11:51:50 25 **Q** And after that visit, what -- well, tell me what happened

1 when your daughter went to the consulate. Why did she go there?

2 **A** She went alone because she had already turned 18 years old.
3 She was of legal age.

4 **Q** And did she have --

11:52:25 5 **A** And none of us could go along with her. None of us could
6 go along with her to process it.

7 **Q** Was she going because her visa -- that she had just turned
8 an adult and needed her own visa?

9 **A** That's right.

11:52:47 10 **Q** And what did she take with her and what happened when she
11 got there?

12 **A** She took all the documents that we are requested by the
13 United States and, furthermore, our passports for the rest of
14 the family.

11:53:18 15 **Q** What happened?

16 **A** With the visas. With the visas. She took our passports --
17 our passports with the visas.

18 **Q** What did they tell her?

19 **A** They made her wait for many hours in there without saying
11:53:45 20 anything to her. And in the end, the consular called her over
21 and told her she could not have a visa and also took away our
22 visas.

23 **Q** And so, after her visit to the consulate, were you and Luis
24 able to go to the United States after that?

11:54:17 25 **A** No. You can't go into the United States without a visa.

Avevalo Serna - Direct/Ahmed

1 Q And so, do you remember what month that was in 2019?

2 A No, I don't recall.

3 Q So, is it fair to say that the reason from that visit in
4 2019 until Luis is arrested in 2023, he didn't come to the
5 United States because he wasn't allowed to?

11:54:53

6 A That's right.

7 Q I'm going to show you what's Docket Number 319-10.

8 It's page 13 of that document.

9 Do you recognize that?

11:55:21

10 A Yes.

11 Q In fact, did you give me -- did you send to me a copy of
12 that same document?

13 A Yes.

14 Q And what did you understand that document to be when it was
15 received?

11:55:43

16 A We understood that we were not welcome in the United States
17 and that we could not enter.

18 Q Is that your name there in the middle of that letter?

19 A Yes.

11:56:08

20 Q And so, I know that what is on the screen now is in
21 Spanish. But from your review of this document, does this say
22 that you're being charged with any crime?

23 A No, it doesn't say that I am being charged with any crime.

24 Q At the top there, the letter is addressed to Luis?

11:56:52

25 A Yes.

1 Q Does this letter say that he is being charged -- currently
2 charged with any crime?

3 A No.

11:57:13

4 Q Does it have -- does it say that he's prohibited from
5 coming to the United States?

6 A Yes.

7 THE COURT: Is there a translation of this letter?

8 MR. AHMED: Let me see if I can find --

11:57:36

9 THE COURT: We're going to break for lunch soon. So,
10 you can find it then.

11 MR. AHMED: I didn't hear what your Honor said.

12 THE COURT: We're going to -- you can find it when we
13 break for lunch, which will be soon.

14 BY MR. AHMED:

11:58:03

15 Q I'm going to ask you a final subset of questions. What
16 happened on the day that Luis was arrested? Where was that?
17 Were you with him?

18 A I was with him. That was April 20 of 2023.

19 Q What happened?

11:58:32

20 A He and I left to go pick up some medication real close by
21 our house because he was sick. When we arrived, he opened the
22 car door and three men rushed in. They beat him. They threw
23 him down on the ground. They did not identify themselves.

24 Q Were they in uniform?

11:59:21

25 A No.

1 Q What did you think was happening?

2 A I believed that he was being kidnapped, and I began to
3 scream and to hit those men.

4 Q And what did you learn eventually?

11:59:44 5 A He was placed into a truck. And when he was put in there,
6 a lady passed me many papers and told me that he was being
7 detained in order to be extradited.

8 Q And this was in April of 2023?

9 A Yes.

12:00:23 10 Q And so, Luis was in jail.

11 Did you talk to him while he was in jail in
12 Mexico?

13 A Yes.

14 Q Was he able to hire a lawyer?

12:00:39 15 A No.

16 Q Why not?

17 A Because we don't have any money -- we don't have enough
18 money.

19 Q Did he get a lawyer?

12:00:54 20 A A court-appointed attorney in Mexico, yes.

21 Q And did you speak with that attorney?

22 A She spoke with me, a lady.

23 Q And did she speak to you about the extradition process and
24 whether Luis should fight it?

12:01:19 25 A Yes, she did tell me. She told me that Luis had to be --

Avevalo Serna - Direct/Ahmed

1 that there was an extradition order against him.

2 And she asked me whether we agreed with having
3 him extradited.

4 I told her we were because we always wanted to
5 cooperate.

12:01:56

6 Q Did she recommend --

7 A She told me --

8 Q Go ahead.

9 A She told me she did not recommend that. What needed to be
10 done in these cases was request a relief so that he would not be
11 extradited.

12:02:17

12 But we said no. And we agreed to the immediate
13 extradition.

14 Q So, the lawyer recommended fighting extradition but Luis
15 chose not to do that?

12:02:39

16 A That's right.

17 Q And you discussed that decision with Luis?

18 A Yes.

19 Q And what was the reason for not wanting to fight the
20 extradition?

12:02:59

21 A Trying to clear up the matter once and for all and to
22 cooperate.

23 Q At any point during this time, from 2012 until 2023 when
24 Luis was arrested, did you ever get the impression that he was
25 worried about being arrested?

12:03:36

Avevalo Serna - Direct/Ahmed

1 **A** He wasn't worried about getting arrested, but he was
2 worried about not receiving any news from the United States.

3 **Q** Did he ever tell you "I have a warrant" or "I will be
4 arrested if I go to the United States"?

12:04:12 5 **A** No. If he had thought that, we would have never applied
6 for the visa.

7 MR. AHMED: I pass the witness.

8 THE COURT: All right. It's good timing. We'll break
9 for lunch until 1:15. Do we anticipate finishing today?

12:04:44 10 MR. AHMED: I think so, Judge. I don't have any other
11 witnesses, just legal argument from those witnesses.

12 MR. LIDDLE: Your Honor, we just heard a lot of new
13 information. But we may. I don't know. We'll go out and talk
14 about it during the lunch break. There's a lot of new
12:05:02 15 information we just heard for the first time that we may need to
16 bring in witnesses to dispute.

17 THE COURT: Do you anticipate asking for a recess of
18 some sort in order to do that?

19 MR. LIDDLE: I think we -- if your Honor would allow
12:05:19 20 me, we would like to talk about that during the recess. We plan
21 to still bring on our two witnesses, but just the amount of
22 information -- new information that we just heard gives me pause
23 to say that the government will be ready to go forward with
24 everything today.

12:05:35 25 THE COURT: All right. Assuming you will go forward

Avevalo Serna - Direct/Ahmed

1 with the two witnesses who are here, do you anticipate those
2 witnesses taking all day?

3 MR. LIDDLE: No. No, your Honor. Those two are very
4 brief.

12:05:48 5 THE COURT: Very good. Thank you. That was my
6 question.

7 MR. LIDDLE: Thank you, your Honor.

8 THE COURT: All right. Thank you very much.

9 THE INTERPRETER: Do they need an interpreter?

12:06:00 10 THE COURT: Not during -- well, unless you need it for
11 conferral. We would like the interpreter to explain to the
12 witness that we're on a break until 1:15 and she needs to be
13 available at that time.

14 THE INTERPRETER: I will, your Honor.

12:06:09 15 THE COURT: Thank you.

16 (Court recessed at 12:06 p.m.)

17 (Court resumed at 1:20 p.m.)

18 THE COURT: Please be seated. Do we have our witness?

19 MR. AHMED: She should still be on Zoom, yes.

01:21:15 20 THE COURT: I think we're ready to resume.

21 MR. LIDDLE: Is she there?

22 THE WITNESS: Yes, I'm here.

23 THE INTERPRETER: Good afternoon.

24 THE WITNESS: Good afternoon.

01:21:42 25 THE COURT: Do we have the visual?

Avevalo Serna - Cross/Liddle

1 Okay. There it is. Go ahead, please.

2 CROSS-EXAMINATION

3 BY MR. LIDDLE:

01:21:56

4 **Q** I just have a few questions for you. What is Triunfo de
5 Mexico?

6 THE COURT: Can you speak in the microphone.

01:22:42

7 THE WITNESS: Triunfo de Mexico was incorporated
8 non-profit organization, and its mission was to help men and
9 women recover from problems of drug addiction and alcoholism and
10 prostitution.

11 BY MR. LIDDLE:

12 **Q** And when --

13 THE COURT REPORTER: I did not get your question.

14 MR. LIDDLE: The original question?

15 THE COURT: Yes.

16 MR. LIDDLE: Was what is Triunfo de Mexico.

17 THE COURT REPORTER: Thank you.

18 MR. LIDDLE: You're welcome.

19 BY MR. LIDDLE:

01:23:01

20 **Q** When was Triunfo de Mexico in operation?

21 **A** I don't know when it began because I wasn't there from the
22 beginning. But my husband and I worked there since we were
23 newlyweds starting in 1994 until maybe -- until 1997, I think,
24 maybe.

01:23:50

25 **Q** And then, what happened to it after 1997?

Avevalo Serna - Cross/Liddle

1 **A** It closed because the director went to the United States --
2 went to the United States.

3 **Q** Did it reopen at all ever?

4 THE INTERPRETER: I'm sorry. Repeat the question.

01:24:21 5 BY MR. LIDDLE:

6 **Q** Did it ever reopen?

7 **A** No.

8 **Q** You testified that you were familiar with your husband's
9 business practice in petroleum; is that correct?

01:24:39 10 **A** That's right.

11 **Q** And you testified that you were aware of some business that
12 your husband was doing in the United States with Enrique
13 Morales.

14 **A** That's right.

01:25:02 15 **Q** Were you aware that your husband's business with Enrique
16 Morales involved picking up hundreds of thousands of US dollars
17 in random parking lots between people who never met each other
18 and who had nothing to do with the oil business?

19 **A** No.

01:25:42 20 **Q** Were you aware that approximately \$350,000 in US cash was
21 seized in the US by the Drug Enforcement Administration?

22 **A** I knew about that later when Enrique Morales was arrested.

23 **Q** How did you learn about the seizure when Enrique Morales
24 was arrested?

01:26:28 25 **A** Because Manuel told Luis, and Luis told me.

Avevalo Serna - Cross/Liddle

1 Q I'm sorry. Luis told you?

2 A Yes.

3 Q Do you remember when that was that Luis told you that
4 Enrique Morales was arrested?

01:26:55 5 A No.

6 Q Do you remember when Luis told you that -- about the
7 350,000-dollar seizure?

8 A He told me that there had been money, but I didn't know it.
9 Not until right now did I know the amount. I didn't know the
01:27:33 10 amount.

11 Q Do you remember when Luis told you that money had been
12 seized by the Drug Enforcement Administration?

13 A No.

14 Q Did Luis tell you that he lied to his lawyers trying to get
01:27:59 15 the money back?

16 A That Luis had lied to his attorneys, no.

17 Q Did Luis tell you that he filed a -- or signed a false
18 affidavit with the Court in an effort to try to get the money
19 back?

01:28:21 20 A No.

21 MR. LIDDLE: We have no more questions, your Honor.

22 THE COURT: All right.

23 Any redirect?

24 MR. AHMED: Yes, your Honor.

01:28:52 25 //

Avevalo Serna - Redirect/Ahmed

1 REDIRECT EXAMINATION

2 BY MR. AHMED:

3 Q Starting with the last question about the money that was
4 seized, did Luis hire any lawyers in the United States?

01:29:27 5 A Not that I know of. Not that I'm aware of.

6 Q The business that Luis had with Enrique in the United
7 States, was that supposed to be through Petrojed?

8 A Well, that's what I know, that it was Petrojed or related
9 to Petrojed.

01:30:11 10 Q And did -- you testified earlier on direct that Luis's
11 father was in the petroleum industry. Is that correct?

12 A Yes. His father worked his entire working life in
13 petroleum.

14 Q Do you know if Luis went to the United States with his
01:30:43 15 father to discuss the petroleum industry -- to discuss the
16 petroleum industry with -- with Enrique?

17 MR. LIDDLE: I'm going to object. I don't know if
18 this witness has any basis to know why Enrique would have gone
19 to the United States -- sorry, why Mr. Ojeda would have gone to
01:31:15 20 the United States.

21 THE COURT: You can rephrase the question.

22 MR. AHMED: Yes, your Honor.

23 BY MR. AHMED:

24 Q Do you know if Enrique's father went to the United States
01:31:28 25 -- I'm sorry, Luis's father?

Avevalo Serna - Redirect/Ahmed

1 MR. LIDDLE: Ever, your Honor? Objection. I don't
2 know what time period we're talking about.

3 THE COURT: Specify.

4 BY MR. AHMED:

01:31:38

5 Q In 2011.

6 A I know that his dad -- Luis's dad went with him once. I
7 don't remember what year, and I don't remember who they talked
8 to over there.

9 Q Do you know someone named Fidel Valdez?

01:32:11

10 MR. LIDDLE: Objection, your Honor. That's beyond the
11 scope.

12 THE COURT: Overruled.

13 THE WITNESS: Yes.

14 BY MR. AHMED:

01:32:20

15 Q Do you know Fidel Valdez?

16 A Yes.

17 Q And who is that person?

18 A He is a businessman from here, from my city. He works in
19 the pharmaceutical industry, and he -- and he is a business
20 investor.

01:32:57

21 Q And did Fidel go to the United States with Luis in 2011?

22 A I know he went with Luis on some occasion. I don't know
23 the year, but they went together.

24 Q The government asked you whether Luis was picking up -- or
25 his business involved -- in the United States involved picking

01:33:24

Avevalo Serna - Redirect/Ahmed

1 up money in parking lots with random people.

2 **A** Yes, he asked me that.

3 **Q** And were you aware that Luis -- that Enrique knew Luis had
4 experience in the money exchange business?

01:33:59 5 **A** Yes, Enrique knew that Luis did have, past tense, a money
6 exchanging business.

7 **Q** So, would it be surprising to you if Luis --

8 MR. LIDDLE: Objection, your Honor. Would it be
9 surprising. It's irrelevant and beyond the scope.

01:34:34 10 THE COURT: Overruled as to beyond the scope.

11 You can rephrase the first part of the question.

12 MR. AHMED: Yes, your Honor.

13 BY MR. AHMED:

14 **Q** Based on your knowledge of Luis's employment and his prior
01:34:47 15 businesses --

16 MR. LIDDLE: Objection, your -- withdraw.

17 THE COURT: He hasn't asked the question yet. Wait
18 until he asks the question.

19 Go ahead.

01:35:01 20 BY MR. AHMED:

21 **Q** Was Luis involved in money transfer transactions from pesos
22 to dollars in his work with Intercambios?

23 **A** I think he was.

24 **Q** And was that one of the services of Intercambios, was
01:35:37 25 exchanging pesos to dollars?

Avevalo Serna - Redirect/Ahmed

1 **A** Yes.

2 **Q** And is it difficult to get physical US dollars in Mexico
3 sometimes?

01:36:02

4 THE COURT: Are you asking about when the defendant
5 was in the currency business or some other time?

6 BY MR. AHMED:

7 **Q** While Luis was in -- I guess from 2007 to 2010, was it
8 difficult to get US dollars in Mexico?

01:36:28

9 MR. LIDDLE: Objection, your Honor. I don't think --

10 THE COURT: I'm sorry. I can't hear you.

11 MR. LIDDLE: Objection, your Honor. I don't think
12 this witness has any basis to answer whether it was difficult to
13 get and to exchange money.

01:36:41

14 THE COURT: She can talk about her own experience and
15 knowledge. If she can answer the question, she may.

16 THE WITNESS: Could you ask the question again,
17 please.

18 BY MR. AHMED:

01:36:56

19 **Q** I'm going to ask a slightly different question: Is it
20 valuable to have physical US dollars in Mexico because of the
21 exchange rate?

22 MR. LIDDLE: Objection, your Honor.

23 THE COURT: She can answer the question. Let's move
24 along.

01:37:26

25 THE WITNESS: Yes, it is valuable. Especially

Avevalo Serna - Redirect/Ahmed

1 previously. Now not so much. But before, it was very valuable
2 to have US dollars.

