UNITED STATES DISTRICT COURT

	for the	FILED BY mp D.C.
Southern District of Indiana		Nov 21, 2024
United States of America		ANGELA E. NOBLE CLERK U.S. DIST. CT. S. D. OF FLA Miami
v.)	00012 7717
RICHARD ALAMEDA (-06)) Case No. 4:23	-cr-00013-TWP-VTW
) 24-MJ-4445-	GOODMAN
Defendant		
A	RREST WARRANT	
To: Any authorized law enforcement officer		
YOU ARE COMMANDED to arrest and (name of person to be arrested) Richard Alameda who is accused of an offense or violation based on		,
☐ Indictment ਓ Superseding Indictment	☐ Information ☐ Supersed	ing Information Complaint
☐ Probation Violation Petition ☐ Supervise	d Release Violation Petition	Violation Notice
This offense is briefly described as follows:		
Count 1: Conspiracy, in violation of 18 U.S.	C. §§ 371, 659, 2314, and 2	
Date: 9/25/2024 City and state: Indianapolis, Indiana	CI BY	ERK OF COURT, Roger A.G. Sharpe Depun Cherk District of more
	Return	
This warrant was received on (date) at (city and state)	, and the person was	arrested on (date)
Date:	Arı	esting officer's signature
		Printed name and title

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF INDIANA SEP 2 4 2024 NEW ALBANY DIVISION U.S. CLERK'S OFFICE UNITED STATES OF AMERICA, INDIANAPOLIS, INDIANA \$8**Ž**? **Ž**88& **Ž**9AA6? 3@ Plaintiff, Cause No.: 4:23-cr-00013-TWP-VTW

-01 CARLOS ENRIQUE FREIRE-PIFFERRER, JUAN PEREZ-GONZALEZ, -02 JOSE ANTONIO GOMEZ-PIFFERRER, -03 DALWY DE ARMAS-RODRIGUEZ, -04 LUIS VELAZQEZ, -05 -06 RICHARD ALAMEDA,

SUPERSEDING INDICTMENT

COUNT 1

18 U.S.C. § 371 (Conspiracy)

The Grand Jury charges that:

Defendants.

v.

From on or about December 2021, and continuing through and including May 2023, in the Southern District of Indiana and elsewhere,

> CARLOS ENRIQUE FREIRE-PIFFERRER, JUAN PEREZ-GONZALEZ, JOSE ANTONIO GOMEZ-PIFFERRER, DALWY DE ARMAS-RODRIGUEZ, LUIS VELAZQUEZ, and RICHARD ALAMEDA,

defendants herein, knowingly and intentionally conspired, together and with other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, the transportation and possession of goods stolen from interstate shipments, in violation of Title 18, United States Code, Sections 659, 2314, and 2.

Purpose and Object of the Conspiracy

It was the purpose and object of the conspiracy to steal property being transported in interstate commerce by semi-tractor trailers, transport the stolen merchandize to locations in Florida, and elsewhere, and to sell the stolen merchandise for financial gain.

Manner and Means

To accomplish the purpose and object of this conspiracy, defendants CARLOS

ENRIQUE FREIRE-PIFFERRER ("FREIRE"), JUAN PEREZ-GONZALEZ ("PEREZ"), JOSE

ANTONIO GOMEZ-PIFFERRER ("GOMEZ"), DALWY DE ARMAS-RODRIGUEZ ("DE

ARMAS"), LUIS VELAZQUEZ ("VELASQUEZ"), RICHARD ALAMEDA ("ALAMEDA")

and other co-conspirators known and unknown used the following manners and means:

- (a) FREIRE, PEREZ, GOMEZ, DE ARMAS, VELAZQUEZ, and their co-conspirators traveled from various locations throughout the United States to Indiana, Kentucky, Ohio, Tennessee, and other U.S. States to steal products that were being shipped in interstate commerce.
- (b) FREIRE, PEREZ, GOMEZ, DE ARMAS, VELAZQUEZ, and their co-conspirators surveilled distribution facilities used by various national companies to distribute their products in interstate commerce.
- (c) FREIRE, PEREZ, GOMEZ, DE ARMAS, VELAZQUEZ, and their co-conspirators located and then followed semi-tractor trailers leaving the distribution facilities transporting products in interstate commerce.

