UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

vs.

EDUARD GHIOCEL (1),
aka Eduard Alexandru, aka "Filica",
FLOAREA GHIOCEL (2),
aka Floarea Alexandru,
GABRIEL GHIOCEL (3),
MARIUS GHIOCEL (4),
LARISA GHIOCEL (5), and
ARGENTINA ALEXANDRU (6)

Defendants.

Magistrate Case No. '23 MJ0474

COMPLAINT FOR VIOLATION OF
Title 18 U.S.C. § 1956(h)and Title 18 U.S.C. § 1956(a)(2)(A) — Conspiracy to Transport Funds to Promote Unlawful Activity;

Title 18, U.S.C., Sec. 982(a) — Criminal Forfeiture

[UNDER SEAL]

The undersigned complainant being duly sworn states:

Count One

1. Beginning on a date unknown, and continuing to and until September, 2022, within the Southern District of California and elsewhere, defendants EDUARD GHIOCEL, aka Eduard Alexandru, aka "Filica"; FLOAREA GHIOCEL, aka Floarea Alexandru; GABRIEL GHIOCEL; MARIUS GHIOCEL; LARISA GHIOCEL; and ARGENTINA ALEXANDRU did knowingly and intentionally combine, conspire, and agree among themselves to commit the following money laundering offense, to wit: to transport, transmit and transfer and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, that is violations of Wire Fraud, 18 U.S.C. § 1343; Mail Fraud, 18 U.S.C. §§ 1341 and 1346; Felony First Degree Robbery, California

Penal Code 211; and Felony Second Degree Robbery, California Penal Code 212.5(c); all in violation of Title 18, United States Code, Section 1956(a)(2)(A).

All in violation of Title 18, United States Code, Section 1956(h).

Criminal Forfeiture Allegations

2. The allegations contained in Count 1 above are incorporated herein for purposes of alleging forfeiture to the United States pursuant to Title 18, United States Code, Sections 982(a) and 982(b).

3. Upon conviction of the offense set forth in Count 1 of the Complaint, defendants EDUARD GHIOCEL, aka Eduard Alexandru, aka Filica; FLOAREA GHIOCEL, aka Floarea Alexandru; GABRIEL GHIOCEL; MARIUS GHIOCEL; LARISA GHIOCEL; and ARGENTINA ALEXANDRU shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 982(a)(1), any property, real and personal, involved in Count 1, and any property traceable to such property. The property to be forfeited includes, but is not limited to:

a. a white 2019 Lamborghini Urus, Vin ZPBUA1ZL5KLA01530, purchased by Ionut Alexandru on or about October 14, 2021 for $260,575.00 from Newport Beach Lamborghini (Paragraph 48).

b. a 2020 or 2021 Ferrari Portofino that cost $230,000 registered in Romania on March 23, 2022 (Paragraph 49).

c. approximately $119,950 worth of stolen jewelry, watches, cash, and money received from applying for California EDD benefits as detailed in Paragraphs 15-41 of the attached Probable Cause statement.

d. approximately $733,092 worth of gold bars and coins purchased as detailed in Paragraphs 45(a)-(m) of the attached Probable Cause Statement.

e. approximately $24,035.02 worth of cash or financial instruments from the international transfers (Paragraphs 50(a)-(q)).

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

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

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

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

d. has been substantially diminished in value; or

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

it is the intent of the United States of America, pursuant to Title 18, United States Code, Section 982(b), to seek forfeiture of substitute property up to the value of forfeitable property described above.

5. This complaint is based on the facts in the attached probable cause statement, which is incorporated herein by reference.

Courtney M. McGuire
____
Courtney M. McGuire
FBI Special Agent

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 9th day of February, 2023.

____
Honorable Michael S. Berg
United States Magistrate Judge

PROBABLE CAUSE STATEMENT

1. I am an investigative or law enforcement officer within the meaning of Title 18, United States Code, Section 2510 (7); that is, an officer of the United States, who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516. I have been employed as a Special Agent with the Federal Bureau of Investigation (FBI) since December of 2021. I am presently assigned to the FBI San Diego's Transnational Organized Crime – Global squad (TOC-G). This squad investigates money laundering and other derivative financial crimes committed by criminal organizations. Prior to my assignment with the TOC-G squad, I completed the 17-week FBI Academy in Quantico, Virginia and was trained in investigative techniques, procedures and strategies. Prior to my appointment as a Special Agent, I worked for the FBI as a Tactical Specialist and administrative support employee for four years. As a Tactical Specialist, I conducted research and analyzed data in support of federal criminal and national security investigations. Prior to my appointment to the FBI, I served as a Jailer for the Laguna Beach Police Department in Laguna Beach, California. I have a Bachelor of Science degree in Biology from Boise State University.

2. As a Tactical Specialist and Special Agent with the FBI, I have participated in numerous investigations involving individuals of criminal organizations engaged in money laundering,

drug trafficking, human trafficking and robbery. Through my investigations, my training and experience, and discussions with other law enforcement personnel, I have become familiar with the tactics and methods used by criminal enterprises to collect and launder the proceeds from specified unlawful activity to include drug trafficking, interstate transportation of stolen goods, wire fraud and mail fraud. My knowledge of the matters contained in this affidavit is based upon my personal knowledge, information provided to me by other law enforcement officers/agents, and information provided by one or more Confidential Sources (CS) and/or Sources of Information (SOI).

A. <u>Background of the Investigation</u>

3. FBI San Diego is currently investigating a criminal organization, hereinafter the Valcea Crime Ring, comprised of Roma travelers known to conduct various frauds and thefts throughout the United States. Members of the Valcea Crime Ring travel from the Valcea region of Romania to Mexico and/or Canada with the intent of smuggling themselves into the United States. If apprehended by United States authorities, members of the Valcea Crime Ring applied for and were often granted asylum status to enter the United States. Upon entrance into the United States, members of the organization were responsible for generating as much income as possible through theft, begging and other financial crimes. Members of the Valcea Crime Ring traveled together, driving rental cars and staying in hotels, and spent a significant amount of time in California. While in California, members of the Valcea Crime Ring traveled throughout the San Francisco Bay Area, Sacramento, Los Angeles, Orange County and San Diego.

