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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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CASE UNSEALED PER ORDER OF COURT

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
June 2017 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACOB BURRELL CAMPOS,

Defendant.

Case No. 18CR3554 H

I N D I C T M E N T

Title 18, U.S.C., Sec. 1960(a) -
Unlicensed Money Transmitting
Business; Title 31, U.S.C.,
Sec. 5318(h) - Failing to Maintain
Anti-Money Laundering Program;
Title 18, U.S.C., Sec. 1956(a)(2)(A) -
Money Laundering; Title 18, U.S.C.,
Sec. 371, and Title 31, U.S.C.,
Sec. 5324(c) - Conspiracy to
Structure; Title 18, U.S.C.,
Sec. 982(a)(1) and (b)(1), and
Title 31, U.S.C., Sec. 5317(c)(1)(A)
and (B) - Criminal Forfeiture

The grand jury charges:

Count 1

From on or about January 2015 to on or about April 2016, within
the Southern District of California and elsewhere, defendant JACOB
BURRELL CAMPOS did knowingly conduct, control, manage, supervise, direct
and own at least part of a money transmitting business affecting
interstate and foreign commerce which failed to comply with the money

cc: Pretrial

1 RMC

1 transmitting business registration requirements under Title 31, United
2 States Code, Section 5330, and the regulations prescribed thereunder.
3 All in violation of Title 18, United States Code, Section 1960(a).

4 Count 2

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

15 All in violation of Title 31, United States Code, Sections 5318(h) and
16 5322(b), and Title 31, Code of Federal Regulations, Section 1022.210.

17 Counts 3-30

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

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COUNT	DATE	FROM	TO	AMOUNT
3	February 26, 2015	Jacob Julio Burrell Campos, Mission Federal Credit Union, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$13,200.00
4	March 10, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$11,500.00
5	March 16, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$20,460.00
6	March 23, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$14,000.00
7	March 25, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$20,100.00
8	March 30, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$27,800.00
9	April 1, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$15,500.00
10	April 6, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$15,600.00
11	April 9, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$23,600.00

COUNT	DATE	FROM	TO	AMOUNT
12	April 15, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$32,790.00
13	April 20, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$28,990.00
14	April 24, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$26,390.00
15	April 28, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$19,190.00
16	April 30, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$25,190.00
17	May 5, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$27,245.01
18	May 8, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$32,690.00
19	May 12, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$29,390.00
20	May 19, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$47,390.00
21	May 21, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$32,190.00

COUNT	DATE	FROM	TO	AMOUNT
22	May 26, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$57,870.84
23	May 28, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$39,725.00
24	June 3, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$55,940.00
25	June 9, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$50,281.00
26	June 16, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$53,256.24
27	June 22, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$82,227.73
28	June 26, 2015	Jacob Julio Burrell Campos, Bank of America, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$52,099.38
29	November 3, 2015	Jacob Julio Burrell Campos, San Diego County Credit Union, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$24,550.00
30	February 12, 2016	Jacob Julio Burrell Campos, San Diego County Credit Union, United States of America	Ifinex Inc. (Bitfinex), Cathay United Bank, Taiwan	\$23,199.60

All in violation of Title 18, United States Code, Section 1956(a)(2)(A).

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Count 31

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

10 Overt Acts

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

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

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

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

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

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

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1 Criminal Forfeiture

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

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

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

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

21 All in violation of Title 18, United States Code, Sections 982(a)(1)
22 and (b)(1).

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

1 4. In the event that any of the property described above, as a
2 result of any act or omission of the defendant:

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

4 b. has been transferred or sold to, or deposited with, a
5 third party;

6 c. has been placed beyond the jurisdiction of the court;

7 d. has been substantially diminished in value; or

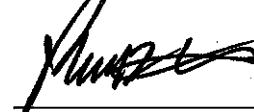
8 e. has been commingled with other property which cannot be
9 divided without difficulty,

10 the United States of America shall be entitled to forfeit substitute
11 property pursuant to Title 21, United States Code, Section 853(p), as
12 incorporated by Title 31, United States Code, Section 5317(c)(B).

13 All in violation of Title 31, United States Code, Sections 5317(c)(1)(A)
14 and (B).

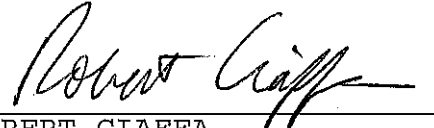
15 DATED: August 9, 2018.

16 A TRUE BILL:

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18 _____
Foreperson

19 ADAM L. BRAVERMAN
20 United States Attorney

21 By: 
22 ROBERT CIAFFA
23 Assistant U.S. Attorney