

U.S. DEPARTMENT OF THE TREASURY

Treasury Sanctions Fugitive, Others Linked to CJNG Timeshare Fraud Network

April 27, 2023

Treasury Coordinates with Government of Mexico to Further Disrupt CJNG Timeshare Fraud

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) sanctioned Eduardo Pardo Espino, who is a fugitive from a U.S. drug trafficking charge, along with six other individuals and 19 Mexican companies. These individuals and companies are linked, directly or indirectly, to timeshare fraud led by the Cartel de Jalisco Nueva Generacion (CJNG), which is a violent Mexico-based organization that traffics a significant proportion of the illicit fentanyl and other deadly drugs that enter the United States. OFAC coordinated this action with the Government of Mexico and U.S. Government partners.

"CJNG's deep involvement in timeshare fraud in the Puerto Vallarta area and elsewhere, which often targets elder U.S. citizens and can defraud victims of their life savings, is an important revenue stream supporting the group's overall criminal enterprise," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. "As part of the Administration's whole-of-government effort to address this crisis and, in coordination with our partners in Mexico, Treasury remains committed to disrupting CJNG's sources of revenue."

EXPOSING CJNG TIMESHARE FRAUD

On [March 2, 2023](#), OFAC sanctioned the following eight Mexican companies, which are linked, directly or indirectly, to CJNG's timeshare fraud activities: Servicios Administrativos Fordtwoo, S.A. de C.V., Integracion Badeva, S.A. de C.V., JM Providers Office, S.A. de C.V., Promotora Vallarta One, S.A. de C.V., Recservi, S.A. de C.V., Corporativo Title I, S.A. de C.V., Corporativo TS Business Inc, S.A. de C.V., and TS Business Corporativo, S.A. de C.V. These eight companies were designated pursuant to Executive Order (E.O.) 14059 for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, CJNG, a person sanctioned pursuant to E.O. 14059.

CONTINUING TO DISRUPT CJNG'S TIMESHARE FRAUD NETWORK

Building on last month's action that sanctioned only companies, today OFAC sanctioned seven individuals and an additional 19 Mexican companies—located in the Puerto Vallarta, Jalisco area and elsewhere—that are linked, directly or indirectly, to CJNG's timeshare activities. Puerto Vallarta is a CJNG strategic stronghold for drug trafficking and various other illicit activities.

Today, OFAC designated Mexican national **Eduardo Pardo Espino** (Pardo), a fugitive from U.S. justice and financial operator for CJNG based in Puerto Vallarta. In September 2019, following an investigation led by the Drug Enforcement Administration, a federal grand jury returned an indictment in the U.S. District Court for the Southern District of California charging Pardo with conspiracy to distribute methamphetamine. Pardo has also played a role in Servicios Administrativos Fordtwoo, S.A. de C.V., which is linked to CJNG's timeshare fraud activities and has made direct payments to CJNG members. OFAC designated Pardo today pursuant to E.O. 14059 for having engaged in, or attempted to engage in, activities or transactions that have materially contributed to, or pose a significant risk of materially contributing to, the international proliferation of illicit drugs or their means of production. Additionally, OFAC designated Pardo for having acted or purported to act for or on behalf of, directly or indirectly, CJNG and Servicios Administrativos Fordtwoo, S.A. de C.V.

Also today, OFAC designated the following five Mexican companies—listed with their purported activities—pursuant to E.O. 14059 for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, Pardo: **Besthings, S.A. de C.V.** (travel agency), **Produzioni Peca, S. de R.L. de C.V.** (wholesale trade), **RH Litman, S. de R.L. de C.V.** (business support), **Servicios Administrativos Dantwoo, S.A. de C.V.** (business support), and **Sociedad Spa Peninsula, S. de R.L. de C.V.** (beauty salon).

Like Pardo, Mexican nationals **Brayan Moises Luquin Rodriguez** (Luquin) and **Horacio Edmundo Lelo de Larrea Ventimilla** (Lelo de Larrea) also act on behalf of CJNG and are linked, directly or indirectly, to its timeshare fraud activities. Today, OFAC designated Luquin and Lelo de Larrea pursuant to E.O. 14059 for having acted or purported to act for or on behalf of, directly or indirectly, CJNG and Servicios Administrativos Fordtwoo, S.A. de C.V. OFAC designated the following Mexican companies—listed with their purported activities—pursuant to E.O. 14059 for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of,

directly or indirectly, Lelo de Larrea: **AKA Integral Services, S. de R.L. de C.V.** (construction), **Envigh, S. de R.L. de C.V.** (real estate), **Suncan Mexico, S. de R.L. de C.V.** (real estate), and **Trados Comercio, S. de R.L. de C.V.** (construction).