Investigators believe members of the Valcea Crime Ring travel frequently to avoid detection and conceal plans of criminal activity.

4. The Valcea Crime Ring operates in a consortium of inter-related sub-groups associated through blood and marriage. The sub-groups are typically led by a male head of family. Although each sub-group typically retain their own criminal proceeds, the sub-groups frequently share and pool resources. Sub-groups travel together to meet with other sub-groups. The Valcea Crime Ring's Roma culture is historically self-governed where sub-group leaders collectively make decisions for the overall criminal organization, to include dispute resolution and information sharing. Sub-group leaders typically publish mass communications via Facebook, including Facebook live videos. It is known to investigators that the sub-group members serve in specialized roles to generate income and launder illicit proceeds for the benefit of each sub-group.

5. The money gained through illicit means is laundered using various techniques with the goal of repatriating the funds to Romania. The investigation to date has shown the Valcea Crime Ring does not typically use the United States banking system to store their illicit proceeds. Most commonly, Valcea Crime Ring members purchase luxury vehicles, jewelry and gold bars with the intent to store the goods in the United States or smuggle the goods to Romania. Occasionally, Valcea Crime Ring members send international wire transfers to Romania via Money Service Businesses (MSBs).

B. <u>Introduction of Valcea Crime Ring and Members of Ghiocel Sub-Group</u>

6. In September 2021, Romanian law enforcement provided information to the FBI identifying Eduard Ghiocel as a leader of an organized criminal group. Investigators discovered Eduard Ghiocel operated as a sub-group leader within the Valcea Crime Ring and participated in criminal acts along with sub-group members, Floarea Ghiocel, Marius Ghiocel, Gabriel Ghiocel, Argentina Alexandru and Larisa Ghiocel. In November of 2021, the San Diego Police Department (SDPD) became aware of a series of felony theft related crimes targeting the elderly population in San Diego. Throughout SDPD's investigation, detectives determined the aforementioned members of the Valcea Crime Ring conducted numerous jewelry thefts throughout the United States.

7. Eduard Ghiocel, a Romanian citizen born March 18, 1975, is described as a bald male with a dark beard. Investigators conducted an interview of cooperating witness F.T.[1] in June of 2022. F.T. told investigators that Eduard Ghiocel, (Aka Eduard Alexandru, aka Filica), is a top "Gypsy" and a "bandit" that makes millions. Another cooperating witness, L.P.[2], identified Eduard as the leader of a 24 to 50 person family.

8. Floarea Ghiocel, a Romanian citizen born March 29, 1974, has a large build and gold teeth. Floarea Ghiocel is married to Eduard Ghiocel. Marius Ghiocel, a Romanian citizen born August 30,

[1] F,T. was detained in June of 2022 for suspicion of California Penal Code (PC) 186.10 (a) money laundering, PC 182(a)(1) conspiracy and PC 532(a) obtain money under false pretenses. F.T. waived his/her Miranda rights and provided a voluntary statement to law enforcement. F.T. was not promised anything in return for his/her cooperation and was ultimately released. F.T. has prior arrests for alien inadmissibility and driving without a license. Additionally, as of January 23, 2023 F.T. had an active arrest warrant out of Georgia for a failure to appear in May of 2022.

[2] L.P. was contacted in July of 2022 and provided a voluntary statement to law enforcement. L.P. was not promised anything in return for his/her cooperation. In February 2021, L.P. plead guilty to one count of Title 8 USC 1324 (a)(1)(A)(i) - conspiracy to bring in aliens for financial gain.

1989, has one cloudy eye and is the son of Eduard and Floarea Ghiocel. Argentina Alexandru, a Romanian citizen born June 23, 1991, was a girlfriend of Marius Ghiocel. Gabriel Ghiocel, is a Romanian citizen born June 16, 1997 and is the son of Eduard and Floarea. Larisa Ghiocel, a Romanian citizen born January 3, 1999, is married to Gabriel Ghiocel.

9. Members of the Valcea Crime Ring are often described by victims as possibly being of Middle Eastern descent. Female members are often reported to wear long dresses, skirts or scarves. When encountered by law enforcement, members of the Valcea Crime Ring self-proclaim to be poor "Gypsies".

C. Means and Methods of Specified Unlawful Activity by Valcea Crime Ring

10. The Valcea Crime Ring, are known to conduct various frauds and thefts throughout the United States. Often, members of the Valcea Crime Ring operate in pairs or small groups to target elderly victims in shopping center parking lots or residential areas. A male suspect frequently waits in a rental vehicle while a female suspect approaches the victim. Their modus operandi (MO) is to distract victims and use sleight-of-hand techniques in which they place inexpensive gold costume jewelry on a victim, while simultaneously removing the victim's expensive jewelry. On some occasions, the Valcea Crime Ring members are also known to use sleight-of-hand techniques to steal cash from victims.

11. According to a Facebook search warrant obtained by investigators, in December of 2020 Gabriel Ghiocel (Facebook profile "Gabriel Piciu," Facebook unique ID 100006267510581) communicated with "Angloma Andrei" via Facebook about getting rich

in the United States. Investigators used Google Translate to review a portion of the communications. On December 13, 2020 at 06:47:05 UTC, Gabriel sent "Here everyone makes money". Immediately after, at 06:47:15 UTC, Gabriel Ghiocel sent "They are very gullible". Investigators believe Gabriel Ghiocel referred to victims of the Valcea Crime Ring being gullible.

12. In July 2022, cooperating witness L.P. told investigators the Ghiocel clan from Valcea are known for selling fake gold and can make up to $20,000.00 per day. L.P. told law enforcement each member of the Ghiocel clan rents cars to go out and commit crimes.

13. In June 2022, M.C.[3], a cooperating witness and member of the Valcea Crime Ring, told investigators they typically sell $200.00 to $300.00 of fake gold jewelry each day. Once reaching their goal, they go back to their hotel to sleep. Investigators believe Valcea Crime Ring members patrol for unsuspecting victims every day.

14. In December 2017, a Canadian police department issued a press release to warn citizens of a "notorious crime group", involving Floarea Ghiocel, who is known for distraction thefts. According to the report, "these groups often travel city to city and province to province to commit their crimes" and they typically target "individuals who wear gold earrings, necklaces, bracelets or rings".