- (d) When the driver of the cargo load would stop to rest, refuel, or park his/her truck, FREIRE, PEREZ, GOMEZ, DE ARMAS, VELAZQUEZ, and their co-conspirators would steal the entire semi-tractor and trailer.
- (e) In many cases, FREIRE, PEREZ, GOMEZ, DE ARMAS, VELAZQUEZ, and their co-conspirators would abandon the stolen tractor a short distance away after hooking the stolen trailer up to a semi-tractor owned/operated by one of the co-conspirators.
- (f) In many cases, FREIRE, PEREZ, GOMEZ, DE ARMAS, VELAZQUEZ, and their co-conspirators would paint over any logos and/or identifying numbers on the stolen trailer, and use different license plates in an effort to conceal the identity of the trailer and evade law enforcement detection.
- (g) In many cases, FREIRE, PEREZ, GOMEZ, DE ARMAS, VELAZQUEZ, and their co-conspirators would then transport the stolen cargo to Dade County, Florida, where it would be sold to ALAMEDA, or another buyer, for a fraction of the stolen load's retail value.

Overt Acts

In furtherance of the conspiracy and to effect the object thereof, defendants FREIRE, PEREZ, GOMEZ, DE ARMAS, VELAZQUEZ, ALAMEDA and other co-conspirators known and unknown to the Grand Jury ("co-conspirators") committed at least one of the following overt acts, among others, in the Southern District of Indiana and elsewhere:

- 1. On or about May 6, 2022, FREIRE and GOMEZ traveled to a distribution Facility in Louisville, KY, and surveilled a distribution facility used by Meta;
- 2. On or about May 6, 2022, FREIRE and GOMEZ located a semi-tractor trailer that left the Louisville, KY, distribution facility laden with Oculus virtual reality goggles valued at approximately \$1.5 million;

- 3. On or about May 6, 2022, FREIRE and GOMEZ traveled to a Pilot truck stop in Haubstadt IN, where they stole a semi-tractor and trailer hauling Oculus virtual reality goggles valued at approximately \$1.5 million;
- 4. On or about May 6, 2023, FREIRE and GOMEZ drove the semi-tractor and trailer hauling Oculus virtual reality goggles values at approximately \$1.5 million to a location in Vanderburgh County, Indiana, where they abandoned the tractor and trailer:
- 5. On or about August 31, 2022, FREIRE and GOMEZ traveled to traveled to Louisville, KY, and surveilled a distribution facility used by Microsoft;
- 6. On or about August 31, 2022, FREIRE and GOMEZ located a semi-tractor trailer that left the Louisville, KY, distribution facility laden with Microsoft products valued at approximately \$940,000;
- 7. On or about August 31, 2022, FREIRE, GOMEZ and DE ARMAS traveled to a Love's truck stop in Demotte, IN, where they stole a semi-tractor and trailer hauling Microsoft products valued at approximately \$940,000;
- 8. On or about August 31, 2022, FREIRE, GOMEZ and DE ARMAS abandoned the stolen semi-tractor on the shoulder of the northbound lanes of Interstate 65 at approximately the 232 mile-marker;
- 9. On or about August 31, 2022, FREIRE, GOMEZ and DE ARMAS transported the stolen trailer and stolen load of Microsoft products southbound, along Interstate 65, from Demotte, Indiana, to Boone County, Indiana, where the stolen trailer and cargo were intercepted by law enforcement officers.

- 10. On or about October 26, 2022, FREIRE and GOMEZ traveled to Ohio, and surveilled a distribution facility used by L Brands, owners of the Victoria's Secret and Bath and Body Works lines of merchandise;
- 11. On or about October 26, 2022, FREIRE and GOMEZ located a semi-tractor trailer that left the Ohio distribution facility laden with Victoria's Secret and Bath and Body Works products valued at approximately \$1 million;
- 12. On or about October 26, 2022, FREIRE and GOMEZ traveled to a Speedway gas station in Lebanon Junction, Kentucky, where they stole a semi-tractor and trailer hauling Victoria's Secret and Bath and Body Works products valued at approximately \$1 million;
- 13. On or about October 26, 2022, FREIRE and GOMEZ abandoned the stolen semi-tractor at a location on Bardstown Road in Hardin County, Kentucky;
- 14. On or about November 7, 2022, FREIRE and GOMEZ traveled to a distribution facility in Louisville, KY, and surveilled a distribution facility used by Sony;
- 15. On or about November 7, 2022, FREIRE and GOMEZ located a semi-tractor trailer that left the Louisville, KY, distribution facility laden with Sony products;
- 16. On or about November 7, 2022, FREIRE and GOMEZ traveled to a gas station in Shepherdsville, Kentucky, where they stole a semi-tractor and trailer hauling Sony products;
- 17. On or about November 7, 2022, FREIRE and GOMEZ traveled to Shepherdsville, Kentucky, and surveilled a distribution facility used Harmon-JBL;
- 18. On or about November 7, 2022, FREIRE and GOMEZ located a semi-tractor trailer that left the Shepherdsville, KY, distribution facility laden with Harmon-JBL audio products valued at approximately \$530,000;