3 BY MR. AHMED:

01:37:47

4 **Q** Were you involved in Luis signing any affidavits that were
5 submitted to a court in the United States?

6 **A** No.

7 **Q** Have you ever discussed with Luis a lawsuit in Harris
8 County, in Houston to try to get money back?

9 **A** No.

01:38:26

10 MR. AHMED: I'm going to ask that the document be
11 pulled up. This is Document Number 319-7.

12 BY MR. AHMED:

13 **Q** Have you seen this document before?

14 **A** No. Not that I recall, no.

01:39:07

15 THE COURT: What's the date on the document, please?

16 MR. AHMED: The date that it was signed is July 31,
17 2012, your Honor.

18 It was filed on August 22, 2024.

19 BY MR. AHMED:

01:39:28

20 **Q** And the second page of that document written in Spanish is
21 a declaration. Have you seen this before?

22 **A** No.

23 **Q** Do you know Juan Antonio de Silos?

24 **A** Juan Antonio de Silos, yes.

01:40:05

25 **Q** And who is that person?

Avevalo Serna - Recross/Liddle

1 **A** He is an associate or partner with Luis in Petrojed who
2 lived in the petroleum area in Mexico.

3 **Q** And how long had they worked together?

4 **A** I couldn't tell you that exactly, but it must have been
5 more than five years.

01:40:47

6 **Q** And is he alive today?

7 **A** No. He passed away.

8 **Q** When?

9 **A** Maybe four or five years ago, maybe.

01:41:11

10 **Q** Was that from COVID complications?

11 **A** No. He had cancer.

12 **Q** And was he working with Luis doing the lawful business of
13 Petrojed?

14 **A** Yes. In Mexico.

01:41:44

15 MR. AHMED: Pass the witness.

16 MR. LIDDLE: I'm sorry. What was the name of that
17 person?

18 MR. AHMED: Juan Antonio de Silos. Last name is d-e
19 S-i-l-o-s.

01:42:07

20 MR. LIDDLE: d-e S-i-s-o-s, de Sisos?

21 MR. AHMED: l-o-s. de Silos.

22 MR. LIDDLE: de Silos.

23 RECROSS-EXAMINATION

24 BY MR. LIDDLE:

01:42:16

25 **Q** Counsel just asked you if Mr. de Silos was involved in the

Avevalo Serna - Recross/Liddle

1 lawful business of Petrojed?

2 **A** Yes.

3 **Q** Was he also involved in the unlawful business of Petrojed?

4 **A** I don't know whether Petrojed had any unlawful business. I
01:42:50 5 don't know the extent of his participation in Petrojed.

6 **Q** You testified earlier about a conversation you had with
7 your husband about a report.

8 Do you remember that?

9 **A** Yes.

01:43:14 10 **Q** And you seem to remember that conversation fairly well.

11 **A** No, not very well.

12 **Q** Not very well.

13 MR. LIDDLE: Could you pull up that 319-7.

14 BY MR. LIDDLE:

01:43:43 15 **Q** You signed an affidavit that was submitted in this case not
16 too long ago, correct?

17 **A** Yes. That was the letter I sent to the attorney. That
18 one, yes.

19 **Q** Was there anything in there about a reporter talking to
01:44:18 20 your husband?

21 **A** No, I don't think so.

22 **Q** Do you remember when you had that conversation with your
23 husband about the reporter?

24 **A** No.

01:44:34 25 **Q** Was it about the same time that the reporter had talked to

Avevalo Serna - Recross/Liddle

1 your husband or was it years later?

2 **A** I don't know how much time went by. I don't know whether
3 it was days or months but --

4 **Q** Could it have been years later?

01:45:12 5 **A** Yes. We might have spoken about that years later, as well,
6 yes.

7 **Q** But the first time your husband told you about that
8 reporter, was it close in time to when he said he spoke to the
9 reporter?

01:45:35 10 **A** I might be able to say yes but truth is it's been such a
11 long time since that happened, it's difficult for me to place
12 it.

13 **Q** Did you say that your husband read the article that the
14 reporter wrote?

01:46:12 15 **A** Yes.

16 **Q** And do you know that the article dealt with the seizure of
17 money by the Drug Enforcement Administration?

18 **A** Yes.

19 **Q** And do you know that the article was written right around
01:46:47 20 the same time as this affidavit that you were just shown which
21 is up on the screen right now that your husband signed?

22 **A** No, I didn't know. I didn't know that.

23 **Q** Do you now know that your husband signed an affidavit
24 stating that the money that was seized belonged to Petrojed?

01:47:29 25 **A** Yes, I know that now.

Avevalo Serna - Recross/Liddle

1 Q But now is the first time you ever knew that?

2 A Yes, that's right.

3 Q Even though this entire forfeiture case was the topic of
4 the article the reporter was writing and talking to your husband
01:48:03 5 about?

6 A Yes, that's right.

7 Q And did you know that this affidavit is false, that the
8 money that was seized by the Drug Enforcement Administration had
9 nothing to do with Petrojed?

01:48:36 10 MR. AHMED: Objection, your Honor. Foundation. She
11 said she doesn't know about the business.

12 THE COURT: If she can answer the question, she can.
13 If she doesn't know, she can say that.

14 THE WITNESS: What was the question?

01:49:02 15 BY MR. LIDDLE:

16 Q Do you know that the money that was seized by the Drug
17 Enforcement Administration had nothing to do with Petrojed?

18 A I did not know. I don't know.

19 Q Counsel asked you previously about Fidel Valdez?

01:49:39 20 A Yes.

21 Q Was he involved in the oil business?

22 A No. As far as I know, he wasn't.

23 Q Was he involved in picking up hundreds of thousands of
24 dollars of US cash in the United States in parking lots?

01:49:59 25 A No, not that I know of.

Avevalo Serna - Recross/Liddle

1 Q Was he involved in taking hundreds of thousands of dollars
2 of cash and splitting it up into four or more different bank
3 accounts in the United States?

4 A No, I don't know.

01:50:39 5 Q Counsel also asked you about Intercambios. They closed in
6 2010?

7 A Yes, I think so.

8 Q Do you remember about when in 2010?

9 A No.

01:51:08 10 Q Was Intercambios involved in picking up hundreds of
11 thousands of dollars in US cash in parking lots in the United
12 States?

13 A No, not that I know.

14 Q Was Intercambios involved in taking hundreds of thousands
01:51:40 15 of dollars of US cash and splitting it up and depositing it into
16 four or more US bank accounts?

17 A I don't know.

18 Q Would that surprise you, that your husband would file --
19 sign a false affidavit to try to get back \$350,000 cash that was
01:52:09 20 seized?

21 A Of course.

22 MR. LIDDLE: I have no further questions, your Honor.

23 THE COURT: Anything further?

24 MR. AHMED: Yes, just a few followups, Judge.

01:52:37 25 //

1 FURTHER REDIRECT EXAMINATION

2 BY MR. AHMED:

3 Q Fidel Valdez, was he an investor?

4 A Yes.

01:52:41 5 Q I'm going to show you a document. It's 319-8, page 4. And
6 this is a document that is titled "Waiver of Interest in Seizure
7 Proceedings."

8 Have you seen this document before?

9 A No.

01:53:25 10 Q Did you discuss with Luis in late 2013 about the money that
11 was seized in Harris County?

12 A No.

13 Q The next page, page 5 of that same document, do you
14 recognize that document?

01:53:55 15 A Yes. It appears that -- it appears to be a driver's
16 license of -- Luis's driver's license.

17 Q Does it look like his full and correct name and his actual
18 driver's license?

19 A Well, it appears to be. It's blurry but --

01:54:32 20 Q And is that the same RFC or the CURP number that we
21 discussed earlier?

22 A Yes, it appears to be.

23 Q Final question --

24 THE COURT: Sorry. What exhibit number was that?

01:54:52 25 MR. AHMED: That would be 319-8 --

Avevalo Serna - Further Redirect/Ahmed

1 THE COURT: Thank you.

2 MR. AHMED: -- page 5.

3 It's Exhibit 8 of the government's first reply.

4 It's what was filed in Harris County in 2013.

01:55:12

5 BY MR. AHMED:

6 Q Your health, did it affect your -- your medical diagnosis
7 in 2012, did it affect your memory?

8 A Yes, a little.

01:55:46

9 Q The things that were happening after you were diagnosed in
10 May 2012, you said you had severe symptoms for about six months?

11 A Yes, that's right.

12 Q And during that time period, was your memory affected by
13 your medical diagnosis from that time period?

14 A Without a doubt.

01:56:24

15 MR. AHMED: Pass the witness, your Honor.

16 THE COURT: I have one question: You talked about
17 having your visas revoked by the consulate in Mexico.

18 Do you recall that?

19 THE WITNESS: Yes.

01:56:45

20 THE COURT: What was your understanding as to the
21 reason that occurred?

22 THE WITNESS: In the letter that they sent us, they
23 told us that they had reason to believe that we were involved
24 with people who dealt with drugs or had business with drugs.

01:57:33

25 And that's all.

1 THE COURT: Thank you.

2 Any other questions of this witness?

3 MR. AHMED: No, your Honor.

4 THE COURT: May this witness --

01:57:53 5 MR. LIDDLE: I have no questions, your Honor.

6 THE COURT: Thank you.

7 May this witness be excused?

8 MR. AHMED: Yes, your Honor.

9 MR. LIDDLE: Yes, your Honor.

01:58:00 10 THE COURT: Thank you.

11 Thank you very much.

12 Do you have another witness?

13 MR. AHMED: No other witnesses, your Honor.

14 THE COURT: All right. Are you resting?

01:58:14 15 MR. AHMED: Your Honor, there is some factual, I
16 guess, claims that we made in some of the pleadings. But they
17 refer to discovery materials. If the Court would allow me to
18 proffer --

19 THE COURT: That's fine.

01:58:30 20 MR. AHMED: -- a few of those facts --

21 THE COURT: That's fine.

22 MR. AHMED: -- just to make sure that they're on the
23 record as being in evidence.

24 One of the main issues, Judge, that I know is
01:58:46 25 proffered to the Court was just from review of the discovery

1 evidence related to the wiretaps and the role of some of the
2 co-conspirators in opening up bank accounts that were in the
3 name of Luis's company.

4 Specifically, there is an individual named Lance
01:59:09 5 Gordon (phonetic spelling) who was -- who opened up the Ciro
6 Logistic Solution bank account at the Post Oak Bank and that was
7 at the direction of Enrique Morales. So, it's a company that is
8 -- belongs to Mr. Ojeda. The name of the company belongs to
9 Mr. Ojeda, but the idea and the bank individuals that were
01:59:35 10 involved in opening up the bank account were someone other than
11 Mr. Ojeda.

12 Additionally, Judge, regarding the affidavits and
13 the lawyers that were involved in Harris County, the proffer
14 would be that Mr. Ojeda's co-defendants, specifically, Alberto
01:59:55 15 -- Alberto Morales, is the one that paid the attorney in the
16 Harris County case and that Luis Ojeda did not hire that
17 attorney.

18 And there is a phone conversation which is one of
19 the -- which was written in our motion. But there was a phone
02:00:09 20 conversation between Alberto Morales and Enrique Morales where
21 they discussed how do we clean the money in the name of
22 Petrojed, the 350,000 that was seized, because there was a
23 transportation agreement between one of the co-defendants and
24 the Petrojed, I guess, phase of the company in Houston.

02:00:36 25 So, there was a discussion that Luis was --

1 Mr. Ojeda was not involved between Alberto Morales and Enrique
2 Morales where they actually made a plan to have Luis claim this
3 money.

02:00:56 4 THE COURT: I'm sorry. Is the proffer that Mr. Ojeda
5 did not know that Mr. Alberto and Mr. Enrique Morales were going
6 to make the claim in his name?

7 MR. AHMED: No, your Honor, it's not. It's just --
8 it's the idea of whose -- whose idea was it and the reason for
9 why Petrojed would have a claim to the money, that there was a
02:01:15 10 transportation agreement session that the money was supposed to
11 be transported from one individual and transferred to Petrojed
12 in -- and transferred to the account eventually is what
13 happened.

14 So, the basis of why Petrojed would make a claim
02:01:33 15 as to whether or not that was completely false, who thought of
16 the idea, there's some wire intercepts as to how the idea
17 originated; and it wasn't from Mr. Ojeda. But I'm not making
18 the proffer that he wasn't aware or that he didn't sign the
19 document.

02:01:50 20 THE COURT: All right.

21 MR. AHMED: That's it.

22 THE COURT: All right. Let me hear from the
23 government.

24 MR. LIDDLE: I would just like to follow up on that.
02:02:01 25 The first proffer that counsel talked about, what exactly -- I'm

Polanco - Direct/Liddle

1 not sure what that proffer is.

2 Counsel, are you going to --

3 Is counsel going to offer evidence to support
4 that? I mean, it was something about Lance Gordon opening up
02:02:14 5 accounts without Mr. Ojeda even knowing, even though it's in his
6 name. I don't know where this evidence is.

7 MR. AHMED: I can file the report, Judge --

8 THE COURT: That's fine.

9 MR. AHMED: -- to follow up.

02:02:24 10 THE COURT: All right. Can you do it promptly so that
11 the government has a chance to respond.

12 MR. AHMED: I'll try to find it now.

13 THE COURT: Thank you.

14 MR. LIDDLE: Thank you, your Honor.

02:02:35 15 THE COURT: Does the government have a witness ready?

16 MR. LIDDLE: Yes, your Honor. The government would
17 call DEA Special Agent Kedwin Polanco.

18 THE COURT: Raise your right hand, please.

19 (The witness, **KEDWIN POLANCO**, called on behalf of the
02:03:04 20 government, was sworn.)

21 THE COURT: Go ahead, please.

22 DIRECT EXAMINATION

23 BY MR. LIDDLE:

24 **Q** Good afternoon

02:03:12 25 **A** Good afternoon.

Polanco - Direct/Liddle

1 Q Please state and spell your name for the record.

2 A My name is Kedwin Polanco, K-e-d-w-i-n. Last name Polanco,
3 P-o-l-a-n-c-o.

02:03:25 4 THE COURT: Can you talk directly into that
5 microphone, please, sir. It doesn't pick up from a distance.

6 THE WITNESS: Okay.

7 THE COURT: You'll have to move closer.

8 THE WITNESS: Thank you, ma'am.

9 THE COURT: Thank you.

02:03:31 10 BY MR. LIDDLE:

11 Q And what do you do for a living?

12 A I'm a special agent with the Drug Enforcement
13 Administration.

14 Q How long have you been doing that?

02:03:38 15 A Over seven years.

16 THE COURT: Closer.

17 THE WITNESS: Yes, ma'am.

18 BY MR. LIDDLE:

19 Q Very generally, what are your responsibilities?

02:03:42 20 A My responsibilities involve identifying drug traffickers
21 and finding or gathering evidence to bring them to prosecution.

22 Q And are you familiar with the Luis Ojeda Medina case?

23 A Yes, sir, I am.

24 Q How are you familiar?

02:03:59 25 A I inherited the case with multiple agents.

Polanco - Direct/Liddle

1 Q Are you currently the case agent?

2 A Yes, sir, I am.

3 Q Were you involved in any way in the investigation leading
4 up to the indictment in Mr. Ojeda Medina?

02:04:12 5 A No, sir, I was not.

6 Q Were you involved in any way in any attempts to locate or
7 extradite Mr. Ojeda Medina or any of his co-defendants?

8 A No, sir, I was not.

9 Q Do you recognize the defendant, Mr. Ojeda Medina, in the
02:04:23 10 courtroom?

11 A Yes, sir, I do.

12 Q Could you please identify him.

13 A He's the gentleman with a grayish cream shirt sitting
14 between legal counsel, facial hair.

02:04:39 15 Q When did you first meet Mr. Ojeda?

16 THE COURT: Can you also use the mike, please, sir,
17 closer.

18 THE WITNESS: I met Mr. Ojeda following his
19 extradition to the United States from Mexico on September 8th of
02:04:55 20 2023.

21 BY MR. LIDDLE:

22 Q Did you meet him again after that?

23 A Yes, sir, I did.

24 Q And when was that?

02:04:59 25 A On December 18 of 2023.