The remaining Mexican nationals designated today—**Luis Lorenzo Gomez Arias** (Gomez), **Clemente Padilla Zarate** (Padilla), **Pedro Rivas Sanchez** (Rivas), and **Ian Jassiel Gonzalez Villegas** (Gonzalez)—are also linked, directly or indirectly, to CJNG’s timeshare fraud activities through their roles in one or more of the Mexican companies designated on March 2, 2023. OFAC designated Gomez, Padilla, and Rivas pursuant to E.O. 14059 for being or having been leaders or officials of one or more the companies designated on March 2, 2023. In 2016, the Illinois state government identified Padilla as being involved in timeshare fraud targeting Mexican citizens. OFAC designated Gonzalez for having acted or purported to act for or on behalf of, directly or indirectly, one or more the companies designated on March 2, 2023. OFAC designated the following nine Mexican companies—listed with their purported activities—that are linked to one or more of the above four individuals. OFAC designated the following company pursuant to E.O. 14059 for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, Gomez: **Atlantic Diamond Group, S.A. de C.V.** (real estate). OFAC designated the following Mexican companies pursuant to E.O. 14059 for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, Padilla: **Constructores B2, S.A. de C.V.** (business support) and **Corporativo Bussines [sic] Mx Insider, S.A. De C.V.** (real estate). OFAC designated the following Mexican companies pursuant to E.O. 14059 for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, Rivas: **Asesores Y Promotores ACG, S.A. de C.V.** (business support) and **Resguardo de Valores y Servicios Integrales RSVI, S.A. de C.V.** (travel agency). OFAC designated the following Mexican companies pursuant to E.O. 14059 for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, Gonzalez: **Bussines [sic] Corporativo T Service Inc, S.A. de C.V.** (real estate), **Corporativo Bussines [sic] Mx Insider, S.A. De C.V.** (real estate), **Corporativo Soporte Legal Recovery, S.A. de C.V.** (business support), **NT Insurance Corporativo, S.A. De C.V.** (real estate), and **T Service Bussines [sic] Inc, S.A. de C.V.** (business support).

Finally, OFAC today designated **Magniservia, S.A. de C.V.**, purportedly engaged in business support, pursuant to E.O. 14059 for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, CJNG.

OTHER ACTIONS AGAINST CJNG

On [April 8, 2015](#), OFAC sanctioned CJNG pursuant to the Foreign Narcotics Kingpin Designation Act (Kingpin Act) for playing a significant role in international narcotics trafficking. On [December 15, 2021](#), OFAC also designated CJNG pursuant to E.O. 14059. In other actions, OFAC has designated numerous CJNG-linked companies that were engaged in various commercial activities and multiple individuals who played critical roles in CJNG's drug trafficking, money laundering, and corruption. Many recent actions have focused on CJNG's strategic stronghold of Puerto Vallarta. OFAC has designated the following senior CJNG members based in Puerto Vallarta: Carlos Andres Rivera Varela (a.k.a. "La Firma"), Francisco Javier Gudino Haro (a.k.a. "La Gallina"), and Julio Cesar Montero Pinzon (a.k.a. "El Tarjetas"). These three individuals are part of a CJNG enforcement group based in Puerto Vallarta that orchestrates assassinations of rivals and politicians using high-powered weaponry.

TIMESHARE FRAUD RESOURCES

On March 2, 2023, the Federal Bureau of Investigation (FBI) issued a [public service announcement](#) to consumers concerning scammers targeting owners of timeshares in Mexico. Individuals who have been victimized by this type of scam are encouraged to file a complaint with the FBI's Internet Crime Complaint Center by visiting <https://www.ic3.gov>.

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of the designated persons described above that are in the United States or in the possession or control of U.S. persons are blocked and must be reported to OFAC. In addition, any entities that are owned, directly or indirectly, individually or in the aggregate, 50 percent or more by one or more blocked persons are also blocked. Unless authorized by a general or specific license issued by OFAC, or exempt, OFAC's regulations generally prohibit all transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or otherwise blocked persons. U.S. persons may face civil or criminal penalties for violations of E.O. 14059 and the Kingpin Act.

Today's action is part of a whole-of-government effort to counter the global threat posed by the trafficking of illicit drugs into the United States that is causing the deaths of tens of thousands of Americans annually, as well as countless more non-fatal overdoses. OFAC, in coordination with its U.S. Government partners and foreign counterparts, will continue to target and pursue accountability for foreign illicit drug actors.

The power and integrity of OFAC sanctions derive not only from OFAC's ability to designate and add persons to the Specially Designated Nationals and Blocked Persons List (SDN List), but also from its willingness to remove persons from the SDN List consistent with the law. The ultimate goal of sanctions is not to punish, but to bring about a positive change in behavior. For information concerning the process for seeking removal from an OFAC list, including the SDN List, please refer to OFAC's Frequently Asked Question 897 [here](#). For detailed information on the process to submit a request for removal from an OFAC sanctions list, please click [here](#).

[For more information on the individuals and entities designated today, click here.](#)

[To view a chart on the entities designated today, click here](#) .

###