D. Overt Acts by Valcea Crime Ring

[3] M.C. was detained in June of 2022 for suspicion of California Penal Code (PC) 186.10 (a) money laundering, PC 182(a)(1) conspiracy and PC 532(a) obtain money under false pretenses. C.M. waived his/her Miranda rights and provided a voluntary statement to law enforcement. C.M. was not promised anything in return for his/her cooperation and was ultimately released. C.M. has prior arrests for alien inadmissibility.

15. On March 4, 2020, two suspects approached victim 1 (V1) in the parking lot of the Westminster Superstore located in Westminster, California. After exiting his/her vehicle, V1 was approached by a 2019 silver Jeep Compass driven by a male suspect. A female suspect exited the vehicle and placed gold colored chains in V1's hand and around V1's neck. The suspects departed in the Jeep Compass. Shortly thereafter, V1 realized the female suspect stole V1's 18 karat gold chain with an attached jade and gold Buddha. The estimated value of the gold chain and the attached Buddha was $5,000.00. At the time of the incident, the suspect vehicle was rented by "Floarea Ghioceo" (believed to be Floarea Ghiocel). Investigators do not believe the incident was referred to the Orange County District Attorney's office for prosecution.

16. On May 14, 2020, victim 2 (V2) was approached by a male and female suspect in the parking lot of a Walmart located in National City, California. As V2 was loading items into his/her vehicle, a black SUV drove up. The driver of the black SUV was described as a Middle Eastern male that had an "issue" with one of his eyes. The female suspect was described as a Middle Eastern female, approximately 30 years old, with black hair, wearing "Muslim clothing". The female suspect called V2 to the passenger window of the suspect vehicle. V2 approached the vehicle and the female suspect placed several items of gold colored jewelry on him/her. As the suspects drove away, V2 realized his/her gold chain and pendant were missing. The estimated value of the gold chain and pendant was $3,000.00.

17. As a result of a follow-up investigation of the facts in

paragraph 16, Marius Ghiocel plead guilty on May 16, 2022 in SCD294523 to Felony Conspiracy, PC 182(a)(1) and Grand Theft Person, PC 487(c)in the Superior Court of California, County of San Diego and sentenced to two years felony summary probation, stating "On May 14, 2020 I did conspire with another person to commit a theft of property over $950 by removing jewelry from the person of another and in furtherance of that conspiracy, I did drive a vehicle with another person in order to make contact with an unsuspecting victim." Additionally, Marius was ordered to pay $12,000 in restitution and surrendered $3,917 cash seized toward restitution to V2.

18. On May 20, 2022, Argentina Alexandru plead guilty to Felony Conspiracy, PC 182(a)(1) and Grand Theft Person, PC 487(c)in the Superior Court of California, County of San Diego agreeing to the factual basis "On May 14, 2020, I did conspire with another person to commit a theft of property over $950 by removing jewelry from the person of another and in furtherance of that conspiracy, I did drive in a vehicle with another person in order to make contact with an unsuspecting victim and did steal jewelry from the person of another worth over $950." Argentina Alexandru was sentenced to two years summary probation and a stayed fine of $820 with the restitution satisfied by co-Defendant Marius Ghiocel in SCD294523.

19. On May 28, 2020, victim 3 (V3) was approached by two suspects driving a black SUV in a residential area of Fountain Valley, California. V3 described the suspects as "Hindu" or Indian. The female suspect lured V3 to the passenger side of the SUV to ask for directions and bless her/him. The female suspect grabbed

V3's wallet from his/her rear pant pocket. As the female suspect prayed, she removed $1,800.00 cash from V3's wallet and placed it in a sock. At the conclusion of the prayer, the female suspect gave V3 a sock and a gold colored chain. After the suspects departed, V3 realized the $1,800.00 was gone. V3 believed the female suspect performed an illusion or trick with the sock and gold colored chain. Approximately one month following the incident, V3 negatively identified subjects in a photo line-up. As a result, the incident was not referred to the Orange County District Attorney's Office for prosecution.

20. On or about June 19, 2020, Eduard and Floarea Ghiocel were stopped by officers of the Fountain Valley Police Department for driving a stolen rental vehicle. Eduard and Floarea were arrested for Felony Driving a Vehicle without Consent, California Vehicle Code (VC) 10851(a). The charges were ultimately dismissed for the furtherance of justice. During the investigation, officers recovered sale slips for Eduard, Floarea and Gabriel from two different jewelry stores located in Los Angeles, California. Law enforcement conducted an interview of cooperating witnesses (CW1 & CW2) from the jewelry stores. CW1 recognized and described Eduard as "bald with a beard", who appeared to be a "Gypsy" and attempted to sell stolen jewelry on numerous occasions. CW2 recognized Eduard and refused to buy items from Eduard because he was a "Gypsy" who stole jewelry.

21. On October 21, 2020, two suspects in a white sedan approached victim 4 (V4) as he/she was parked in Fountain Valley, California. The female suspect exited the vehicle, approached V4 and placed rings and gold colored chains around V4's neck. After

placing chains around V4's neck, the female suspect rushed back to the car. V4 checked his/her neck and discovered his/her 18 karat gold chain was missing. The following day, V4 identified Floarea in a line-up as the female suspect that stole his/her gold chain. The estimated value of the gold chain was $1,900.00. As of May 11, 2021, the investigation was suspended due to the lack of an independent witness and video footage of the incident. Therefore, the incident was not referred to the Orange County District Attorney's Office.

22. On October 23, 2020, Eduard Ghiocel submitted a fraudulent application to California Employment Development Department (EDD) to receive California unemployment insurance (UI) benefits. As a result of this fraudulent application, Eduard ultimately received $2,400.00 in UI benefits between November 2, 2020 and June 1, 2021. California UI applicants receive UI benefits via Bank of America debit accounts which receive interstate wire transfers of federally funded money from Washington, D.C. to a Bank of America location in Sacramento, California. On the fraudulent application, Eduard claimed to have worked as a self-employed individual for 23 months performing "Take out trash clean garden cleaner" with an annual salary of $47,000.00. Eduard fraudulently claimed to be a United States citizen and reported his social security number as 205-38-7932. According to the United States Social Security Administration, social security number 205-38-7932 is not assigned to Eduard Ghiocel. Additionally, in September 2021 Eduard submitted another EDD application for UI benefits using a different social security number of 209-38-7932.