Polanco - Direct/Liddle

1 Q And under what circumstances?

2 A It was for a proffer interview.

3 Q And was Mr. Ojeda's counsel present?

4 A Yes, sir.

02:05:12 5 Q Did Mr. Ojeda discuss his conduct in this case?

6 A Yes, sir.

7 Q Did he say anything about opening up business bank accounts
8 in the US?

9 A Yes, he did.

02:05:24 10 Q And what did he say about it?

11 A Mr. Ojeda indicated during the proffer that he opened
12 multiple bank accounts to use them for oil business
13 transactions.

14 Q Is that what he told the banks?

02:05:42 15 A That's what he told the banks.

16 Q Okay. And were they in the names of Ciro and Petrojed?

17 A Yes, sir, that's my understanding.

18 Q And did he say -- let me back up a second. He told the
19 banks that that's why he was opening up the accounts, correct?

02:06:02 20 In reality, did he tell you what he was going to use the
21 accounts for?

22 A Yes, sir. During the same proffer, he indicated that these
23 bank accounts were going to be used to deposit bulk currency
24 unrelated to oil business accounts or the general business.

02:06:18 25 Q And did you have another chance to meet Mr. Ojeda?

Polanco - Direct/Liddle

1 **A** Yes, sir, I did.

2 **Q** And when was that?

3 **A** It was on February 5th of 2024.

4 THE COURT: I'm sorry. Can you --

02:06:31 5 THE WITNESS: February 5th of 2024. I'm sorry.

6 THE COURT: Thank you.

7 BY MR. LIDDLE:

8 **Q** And under what circumstances?

9 **A** It was a follow-up proffer interview.

02:06:40 10 **Q** And during that proffer, did Mr. Ojeda discuss a business
11 called Triunfo de Mexico?

12 **A** Yes, he did.

13 THE COURT REPORTER: I'm sorry. Discuss what?

14 MR. LIDDLE: A business called Triunfo de Mexico.

02:06:52 15 THE COURT: I'm sorry. Can you spell it.

16 MR. LIDDLE: T-r-i-u-n-f-o d-e M-e-x-i-c-o.

17 THE COURT: Thank you.

18 BY MR. LIDDLE:

19 **Q** And what was the answer again?

02:07:13 20 **A** Yes, he did discuss Triunfo de Mexico.

21 **Q** And did he say who owned it?

22 **A** I don't recall.

23 **Q** Do you have any notes or anything that would help you
24 remember?

02:07:26 25 **A** Let me review my reports.

Polanco - Direct/Liddle

1 Yes, sir. Can you repeat the question one more
2 time.

3 **Q** Did Mr. Ojeda indicate who owned Triunfo de Mexico?

4 **A** It is my understanding that he owned Triunfo de Mexico.

02:08:21 5 **Q** And did he indicate how Triunfo de Mexico bank accounts
6 were being used?

7 **A** Yes, sir, he did.

8 **Q** What did he say?

9 **A** He had mentioned that those bank accounts were actually --
02:08:33 10 I got to refer my report. He mentioned that those bank accounts
11 were used by another co-defendant for making illegal money
12 transactions.

13 **Q** And did he take personal -- did Mr. Ojeda take
14 responsibility for the use of the Triunfo bank accounts?

02:08:57 15 **A** He didn't take responsibility for the transactions, no.

16 THE COURT: I think the question was did Mr. Ortega --
17 I'm sorry, Mr. Ojeda, did he say that he used the bank account?

18 THE WITNESS: No, ma'am, I don't recall that.

19 BY MR. LIDDLE:

02:09:12 20 **Q** But he did say that they were used for illegal
21 transactions?

22 **A** Yes, sir.

23 THE COURT: Did he name the co-defendant?

24 THE WITNESS: Yes, ma'am, he did.

02:09:20 25 THE COURT: And who was that?

Polanco - Direct/Liddle

1 THE WITNESS: Mr. Rios.

2 THE COURT REPORTER: I'm sorry?

3 THE WITNESS: Rios, R-i-o-s.

4 BY MR. LIDDLE:

02:09:28 5 **Q** Now, unlike the Triunfo accounts where Mr. Ojeda did not
6 take responsibility, going back to the first proffer, did
7 Mr. Ojeda take responsibility for the use of the US bank
8 accounts in the names of Petrojed and Ciro?

9 **A** One more time.

02:09:48 10 **Q** You testified that Mr. Ojeda did not take personal
11 responsibility of the illegal transactions that were made
12 through the Triunfo bank accounts, correct?

13 **A** Correct.

14 **Q** But as you previously testified in the first proffer,
02:10:03 15 Mr. Ojeda did take personal responsibility for the illegal
16 transactions that were made through Petrojed and Ciro bank
17 accounts?

18 **A** He was aware of them, yes, sir.

19 **Q** Did Mr. Ojeda say anything at either proffer about money
02:10:31 20 that was seized by the DEA?

21 **A** I don't -- I don't recall, sir. I know it was mentioned
22 throughout, but I don't recall specific details.

23 **Q** Might you remember if you looked back at your notes?

24 **A** Yes, sir.

02:10:53 25 **Q** Specifically, the 12-29-2023 proffer?

Polanco - Direct/Liddle

1 **A** I'm sorry. If you can just walk me through it.

2 **Q** Paragraph 15.

3 **A** All right.

4 Yes, sir. He actually indicated that there was a
02:11:41 5 money seizure in which the money actually would be going to
6 Mr. Alberto's people.

7 **Q** And did that money have anything to do with Petrojed?

8 **A** It did. I believe so.

9 **Q** It had something to do with Petrojed?

02:11:59 10 **A** It's my understanding.

11 **Q** That's your memory or are you seeing that in your notes?

12 **A** Well, I'm seeing it based on the reports and the
13 understanding on the proffer interviews that we had with
14 Mr. Ojeda.

02:12:33 15 **Q** Do you know who Enrique Morales is?

16 **A** Yes, sir.

17 **Q** And have you ever spoken with him?

18 **A** I have.

19 **Q** And have you ever spoken to him about purported phone calls
02:12:43 20 that he's had with Mr. Ojeda?

21 **A** Yes, I had.

22 MR. LIDDLE: Your Honor, may I approach?

23 THE COURT: Yes. Nobody needs to ask permission to
24 approach the witness.

02:13:05 25 MR. LIDDLE: This has been pre-marked as Government's

Polanco - Direct/Liddle

1 Exhibit Number 1 which is a transcript.

2 THE COURT: Do you have a copy for me?

3 MR. LIDDLE: I do.

4 THE COURT: Thank you.

02:13:07 5 BY MR. LIDDLE:

6 Q This is Call Number 4384 from phone number ending in 2816
7 dated June 16, 2011.

8 Do you recognize that transcript?

9 A I do.

02:13:27 10 Q And who is speaking in this phone call?

11 A This conversation is between Mr. Enrique Morales and Luis
12 Ojeda.

13 Q And did you talk to Mr. Morales about this phone call?

14 A Yes, I did.

02:13:43 15 Q Did you play the actual phone call for him?

16 A I actually played those recordings for him.

17 Q And is it fair to say that this phone call generally
18 involved Mr. Ojeda trying to convince Mr. Morales to increase
19 the amount of money they were moving?

02:13:59 20 A That was my understanding of the conversation with
21 Mr. Morales.

22 Q And did Mr. Morales agree with that description?

23 A Yes, sir.

24 Q That was yes?

02:14:09 25 A Yes, he did.

Polanco - Direct/Liddle

1 Q Okay. If you turn to page 5 please of the transcript.

2 And could you read where it says "Kike."

3 A Yes, sir, I can. "Oh, dude. I don't know, dude. It's a
4 nightmare to move that -- all that fucking --"

02:14:37 5 Q And then Luis said?

6 A "I know."

7 Q And then, Luis said again?

8 A "I know. I imagined. But is said -- listen, this is --
9 well, I'm saying -- personally, this is the only thing that I'm
10 living off of."

02:14:58 11 Q And "Kike" said?

12 A "Uh-huh."

13 Q And Luis said?

14 A "I mean, I don't have another business right now to say,

02:15:09 15 'Well, I'll live off of the other one and this one doesn't
16 matter if they lower it on us.' But honestly, this is the only
17 one that I have right now, brother; and I wanted to ask you a
18 favor, to help me out. What do you think?"

19 Q And is it fair to say that a reading of this transcript
02:15:30 20 indicates that Mr. Ojeda is saying that he has no other business
21 to live off of other than what he's doing with Mr. Morales?

22 A Yes, sir. That was my understanding when I listened to
23 that conversation, and it was confirmed by Mr. Morales.

24 Q I'm going to hand you what's been marked as Government
02:15:59 25 Exhibit 2.

Polanco - Direct/Liddle

1 MR. LIDDLE: Here you go, your Honor.

2 THE COURT: Thank you.

3 BY MR. LIDDLE:

02:16:14

4 Q And this is Call 1858 from telephone ending in 2816 dated
5 May 2, 2011.

6 Do you recognize this transcript?

7 A Yes, sir, I do.

8 Q And who's speaking during this call?

02:16:27

9 A This conversation is between again Enrique Morales and Luis
10 Ojeda.

11 Q And did you also play this call for Mr. Morales?

12 A Yes, I did.

13 Q And is it fair to say that this call came after one of the
14 law enforcement seizures?

02:16:42

15 A Yes, sir.

16 Q And is it fair to say that they're discussing talking to
17 lawyers about trying to get the money back?

18 A That is correct.

19 Q And if you'd turn to page 1 at the bottom.

02:17:01

20 If you could read starting with "Kike": "It's
21 just a matter of gathering."

22 A Okay. Sorry about that. So, "Kike": "It's just a matter
23 of gathering --"

24 Q And Luis said?

02:17:18

25 A "Paperwork."

Polanco - Direct/Liddle

1 Q And "Kike" says?

2 A "A lot of paperwork. Yes, to -- well, it's just to
3 justify."

4 Q And the top of page 3, Luis says?

02:17:30 5 A "Well, of course. Of course. What I was also going to ask
6 is that if -- if you could also use -- I can make some invoices
7 for Petrojed or for Giro, as well. You just need to let me know
8 so that -- so that I can prepare them."

9 Q And did Mr. Morales agree that Mr. Ojeda was offering to
02:17:56 10 create false invoices to justify the money that was seized?

11 A Yes, sir.

12 Q Are you aware of a Global Entry application that Mr. Ojeda
13 submitted a few years ago --

14 A I am.

02:18:13 15 Q -- or years ago?

16 And did you talk to anyone at the Custom and
17 Border Protection Trusted Traveler Program about his
18 application?

19 A Yes, sir, I did.

02:18:24 20 Q And did the agent with the Trusted Traveler Program
21 communicate whether or not there was a process back when this
22 application was made whereby agents -- whereby agents who are
23 investigating someone who had applied for Global Entry would be
24 notified about the Global Entry application?

02:18:46 25 A After speaking to the agent, he explained that there was no

Polanco - Cross/Ahmed

1 procedure or process back then and the investigator --

2 THE COURT REPORTER: I couldn't understand you.

3 THE COURT: I'm sorry.

4 THE WITNESS: That the investigator would not have

02:18:58 5 been notified. There is no way of tracking that, whether the
6 investigators were notified or not. There was no procedure in
7 place at the time.

8 BY MR. LIDDLE:

9 Q And have you talked to the prior case agents on -- that
02:19:10 10 were on this case?

11 A Yes, I have.

12 Q And did they indicate whether or not they were aware of a
13 Global Entry application by Mr. Ojeda?

14 A They advised that they were not aware of it.

02:19:22 15 MR. LIDDLE: I have no further questions, your Honor.

16 THE COURT: Go ahead.

17 MR. AHMED: Is it okay if I stay here, Judge?

18 THE COURT: Yes. That's fine.

19 CROSS-EXAMINATION

02:19:34 20 BY MR. AHMED:

21 Q Good afternoon.

22 A Good afternoon.

23 Q We were in the proffer meetings with my client together; is
24 that correct?

02:19:40 25 A Yes, sir, that's correct.

Polanco - Cross/Ahmed

1 Q I didn't know you were testifying until this morning. But
2 I'll try to ask you some questions --

3 A Sure.

4 Q -- about our first meeting that happened in December of
5 last year.

02:19:51

6 One of the main purposes and, I guess, goals of
7 the meeting was to try to provide information against
8 outstanding fugitives in this case.

9 Is that fair to say?

02:20:10

10 A That was not my intention, sir.

11 MR. LIDDLE: Objection. Goals for who?

12 BY MR. AHMED:

13 Q For the proffer meeting, the first one?

14 A That was not my understanding.

02:20:21

15 THE COURT: What was your understanding?

16 THE WITNESS: In speaking to Mr. Ojeda following his
17 extradition to the United States and subsequent interviews, it
18 was my understanding that he actually wanted to cooperate and
19 take a plea agreement.

02:20:35

20 THE COURT: All right.

21 BY MR. AHMED:

22 Q By "cooperate" -- first of all, you were -- you're not
23 directly involved in any plea negotiations?

24 A I am not. No, sir, I'm not.

02:20:46

25 Q And when you say "cooperate," by providing information

Polanco - Cross/Ahmed

1 about outstanding fugitives in this case?

2 **A** Not necessarily, sir. Again, he mentioned that he wanted
3 to cooperate. I interpreted that as him coming forward, taking
4 responsibility, and cooperate with the government.

02:21:07 5 **Q** Okay. We'll get to taking responsibility in a moment. But
6 as far as cooperation, during that meeting in December of last
7 year, my client, Mr. Ojeda, spoke about Carlos Enrique Zamora
8 (phonetic spelling), correct?

9 **A** I have to refer to my report.

02:21:23 10 **Q** Yes. It's paragraph 3, page 1.

11 **A** Just give me one second.

12 THE COURT: While he's looking, let me clarify: Does
13 the government want me to admit Exhibits 1 and 2?

14 MR. LIDDLE: Yes, your Honor.

02:21:54 15 MR. AHMED: I have a copy somewhere, but I don't have
16 them in front of me. I have no objection.

17 THE COURT: All right. They're admitted. And if you
18 need a copy, we'll make you one.

19 MR. AHMED: I do need one --

02:22:02 20 THE COURT: I'm sorry?

21 MR. AHMED: I do need one for this questioning
22 actually.

23 Thank you, Judge.

24 THE WITNESS: Yes, sir. I just reviewed paragraph
02:22:18 25 number 3. What was the question one more time?

Polanco - Cross/Ahmed

1 BY MR. AHMED:

2 Q My client was giving information about Carlos Enrique
3 Zamora, correct?

4 A Yes, sir.

02:22:27 5 Q And he is currently an outstanding fugitive, correct?

6 A I'll have to check back on that.

7 Q You're not sure if he's been arrested?

8 A I am not.

9 Q And in this -- in the information in that paragraph, he's
02:22:42 10 saying that he gave money to Mr. Zamora to start a money
11 exchange business?

12 A Yes, sir.

13 Q And that money exchange business is called Casa de Cambios?

14 A It translates to Casa de Cambios, yes, sir.

02:22:58 15 Q It's Intercambios, correct?

16 A If you want to be technical and proper, yes; but I'm not
17 sure.

18 Q I didn't ask you about your experience. You said seven
19 years in the DEA?

02:23:12 20 A Yes, sir.

21 Q Did you work in Mexico at any point?

22 A I have not.

23 THE COURT: Are you a fluent Spanish speaker?

24 THE WITNESS: Yes, ma'am, I am.

02:23:23 25 THE COURT: Thank you.

1 BY MR. AHMED:

2 Q And so, the next paragraph, paragraph 5, Mr. Ojeda was
3 speaking about Enrique Morales, correct?

4 A Yes, sir.

02:23:37 5 Q And he said that Enrique Morales had a money exchange
6 business in Mexico?

7 A Yes, sir.

8 Q And that he reached out to Mr. Morales to ask questions
9 about the money exchange business?

02:23:53 10 A Yes, sir.

11 Q And that the Moraleses owed money to Luis Ojeda? That's in
12 paragraph 6.

13 A Yes.

14 Q And so, in order to pay off that debt, the Moraleses
02:24:17 15 offered a business opportunity to my client?

16 A I don't know that.

17 Q That's what my client said. I'm not asking you if you know
18 if it's true or not.

19 THE COURT: That's part of the proffer.

02:24:31 20 THE WITNESS: I'm sorry. Can you repeat that
21 question.