- 19. On or about November 8, 2022, FREIRE and GOMEZ traveled to a parking lot in Louisville, Kentucky, owned by Forward Air, where they stole a semi-tractor and trailer loaded with Harmon-JBL audio products valued at approximately \$530,000;
- 20. On or about November 8, 2022, FREIRE and GOMEZ transported the load of stolen Harmon-JBL audio products from Louisville, Kentucky, to Dade County, Florida;
- 21. On or about January 13, 2023, FREIRE, GOMEZ, PEREZ, and other co-conspirators traveled to Louisville, KY, and surveilled a distribution facility used by Logitech;
- 22. On or about January 13, 2023, FREIRE, GOMEZ, and PEREZ and other coconspirators located a semi-tractor trailer that left the Louisville, KY, distribution facility laden with Logitech products valued at approximately \$180,000;
- 23. On or about January 13, 2023, FREIRE, GOMEZ, and PEREZ traveled to a warehouse on Jennings Lane in Louisville, KY, where they stole a semi-tractor and trailer hauling Logitech products valued at approximately \$180,000;
- 24. On or about January 13, 2023, FREIRE, GOMEZ, and PEREZ transported the stolen semi-tractor to a location on Abell Avenue in Louisville, KY, where it was abandoned;
- 25. On or about January 13, 2023, FREIRE, GOMEZ, and PEREZ transported the stolen trailer and stolen Logitech products to Miami, Florida;
- 26. On or about January 27, 2023, FREIRE, GOMEZ, and PEREZ traveled to Louisville, KY, and surveilled a distribution facility used by UPS;
- 27. On or about January 27, 2023, FREIRE, GOMEZ, and PEREZ located a semi-tractor and trailer that left the Louisville, KY, UPS facility hauling Harmon-JBL audio products;

- 28. On or about January 27, 2023, FREIRE, GOMEZ, and PEREZ traveled to a parking lot in Louisville, KY, where they stole a semi-tractor and trailer loaded with Harmon-JBL audio products;
- 29. On or about February 19, 2023, FREIRE, GOMEZ, and PEREZ traveled to Columbus, OH, and surveilled a facility used by CF Moto;
- 30. On or about February 19, 2023, FREIRE, GOMEZ, and PEREZ stole a semi-tractor and trailer loaded with CF Moto ATV's;
- 31. On or about February 19, 2023, FREIRE, GOMEZ, PEREZ, and VELAZQUEZ transported the stolen CF Moto ATVs to a warehouse in Dade County, Florida;
- 32. On or about February 20, 2023, FREIRE made arrangements with ALAMEDA to sell the stolen CF Moto ATVs to ALAMEDA at a warehouse in Dade County, Florida;
- 33. On or about March 3, 2023, FREIRE, GOMEZ, and PEREZ traveled to Louisville, KY, where the surveilled a distribution facility used by Meta;
- 34. On or about March 3, 2023, FREIRE, GOMEZ, and PEREZ located a semi-tractor and trailer that left the Louisville, KY, distribution facility hauling Meta electronic products;
- 35. On or about March 3, 2023, FREIRE, GOMEZ, and PEREZ traveled to parking lot in Shepherdsville, KY, where they stole a semi-tractor and a trailer loaded with Meta electronic products;
- 36. On or about April 14, 2023, FREIRE, GOMEZ, and PEREZ traveled to Shepherdsville, KY, and surveilled a distribution facility used by Harmon-JBL;
- 37. On or about April 14, 2023, FREIRE, GOMEZ, and PEREZ located a semi-tractor and trailer leaving the Shepherdsville, KY, distribution facility loaded with Harmon-JBL audio products valued at approximately \$139,000;