Similarly, social security number 209-38-7932 is not assigned to Eduard Ghiocel.

23. In support of Eduard's October 2020 EDD application, Eduard submitted a photo of his valid Washington Driver License and two earnings statements for Ghiocel Cleaning. The earnings statements listed a business address of 2412 Associated Rd., Fullerton, CA 92385, with assigned employee ID of 7932. The later of the two earnings statements purported Eduard's YTD (Year to Date) Gross pay was $58,800.00 as of October 18, 2019. Additionally, the earnings statement dated October 18, 2019 purported a total deduction amount of $19,525.80 to include withholdings for Federal tax, California state tax, and California SDI tax. As part of his ID.me verification, Eduard submitted photos of his Washington Driver License, his Romanian passport, another earnings statement for Ghiocel Cleaning, and an Anthem Blue Cross insurance card. According to Anthem Blue Cross, the member identification number listed on Eduard's insurance card does not exist. The Ghiocel Cleaning earnings statement submitted to ID.me was dated February 7, 2020, listed a business address of 2608 2nd Ave. apt 303, Seattle, WA 98121 and listed assigned employee ID of 123. Additionally, the earnings statement submitted to ID.me was from a different stock and format than the previously submitted earnings statements to EDD for the same October 2020 application.

24. On October 26, 2020, Floarea Ghiocel submitted a fraudulent application to California EDD to receive California UI benefits. Ultimately, Floarea's application yielded no UI benefits. However, on the application, Floarea claimed to have worked as a self-employed individual for 23 months performing "Take

out trash clean garden clean house" with an annual salary of $47,000.00. Floarea fraudulently claimed to be a United States citizen and reported her social security number as 205-38-7931. According to the United States Social Security Administration, social security number 205-38-7931 is not assigned to Floarea Ghiocel. As part of her ID.me verification, Floarea submitted an earnings statement for Ghiocel Cleaning dated February 7, 2020, with the business address of 2900 W Lincoln Ave Apt E115, Anaheim, CA 92801. Floarea and Eduard Ghiocel both submitted earnings statements for Ghiocel Cleaning dated February 7, 2020 in the same format but listed different business addresses.

25. On November 4, 2020, three suspects believed to be Marius and Floarea Ghiocel, and Argentina Alexandru, occupied a Kia Sorrento SUV with Texas license plate MLW0777. At approximately 12:38 PM, the female suspect, who is believed to be Floarea, approached victim 5 (V5) in the parking lot of an Indian food market located in Artesia, California. The female suspect exited the Kia, hugged V5, placed a gold colored necklace on V5's neck and quickly returned to the Kia. Immediately thereafter, V5 realized his/her gold chain and pendant were stolen. The estimated value of the gold chain and pendant was $7,000.00. On November 5, 2020, officers with the Ontario Police Department conducted a felony traffic stop of the suspect vehicle bearing Texas license plate MLW0777. Marius and Floarea Ghiocel, and Argentina Alexandru were detained for grand theft from a person. Using photo lineups, V5 identified Marius as the driver of the suspect vehicle and Floarea as the female suspect responsible for stealing V5's gold chain and pendant. According to Hertz Vehicles LLC, the suspect

vehicle was rented to Marius Ghiocel at the time of the crime. Marius and Argentina were released following detention. Floarea was arrested and charged with Felony Grand Theft from a Person, PC 487(c). However, in October of 2021 the charge was ultimately dismissed in furtherance of justice.

26. On February 28, 2021, Gabriel and Larisa Ghiocel were detained by Milpitas Police Department following a high risk traffic enforcement stop. Gabriel and Larisa were occupants of a black Dodge Durango bearing California license plate 8PKD183, that was wanted by Monterey Park Police Department for its connection to a robbery. Milpitas Police Department conducted a search of the vehicle and observed numerous bracelets, rings, necklaces and assorted jewelry in a red handbag. Gabriel and Larisa were released at the scene at the request of Monterey Park Police Department. According to Monterey Park Police Department, the robbery victim was not desirous of prosecution and could not identify the suspects that stole his/her $3,000.00 necklace. As a result, investigators do not believe this incident was referred for prosecution.

27. On April 20, 2021, two suspects, believed to be Eduard and Floarea, approached an elderly victim (V6) in a residential neighborhood in La Palma, California and offered him/her gold colored jewelry. The female suspect used force in an attempt to take V6's Rolex watch, resulting in minor injuries to V6. The female suspect was unsuccessful in stealing V6's watch, however, Floarea's DNA profile was extracted from a swab of the watch after the encounter. Additionally, GPS location data for Eduard's cellular telephone, 206-694-9092, revealed his telephone was near La Palma approximately 45 minutes prior to the incident. As of May

2021, La Palma Police Department did not have any further investigative leads. Investigators do not believe this incident was referred for prosecution.

28. On May 10, 2021, an unknown female suspect approached victim 7 (V7) in Anaheim, California with her hand on a knife in her waistband. V7 feared that he/she would be stabbed. The female suspect subsequently stole V7's necklace and left V7 with fake jewelry. Although Floarea was not identified as the female suspect, Floarea's DNA profile was recovered from the fake jewelry left at the crime scene. The estimated value of the stolen necklace was $600.00. Two other Ghiocel clan members were identified by V7, however all charges associated to this event were dismissed due to a lack of evidence.

29. On July 14, 2021, a female suspect exited a black vehicle and approached victim 8 (V8) in a residential area of Garden Grove, California. A male driver remained in the running vehicle. The female suspect was described as wearing a long "Muslim" dress that covered the female's hair, but not her face. The female suspect prayed over V8, hugged him/her, and attempted to give him/her a gold colored necklace and ring before quickly departing in the suspect vehicle. A short time later, V8 realized the gold ring and gold chain necklace he/she was originally wearing was stolen by the female suspect. On October 29, 2021, V8 identified Marius Ghiocel from a photo line-up as the driver of the suspect vehicle. V8 was unable to identify the female suspect from a photo line-up and told law enforcement it was difficult because the female was covered up. The estimated value of the stolen jewelry was $900.00. After a follow-up investigation, on December 15, 2021, Marius was

arrested by Garden Grove Police Department for Felony Grand Theft from a Person, PC 487(c). In April of 2022, the Orange County District Attorney's Office dismissed the case due to a lack of sufficient evidence. The female suspect was not identified by V8 and thus not charged for the incident.