22 BY MR. AHMED:

23 Q Sure. I'm going to ask you to look at paragraph 7.

24 Did my client, Mr. Ojeda, tell you and tell the
02:24:40 25 government that the Moraleses tried -- were interested in paying

Polanco - Cross/Ahmed

1 back his debt?

2 **A** Yes, sir.

3 **Q** It states Morales's father actually paid part of it and
4 that his son wanted to take care of that debt?

02:24:57

5 **A** Yes.

6 **Q** And the son being Alberto Morales?

7 **A** I don't know that. I don't recall that.

8 THE COURT REPORTER: Judge, I'm sorry. I need to get
9 my charger.

10 THE COURT: Okay.

11 Hang on one second.

12 BY MR. AHMED:

13 **Q** Okay. And in paragraph 8, my client, Mr. Ojeda, said that
14 he wanted to focus on major companies that needed money
15 exchanged; is that correct?

02:25:52

16 **A** Yes, sir.

17 **Q** And he said that he was interested in having a meeting to
18 discuss oil business with Mr. Ojeda?

19 **A** One more time.

02:26:12

20 **Q** There was discussion about someone named Elvira Garcia
21 (phonetic spelling)?

22 **A** Okay.

23 **Q** And in paragraph 10 it says that Ojeda said Garcia was
24 interested in having a meeting to discuss oil business; is that
25 correct?

02:26:35

Polanco - Cross/Ahmed

1 **A** So, Mr. Luis Ojeda stated that Mr. Garcia was interested in
2 having a meeting with his father.

3 **Q** With Luis's father?

4 **A** With his father. That was my understanding of it.

02:26:51 5 **Q** Yes.

6 **A** Yes.

7 **Q** And because Luis's father is in the oil business?

8 **A** That was my understanding, yes, sir.

9 **Q** And that they flew my client and his father and Fidel
02:27:03 10 Valdez to Houston?

11 **A** Correct.

12 **Q** And you understood that to mean they paid for their
13 flights?

14 **A** I would assume so, but I don't know exactly that's what
02:27:15 15 happened.

16 **Q** Okay. And that Mr. Ojeda in paragraph 11 started a
17 business -- oil and gas business -- industry business in 2005?

18 **A** Yes, sir.

19 **Q** And that -- that would have been Ciro; is that correct?

02:27:32 20 **A** I don't know that.

21 **Q** And in paragraph 13, during the proffer, Mr. Ojeda told the
22 government that he opened up multiple bank accounts?

23 **A** Yes.

24 **Q** And that he thought those bank accounts were being opened
02:27:59 25 for the oil and gas business?

Polanco - Cross/Ahmed

1 **A** No, sir. That's what he told the bank. Mr. Ojeda told the
2 banks that those bank accounts were going to be opened and used
3 for oil business transactions?

02:28:26

4 **Q** He stated that he didn't check the balances on the
5 statements?

6 **A** Correct. He did not check the balance on them, that's
7 correct.

8 **Q** And from your understanding, was there another
9 co-conspirator that was involved in managing the bank accounts?

02:28:43

10 **A** I would believe so, yes, sir.

11 **Q** And was Lance Gordon one of those individuals?

12 **A** What is it? What was the name again?

13 **Q** Lance Gordon.

14 **A** I don't recall that name, sir.

02:28:54

15 **Q** From your review of the evidence -- have you been able to
16 read through the DEA reports in this case?

17 **A** Some of his reports.

18 **Q** Do you remember a report from 2013 that involves the
19 opening of a bank account at Post Oak?

02:29:16

20 **A** No, sir, I don't remember that.

21 **Q** From your just big picture overview of the evidence in this
22 case, is it -- would you say that Alberto Morales and Enrique
23 Morales were the ones directing the opening of these banks?

24 **A** Sir, based on my entire understanding of this case,

02:29:41

25 Mr. Ojeda was heavily involved in this money pick-up operations

1 in Houston, Texas.

2 **Q** And so, how much money was involved in this indictment?

3 **A** It's my understanding there are two money seizures. I
4 believe one was for approximately \$350,000. I don't recall the
5 other amount.

02:30:03

6 **Q** Do you know what the overall amount of money involved in
7 this conspiracy is?

8 **A** Not entirely.

9 **Q** Do you have a copy of the indictment with you?

02:30:21

10 **A** I do not.

11 **Q** Would it be fair to say that it's over \$27 million?

12 **A** I don't have a copy of it.

13 **Q** Okay. But just kind of looking at the case in general, do
14 you know if it's over \$27 million?

02:30:35

15 **A** I don't have it in front of me. I don't recall that
16 information.

17 **Q** How -- do you know how much money went through the bank
18 accounts -- passed through the bank accounts that were opened?

19 **A** I don't know that.

02:30:46

20 THE COURT: I'm sorry. What was the indictment number
21 you cited?

22 MR. AHMED: Indictment number?

23 THE COURT: Yes.

24 MR. AHMED: Like in the docket?

02:30:57

25 THE COURT: No.

Polanco - Cross/Ahmed

1 MR. AHMED: I'm sorry.

2 THE COURT: The indictment dollar figure you read.

3 MR. AHMED: Yes. In the indictment, the number is
4 27,492,000.

02:31:00 5 THE COURT: Thank you.

6 MR. AHMED: That's on page 10 of the indictment.

7 THE COURT: Thank you.

8 Could I ask a question at this point?

9 MR. AHMED: Yes.

02:31:21 10 THE COURT: Did you have any involvement in securing
11 the extradition of Mr. Ojeda?

12 THE WITNESS: No, ma'am, I did not.

13 THE COURT: Do you have any first-hand knowledge of
14 what information about Mr. Ojeda the American law enforcement
02:31:37 15 authorities had or attempted to get before the extradition
16 occurred?

17 THE WITNESS: No, ma'am.

18 THE COURT: Thank you.

19 BY MR. AHMED:

02:31:54 20 **Q** The government was asking questions earlier from my
21 client's wife. You were in the courtroom during that time,
22 correct?

23 **A** I was.

24 **Q** And do you remember questions about money being picked up
02:32:06 25 in parking lots?

Polanco - Cross/Ahmed

1 **A** I remember all those questions, yes, I do.

2 **Q** Was it -- from your understanding, was it the role of
3 Mr. Ojeda to pick up money in parking lots as part of this
4 conspiracy?

02:32:20 5 **A** I don't believe so.

6 **Q** And the individual who was actually transporting the money
7 that was stopped by the police is Willie Whitehurst; is that
8 correct?

9 **A** Sounds about right. But, again, this happened before I
02:32:47 10 inherited the case.

11 **Q** Okay. Going to the second interview that was in February
12 of 2024 -- do you have that report?

13 **A** Yes, sir. Just give me one second, please.

14 Okay, I'm ready.

02:33:26 15 **Q** And so, in paragraph 2, actually on the second page, there
16 was a discussion about bank accounts opened and managed by
17 Carlos Rios Zamora (phonetic spelling).

18 Do you see that?

19 THE COURT REPORTER: I'm sorry. What was the name?

02:33:37 20 MR. AHMED: Carlos Rios Zamora.

21 THE WITNESS: Yes, sir, I see that.

22 BY MR. AHMED:

23 **Q** And Mr. Ojeda said that he knew there was a lot of money
24 going through accounts but that Carlos was the one managing
02:34:02 25 those accounts?

1 **A** Yes, sir.

2 **Q** And so, the government asked you questions about Triunfo de
3 Mexico?

4 **A** Yes, they did.

02:34:31 5 **Q** So, in paragraph 3 Mr. Ojeda stated that that was a
6 legitimate charity that was tax exempt?

7 **A** Yes, sir.

8 **Q** And, also, he stated that the bank accounts were used by
9 Carlos Zamora for illegal money laundering activities?

02:34:48 10 **A** Correct.

11 **Q** And so, that -- from your memory of the proffer and from
12 these notes, did Mr. Ojeda state that he was involved in any of
13 those money laundering transactions?

14 **A** I don't recall.

02:35:00 15 THE COURT: You don't recall that he did or whether he
16 did?

17 THE WITNESS: No. Whether he was involved in each
18 transaction.

19 BY MR. AHMED:

02:35:09 20 **Q** There was testimony earlier from his wife about this
21 non-profit organization being closed at some point.

22 **A** Sorry. I don't understand the question.

23 **Q** From your understanding of this organization Triunfo, was
24 it active as a legitimate charity at some point and then closed?

02:35:29 25 **A** I don't know that. I don't know that to be the case.

Polanco - Cross/Ahmed

1 Q Okay. But as far as you know, is there any evidence that
2 my client was involved with money laundering through Triunfo?

3 A It's my understanding based on the statements that he made
4 that he was involved.

02:35:50 5 Q In what way was he involved?

6 A He opened the accounts. He knew -- like I said before, he
7 mentioned in the report that money was being used in those
8 accounts.

9 Q Do you know who owned Triunfo de Mexico?

02:36:08 10 A Not necessarily. But my understanding is Mr. Ojeda.

11 Q That he owned the nonprofit?

12 A I'm sorry?

13 Q That he owned the nonprofit, the Triunfo de Mexico?

14 A Triunfo de Mexico, correct.

02:36:22 15 Q And do you remember testimony or information that my client
16 gave that he -- that the accounts -- that the organization had
17 been closed? It's in paragraph 4.

18 A Yes, sir.

19 Q So, in 2006 -- my client said in 2006 that all the bank
02:36:48 20 accounts linked to Triunfo had been closed?

21 A Correct.

22 Q But that this other individual, Carlos Rios, had access and
23 power of attorney over these accounts?

24 A Yes, sir.

02:37:01 25 Q And that Rios opened new bank accounts to conduct money

Polanco - Cross/Ahmed

1 laundering?

2 **A** Yes, sir.

3 **Q** So, from your review of the evidence, is there any
4 awareness or knowledge from my client that he was money
02:37:17 5 laundering through Triunfo?

6 **A** I don't know that, sir. Again, this is statements made
7 during a proffer interview.

8 **Q** Understood.

9 THE COURT: Can I ask a question at this point --

02:37:29 10 MR. AHMED: Yes.

11 THE COURT: -- for both sides? I'm concerned that
12 we're wandering a bit from the focus of this motion and the
13 response.

14 MR. AHMED: Yes.

02:37:40 15 THE COURT: The question I think is whether Mr. Ojeda
16 continued to live and work openly in Mexico with knowledge of an
17 investigation or charges pending against him. That's --

18 MR. AHMED: The legal element that I have in mind --

19 THE COURT: Sorry?

02:38:01 20 MR. AHMED: The legal element I have in mind here is
21 to prove prejudice if your Honor -- if the Court doesn't presume
22 prejudice and we have to show that there's documents relating to
23 legitimate money exchange business transactions and my client's
24 involvement in legitimate money exchange and oil.

02:38:17 25 THE COURT: Is your point that the records relating to

Polanco - Cross/Ahmed

1 those transactions that you assert are legitimate are no longer
2 available?

3 MR. AHMED: Yes. And witnesses. And so, their
4 relevance to his defense is just what I'm trying to do. But
02:38:35 5 I'll speed it up.

6 THE COURT: All right. If you could tie it more
7 directly to the point of prejudice, that would be helpful.

8 MR. AHMED: Yes, your Honor.

9 BY MR. AHMED:

02:38:48 10 Q Well, just kind of asking generally, is there any evidence,
11 either from the proffer or from the wiretaps, that my client,
12 Mr. Ojeda, knew that the source of the money that was being --
13 that was seized was drug money?

14 A I don't have that information, sir. I have reviewed the
02:39:12 15 information and what's here in this entire case.

16 Q In the two meetings that you attended with Mr. Ojeda, did
17 he ever say, "I knew the money that was seized was drug money"?

18 A I don't recall that information.

19 Q So, that's -- that's a no, that he didn't --

02:39:28 20 A I don't recall that.

21 Q Is it in either of the two reports that you have in front
22 of you?

23 A Not that I can see right now, no, sir.

24 Q So, did he ever admit and accept responsibility for
02:39:44 25 knowingly transferring drug money?

Polanco - Cross/Ahmed

1 **A** I don't recall that.

2 **Q** The government asked you about Petrojed. Do you know if
3 Petrojed was ever investigated in Mexico by the United States?
4 Let me rephrase that. Do you know if the DEA or the US
02:40:21 5 Government ever investigated the Petro -- the Mexican company
6 Petrojed?

7 **A** I don't know that.

8 **Q** And you said that you spoke to someone at CBP regarding
9 Global Entry?

02:40:41 10 **A** Yes, I did.

11 **Q** And that they said there was no process to -- no procedure
12 to alert when someone was being investigated who had Global
13 Entry?

14 **A** To notify investigating agents on, yes, sir.

02:40:57 15 **Q** CBP is the agency that had lookouts for my client; is that
16 correct?

17 **A** I believe so.

18 THE COURT: What does CBP stand for?

19 MR. AHMED: I'm sorry, your Honor. Custom and Border
02:41:17 20 Patrol.

21 THE COURT: Thank you.

22 BY MR. AHMED:

23 **Q** And that's a Department of Homeland Security agency?

24 THE COURT: All right.

02:41:18 25 BY MR. AHMED:

Polanco - Cross/Ahmed

1 Q And I think you testified earlier that the DEA was not
2 aware that my client had Global Entry permission?

3 A There is no notification for agents in which they were --
4 they would know whether it was a hit or not.

02:41:38 5 Q Understood.

6 THE COURT: So, agents of both DEA and Customs and
7 Border Patrol have no mechanism for learning when someone --

8 THE WITNESS: So, it was my understanding after
9 speaking to one of my contacts there that there was no procedure
02:41:54 10 in place to notify the investigating officers whether there was
11 a hit on one of their targets or one of the -- the person being
12 investigated.

13 THE COURT: Is that true for Custom and Border Patrol,
14 as well?

02:42:06 15 THE WITNESS: I don't recall that.

16 THE COURT: Okay.

17 THE WITNESS: But I also learned that procedure has
18 changed since then.

19 THE COURT: I'm looking for information about the
02:42:18 20 procedure --

21 THE WITNESS: Yes, ma'am.

22 THE COURT: -- back then.

23 THE WITNESS: Yes, ma'am.

24 MR. AHMED: Pass the witness, your Honor.

02:42:25 25 THE COURT: Thank you.

Polanco - Redirect/Liddle

1 //

2 REDIRECT-EXAMINATION

3 BY MR. LIDDLE:

4 **Q** Just a couple of follow-up questions.

02:42:31 5 **A** Yes, sir.

6 **Q** Special Agent Polanco, is it fair to say that you've done a
7 lot of proffers?

8 **A** Yes, I have.

9 **Q** And in your experience, do defendants often make
02:42:45 10 self-serving statements during proffers?

11 **A** Correct.

12 **Q** And is it your experience that defendants don't always
13 admit to everything that they did, especially at the first
14 couple proffers?

02:42:58 15 **A** Yes, sir.

16 **Q** And in this proffer, Mr. Ojeda blamed a lot on Carlos Rios
17 Zamora; is that right?

18 **A** Yes.

19 **Q** Counsel asked you if the defendant admitted to knowing the
02:43:13 20 money was drug money.

21 Do you remember him asking that?

22 **A** (No response.)

23 **Q** The defendant did admit, though, that he opened these bank
24 accounts knowing they would be used to transact illegal money?

02:43:29 25 **A** Yes, sir, he did.

Polanco - Recross/Ahmed

1 Q Okay.

2 MR. LIDDLE: I have no further questions.

3 THE COURT: Thank you.

4 RECROSS-EXAMINATION

02:43:40

5 BY MR. AHMED:

6 Q That last question, what kind of illegal money did my
7 client say that he was aware of?

8 A He didn't specify, sir. I don't recall the specification.

02:43:53

9 Q So, he did not say that he was aware that it was drug
10 money?

11 A I don't recall that.

12 Q Did he say that he was aware it was illegal money?

13 A Yes, sir. That's right in my report.

14 Q And so, what was the context of that statement?

02:44:04

15 A Mr. Ojeda was very difficult to control during the proffer
16 interview. He would jump from one statement and give you
17 something entirely different. And that is the reason why that
18 statement does not go into further details. I don't recall the
19 specific structure --

02:44:24

20 THE COURT: The question was what the context was. Do
21 you remember the question?

22 THE WITNESS: No, I do not remember the context of the
23 statement.

24 BY MR. AHMED:

02:44:46

25 Q Is there any evidence that he was told that this was money

Polanco - Recross/Ahmed

1 from an illegal source?