- 38. On or about April 14, 2023, FREIRE, GOMEZ, and PEREZ traveled to a parking lot in Louisville, Kentucky, where they stole the semi-tractor and trailer loaded with Harmon-JBL products valued at \$139,000;
- 39. On or about April 14, 2023, FREIRE, GOMEZ, and PEREZ transported the stolen semi-tractor to a location in Hillview, KY, where it was abandoned;
- 40. On or about April 14, 2023, FREIRE, GOMEZ, and PEREZ arranged for the stolen trailer containing Harmon-JBL products to be transported to Dade County, Florida;
- 41. On or about May 7, 2023, FREIRE, GOMEZ, and PEREZ traveled to a Meijer parking lot in Louisville, KY, and stole a semi-tractor and trailer loaded with Bose audio speakers, valued at approximately \$480,000, that were traveling as an interstate shipment from the Port of Long Beach, California, to a Bose distribution facility in Jeffersonville, Indiana;
- 42. On or about May 7, 2023, FREIRE, GOMEZ, PEREZ, and VELAZQUEZ transported the stolen Bose audio speakers, valued at approximately \$480,000, to a warehouse in Dade County, Florida;
- 43. On or about May 7, 2023, FREIRE made arrangements with ALAMEDA to sell the stolen Bose audio speakers to ALAMEDA at a warehouse in Dade County, FL;
- 44. On or about May 7, 2023, FREIRE, GOMEZ, PEREZ, and VELAZQUEZ delivered the stolen Bose audio speakers, valued at approximately \$480,000, to ALAMEDA at a warehouse in Dade County, Florida;
- 45. On or about May 19, 2023, FREIRE, GOMEZ, and PEREZ traveled Hillview, KY, where they surveilled a distribution facility used by Meta;

- 46. On or about May 19, 2023, FREIRE, GOMEZ, and PEREZ located a semi-tractor and AMA Logistics trailer leaving the distribution facility loaded with Meta Oculus virtual reality goggles valued at approximately \$600,000;
- 47. On or about May 19, 2023, FREIRE, GOMEZ, and PEREZ traveled to a parking lot in Shepherdsville, KY, where they stole two semi-tractors each pulling an AMA Logistics trailer loaded with Meta Oculus virtual reality goggles;
- 48. On or about May 19, 2023, after stealing the semi-tractors and trailers, FREIRE, GOMEZ, and PEREZ painted over the AMA Logistics logo on the trailers and changed the trailers' license plates to conceal the identity of the trailers from law enforcement authorities;
- 49. On or about May 19, 2023, FREIRE, GOMEZ, and PEREZ transported one of the stolen tractor trailers to a movie theater parking lot in Louisville, KY, where it was recovered by law enforcement authorities;
- 50. On or about May 20, 2023, VELAZQUEZ drove a semi-tractor with no trailer from Jacksonville, FL, to Louisville, KY;
- 51. On or about May 20, 2023, VELAZQUEZ hooked his semi-tractor up to one of the stolen AMA Logistics trailers loaded with Meta Oculus virtual reality goggles and subsequently transported the stolen trailer and stolen cargo to Jacksonville, FL;
- 52. On or about May 21, 2023, FREIRE, GOMEZ, and PEREZ flew from Louisville, KY, to Tampa, FL;
- 53. On or about May 22, 2023, FREIRE, GOMEZ, and PEREZ traveled from Tampa, FL, to a warehouse in Dade County, FL;
- 54. On or about May 22, 2023, FREIRE made arrangements with ALAMEDA to sell the stolen Oculus virtual reality goggles to ALAMEDA at a warehouse in Dade County, FL;

- 55. On or about May 22, 2023, VELAZQUEZ delivered the stolen AMA Logistics trailer loaded with Meta Oculus virtual reality goggles to ALAMEDA at a warehouse in Dade County, FL;
- 56. On or about May 22, 2023, VELAZQUEZ, FREIRE, and ALAMEDA monitored the unloading of stolen Oculus virtual reality goggles from the stolen AMA Logistics trailer into the warehouse;

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

-200

COUNT 2

18 U.S.C. §§ 2314, 2

(Attempted Interstate Transportation of Stolen Property)

The Grand Jury further charges that:

On or about May 6, 2022, within the Southern District of Indiana and elsewhere, defendants,

CARLOS ENRIQUE FREIRE-PIFFERRER, and JOSE ANTONIO GOMEZ-PIFFERRER,

did unlawfully attempt to transport, transmit, and transfer in interstate commerce from the State of Indiana to another state, stolen goods, wares and merchandise, including Meta brand virtual reality goggles, of a value of approximately \$1.5 million, knowing the same to have been stolen;

All in violation of Title 18, United States Code, Sections 2314 and 2.