30. On July 18, 2021, Gabriel Ghiocel submitted a fraudulent application to California EDD to receive California UI benefits. Gabriel ultimately received $28,350.00 in UI benefits between August 3, 2021 and September 12, 2021 as a result of this fraudulent application. On the fraudulent application, Gabriel claimed he was employed by L B Construction Co. for one month and reported an annual income of $47,251.00. However, the California Franchise Tax Board has no record of L B Construction Co. existing in the state of California. Gabriel fraudulently claimed to be a United States citizen and reported his social security number as 205-38-7930. According to the United States Social Security Administration, social security number 205-38-7930 is not assigned to Gabriel Ghiocel. In support of his application, Gabriel conducted a video verification session with ID.me where he confirmed he was attempting to get "verified for California unemployment", stated his name, date of birth, and presented a valid Washington Driver License. Additionally, Gabriel submitted a photo of an Anthem Blue Cross insurance card for identification purposes. According to Anthem Blue Cross, the member identification number listed on Gabriel's insurance card does not exist.

31. On July 21, 2021, three suspects in a sedan approached victim 9 (V9) in a residential neighborhood of Garden Grove,

California. As V9 was entering his/her vehicle, a female exited the suspect vehicle and approached V9. All three suspects were described as Middle Eastern and approximately 45 years old. The female suspect asked for directions and offered a gold colored necklace to V9. V9 was wearing a silver and black Rolex watch on his/her left wrist and the female suspect wrapped the gold colored necklace around V9's wrist, which made him/her uncomfortable. V9 was aware that the female was attempting to steal his/her Rolex watch. To prevent the female suspect from stealing his/her watch, V9 tossed the watch onto the front seat of his/her vehicle. The female suspect lunged into V9's vehicle to grab the watch. As V9 attempted to pull the female suspect out of his/her vehicle, the driver of the suspect vehicle yelled at V9. Additionally, V9 reported a second male suspect present outside of the suspect vehicle. The female suspect grabbed the watch, ran back to the suspect vehicle and departed the scene with the two male suspects. A DNA profile was obtained from the gold colored necklace left at the scene, which resulted in a match to Floarea. The estimated value of the stolen watch was $9,000.00. As a result of a follow-up investigation, Floarea Ghiocel was charged on January 10, 2023 with Felony 2nd Degree Robbery, PC 211 and 212.5(c) in the Superior Court of California, County of Orange.

32. On August 4, 2021, two suspects, believed to be Eduard and Floarea Ghiocel, approached victim 10 (V10) in a Costco parking lot located in Vista, California. The two suspects worked together using sleight-of-hand and distraction techniques to steal V10's necklace. V10 identified Eduard as the male suspect in a photo line-up. The suspect vehicle was rented to Eduard at the time of

the crime. GPS location data for Eduard's cellular telephone, 206-694-9092, revealed his telephone was at or near the scene of the crime. The estimated value of the stolen necklace was $2,100.00. As a result of a follow-up investigation, on January 4, 2023, Eduard and Floarea Ghiocel were arrested and charged with Felony First Degree Robbery, PC 211, Felony Grand Theft, PC 487(a), Conspiracy PC 182, Theft Elder Adult PC 368(d) and Obtain Money on False Pretenses PC 532(a) in the Superior Court of California, County of San Diego.

33. On August 4, 2021, two suspects, believed to be Marius and Argentina, approached victim 11 (V11) in a residential neighborhood in National City, California. While driving a grey SUV, the two suspects contacted V11. The female suspect exited the vehicle, showed V11 gold colored jewelry and placed gold colored necklaces on V11's neck. At some point during the interaction, the female suspect removed V11's gold chain and returned to the vehicle. Following the interaction, V11 discovered his/her real gold necklace was missing. The estimated value of the stolen necklace was $3,000.00.

34. As a result of a follow-up investigation, Marius plead guilty on May 16, 2022 in SCD294523 to Felony Conspiracy, PC 182(a)(1) and Grand Theft Person, PC 487(c) in the Superior Court of California, County of San Diego and sentenced to 25 days jail and two years of probation. Marius agreed to the factual basis "On August 4, 2021, I did steal real property from the person of another in an amount over $950." Additionally, Marius was ordered to pay $3,000.00 in restitution to V11. Argentina Alexandru was also charged for this incident in SCD294732 with Felony Conspiracy,

PC 182(a)(1) and Grand Theft Person, PC 487(c) in the Superior Court of California, County of San Diego. However, for the purposes of a plea agreement, Argentina plead guilty to the May 2020 robbery.

35. On or about August 6, 2021, two suspects, believed to be Eduard and Floarea, approached elderly victim (V12) at a Home Depot in Lake Forest, California. The female suspect placed gold colored jewelry around V12's wrist and neck. The female suspect removed V12's Rolex watch and departed the scene. The suspect vehicle was rented by Eduard at the time of the incident. The estimated value of the stolen watch was $29,000.00. As a result of a follow-up investigation, Eduard and Floarea Ghiocel were charged on January 10, 2023 with Felony 2nd Degree Robbery, PC 211 and 212.5(c) Felony Theft from an Elder, PC 368(d)(1) and Felony Grand Theft Person, PC 487(c) in 23F01251 by the Superior Court of California, County of Orange.

36. On September 21, 2021, Larisa Ghiocel submitted a fraudulent application to California EDD to receive UI benefits. Larisa ultimately received $1,500.00 in UI benefits on October 10, 2021 as a result of this fraudulent application. On the application Larisa claimed to have worked as a self-employed mechanic for one month with an annual income of $99,886.00. Larisa fraudulently claimed to be a United States citizen and reported her social security number as 205-38-7929. According to the United States Social Security Administration, social security number 205-38-7929 is not assigned to Larisa Ghiocel. In support of her application, Larisa Ghiocel submitted photos of an earnings statement for Larisa's Auto Shop, an Anthem Blue Cross insurance card, and a

fraudulent Washington Driver License. Based on the earnings statement, Larisa's YTD Gross income was $88,324.15 and reflected withholding amounts for Federal, California, and California SDI taxes. According to Anthem Blue Cross, the member identification number listed on Larisa's insurance card does not exist.