2 **A** I don't have any evidence on that at this moment.

3 **Q** The first question -- the first line of questions was about
4 the wire conversations, wire intercepts?

02:45:05 5 **A** Correct.

6 **Q** And in any of those wire transactions that you read from
7 this morning or this afternoon or from reading previously, is
8 there any individual or co-conspirator or any statement about my
9 client that shows that he knew that the money that was seized
10 was from an unlawful source?

02:45:27 11 **A** Yes. Somewhere in the two recordings that I played for
12 Mr. Enrique, no, he didn't mention any individual names.

13 MR. AHMED: I pass the witness.

14 THE COURT: I have one question.

02:45:45 15 THE WITNESS: Yes, ma'am.

16 THE COURT: The wiretaps that have been presented in
17 transcript form that, apparently, took place in May and June of
18 2011. Did the wiretap -- did the ability to place a wiretap on
19 these specific numbers -- I gather that's how it was done. Is
20 that right?

02:46:07 21 THE WITNESS: I'm sorry, ma'am. Can you rephrase.

22 THE COURT: Was the wiretap placed on specific
23 telephone numbers?

24 THE WITNESS: Yes, ma'am.

02:46:19 25 THE COURT: And you knew those numbers, obviously?

Polanco - Recross/Ahmed

1 THE WITNESS: Yes, ma'am.

2 THE COURT: The first one?

3 THE WITNESS: Yes, ma'am.

4 THE COURT: The agency?

02:46:25 5 THE WITNESS: Yes, ma'am.

6 THE COURT: The agents putting --

7 THE WITNESS: Yes, ma'am.

8 THE COURT: All right. Do you know if knowledge of

9 the telephone numbers on either end of the conversation would

02:46:44 10 enable a search to a physical address?

11 THE WITNESS: I don't know that, ma'am. I'm sorry.

12 THE COURT: There's a name for the kind of directory
13 that allows you to go from an address to a phone number and from
14 a phone number to an address.

02:47:02 15 Are you familiar with that kind of directory?

16 THE WITNESS: No, ma'am.

17 THE COURT: All right. Thank you.

18 Anything further?

19 MR. AHMED: Nothing.

02:47:10 20 MR. LIDDLE: Nothing, your Honor.

21 THE COURT: You may step down, sir. Thank you.

22 Your next witness, please.

23 MR. LIDDLE: Your Honor, the government calls IRS CI
24 Special Agent Harrison Neider.

02:47:22 25 (The witness, **HARRISON NEIDER**, called on behalf of the

Neider - Direct/Liddle

1 government, was sworn.)

2 THE COURT: Please be seated, sir.

3 DIRECT EXAMINATION

4 BY MR. LIDDLE:

02:47:47 5 Q Please state your name and spell it for the record.

6 A Harrison Neider, H-a-r-r-i-s-o-n, N-e-i-d-e-r.

7 Q And what do you do for a living?

8 A I'm a special agent with the Internal Revenue Service,
9 Criminal Investigation.

02:48:05 10 Q For how long?

11 A About one year.

12 Q And just very generally what are your responsibilities?

13 A Investigate criminal violations of Internal Revenue Code
14 and related financial crimes.

02:48:21 15 Q Are you familiar with the Luis Ojeda Medina case?

16 A Yes.

17 Q And how are you familiar?

18 A I am the case agent.

19 Q And when did you become the case agent?

02:48:29 20 A Approximately, two months ago.

21 Q Were you involved in any way in the investigating leading
22 up -- investigation leading up to the indictment of Mr. Ojeda
23 Medina?

24 A No.

02:48:41 25 Q Were you involved in any way in any attempts to locate or

Neider - Direct/Liddle

1 extradite Mr. Ojeda Medina or any of his co-defendants?

2 **A** No.

3 **Q** Have you reviewed any financial records in this case?

4 **A** Yes, sir.

02:48:52 5 **Q** Are you familiar with the businesses called Petrojed and
6 Ciro?

7 **A** Yes, sir.

8 **Q** And who owned them?

9 **A** Ojeda Medina.

02:49:03 10 **Q** Have you reviewed records involving Ciro and Petrojed doing
11 purported business in the United States?

12 **A** Yes, sir.

13 **Q** Have you reviewed records involving Petrojed doing
14 purported business in Mexico?

02:49:22 15 **A** Yes, sir.

16 **Q** What records related to Ciro and Petrojed in the United
17 States have you reviewed?

18 **A** Bank statements.

19 **Q** And what records related to Petrojed in Mexico have you
02:49:39 20 reviewed?

21 **A** Two tax returns and three months of bank statements.

22 **Q** And what is your understanding about where the government
23 got these records?

24 **A** From defense counsel.

02:49:55 25 **Q** And were these records in Spanish?

Neider - Direct/Liddle

1 **A** Yes, sir.

2 **Q** Did you have them professionally translated?

3 **A** Yes, sir.

4 **Q** I'm going to hand you what's been marked as Government
02:50:08 5 Exhibit 3.

6 THE COURT: Thank you.

7 MR. LIDDLE: You're welcome, your Honor.

8 BY MR. LIDDLE:

9 **Q** Do you recognize this?

02:50:21 10 **A** Yes, sir.

11 **Q** Did you prepare this?

12 **A** Yes, sir.

13 **Q** Based on the records you reviewed?

14 **A** That's correct.

02:50:26 15 **Q** Okay. Let's look at the -- the first page. It's titled
16 Money In and on the left side says "Petrojed/Ciro Indicted Money
17 Laundering Scheme in the US" and on the right side "Purported
18 Petrojed Oil and Gas Business in Mexico."

19 **A** Yes, sir.

02:50:48 20 **Q** And can you just explain generally what these charts show.

21 **A** Yes, sir. So, on the left side representing the cash in --
22 cash into the United States, there's two businesses here, Ciro
23 Logistics and Petrojed Supplies, total cash deposits is \$1.5
24 million over the statements that we have.

02:51:18 25 And then, on the right side is money coming into

Neider - Direct/Liddle

1 the -- Petrojed in Mexico, statements that were provided -- this
2 was through check or wire or unknown; it was not noted --
3 totaling approximately \$21,000 US over the three statements
4 provided.

02:51:42 5 **Q** So, looking back on the left side, this is money -- these
6 are bank accounts in the United States, correct?

7 **A** Yes, sir.

8 **Q** Okay. And it's covered in two months, June and July, 2011?

9 **A** Yes, sir.

02:51:56 10 **Q** So, more than 1.5 million in US cash was deposited in Ciro
11 and Petrojed during these two months?

12 **A** Yes, sir.

13 **Q** And then, on the right side, in Mexico, we actually have
14 three months of statements, right?

02:52:14 15 **A** Yes, sir.

16 **Q** And in those three months only 21,000 dollars -- US dollars
17 was deposited; is that right?

18 **A** Yes, sir.

19 **Q** And the form of payment of deposits on the left side into
02:52:30 20 US bank accounts was cash?

21 **A** Yes, sir.

22 **Q** 1.5 million in cash?

23 **A** Yes, sir.

24 **Q** And on the right side in Mexico, the form was check and
02:52:42 25 wire?

Neider - Direct/Liddle

1 **A** Yes, sir. Or unknown.

2 **Q** For a little over 21,000?

3 **A** Yes, sir.

4 **Q** And if you could, explain the chart below that.

02:52:54 5 **A** The chart at the bottom is three consecutive days in July
6 for the four accounts, two being at Post Oak and two being at
7 the BBVA. Total cash deposits over these four days was
8 approximately 250,000.

9 **Q** And does this show how that cash was divided up and
02:53:18 10 deposited during those three days?

11 **A** Yes. So, you can see these four transactions each being --
12 the four transactions on three separate days is split into four
13 different accounts. And then, when you total those three
14 accounts -- sorry, total those three days, the total is
02:53:43 15 \$250,000.

16 **Q** Okay. If you could turn to the second page of the exhibit,
17 please. This is entitled "Money Out" and, again, on the left
18 side same title, "Petrojed/Ciro Indicted Money Laundering Scheme
19 in the US"; on the right side "Purported Petrojed Oil & Gas
02:54:04 20 business in Mexico."

21 And could you please explain these charts.

22 **A** Yes. On the left side to the United States accounts, there
23 was total wire withdrawals of one point -- approximately 1.6
24 million to Triunfo de Mexico. On the right side here, this is
02:54:29 25 money moving out of the Petrojed Mexican accounts.

Neider - Direct/Liddle

1 These are by wire, check; but they are going to
2 MCI, Produces S. de R.L. de C.; an account; check cashed;
3 Comercializacion -- excuse my pronunciation -- Asesoria; Pago de
4 Facturas en efectivo September.

02:55:05 5 **Q** I don't mean to cut you off but you don't have to go
6 further.

7 **A** Yes, sir.

8 **Q** We're moving to the third page.

9 And could you please explain what this shows.

02:55:19 10 **A** Yes, sir. The chart on the top is the 2013 tax return, a
11 few snippets of it. Total domestic sales in US dollars was
12 approximately 14,300. And below the 2012 tax return, domestic
13 sales in US dollars was approximately 12,400 US dollars.

14 **Q** And when this says 2012 tax return, does that mean business
02:55:51 15 declared in the year 2012 and filed in 2013?

16 **A** That's correct.

17 **Q** And when it says 2013 tax return, it means business
18 declared in 2013 filed in 2014?

19 **A** That's correct.

02:56:04 20 **Q** And this is in the name of Petrojed?

21 **A** That's correct.

22 **Q** And this reflects the domestic and -- tax returns?

23 **A** Yes, sir.

24 **Q** Thank you.

02:56:16 25 MR. LIDDLE: I have no further questions, your Honor.

Neider - Cross/Ahmed

1 THE COURT: Any cross?

2 MR. AHMED: Briefly.

3 CROSS-EXAMINATION

4 BY MR. AHMED:

02:56:24 5 Q In the money-in section, Special Agent Neider -- good
6 afternoon.

7 A Good afternoon.

8 THE COURT: Exhibit 3?

9 MR. AHMED: Government's Exhibit 3, yes, your Honor.

02:56:31 10 BY MR. AHMED:

11 Q Do you know who deposited the money on the left side into
12 these accounts on -- into the accounts on the left side of this
13 page?

14 A I don't recall.

02:56:53 15 Q And do you have any information to know who made the actual
16 deposits?

17 A I have to refer to the statements again. I don't recall.

18 THE COURT: Do you have access to all the statements?

19 THE WITNESS: Uh-huh. To the -- yeah.

02:57:11 20 THE COURT: Do you have access for all the statements
21 that these accounts were in existence?

22 THE WITNESS: These -- June and July, we have. We
23 also have some of April and May. The activities are very small
24 there. Also, I don't recall if the cash deposit slip states the
02:57:31 25 name of the person who made the deposit or not.

Neider - Cross/Ahmed

1 BY MR. AHMED:

2 Q Okay.

3 THE COURT: Do you have access to -- are those the
4 only bank statements for Ciro and Petrojed that you have access
5 to?

02:57:43

6 THE WITNESS: To the best of my recollection, that's
7 correct.

8 THE COURT: For those two months, June and July of
9 2011?

02:57:52

10 THE WITNESS: Yes.

11 THE COURT: And is the -- the Banorte statements --
12 I'm mispronouncing it, I'm sure -- for Petrojed that are shown
13 on the right-hand chart --

14 THE WITNESS: Uh-huh.

02:58:07

15 THE COURT: -- for April 2013, April 2014, and
16 November 2015, are these the only deposits that you have for
17 Petrojed in the Mexican bank?

18 THE WITNESS: Yes, your Honor.

19 THE COURT: Just those months?

02:58:24

20 THE WITNESS: Yes.

21 THE COURT: And these daily totals that are shown on
22 the bottom --

23 THE WITNESS: Uh-huh.

24 THE COURT: -- for three days in July of 2011 --

02:58:37

25 THE WITNESS: Uh-huh.

Neider - Cross/Ahmed

1 THE COURT: -- are those the -- and the court reporter
2 can't get an "uh-huh." You have to answer out loud.

3 THE WITNESS: Sorry about that. Yes.

02:58:46

4 THE COURT: -- are these the only records of deposits
5 into these bank accounts?

6 THE WITNESS: On the bottom?

7 THE COURT: Yes.

02:59:01

8 THE WITNESS: This is just a snippet of three days
9 from the July statement. So, there's -- in the June and July
10 statements for Ciro and Petrojed, there are many, many cash
11 deposits.

02:59:23

12 THE COURT: All right. That was my question. Do you
13 have the ability to get from Post Oak Bank and BBVA Compass all
14 of the bank activity records for Ciro Logistic and Petrojed, not
15 just these three days?

16 THE WITNESS: Yes. We have that.

17 THE COURT: All right. And have you already obtained
18 those records?

19 THE WITNESS: Yes, your Honor.

02:59:30

20 THE COURT: Do you have any ability -- do you have the
21 same ability to get the records for Ciro and Petrojed for cash
22 deposits for Post Oak Bank and BBVA for dates not limited to
23 June and July of 2011?

02:59:52

24 THE WITNESS: The only months that we have statements
25 for is partial April 2011, May 2011, and June and July of 2011.

Neider - Cross/Ahmed

1 THE COURT: Do you have the ability to get the -- any
2 other statements that reflect deposits into these two bank
3 accounts, at Post Oak Bank and BBVA?

4 THE WITNESS: I don't know at this time.

03:00:15 5 THE COURT: Are these the only months that you asked
6 for?

7 THE WITNESS: These account statements were gathered
8 before I came to the case.

9 THE COURT: All right. Same question: Do you have
03:00:26 10 the same ability to obtain statements from the Mexican bank,
11 Banorte, beyond the bank activity records reflected in this
12 chart on Exhibit 3?

13 THE WITNESS: These three statements were provided by
14 defense counsel.

03:00:46 15 THE COURT: So, the government, as far as you know --
16 as far as you know -- hasn't obtained other bank statements from
17 the Mexican bank for the Petrojed account?

18 THE WITNESS: That's correct.

19 THE COURT: Okay. But you don't know if they could or
03:00:59 20 couldn't?

21 THE WITNESS: That's correct.

22 THE COURT: If you look at page 2, same sort of
23 questions. You have a snippet, you have wire withdrawals in
24 June and July of 2011 --

03:01:15 25 THE WITNESS: Yes.

Neider - Cross/Ahmed

1 THE COURT: -- to Triunfo from Post Oak Bank and BBVA?

2 THE WITNESS: Yes.

3 THE COURT: Do you know if that's the total of the
4 wire withdrawals that were made to this Mexican entity or if
03:01:28 5 these were the only two that you were provided?

6 THE WITNESS: Yes. So, the total at the bottom on the
7 left --

8 THE COURT: Yes.

9 THE WITNESS: -- that is a total of many, many
03:01:39 10 withdrawals to Triunfo de Mexico.

11 THE COURT: Limited to July and -- to June and July of
12 2011?

13 THE WITNESS: Yes, your Honor.

14 THE COURT: All right.

03:01:47 15 THE WITNESS: Yes.

16 THE COURT: Do you know if the records -- the activity
17 reflected in the Banorte statements that are summarized in the
18 chart on the right-hand side of page 2, do you know if there are
19 other Banorte records related to the Petrojed accounts?

03:02:16 20 THE WITNESS: I don't know.

21 THE COURT: Do you know when the tax returns for
22 Mr. Ojeda were obtained?

23 THE WITNESS: When the government obtained them?

24 THE COURT: Yes.

03:02:46 25 THE WITNESS: Defense counsel provided those probably

Neider - Cross/Ahmed

1 about four weeks ago.

2 THE COURT: All right. Do you know if the government
3 has any ability to ask for tax returns from the government of
4 Mexico without the defendant's -- without the taxpayer's
03:03:08 5 knowledge? It's just a do-you-know.