COUNT 3

18 U.S.C. §§ 659, 2

(Possession of Goods Stolen From Interstate Commerce)

The Grand Jury further charges that:

On or about May 6, 2022, within the Southern District of Indiana and elsewhere, defendants,

CARLOS ENRIQUE FREIRE-PIFFERRER, and JOSE ANTONIO GOMEZ-PIFFERRER,

did knowingly have in their possession goods and chattels of a value in excess of \$1,000.00, that is a shipment of Meta brand virtual reality goggles, of a value of approximately \$1.5 million, which had been stolen while moving as an interstate shipment of property from the Commonwealth of Kentucky to the state of Colorado, knowing the said goods and chattels to be stolen;

All in violation of Title 18, United State Code, Sections 659 and 2.

COUNT 4

18 U.S.C. §§ 2314, 2

(Attempted Interstate Transportation of Stolen Property)

The Grand Jury further charges that:

On or about August 31, 2022, within the Southern District of Indiana, defendants,

JOSE ANTONIO GOMEZ-PIFFERRER, CARLOS ENRIQUE FREIRE-PIFFERRER,

did unlawfully attempt to transport, transmit, and transfer in interstate commerce from the State of Indiana to the State of Florida, stolen goods, wares and merchandise, including Microsoft brand electronics, of a value of approximately \$914,000, knowing the same to have been stolen;

All in violation of Title 18, United States Code, Sections 2314 and 2.

COUNT 5

18 U.S.C. §§ 659, 2

(Possession of Goods Stolen From Interstate Commerce)

The Grand Jury further charges that:

On or about August 31, 2022, within the Southern District of Indiana and elsewhere, defendant,

JOSE ANTONIO GOMEZ-PIFFERRER, CARLOS ENRIQUE FREIRE-PIFFERRER,

did knowingly aid and abet the possession of goods and chattels of a value in excess of \$1,000.00, that Microsoft brand electronics, of a value of approximately \$914,000, which had been stolen while moving as an interstate shipment of property from the Commonwealth of Kentucky to the State of Minnesota, knowing the said goods and chattels to be stolen;

All in violation of Title 18, United State Code, Sections 659 and 2.

COUNT 6

18 U.S.C. §§ 659, 2 (Possession of Goods Stolen From Interstate Commerce)

The Grand Jury further charges that:

On or about May 7, 2023, within the Southern District of Indiana and elsewhere, defendants,

CARLOS ENRIQUE FREIRE-PIFFERRER, JUAN PEREZ-GONZALEZ, JOSE ANTONIO GOMEZ-PIFFERRER, and LUIS VELAZQUEZ,

did knowingly have in their possession goods and chattels of a value in excess of \$1,000.00, that is a load of Bose brand audio products, of a value of approximately \$407,520, which had been stolen while moving as an interstate shipment of property from the Port of Los Angeles, California, to Jeffersonville, Indiana, within the Southern District of Indiana, knowing the said goods and chattels to be stolen;

All in violation of Title 18, United State Code, Sections 659 and 2.

COUNT 7

18 U.S.C. §§ 2314, 2 (Interstate Transportation of Stolen Property)

The Grand Jury further charges that:

On or about May 7, 2023, within the Southern District of Indiana and elsewhere, defendants,

CARLOS ENRIQUE FREIRE-PIFFERRER, JUAN PEREZ-GONZALEZ, JOSE ANTONIO GOMEZ-PIFFERRER, and LUIS VELAZOUEZ,

did unlawfully transport, transmit, and transfer in interstate commerce from the Commonwealth of Kentucky to the State of Florida, stolen goods, wares and merchandise, including a load of

Bose audio products, of a value of approximately \$407,520, which had been moving as an interstate shipment of property from the Port of Los Angeles, California, to Jeffersonville, Indiana, within the Southern District of Indiana, knowing the same to have been stolen;

All in violation of Title 18, United States Code, Sections 2314 and 2.

FORFEITURE

The allegations contained in Counts 1 through 7 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

- 2. Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of Theft from Interstate Shipment, in violation of 18 U.S.C. §§ 659 and 2; Interstate Transportation of Stolen Property, in violation of 18 U.S.C. §§ 2314 and 2; and Conspiracy to violate 18 U.S.C. § 659 or 18 U.S.C. § 2314, in violation of 18 U.S.C. § 371, defendants FREIRE, PEREZ, GOMEZ, DE ARMAS, and VELAZQUEZ, shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violation(s). The property to be forfeited includes, but is not limited to, currency, jewelry, financial instruments, and motor vehicles.
- 3. If any of the property described above, as a result of any act or omission of the defendant[s]:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided

without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL:

FOREPERSON /

ZACHARY A. MYERS United States Attorney

By:

Matthew J. Rinka

Assistant United States Attorney