37. On October 9, 2021, victim 13 (V13) was approached by two suspects driving a vehicle in the parking lot of the Nam Giao restaurant in Garden Grove, California. The suspects used hand motions to get V13 to walk closer to the vehicle. After approaching the vehicle, a female suspect in the rear passenger seat hugged and kissed V13. Simultaneously, the female suspect removed V13's necklace and replaced it with another necklace. The suspect vehicle subsequently departed the scene. Approximately five minutes after the encounter, V13 realized his/her necklace was stolen. On November 3, 2021, V13 confidently identified Argentina Alexandru as the female suspect who stole his/her gold and jade Buddha necklace. The estimated value of the necklace was $2,000.00. Argentina was charged by the Superior Court of California, County of Orange, however, Argentina failed to show up for court on January 23, 2023. Thus, a bench warrant was issued for Argentina's arrest.

38. On October 18, 2021, victim 14 (V14) was approached by a male and female suspect in a light colored mini-van outside of the Hoa Binh Garden Grove Supermarket in Garden Grove, California. The female suspect attempted to lure V14 to the suspect vehicle, but was unsuccessful. The suspects drove to a different location within the parking lot. Shortly after, the female suspect, described by V14 as Filipina, approached V14 on foot. The male

suspect was the driver of the vehicle. Without warning, the female suspect spoke to V14 and touched his/her neck. The female suspect gave V14 a $100.00 bill, which V14 spent prior to contacting Garden Grove Police Department. As the suspects fled the scene, V14 realized his/her 18 karat gold necklace with a jade medallion was missing. On November 3, 2021, V14 identified Floarea in a photo line-up as the suspect who took his/her necklace. The estimated value of the necklace was $10,000.00. Ultimately, this case was rejected by the Orange County District Attorney's Office for a lack of sufficient evidence.

39. On January 19, 2022 at approximately 12:45 PM Pacific Time, victim 15 (V15) was approached by two suspects in a residential neighborhood of Milpitas, California. The suspects were driving a silver Ford SUV bearing license plate 8URB024. The female suspect exited the vehicle and approached V15. The female suspect attempted to place jewelry around V15's neck and wrist. V15 believed the suspect attempted to steal his/her gold bracelet. The female gave V15 jewelry and returned to the SUV driven by a light skinned male. The suspect vehicle departed the scene and V15 realized his/her 24 karat gold necklace was stolen. Based on Avis Budget rental car records, Gabriel Ghiocel was the renter of the silver Ford SUV at the time of the incident. Additionally, according to Google location data, Gabriel's telephone was present at the scene of the crime on January 19, 2022 at 12:45 PM Pacific Time. The estimated value of the gold necklace was $1,500.00. Investigators do not believe charges were filed for this incident.

40. On January 30, 2022 at approximately 8:45 AM Pacific Time, a silver SUV with two suspects approached victim 16 (V16) in

a residential neighborhood of Fremont, California. The female suspect told V16 "God would be good" to him/her if he/she put on the suspect's necklace. V16 bent at the waist to receive the blessing. The female suspect removed V16's gold necklace. The female suspect subsequently removed V16's two rings and abruptly returned to the suspect vehicle. V16 identified Larisa Ghiocel from a photo line-up, with 80-90% certainty, as the suspect who stole his/her jewelry. The estimated value of the stolen jewelry was $4,900.00. On December 9, 2022, a felony arrest warrant for robbery was issued for Larisa Ghiocel.

41. On January 30, 2022 at approximately 10:09 AM Pacific Time, victim 17 (V17) and cooperating witness 3 (CW3) were approached by two suspects driving a silver ford SUV bearing California license plate 8URB024 in a residential neighborhood of Fremont, California. The suspect vehicle approached V17 to ask for directions and offer V17 jewelry. The female suspect exited the vehicle, grabbed V17 and forcibly removed his/her 22 karat gold necklace. The female suspect returned to the suspect vehicle, which fled at a high rate of speed. V17 identified Larisa in a photo line-up as the suspect who forcibly stole his/her necklace. CW3 identified Gabriel in a photo line-up as the suspect driver of the silver SUV. The silver SUV was rented by Gabriel at the time of the incident and used in the January 19, 2022 robbery previously discussed. Additionally, according to Google location data, Gabriel's telephone was present at the scene of the crime on January 30, 2022. The estimated value of the stolen necklace was $3,000.00. On December 9, 2022, a felony arrest warrant for robbery was issued for Gabriel Ghiocel.

E. Laundering of Illicit Proceeds

42. The money gained through illicit means is laundered using various techniques developed by the criminal organization with the goal of repatriation of the funds to Romania.

43. Investigators believe the Valcea Crime Ring members pawn stolen jewelry to convert their illicit proceeds to cash. In June 2020, law enforcement officers recovered sale slips for Eduard, Floarea, and Gabriel from two different jewelry stores located in Los Angeles, California. Law enforcement subsequently conducted an interview of a jewelry store employee who told law enforcement that Eduard attempted to sell stolen jewelry on numerous occasions. In February of 2022, law enforcement officers recovered jewelry receipts from C.C.L. Heng jewelry store and Heang Sang Heng Jewelry in Gabriel's possession. In August 2022, law enforcement officers conducted an interview of B.V.[4], a cooperating witness with knowledge of the Valcea Crime Ring. B.V. told law enforcement officers Max from C.C.L. Heng is well known, will buy jewelry and pay cash.

44. Once stolen goods are converted to cash, Valcea Crime Ring members purchase luxury vehicles, jewelry, and gold bars with the intent to store the goods in the United States or smuggle the goods to Romania. Occasionally, Valcea Crime Ring members send international wire transfers to Romania via Money Services Businesses (MSBs).