6 THE WITNESS: I think that's possible.

7 THE COURT: Okay.

8 THE WITNESS: I'm not hundred percent.

9 THE COURT: And you said you were new to the case. I
03:03:20 10 gather that means you don't know whether or not the government
11 sought to obtain any tax returns or financial records related to
12 Mr. Ojeda back in 2011.

13 THE WITNESS: In Mexico or in the United States?

14 THE COURT: Start with -- either one.

03:03:35 15 THE WITNESS: In Mexico, I don't know. And in the
16 United States, there was -- there was not an ex parte filed to
17 obtain the tax returns.

18 THE COURT: Or bank accounts? Is that accurate?

19 THE WITNESS: Bank accounts? In what regards? Can
03:03:56 20 you restate it.

21 THE COURT: The Petrojed bank accounts at BBVA and the
22 Ciro bank accounts at Post Oak Bank and BBVA, do you know when
23 the information about the activity in these bank accounts was
24 first requested by the government from the banks?

03:04:10 25 THE WITNESS: I don't know.

Neider - Cross/Ahmed

1 THE COURT: Do you know if it ever was?

2 THE WITNESS: Just to clarify, are you asking beyond
3 the months that I said we have available?

4 THE COURT: Yes.

03:04:21 5 THE WITNESS: I believe those months are available
6 because there are no other months. I think it was opened and
7 closed. That was my understanding.

8 THE COURT: And what is the basis of that
9 understanding? Because I see -- all right. Do you know the
03:04:44 10 basis of that understanding?

11 THE WITNESS: Yes. If I recall correctly, I read it
12 on the cover page from the subpoena results from the bank.

13 THE COURT: When did these bank accounts get
14 subpoenaed?

03:05:02 15 THE WITNESS: 2011, approximately.

16 THE COURT: You don't -- do you know the date?

17 THE WITNESS: Not offhand.

18 THE COURT: Are you confident in the year?

19 THE WITNESS: No.

03:05:15 20 THE COURT: Thank you.

21 Any other questions?

22 BY MR. AHMED:

23 **Q** Can you tell me a little bit about your experience. Do you
24 have international tax experience?

03:05:28 25 **A** No.

Neider - Cross/Ahmed

1 Q How long have you been with the IRS?

2 A I've been a special agent for approximately one year.

3 Q And prior to that?

4 A I worked for CBRE as a commercial real estate analyst. And
03:05:41 5 prior to that, I worked for the Federal Deposit Insurance
6 Corporation conducting bank exams.

7 Q Have you ever worked on a money laundering case before?

8 A No.

9 Q The government asked you about page 1 in the money-in
03:06:00 10 accounts. Do you know -- I think you testified that these
11 accounts were owned by Mr. Ojeda; is that correct?

12 A Per the evidence, that's correct.

13 Q Do you know who opened them?

14 A On the application, it indicates Luis Ojeda Medina.

03:06:20 15 Q Do you know who controlled the accounts, who checked them
16 or deposited money into them?

17 A No, I don't know.

18 Q Do you know who closed the accounts?

19 A No, I do not know.

03:06:37 20 Q The statements on page 2 that says wire trans -- total wire
21 withdrawals to Triunfo de Mexico, do -- does the government have
22 statements for Triunfo's bank accounts?

23 A Not to my recollection, no.

24 Q Are you familiar with the SAT which is like the IRS in
03:07:15 25 Mexico?

Neider - Cross/Ahmed

1 **A** I've never heard of them until right now.

2 **Q** The money that was -- that's indicated there, the
3 1,500,000, is that the same sources of money that's listed on
4 page 2 where it says money out? It's a slightly larger number.
03:08:10 5 One is 1,000,544, the other shows money out of 1,000,573.

6 **A** Yes. Some deposits were omitted because the deposit slip
7 did not indicate cash or some deposits were omitted because they
8 were not cash deposits. That's why they do not match up.

9 **Q** Do you know who controlled or owned the Triunfo de Mexico
03:08:38 10 account?

11 **A** No.

12 **Q** The transactions on the right that says -- for the Mexican
13 bank account for Petrojed, is there any reason to doubt the
14 legitimacy of those transactions? These are in 2013 through
03:08:59 15 2015.

16 **A** What page?

17 **Q** Page 1.

18 MR. LIDDLE: Objection as to vagueness, your Honor.

19 THE COURT: Can you rephrase, please.

03:09:07 20 MR. AHMED: Yes.

21 BY MR. AHMED:

22 **Q** Is there any evidence that after the 2012 indictment was
23 issued that my client was involved in money laundering?

24 **A** I don't know.

03:09:21 25 **Q** So, these transactions in 2013 through 2015, are those

Neider - Cross/Ahmed

1 suspected money laundering transactions?

2 MR. LIDDLE: Objection, your Honor. I don't know how
3 -- are they suspected?

4 THE COURT: I can't --

03:09:38

5 MR. LIDDLE: I'm sorry. The question was are they
6 suspected money laundering transactions. I don't --

7 THE COURT: Are you asking if he suspected them or if
8 he understood that the government was calling them into
9 question?

03:09:50

10 MR. AHMED: The second one, your Honor.

11 THE COURT: All right.

12 If you know, you can answer that.

13 THE WITNESS: Page 1, chart on the right, correct?

14 BY MR. AHMED:

03:09:58

15 Q Correct.

16 MR. LIDDLE: And just so I can clarify, "the
17 government," does that mean the prosecution team -- the
18 prosecutors' decision whether -- whether the prosecutors think
19 these things represent money laundering? That seems like a
20 legal question, your Honor.

03:10:14

21 BY MR. AHMED:

22 Q Is there --

23 MR. AHMED: I can reask it.

24 THE COURT: All right.

03:10:19

25 BY MR. AHMED:

Neider - Cross/Ahmed

1 Q Was there any ongoing investigation of Mr. Ojeda that would
2 suggest that he continued to engage in money laundering after
3 2012?

4 A Say one more time.

03:10:30 5 Q Are you aware of any ongoing investigation or suspicion by
6 the DEA or the IRS of my client engaging in money laundering
7 after 2012?

8 A No.

9 Q Do you know who Lance Gordon is?

03:10:49 10 A No.

11 MR. AHMED: I pass the witness, Judge.

12 THE COURT: Thank you.

13 Anything else?

14 MR. LIDDLE: I have no questions, your Honor.

03:11:00 15 THE COURT: All right.

16 You may step down, sir. Thank you very much.

17 MR. LIDDLE: We just ask that the three exhibits be
18 admitted. Thank you, your Honor.

19 MR. AHMED: No objection.

03:11:09 20 THE COURT: They're admitted. Thank you.

21 I'm looking at the government expectantly.

22 MR. LIDDLE: Your Honor, I don't have anything -- any
23 more witnesses but I will say this: We've heard a lot of
24 questions about inferences and vocations about Mr. Ojeda not
03:11:29 25 having any control or knowledge of what's going on with these

1 accounts.

2 I don't think that's relevant here. But to the
3 extent that your Honor thinks it is, I would ask that we be
4 allowed to offer, you know -- I can proffer right now what we
03:11:44 5 will -- you know, we can offer text messages and phone call
6 transcripts that show Mr. Ojeda, in fact, did know money was
7 going into all of his accounts.

8 THE COURT: Okay. Again, that will become relevant at
9 some point depending on what happens in the case. But the
03:12:02 10 question for today, I don't think, is going to turn on the
11 subject of your proffer.

12 MR. LIDDLE: I agree, your Honor.

13 THE COURT: So, let's --

14 MR. LIDDLE: Thank you.

03:12:12 15 THE COURT: All right. Let's focus on the subject of
16 the motion.

17 Do the parties intend to submit additional
18 witnesses or evidence with respect to the motion?

19 MR. AHMED: No, your Honor.

03:12:24 20 MR. LIDDLE: No, your Honor.

21 THE COURT: Do you want to argue?

22 MR. LIDDLE: Yes, your Honor.

23 THE COURT: Are you prepared to do so now?

24 MR. LIDDLE: Yes, your Honor.

03:12:40 25 MR. AHMED: Yes.

1 THE COURT: All right.

2 MR. AHMED: It's my motion.

3 THE COURT: Thank you.

4 MR. AHMED: Judge, I think that the Court is concerned
03:12:53 5 with who's to blame. The issue is whether the delay is the
6 government's fault or my client's fault. The DC case that I
7 cited is the *Fernandes* case. Every case is distinguishable,
8 Judge. These are a very fact-specific analysis.

9 The distinguishing factor for Mr. Ojeda's case is
03:13:15 10 that he was not extradited for a very long period of time. The
11 government submitted argument and evidence that it was diligent
12 and the reason for the delay was that he did not have a specific
13 address for Mr. Ojeda or at least not one that they were
14 confident in.

03:13:37 15 But I'd ask the Court to look -- scrutinize the
16 record as to whether that's supported by the evidence. In our
17 initial motion, we submitted a large number of DEA reports that
18 were, essentially, case statuses.

19 In my review of those reports, that didn't seem
03:13:54 20 to be the theme of the proffer, that they don't have a specific
21 address for Mr. Ojeda. There's multiple fugitives, five
22 outstanding fugitives. Now it's four. And the government was,
23 understandably, trying to arrest as many as they could and
24 extradite as many as they could.

03:14:10 25 And there was effort to locate the other

1 co-defendants and some conversation, especially what was filed
2 in the affidavits about I guess what looks like controlled
3 conversations, about trying to find my client. But what's
4 lacking is -- and this is where the burden rests on the
5 government, and I don't think they have overcome that burden
6 through the witnesses today who were not really involved in the
7 process.

8 The affidavits fall short of answering a lot of
9 questions. They don't -- the affidavits and the evidence does
10 not answer why the specific addresses that the government had,
11 at least two, were not specific enough. There's the one that
12 was the residential address that was submitted in the 2007 visa
13 and then later the 2018 visa, and the extradition was not filed
14 until 2021.

15 And then, there was a further delay of that
16 extradition process because of how it was filed. The issue --
17 the legal issue that they ran into was, hey, the statute of
18 limitations has already expired. But Mr. Ojeda chose not to
19 fight the extradition. And so, he was extradited in 2013.

20 But it's, essentially, a wait-and-see approach.
21 I don't -- there is no evidence and I don't think the government
22 has argued that filing the extradition request would have been
23 futile even if the address turned out to not be the correct
24 address which the government knows now in hindsight.

25 That is -- would not have stopped the extradition

1 of being granted and, perhaps, he wouldn't have been arrested
2 until the address was located. But he went to the embassy in
3 2018 with his wife. And so, had extradition been --

4 THE COURT: To the consulate I think.

03:16:04

5 MR. AHMED: To the consulate, sorry, Judge. Yes. And
6 with his family and he submitted his correct address. He
7 submitted -- the evidence shows that the same two phone numbers
8 that were provided -- we provided phone records. The home phone
9 number and the business landline both had his home address.

03:16:20

10 Those are the same two numbers that were in the record on the
11 2018 visa application.

12 So, had the government been diligent in seeking
13 extradition, he would have been arrested in 2018 when he
14 appeared at the embassy, even if the address that was submitted
15 was not a correct one. So, the evidence does not really point
16 towards the government having an issue with those specific
17 addresses and there's -- I don't see any evidence that there was
18 really an effort to verify those addresses, either the 2017
19 address or the one that was provided by the informant.

03:16:57

20 And then, a related point is that, once he filed
21 -- once he submitted the correct address in the 2018 visa
22 application, there 's no evidence that the government went
23 through any other steps to verify that address before the
24 extradition was filed three or four years later in 2021.

03:17:19

25 So, to rely on saying, well, we weren't sure of

1 that address but then to go ahead and file an extradition
2 request with an address that was submitted three years before,
3 there's an issue there that I think the Court should scrutinize.
4 And I think there's a lack of diligence on behalf of the
03:17:36 5 government, and there's certain periods of time that really
6 stand out.

7 One of them is from 2013 to 2017. I think that
8 there's a -- there's a priority issue, which, understandably,
9 the government has other crimes that they're investigating.
03:17:50 10 Mexico has other crimes that they are investigating and there
11 are other co-defendants in here. I think that does play a
12 factor and in some of the other cases where the Court recognizes
13 that the government can make a decision to not extradite, not
14 publicize the indictment for one co-defendant so as to be able
03:18:09 15 to catch other co-defendants.

16 So -- but the government did not make efforts --
17 any significant efforts to try to notify Mr. Ojeda that he had
18 been charged and the indictment remained sealed. There's
19 another case from the Ninth Circuit which is the -- I think the
03:18:28 20 Corona-Rivera case, a 2007, Ninth Circuit case, where the
21 government went through extensive efforts to try to publicize
22 and locate a defendant to the extent that they created a TV
23 episode on American's Most Wanted or any kind of, you know,
24 wanted publication of a crime.

03:18:47 25 The *Houston Chronicle* article is not really an

1 effort by the government and it's not clear that Mr. Ojeda's
2 charged. The indictment remained sealed. There's no effort to
3 contact our client despite the contact information that the
4 government had, email addresses, phone numbers throughout the
5 years.

03:19:08

6 So, even though we've essentially -- you know,
7 we're not really trying to hang our hat on the third element,
8 which is asserting the speedy trial, the Court should -- should
9 consider that in light of what information Mr. Ojeda had.

03:19:24

10 It is not like some of the other cases like the
11 *Fernandes* case where the government directly contacts the person
12 and invites them and the person hires a lawyer while they're
13 abroad and files a motion to dismiss.

03:19:41

14 Those are, you know, where a person, obviously --
15 as the Court recognized, a person who is using false
16 information, false IDs, living -- you know, trying to go to a
17 country where they cannot be extradited. There's a case where
18 -- the country there was Lebanon and they have no ability to
19 extradite. Mr. Ojeda is in a country that has an extradition
20 treaty and the government did not file for extradition.

03:20:06

21 As far as his knowledge being a reason for the
22 delay, it's clear he knew there was an investigation. We're not
23 trying to hide that. Whether he knew that there was an
24 outstanding warrant is not clear.

03:20:20

25 THE COURT: Outstanding indictment.

1 MR. AHMED: Outstanding indictment, correct, your
2 Honor. And whether he knew going to the United States
3 automatically -- and I'll concede, despite the evidence that was
4 presented today, any reasonable person would have some -- would
03:20:35 5 falter, maybe have some hesitation as to whether something would
6 happen, maybe an investigation would develop into a charge.

7 But it's not like the other cases where a person
8 is aware of an indictment, knows that they're charged, knows
9 that they'll be arrested upon entry into the United States. And
03:20:50 10 the evidence here is that the defendant was trying to go to the
11 United States but they had understandable reasons for not
12 traveling, financial and health reasons.

13 THE COURT: So, two questions.

14 MR. AHMED: Yes.

03:21:04 15 THE COURT: The evidence of continued bank activity
16 after the indictment --

17 MR. AHMED: Yes.

18 THE COURT: -- bank activity in the United States, are
19 you arguing any inference from that activity with respect to
03:21:21 20 whether it is evidence of a lack of intent to conceal?

21 MR. AHMED: Where is -- is that from the government's
22 last exhibit, your Honor?

23 THE COURT: The Petrojed --

24 MR. AHMED: The 2013 and 2015 statements?

03:21:45 25 THE COURT: Those are actually -- the ones I have

1 appear to be Mexican bank statements.

2 MR. AHMED: Yes. So, we submitted those. We gave the
3 government lots of documents that his wife gave to us that were
4 not filed in evidence, including tax returns and some additional
03:22:04 5 invoices in an effort to establish to the Court that Mr. Ojeda
6 conducted legitimate business.

7 And the main thing over there is he didn't change
8 the name of the company. Petrojed was the company that was --
9 the government was investigating. I think it's even in the
03:22:22 10 *Houston Chronicle* article, that if someone who had a guilty
11 conscience and was trying to avoid or evade prosecution, they
12 would at least dissociate themselves from what they thought was
13 a company that was --

14 THE COURT: The lack of any bank activity after July
03:22:39 15 of 2011, is there any inference that can be drawn from that?

16 MR. AHMED: That's where the connection is to who
17 really opened and controlled those accounts. The USA accounts
18 in the name of Petrojed and Ciro, even though the evidence would
19 probably establish in court that my client was involved, there's
03:22:59 20 no reason for those US banks to exist especially because they
21 were -- they were actually going to be closed.

22 I think they were closed by the banks themselves
23 because of the investigation, not -- not that my client went out
24 of his way to -- but I'm not hundred percent sure on that as far
03:23:19 25 as the facts, Judge.

1 But I don't think that there's any strong
2 inference that because he didn't continue bank activity -- the
3 testimony from his wife regarding the oil and gas industry was
4 that the law and the politics changed in Mexico, made it more
03:23:34 5 difficult for the oil and gas industry in Mexico to conduct
6 business in the United States.

7 THE COURT: So, one last question for you at this
8 time: The allegations and evidence as to actual prejudice --

9 MR. AHMED: Yes.

03:23:47 10 THE COURT: -- can you spell out the ones that you
11 think are the most helpful to your side of the argument.

12 MR. AHMED: Yes, your Honor. So, I'll start with the
13 presumption of prejudice. The Courts have asked -- the Courts
14 have been asked to look at the length of the delay. And so,
03:24:01 15 there's cases where less than five-year delay Courts still
16 presume prejudice.

17 So, it's not a hard-and-fast rule. But it seems
18 like the Fifth Circuit has been relying on the five-year rule.
19 This is more than five years. It's about 11 years, also. And
03:24:17 20 so, it's intertwined, obviously, with the cause for the delay.

21 There was a case in the Fifth Circuit from 2002
22 which is the *Bergfeld* case where a defendant knew of the
23 investigation. It was a beauty products company that had been
24 searched and co-defendants pled, and the Courts still presumed
03:24:42 25 that there was a five-year delay. But the facts of that case

1 are different. I think eventually the defendant did present
2 himself. But just that amount of time, the Court still presumed
3 that there was a presumption of prejudice.

4 And in *Fernandes*, the DC case, the third factor
03:25:02 5 was against the defendant. That was the case where a person was
6 in India. He was not --

7 THE COURT: I read the case.

8 MR. AHMED: -- exactly fleeing but aware of the
9 charge. And so, despite saying that the third factor, that he
03:25:15 10 didn't assert speedy trial right, was against him, they still
11 presumed prejudice. So, this is clearly a case where prejudice
12 should be assumed because of the amount of time.

13 THE COURT: Is there any specific evidence of
14 prejudice beyond the presumption that you want to point to?

03:25:32 15 MR. AHMED: Yes, your Honor. Sorry. I know that was
16 the Court's initial question. Yes. The reason I was trying to
17 make the connection between the money exchange business and the
18 money laundering accusation is that at trial Mr. Ojeda's defense
19 would be -- would rely on documents that existed prior to 2010
03:25:51 20 that no longer apply.

21 And, specifically, what was testified by the wife
22 was Intercambios was a money exchange business and it had
23 documents that were in an office that went to Mr. Ojeda's home
24 and that about six years or so ago the vast majority of them
03:26:08 25 were destroyed, which is not unusual because Mexico has a

1 five-year records-keeping requirement for tax purposes.

2 And so, those documents are lost. And had he
3 been arrested sooner, we would have been at -- we're at a
4 disadvantage at trial. And this is a legitimate one. We're
03:26:27 5 trying to get records from his wife. She's very helpful but
6 time has passed.

7 So, documents is one thing. The same thing with
8 Petrojed. They do have more documents for Petrojed than
9 Intercambios. It's more recent, and the company actually still
03:26:41 10 exists right now. It's just not operating.

11 In addition, Judge, there are witnesses. One of
12 the witnesses that I named was an individual who is deceased.
13 He died a few years ago, and that was someone who was a business
14 associate of Mr. Ojeda who conducted legitimate business for --
03:27:02 15 with Petrojed.

16 So, having witnesses and business partners, even
17 clients. This is a person who is now deceased. And, of course,
18 you know, memory is the catch-all. It's what everyone will say
19 after a long time, but it's also a concern.

03:27:19 20 Co-defendants have -- looking through the
21 government's DEA reports, the co-defendants, same things that
22 are exculpatory about this case regarding Mr. Ojeda with respect
23 to who opened up the bank accounts. So, access to those
24 co-defendants as witnesses at Mr. Ojeda's trial and their memory
03:27:40 25 has faded.

1 And specifically, Judge, there is a -- I'll try
2 to -- we referenced a proffer, essentially; and the Court asked
3 us to find the report and just I didn't have time to find that
4 report, but I can submit it. It's a DEA report of investigation
03:28:03 5 in September of 2012 where one of the co-defendants, Sarah
6 Combs, said that Alberto Morales and -- was the one that was
7 paying the lawyers in Harris County and that was deciding the
8 amount that would actually be deposited into the bank accounts.

9 So, the allegation regarding the Harris County
03:28:27 10 documents is an important one because it seems to be one of
11 Mr. Morales, and that's an allegation that needs to be addressed
12 and explained. So, access to those witnesses at trial is
13 something that has faded, their memory and the access to the
14 witnesses. In fact, I think one of the co-defendants is about
03:28:50 15 to be released which is a concern that both the government and I
16 have. Enrique Morales is about to finish his sentence in
17 December.

18 So, just in summary, as far as legal argument,
19 the Court has the task of weighing the first three factors
03:29:11 20 against the fourth factor. I believe that's how the Courts have
21 said it. And even if one of the first three factors is against
22 Mr. Ojeda, the fourth factor of prejudice, because of the amount
23 of time, is a real concern.

24 This is a money laundering case. It involves
03:29:29 25 documents. The government has preserved a lot of their evidence

03:29:51 1 that they need to show guilt, and Mr. Ojeda has been formally
2 advised of his charges just last year. So, his -- the time
3 period, as far as asserting and whether he waives and wants a
4 trial, the Court needs to look at that first 11 years instead of
5 saying, well, he didn't demand a trial during that time.

6 That would be a very strong argument if he was
7 fleeing, clearly fleeing. But this is a person who was living
8 publicly, probably aware of the investigation, not sure. So,
9 the way that we look at whether he asserted and how he asserts
03:30:08 10 his speedy trial right in the first 11 years is not the same way
11 that the Courts analyzed it and held it against the defendant.

12 THE COURT: So, you're saying that I should disregard
13 the continuances he sought since he was arrested and extradited?

14 MR. AHMED: No. Disregarding them is not what we're
03:30:25 15 asking the Court to do. It's clearly -- regardless of whether
16 it's, you know, defense counsel's due diligence in demanding a
17 speedy trial for him.

18 What's clear is that the last year that he's been
19 in custody -- it's been a year and a half in federal custody --
03:30:45 20 is not -- does not weigh as heavily against the 11 years. So,
21 his seeking three continuances while he's cooperating with the
22 government -- and during those cooperation meetings, it's not
23 hundred percent clear that he's admitting guilt. There's this
24 knowledge issue.

03:31:02 25 You know, this is not the government saying that

1 he doesn't want a trial because he's engaging in plea
2 negotiations. It's clearly -- there's clearly a trial issue as
3 to whether he knew these transactions were unlawful or not. So,
4 him trying to get a benefit of cooperating against other
03:31:20 5 individuals, it's not something that's in our favor; but it
6 shouldn't be held against us to such an extent that it --

7 THE COURT: There was testimony from the agent about
8 the cooperativeness of Mr. Ojeda during the proffers. Is there
9 evidence that had Mr. Ojeda been taken into custody earlier, he
03:31:45 10 could have given more valuable information that would have --
11 could have advantage to him in a plea process?

12 MR. AHMED: Yes, your Honor. It's the same as -- yes.

13 THE COURT: Point me to that evidence.

14 MR. AHMED: That evidence is that he spoke about
03:32:03 15 Carlos Rios Zamora, who is still a fugitive at this time and is
16 his former brother-in-law. And so, his ability to say where he
17 is is not the same as -- if he had been arrested ten years ago.

18 Obviously, his memory and access to documents and
19 the same, you know, prejudice, actual prejudice that we were
03:32:27 20 just arguing at trial, all of that would have been supporting
21 his cooperation.

22 THE COURT: All right. Anything further before I turn
23 to the government?

24 MR. AHMED: No, your Honor.

03:32:45 25 THE COURT: All right.

1 Government?

2 MR. LIDDLE: Your Honor, I think first we --

3 THE COURT: Can you use the mike, please, sir.

4 MR. LIDDLE: Yes. I think first we can take a step

03:32:56 5 back and think about what this is. This is not a statute of
6 limitations technicality defense. This was a real
7 constitutional right, and it is out there for people who want a
8 trial. They want a trial now. That's what this whole thing is
9 about. The Courts talk about that, that you need to show that
03:33:18 10 you wanted a trial.

11 I think we'd be hard pressed to find facts that
12 more strongly show a defendant who never wanted to go to trial.
13 You start with the knowledge when the report -- when he talked
14 to the reporter. He professed his innocence. He proclaimed his
03:33:40 15 innocence. When do you proclaim your innocence? When you've
16 been accused.

17 THE COURT: Okay. I want to step back further. Can
18 you tell me the -- your explanation for the government's delay
19 in seeking extradition -- indicting and extraditing.

03:34:06 20 MR. LIDDLE: That has been briefed, your Honor. I can
21 do it generally, but I can -- you know, from my memory.

22 THE COURT: Just tell me the reason first.

23 MR. LIDDLE: But, generally, unlike these cases --
24 unlike all the cases that we have here where a motion to dismiss
03:34:21 25 was granted, the prosecution team went immediately to the Office

1 of International Affairs and started the extradition process.

2 That has not happened in any of these other
3 cases. Prosecution team went there immediately, started the
4 process; and they were told in no uncertain terms that specific
03:34:42 5 location was required.

6 THE COURT: Okay.

7 MR. LIDDLE: And agents did what they could. We had
8 an agent in Mexico, which doesn't always happen. But that
9 agent, of course, had -- and that agent, as said in the
03:34:57 10 affidavit, had limited authority, very limited things that he
11 can do. But he did what he could to do to locate Mr. Ojeda.

12 Now, the case law talks about -- some cases talk
13 about, you know, putting lookouts and databases. That was done.
14 And, in fact, the lookouts --

03:35:22 15 THE COURT: At the border.

16 MR. LIDDLE: I'm sorry?

17 THE COURT: Is this lookouts at the border?

18 MR. LIDDLE: Yes.

19 THE COURT: Okay. Let's step away from that because
03:35:31 20 I'm not sure that that's -- yes, I will credit your -- the
21 testimony that there were lookouts at the border.

22 There were addresses for Mr. Ojeda that,
23 apparently, the government received in 2007 and 2013. Is that
24 accurate? Let's go back to the 2007 address. What attempts
03:35:53 25 were made to verify that address?

1 MR. LIDDLE: There's nothing in the record, your
2 Honor, about attempts. What is in the record and I think is an
3 inference -- the only fair inference is that the government
4 understood that address to be incorrect because the government
03:36:10 5 continued to look.

6 THE COURT: Did the government make efforts to verify
7 that address?

8 MR. LIDDLE: There's nothing in the record, your
9 Honor.

03:36:17 10 THE COURT: Okay. Is the only explanation for the
11 delay that the government didn't believe it had a specific
12 location, an address?

13 MR. LIDDLE: There's other explanations for the delay,
14 your Honor, the big one being the defendant was in Mexico.

03:36:47 15 THE COURT: Okay.

16 MR. LIDDLE: If we're looking at the government's
17 diligence, then I can go through and talk about the government's
18 diligence. But if I'm asked is that the only reason for the
19 delay, the government's position is, no, that's not the only
03:37:01 20 reason for the delay.

21 THE COURT: If there had been a specific address in
22 Mexico, would the government have indicted sooner and
23 extradited?

24 MR. LIDDLE: If the government had a specific location
03:37:12 25 that was accurate, then, yes, the government could have -- the

1 government could have processed the extradition.

2 THE COURT: So -- but there's no evidence in the
3 record of any attempt by the government to verify the address
4 that it might have had or to find a specific address?

03:37:32 5 MR. LIDDLE: There is evidence that the government did
6 try to find a specific address. That's in the DEA agent's
7 affidavit. And what is not in the record, your Honor, is direct
8 evidence that the government tried to verify the addresses.

9 Again, the fair inference is because the
03:37:51 10 government continued to look for the correct address that the
11 government understood that the address that the government had
12 were incorrect. That's the only fair inference, but there's no
13 direct evidence of that.

14 THE COURT: So, lay out for me your best evidence as
03:38:09 15 to the government's diligence in finding the address.

16 MR. LIDDLE: Well, it's laid out in the briefings,
17 your Honor; but I will lay it out again for your Honor. The --
18 again, unlike these other cases, the government immediately
19 looked into extradition.

03:38:28 20 THE COURT: I understand that.

21 MR. LIDDLE: And they continued to do it. They
22 continued to do it. And this was a complex -- this is a complex
23 money laundering case. This is not the normal money laundering
24 case.

03:38:43 25 THE COURT: Okay. I asked a narrower question:

1 Evidence in the record of the government's continued efforts to
2 verify an address where Mr. Ojeda lived or did business.

3 MR. LIDDLE: Okay. So, you're asking about efforts
4 the government made to verify the addresses that the government
5 had?

6 THE COURT: Start there.

7 MR. LIDDLE: Okay.

8 THE COURT: Or to find a correct address, if the
9 government didn't believe it had the correct one.

10 MR. LIDDLE: The government has limited ability to
11 investigate in Mexico. In the affidavit, the agent -- Agent
12 Vargas goes through the efforts that he made to try to find out
13 through his informant -- the case law talks about that, that
14 being diligent effort -- and also his counterparts in the
15 Mexican government, different agencies in the Mexican
16 government; and he was unsuccessful. But he lays out his
17 attempts.

18 THE COURT: So, as I understand the record, the
19 government begins the formal extradition process the same day as
20 the *Houston Chronicle* article was published. Is that accurate?

21 MR. LIDDLE: I would have to go back and look. But I
22 think it's around that time. It's fairly soon after the
23 indictment. And this is not a case where the government forgot
24 about Mr. Ojeda.

25 THE COURT: The government had -- a part of the

1 government had a 2007 visa application with an address, correct?

2 MR. LIDDLE: Correct, your Honor.

3 THE COURT: And a cooperating defendant gave an
4 interview in February of 2013 which also gave Mr. Ojeda's
03:40:46 5 address, correct?

6 MR. LIDDLE: Gave an address, correct.

7 THE COURT: Okay. Any attempts on those sources of
8 information to verify?

9 MR. LIDDLE: Again, your Honor, there's nothing in the
03:40:58 10 record of direct attempts to verify. The only thing there is is
11 a fair inference that because the government continued to look,
12 they understood that they did not have the correct address.

13 THE COURT: Okay. The 2018 visa application, does the
14 government agree that that gave the government information that
03:41:26 15 it could rely on as to Mr. Ojeda's address?

16 MR. LIDDLE: According to Mr. Ojeda and his wife, that
17 was the correct address where they were living.

18 THE COURT: I believe you make a statement in your
19 briefings that that was the first time the prosecution team
03:41:46 20 learned of that address.

21 MR. LIDDLE: Correct.

22 THE COURT: In that visa application?

23 MR. LIDDLE: Correct.

24 THE COURT: Okay. Then, we have another almost three
03:41:56 25 years before the extradition packet is finalized. What happened

1 there?

2 MR. LIDDLE: Soon after that visa application was
3 submitted, the government -- the prosecution team went back to
4 OIA, the Office of International Affairs, and started up the
03:42:22 5 extradition. It took time. It took time to get everything in
6 place, get everything signed; and the pandemic hit.

7 THE COURT: Three and a half years?

8 MR. LIDDLE: It took time; and then, the pandemic hit.
9 And then, there was a delay.

03:42:37 10 THE COURT: The pandemic hit, I believe, in early
11 2020. So, back out that last year roughly. 2018 to 2020?

12 MR. LIDDLE: I believe it was late 2018 when --

13 THE COURT: October.

14 MR. LIDDLE: -- the application was submitted.

03:42:55 15 THE COURT: October.