[4] B.V. was contacted by law enforcement in August of 2022, waived his/her Miranda rights and provided a voluntary statement. B.V. was not promised anything in return for his/her cooperation. In June of 2022, B.V. was arrested for misdemeanor theft and B.V. failed to appear for court. As such, the court issued a failure to appear in August of 2022 for B.V. Between 2012 and 2022, B.V. was arrested on four occasions for alien inadmissibility charges. In 2017 B.V. was arrested for felony larceny, but the charge was dismissed.

45. Based on reports from the Financial Crimes Enforcement Network (FinCEN) database and a follow-up interview of Irvine Gold Mine in Irvine, California, the following cash purchases were made:

a. On August 19, 2021, Eduard Ghiocel purchased a gold bar for $59,000.00 from Irvine Gold Mine using U.S. currency. Eduard reported his occupation as a car dealer.

b. On August 20, 2021, Gabriel Ghiocel purchased a gold bar for $58,900.00 from Irvine Gold Mine using U.S. currency. Gabriel reported his occupation was in auto sales.

c. On August 21, 2021, Gabriel Ghiocel purchased a gold bar for $58,900.00 from Irvine Gold Mine using U.S. currency. Gabriel reported his occupation was in auto sales. On February 2, 2022, law enforcement officers with the Orange County Auto Theft Task Force recovered a receipt for this transaction in Gabriel's possession.

d. On August 23, 2021, Gabriel Ghiocel purchased a gold bar for $59,700.00 from Irvine Gold Mine using U.S. currency. Gabriel reported his occupation was in auto sales. On February 2, 2022, law enforcement officers with the Orange County Auto Theft Task Force recovered a receipt for this transaction in Gabriel's possession.

e. On August 25, 2021, Gabriel Ghiocel purchased a gold bar for $63,200.00 from Irvine Gold Mine using U.S. currency. Gabriel reported his occupation was in auto sales.

f. On August 25, 2021, Gabriel Ghiocel purchased a gold bar for $55,200.00 from Irvine Gold Mine using U.S. currency. Gabriel reported his occupation was in auto sales.

g. On August 26, 2021, Gabriel Ghiocel purchased a gold bar for $58,785.00 from Irvine Gold Mine using U.S. currency. Gabriel reported his occupation was in auto sales.

h. On August 27, 2021, Gabriel Ghiocel purchased a gold bar for $60,056.00 from Irvine Gold Mine using U.S. currency. Gabriel reported his occupation was in auto sales.

i. On August 30, 2021, Gabriel Ghiocel purchased a gold bar for $59,863.00 from Irvine Gold Mine using U.S. currency. Gabriel reported his occupation was in auto sales.

j. On August 31, 2021, Gabriel Ghiocel purchased a gold bar for $60,000.00 from Irvine Gold Mine using U.S. currency. Gabriel reported his occupation was in auto sales.

k. On September 2, 2021, Gabriel Ghiocel purchased a gold bar for $59,734.00 from Irvine Gold Mine using U.S. currency. However, a report for this purchase was not available in the FinCEN database.

l. On September 3, 2021, Gabriel Ghiocel purchased a gold bar for $59,734.00 from Irvine Gold Mine using U.S. currency. However, a report for this purchase was not available in the FinCEN database.

m. On December 14, 2021, Marius Ghiocel purchased gold bars and coins for a total of $20,020.00 from Irvine Gold Mine using U.S. currency. Marius reported his occupation was in auto sales.

46. The auto sales occupations reported by Eduard and Gabriel Ghiocel are inconsistent with their California EDD applications filed between October 23, 2020 and September 21, 2021. On Eduard's October 23, 2020 EDD application, he reported the nature of his self-employment to be "take out trash clean garden cleaner". On Gabriel's July 18, 2021 EDD application, he reported being a bricklayer employed by "L B construction co". Additionally, on Eduard's second EDD application dated September 21, 2021, he reported the nature of his self-employment to be "I do dry walk service".

47. Cooperating witness L.P. told law enforcement the Ghiocels use cash they earn from fake jewelry to buy vehicles. L.P. estimated that approximately 70% of the vehicles purchased are for the purpose of money laundering and then sent to Romania through ports in New York, Baltimore or Cancun. Eduard goes to the port approximately one or two times a month while in Romania.

48. On October 14, 2021, Eduard Ghiocel posted a live stream video, speaking Romanian as he was walking through the Newport Lamborghini dealership. In the video, several people were present and appeared to be together. At one point, Eduard entered an office where a male, later identified as Ionut Alexandru, placed what appeared to be $200,000.00 in cash on the desk. According to records from Newport Beach Lamborghini, Ionut Alexandru purchased a white 2019 Lamborghini Urus, VIN ZPBUA1ZL5KLA01530 on October

14, 2021 for $260,575.00 in U.S. currency. According to records received from Romania's Directorate for Combating Organized Crime (DCCO), the aforementioned Lamborghini Urus arrived to the Port of Constanta in Romania in September 2022.

49. On January 29, 2022, Eduard conversed via Facebook with Serafim Gunici regarding a 2020 or 2021 Ferrari Portofino. Eduard told Gunici the vehicle would arrive from Germany, cost $230,000.00 and that Eduard had paid in full. According to information received from the Romanian Directorate for Combating Organized Crime, the Ferrari Portofino was registered in Romania on March 23, 2022. On an unknown date between March and August 2022, Romanian law enforcement officials reportedly witnessed Eduard driving the Ferrari Portofino in Romania.