16 MR. LIDDLE: October. Then, I think, if my memory is
17 correct, I think it was April of 2019 when the prosecution team
18 went back to OIA; and it did take some time, you know, from
19 April -- if I'm correct, April 2019 through February 2020; and
03:43:08 20 the prosecutor --

21 THE COURT: June twenty twenty --

22 MR. LIDDLE: I'm sorry?

23 THE COURT: June 2021 is when the extradition packet
24 was finalized.

03:43:18 25 MR. LIDDLE: I understand, your Honor. But from April

1 2019 to February around 2020 --

2 THE COURT: Okay. I understand that COVID does
3 interrupt a lot of functions. But I know the government was
4 operating on email and Zoom just like the rest of us, speaking
03:43:37 5 as a part of the government. It's not like there was a total
6 lack of communication or ability to get work done.

7 MR. LIDDLE: That's correct, your Honor. But I
8 personally was involved in this, and we -- we were going out to
9 get inmates to sign their affidavits. The jails were closed.

03:43:58 10 THE COURT: The jails were on short periods of
11 intermittent lockdown for very -- and some of the lockdowns were
12 more secure than others. I mean, it varied across the country,
13 of course. But law enforcement continued to function, as I
14 recall it.

03:44:14 15 Now, I'm looking at what's in the record; and I'm
16 not finding evidence in the record to account for the delay.
17 So, I'm asking you.

18 MR. LIDDLE: And my response, your Honor, is there was
19 a delay because of the pandemic. I personally did not want to
03:44:29 20 go into federal prisons even if I was allowed during the
21 pandemic, but I was not allowed. I was told I was not allowed.
22 So, that was part of the delay.

23 THE COURT: All right. But focusing on the period
24 from October 2018 to early 2020, February, March -- I think
03:45:00 25 March 15th was the date that -- of 2020 was the date that things

1 ground to the COVID halt for some months. We agree that we just
2 don't have any information about what the cause of that delay
3 was?

4 MR. LIDDLE: Well, again, your Honor, I think -- it's
03:45:21 5 in the briefings, but I think it was about April 2019 when the
6 prosecution team went back to OIA and started working on it.
7 And it did take some time to finish it. The translation takes
8 time. A lot of these things do take time.

9 THE COURT: All right. Did you want to address any
03:45:52 10 other points?

11 MR. LIDDLE: Yes, your Honor.

12 THE COURT: Go ahead.

13 MR. LIDDLE: The defendant has known about likely
14 charges against him since 2012, and he stayed Mexico. When he
03:46:10 15 was extradited, as soon as he got here he wanted to plead
16 guilty. He wanted to cooperate and plead guilty.

17 We were in plea negotiations, and it was not
18 about whether or not you're going to plead guilty, it was not
19 about whether or not -- whether you're going to plead guilty to
03:46:29 20 money laundering or the illegal money transmitting business, the
21 lesser charge. It was the defendant saying, "I'm going to plead
22 guilty to money laundering. It's just about the stipulations,
23 the sentencing stipulations."

24 He was pleading guilty, pleading guilty while he
03:46:44 25 's filing continuances, as your Honor pointed out. And then, he

1 proffers. When someone proffers, they're going in there to
2 confess their sins. That can be later used against them if they
3 go to trial and take a different position. And that's what the
4 defendant did.

03:47:02

5 He didn't confess all of his sins. But he went
6 into the proffer and he said, "I opened up these bank accounts.
7 I did. Not someone else. I opened them up. I told the bank
8 they were going to be used for oil." In fact, they were not
9 going to be used for oil, and they weren't used for oil. They
10 were used for illegal transactions.

03:47:20

11 That's not someone who wants to go to trial. And
12 then, even when we first heard about a speedy trial assertion,
13 in that same breath counsel told us, "My client made it clear he
14 still does not want to go to trial." Even if he loses this
15 motion, he does not want to go to trial. This is not a
16 defendant who ever wanted to go to trial, and that's what this
17 whole thing is about.

03:47:40

18 THE COURT: I'm a little unclear. Are you saying that
19 a defendant who -- who proffers is not credible in his
20 insistence on a speedy trial violation? I mean, I understand
21 the argument that, yes, he moved for continuances; and that's
22 inconsistent with wanting a speedy trial.

03:48:30

23 We can talk about what the case law says about
24 that argument. But I'm a little unclear. Are you saying that
25 if a defendant proffers, he can't then turn around and say, "The

03:48:49

1 government has waited too long, not been diligent in --"

2 MR. LIDDLE: I think that is a tough argument to make,
3 your Honor. When you come and you say, "I want to plead guilty,
4 I want to plead guilty and I'm even going to proffer and admit
03:49:12 5 everything because I'm going to plead guilty" and then you turn
6 around the next day and say, "Oh, by the way, I wanted a trial
7 six months ago, a year ago --"

8 THE COURT: 11 years ago.

9 MR. LIDDLE: "-- 11 years ago," yeah, I think it is a
03:49:26 10 difficult argument to make.

11 And I think there's a reason why in none of these
12 case laws they talk about continuances. But I haven't seen a
13 case where -- even a case where they -- the Court rejects the
14 motion to dismiss where -- where the evidence is as this, where
03:49:40 15 the defendant wanted to plead guilty.

16 He was on the eve of pleading guilty, and he was
17 even proffered. That's not in the cases because that's not a
18 defendant who has demonstrated -- which the law requires, has
19 demonstrated a desire to go to the trial. That's a defendant
03:49:59 20 who doesn't want to go to trial.

21 THE COURT: It seems to me there's a difference
22 between a defendant subjectively not looking forward to or
23 really not wanting to go to trial and somehow forfeiting his
24 speedy trial right.

03:50:16 25 He can at the same time say, "If I lose this

1 motion, I don't want to go to trial. I'll proffer. But I do
2 have a speedy trial right, and I'm going to invoke it." Is that
3 inconsistent?

4 MR. LIDDLE: I think it is, your Honor.

03:50:31 5 THE COURT: Do you have a case that says that?

6 MR. LIDDLE: No. As I said, your Honor, I don't have
7 any cases where they actually proffered or were about to plead
8 guilty.

9 THE COURT: What is your best Fifth Circuit case?

03:50:50 10 MR. LIDDLE: On what point, your Honor?

11 THE COURT: On analyzing the factors that go into a
12 speedy trial violation.

13 MR. LIDDLE: Well, your Honor, I think the Fifth
14 Circuit has been very clear and contrary to *Fernandes* that if
03:51:12 15 it's over five years, then the next two factors have to be
16 heavily in the defendant's favor to get presumption of
17 prejudice. That's been very clear.

18 *Fernandes*, it appears, goes against that. That's
19 not -- *Fernandes* is contrary to Fifth Circuit law. And so,
03:51:34 20 here, you know, I don't think there's any doubt that this is --
21 I think this has, basically, been conceded, that his assertion
22 goes to the government.

23 Whether it goes heavily, that seems to be what
24 the defense is arguing. So, this really comes down to
03:51:50 25 prejudice: Can the defendant prove prejudice?

1 THE COURT: What do you do with the evidence that
2 Mr. Ojeda knew that there was at least an investigation but he
3 lived openly in Mexico, he worked openly in Mexico?

4 MR. LIDDLE: Well, I think that goes to the balancing
03:52:14 5 test in the second factor, the government's diligence versus the
6 defendant who is living in Mexico, not turning himself in, which
7 he's got a right to do. He's got a right not to turn himself
8 in. Right.

9 But that's still relevant. That can go against
03:52:31 10 him in a speedy trial hearing and it has in the cases. But he
11 does have a right to do that. And so, it goes to the balancing
12 test. We would have a much stronger case, your Honor, I'll
13 acknowledge, if we had evidence that he was hiding --

14 THE COURT: Right.

03:52:44 15 MR. LIDDLE: -- a much stronger case. I acknowledge
16 that.

17 THE COURT: Absolutely.

18 MR. LIDDLE: This is a balance -- the second factor is
19 balancing. The third factor, the government's position is, is
03:52:53 20 heavily against the defendant. And so, it's the defendant's
21 burden to prove prejudice.

22 THE COURT: All right.

23 MR. LIDDLE: And we can go into prejudice. And I got
24 a hard time following, you know, what these records were
03:53:09 25 supposed to show. What defense counsel just talked about was

1 Intercambios, the exchange business.

2 That happened in 2010. So, I don't know what
3 records in 2009, 2008 would have helped them at trial. I mean,
4 you know, we're talking about, just looking at this picture of
03:53:29 5 June and July of 2011, \$1.5 million in cash going into accounts
6 that he's admitted he told the banks were for oil when, in
7 reality, they were for illegal transactions.

8 I don't know what records he can ever have that
9 could possibly help him explain what he's already admitted is
03:53:54 10 inexplicable. I mean, I don't know what records -- he could
11 come in here and he could argue that somehow that he didn't know
12 the money was illegal.

13 But I don't know how records are going to show
14 that. He's not going to have records of where this money came
03:54:10 15 from that was picked up in parking lots and laundered through
16 his business bank accounts. He never had records of those.

17 And he talks -- again, Intercambios closed in
18 2010. Petrojed, too. I mean, he's got what appears to be a
19 very small but legitimate -- appears, for the sake of
03:54:32 20 argument -- appears to be a legitimate Petrojed business in
21 Mexico in 2013.

22 That is so different from what was -- the illegal
23 contact that he was indicted for in 2011. He's not going -- he
24 never had records -- it's his burden and he has not shown that
03:54:54 25 he's got records that are going to explain away that 1.5 million

1 that was picked up in parking lots.

2 THE COURT: All right. Thank you. Anything further
3 for the government?

4 MR. LIDDLE: Your Honor, I would add, also, he also
03:55:10 5 was charged with 18 USC 1960. Again, I don't know what records.
6 We certainly haven't heard -- and, again, the burden is on him
7 to show what kind of records he had that he was licensed within
8 and registered in the State of Texas to act as an MSB in the
9 United States.

03:55:30 10 We also haven't heard anything about Ciro. Half
11 of this money that was laundered in the United States he was
12 indicted for was through Ciro. We've only heard about Petrojed.
13 There's no evidence about any lost records of Ciro or of -- or
14 that would help him in the 1960 charge.

03:55:52 15 THE COURT: Thank you.

16 MR. LIDDLE: Thank you, your Honor.

17 THE COURT: You can respond.

18 MR. AHMED: Just a few points, your Honor. The one
19 fact about the 2018 visa application, I think the exhibit
03:56:03 20 submitted shows it was July of 2018.

21 THE COURT: Thank you.

22 MR. AHMED: With regards to cases, I would ask the
23 Court to consider the *Barker* case with respect to the assertion
24 that the Court -- that's the original Supreme Court case that
03:56:19 25 set out the factors. And it said to look at the circumstances

1 as to how or why a person was asserting. That's really the
2 third factor.

3 For the second factor, the *Doggett* case and, of
4 course, the *Fernandes'* case, the Supreme Court case from 1992.

03:56:34 5 It talks about official negligence and about someone who might
6 be a low priority for the government and someone who is living
7 opening. And the *Fernandes'* case, obviously, is the one that is
8 about official negligence and the efforts the government could
9 have made that were not made in this case.

03:56:56 10 With respect to the proffer that Mr. Ojeda made
11 in plea agreements, there is a difference between someone who is
12 trying to cooperate. Sometimes it's because they think it's the
13 correct thing to do. Usually, it's because they're trying to
14 get a benefit for a case.

03:57:11 15 But when you have someone who is arrested 11
16 years after an allegation, the cards are tilted against them.
17 They're meeting a lawyer who has all this evidence and is
18 showing them wiretaps and DEA reports, just a mountain of
19 discovery.

03:57:28 20 So, even the Supreme Court has recognized that
21 some people are ready and willing to plead guilty despite
22 contesting guilt. That's the *Alford* case. Some people are just
23 scared of going to trial. And so, I'm not saying that that's --
24 that's what Mr. Ojeda is doing -- was doing here because,
03:57:47 25 ultimately, he did inform the government he is going to trial.

1 There was some negotiation that was going back
2 and forth. But around the time -- I think soon after this
3 motion was filed, Mr. Ojeda informed the government that we're
4 not going to come to an agreement. This is going to be a trial
5 in this case.

03:58:05

6 And so, it's not his current position -- just so
7 the record is clear, because there was some proffer that
8 happened during the argument, that he is not planning to plead
9 guilty if this motion is dismissed. That's not what he's told
10 the government at this time.

03:58:19

11 He did tell the government that he wanted to
12 cooperate. There was some plea negotiation that was happening.
13 But, ultimately, there's never been a clear admission from
14 Mr. Ojeda, either during the proffer or during plea
15 negotiations, as to the knowledge of element.

03:58:44

16 There's a question as to whether he should have
17 known. There were red flags because of the amount of money,
18 because of the way that this case was involved. He was not
19 directly involved in the financial -- the transferring the money
20 in -- from parking lots.

03:59:01

21 And the government was arguing that there are --
22 basically, he can't show prejudice because of any documents he
23 could have produced aren't really going to say it. And that's
24 certainly something I would take issue.

03:59:17

25 If we're trying to show that he didn't know that

03:59:33 1 this money was of an illegal source, these conversations with
2 his co-conspirators, specifically, Alberto and Enrique Morales
3 -- they approached him, having a debt owed to Mr. Ojeda, knowing
4 that he's in the money exchange business, and really enticing
5 him with opportunities for business in the United States related
6 to the petroleum industry.

7 So, even though he made a statement during the
8 proffer saying that he told the banks it was for the petroleum
9 industry, knowing that the Moraleses wanted him to transfer
03:59:49 10 money through it, it doesn't mean that he still didn't plan to
11 have an oil and gas business through Petrojed in the United
12 States.

13 That's what the evidence actually demonstrates
14 but the opportunity didn't arise. So, his credibility relies on
04:00:03 15 documents and witnesses that are now lost to show that he had
16 legitimate -- he had a money exchange business changing dollars
17 to pesos. It's not the same quantity but --

18 THE COURT: What about the fact that that business
19 ended in -- I believe the date was 2010?

04:00:23 20 MR. AHMED: That was Intercambios.

21 THE COURT: Yes.

22 MR. AHMED: Yes, your Honor. And that's just because
23 of the course of the business. It was his brother-in-law that
24 was really running it. But it was in his name. And he switched
04:00:30 25 to the oil and gas business around that time. That's when he

1 and his wife went to Houston and went to the oil -- so, his
2 money exchange business did --

3 THE COURT: So, you're arguing that his credibility to
4 show that he had a legitimate oil and gas business was --

04:00:48 5 MR. AHMED: And experience. Yes, your Honor. And
6 experience and really a network, that Enrique Morales didn't
7 approach him saying, "Hey, I have drug money. Help me open up
8 shell accounts with no contacts." He knew -- he knew him to be
9 in the money exchange business, legitimate money exchange
04:01:07 10 business.

11 So, for Luis Ojeda to be able to be, essentially
12 tricked, by co-defendants into thinking that this was -- and
13 it's not just that the money is beyond any suspicion. The
14 government has to prove this is from an unlawful source, not
04:01:21 15 just money that was seized because of some tax violation or some
16 other investigation that doesn't relate to narcotics
17 transactions or some other money laundering evidence.

18 So, there's certainly prejudice. It's real,
19 Judge. And there is definitely negligence on behalf of the
04:01:40 20 government with respect to locating -- it's really three
21 addresses because Global Entry is a CBP -- it's a government
22 agency.

23 With respect to the evidence, well, they didn't
24 have triggers for the -- but that's part of the diligence of the
04:01:52 25 government. He went in 2011 and gave them an address that was

1 for a business address. And it seemed the government was at
2 least certainly aware of that.

3 THE COURT: All right. Both sides have done an
4 excellent job in making sure I was fully aware of the arguments
04:02:07 5 and evidence on both sides. I will look at it very carefully
6 along, of course, with the affidavits that have been referenced
7 that are an important part of this record, as well.

8 Anything further?

9 MR. AHMED: No, your Honor.

04:02:23 10 THE COURT: All right. Thank you very much.
11 (Proceedings concluded at 4:02 p.m.)

12

13

14

15

16 C E R T I F I C A T E

17

18 I certify that the foregoing is a correct transcript
19 from the record of proceedings in the above-entitled matter, to
20 the best of my ability.

21

22 By: /s/ Gayle L Dye 04-18-2025

23 Gayle L. Dye, CSR, RDR, CRR Date

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