50. Between February 10, 2020 and March 23, 2021, Argentina Alexandru and Eduard, Gabriel, Floarea, and Larisa Ghiocel sent the following 17 wire transactions totaling US$24,035.02. The wire transactions were sent from locations in California to a variety of people in Ramnicu, Valcea, Romania. These transactions were made from businesses such as Walgreens, CVS, Ria, Express Latin, and Tana Market. Standard practice in Money Service Businesses (MSBs) requires senders to provide identification verifying their identity when sending money.

a. On February 10, 2020, Eduard Ghiocel sent $500.00 via Western Union to Ramnicu, Valcea, Romania. The payee received the money in Romania on February 11, 2020.

b. On February 18, 2020, Eduard Ghiocel sent $500.00 via Western Union to Ramnicu, Valcea, Romania. The payee received the money in Romania on February 19, 2020.

c. On February 28, 2020, Eduard Ghiocel sent $700.00 via Continental Exchange Solutions to Ramnicu, Valcea, Romania. The payee received the money in in Romania on February 29, 2020.

d. On March 18, 2020, Gabriel Ghiocel sent $780.01 via Continental Exchange Solutions to Ramnicu, Valcea, Romania. The payee received the money in Romania on March 19, 2020.

e. On April 1, 2020, Eduard Ghiocel sent $700.00 via Continental Exchange Solutions to Ramnicu, Valcea, Romania. It is unknown when the payee received the money in Romania.

f. On June 10, 2020, Floarea Ghiocel sent $2,000.00 via MoneyGram to Ramnicu, Valcea, Romania. The payee received the money in Romania on June 11, 2020.

g. On June 12, 2020, Floarea Ghiocel sent $2,000.00 via MoneyGram to Ramnicu, Valcea, Romania. The payee received the money in Romania on June 12, 2020.

h. On August 10, 2020, Floarea Ghiocel sent $1,960.00 via MoneyGram to Ramnicu, Valcea, Romania. The payee received the money in Romania on August 11, 2020.

i. On August 10, 2020, Gabriel Ghiocel sent $1,950.00 via MoneyGram to Ramnicu, Valcea, Romania. The payee received the money in Romania on August 11, 2020.

j. On August 11, 2020, Larisa Ghiocel sent $1,955.00 via MoneyGram to Ramnicu, Valcea, Romania. The payee received the money in Romania on August 11, 2020.

k. On August 12, 2020, Larisa Ghiocel sent $1,950.00 via MoneyGram to Ramnicu, Valcea, Romania. The payee received the money in Romania on August 12, 2020.

l. On August 12, 2020, Gabriel Ghiocel sent $1,940.00 via MoneyGram to Ramnicu, Valcea, Romania. The payee received the money in Romania on August 12, 2020.

m. On August 14, 2020, Gabriel Ghiocel sent $1,960.00 via MoneyGram to Ramnicu, Valcea, Romania. The payee received the money in Romania on August 14, 2020.

n. On August 19, 2020, Gabriel Ghiocel sent $1,960.00 via MoneyGram to Ramnicu, Valcea, Romania. The payee received the money in Romania on August 19, 2020.

o. On October 20, 2020, Larisa Ghiocel sent $1,900.00 via Western Union to Ramnicu, Valcea, Romania. The payee received the money in Romania on October 21, 2020.

p. On March 11, 2021, Larisa Ghiocel sent $500.00 via Continental Exchange Solutions to Ramnicu, Valcea, Romania. The payee received the money in Romania on March 12, 2021.

q. On March 23, 2021, Argentina Alexandru sent $780.01 via Continental Exchange Solutions to Ramnicu, Valcea, Romania. The payee received the money in Romania on March 24, 2021.

51. Cooperating witness, B.V. told investigators Eduard and Floarea Ghiocel were in the United States until January of 2022. On January 9, 2022, Eduard and Floarea Ghiocel flew via Turkish Airlines from New York, New York to Istanbul, Turkey. On January 13, 2022, after Eduard and Floarea Ghiocel traveled back to

Romania, Eduard sent the following photo of Floarea to Gabriel via Facebook:

D. Conclusions

52. Between March 2020 and January 2022, Eduard, Floarea, Gabriel, Larisa, Marius, and Argentina conspired with one another to conduct numerous thefts and frauds amassing a large amount of illicit proceeds. Enumerated above, investigators have identified over $115,000.00 in value of items stolen by the group and fraudulent benefits received. However, the investigation has identified over $750,000.00 worth of transactions made with illicit funds.

53. The Valcea Crime Ring members frequently target unsuspecting, elderly individuals who are of an ethnic minority.

Investigators are aware individual events of comparatively small thefts, robberies and swindles are frequently not reported to law enforcement. Additionally, instances of successful victim identification of suspects are uncommon. Despite these challenges, Floarea, Eduard, Gabriel, Marius, and Larisa were identified in photo line-ups by victims and witnesses. Members of this sub-group traveled through communities and 'patrolled' areas looking for potential victims.

54. The group worked together by pooling resources to commit their crimes. Eduard, Floarea, Gabriel and Marius all rented vehicles used to conduct the thefts. Three of the four individuals who applied for UI benefits, used fake Anthem Blue Cross insurance cards in support of their fraudulent applications. Eduard, Gabriel and Marius each purchased gold with cash.

55. The investigation established Eduard, Floarea, Gabriel, Larisa, Marius and Argentina worked in conspiracy with one another to obtain significant illicit proceeds. Additionally, the entire group worked together to conduct financial transactions with the illicit proceeds through numerous gold purchases, jewelry purchases, and wire transfers to Romania.

56. Eduard and Floarea Ghiocel were recently arrested by San Diego Police Department after attempting to cross the Mexico-United States border for their involvement in the August 4, 2021 incident referenced in paragraph 32. As a result, Eduard and Floarea were charged with Robbery PC 211, Conspiracy PC 182, Theft Elder Adult PC 368(d), Grand Theft PC 487(a), Obtain Money on False Pretenses PC 532(a) and Money Laundering PC 186.10 (a) filed by the Superior Court of California, County of San Diego. Eduard and

Floarea Ghiocel were both denied bond and remain in state custody with their next hearing set for February 16, 2023. Gabriel and Larisa Ghiocel departed the United States on June 4, 2022 on a flight from New York City to Istanbul, Turkey. Marius Ghiocel was in United States Immigration custody until he was voluntarily deported from the United States on January 11, 2023 on a flight from Los Angeles to Warsaw, Poland. Investigators believe Argentina Alexandru departed the United States on or about November 10, 2022 from New York City.

57. Therefore, I do believe there is substantial probable cause for a criminal complaint to be filed against defendants EDUARD GHIOCEL, aka Eduard Alexandru, aka "Filica"; FLOAREA GHIOCEL, aka Floarea Alexandru; GABRIEL GHIOCEL; MARIUS GHIOCEL; LARISA GHIOCEL; and ARGENTINA ALEXANDRU for Title 18 U.S.C. § 1956(h), Title 18 U.S.C. § 1956(a)(2)(A), and Title 18, U.S.C., Sec. 982(a).