

Treasury Takes Third Action Against CJNG Timeshare Fraud Network Centered in Puerto Vallarta

November 30, 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 three Mexican individuals and 13 Mexican companies. These individuals and companies are linked, directly or indirectly, to timeshare fraud led by the Cartel de Jalisco Nueva Generacion (CJNG). CJNG, a violent Mexico-based organization, 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, including its Financial Intelligence Unit, as well as U.S. Government partners, including the Federal Bureau of Investigation (FBI), and the Drug Enforcement Administration.

“The CJNG cartel, a leading trafficker of narcotics like illicit fentanyl into the United States, generates substantial revenue for its multi-faceted criminal enterprise through its timeshare fraud network,” said Secretary of the Treasury Janet L. Yellen. “CJNG uses extreme violence and intimidation to control the timeshare network, which often targets elder U.S. citizens and can defraud victims of their life savings. Treasury remains committed to the Administration's whole-of-government effort, in coordination with our partners in Mexico, to disrupt CJNG's revenue sources and ability to traffic deadly drugs like fentanyl.”

EXPOSING CJNG TIMESHARE FRAUD

On [March 2, 2023](#), OFAC sanctioned eight Mexican companies pursuant to Executive Order (E.O.) 14059. These companies are linked, directly or indirectly, to CJNG's timeshare fraud activities. On [April 27, 2023](#), OFAC sanctioned seven Mexican individuals, including drug trafficking fugitive Eduardo Pardo Espino, and 19 Mexican companies pursuant to E.O. 14059. These individuals and companies are also linked, directly or indirectly, to CJNG's timeshare fraud activities.

Although there are different types of timeshare fraud, the schemes often involve the following: (1) third-party scammers, who claim to have ready buyers, make unsolicited

purchase offers to timeshare owners;

(2) if offers are accepted, scammers make requests to timeshare owners for payments of advance fees and taxes, supposedly to facilitate or expedite the sale with assurances of reimbursement upon closing; and

(3) once multiple payments have been made to the scammers, timeshare owners eventually realize that the offers were fictitious, that there are no buyers, and that their money is gone.

CONTINUING TO DISRUPT CJNG'S TIMESHARE FRAUD NETWORK

CJNG Timeshare Fraud Network
November 2023

CARTEL DE JALISCO NUEVA GENERACION (CJNG)
Mexican cartel engaged in the trafficking of fentanyl and other deadly drugs to the United States
Designated April 8, 2015 (Kingpin Act) and December 15, 2021 (E.O. 14059)

Previously Designated Senior CJNG Members Based in Puerto Vallarta, Jalisco, Mexico

- Carlos Andres RIVERA VARELA, a.k.a. "La Firma" - Designated April 6, 2021 (Kingpin Act)
- Julio Cesar MONTERO PENZON, a.k.a. Luis Armando VELAZQUEZ BALAZAR; a.k.a. Cesar HERNANDEZ JIMENEZ, a.k.a. "El Torijota"; a.k.a. "Mareno" - Designated June 2, 2022 (E.O. 14059)
- Francisco Javier GUIDENO HARO, a.k.a. "La Gallina" - Designated April 6, 2021 (Kingpin Act)

Puerto Vallarta-Based Individuals Acting on Behalf of CJNG

- Manuel Alejandro FOUBERT CADENA, DOB 16 Oct 1982, C.U.R.P. FOCMB21916HFCB02 (Mexico)
- Teresa De Jesus ALVARADO RUBIO, DOB 27 Oct 1972, C.U.R.P. AART721027MCLB09 (Mexico)
- Gabriela DEL VILLAR CONTRERAS, DOB 06 Oct 1984, C.U.R.P. VVCG410908CHLN04 (Mexico)

Previously Designated Puerto Vallarta-Based Individual Acting on Behalf of CJNG

- Eduardo PARD0 ESPINO, Designated April 27, 2023 (E.O. 14059)

Company Acting For or on Behalf, Directly or Indirectly, of CJNG

- EPTA (Grupo Empresarial EPTA, S.A. DE C.V., Puerto Vallarta, Jalisco, Mexico; Leon, Guanajuato, Mexico)

Companies Controlled or Directed By, or Acting For or on Behalf of, FOUBERT

- COMERCIALIZADORA DE SERVICIOS TURISTICOS DE VALLARTA, S.A. DE C.V., Puerto Vallarta, Jalisco, Mexico
- ASIS REALTY AND VACATION CLUB, S.A. DE C.V., Puerto Vallarta, Jalisco, Mexico
- GRUPO MINERABARRA PACIFIC, S.A. DE C.V., Leon, Guanajuato, Mexico
- CIUDAD & VACACIONES REUNIDAS SA DE CV, Puerto Vallarta, Jalisco, Mexico
- AXIS SALE & MAINTENANCE REALTY, S.A. DE C.V., Puerto Vallarta, Jalisco, Mexico
- REAL ESTATES & HOLIDAY CITIES, S.A. DE C.V., Puerto Vallarta, Jalisco, Mexico
- MILA CORPORATE SERVICES, S.A. DE C.V., Cuandahuacana, Jalisco, Mexico
- FRANCOIS SA F INVESTISSIONS DEL PUEBLO, S.A. DE C.V., Cuandahuacana, Jalisco, Mexico
- INVESTISSIONS REALTY & MANAGEMENT, S.A. DE C.V., Puerto Vallarta, Jalisco, Mexico

Companies Controlled or Directed By, or Acting For or on Behalf of, DEL VILLAR

- CROWLAMSA, S.A. DE C.V., Cuandahuacana, Jalisco, Mexico
- SKARBE, S.A. DE C.V., Cuandahuacana, Jalisco, Mexico
- BANCO COMERCIALIZADORA, S.A. DE C.V. (a.k.a. CEAB CVM), Puerto Vallarta, Jalisco, Mexico; Zapopan, Jalisco, Mexico

Building on the two actions taken earlier this year, today OFAC sanctioned additional Mexican individuals and companies pursuant to E.O. 14059 that are linked, directly or indirectly, to CJNG's timeshare activities. Many of these individuals and entities are located in Puerto Vallarta, Jalisco, Mexico, which is a CJNG strategic stronghold for drug

trafficking and various other illicit activities.

Today, OFAC sanctioned Mexican individuals **Teresa De Jesus Alvarado Rubio (Alvarado)**, **Manuel Alejandro Foubert Cadena (Foubert)**, and **Gabriela Del Villar Contreras (Del Villar)** pursuant to E.O. 14059 for being owned, controlled, or directed by, or having acted or purported to act for on behalf of, directly or indirectly, CJNG, a person sanctioned pursuant to E.O. 14059. Alvarado has been linked to timeshare fraud activities in the Puerto Vallarta area for approximately 15 years. Foubert has been linked to timeshare fraud activities in Puerto Vallarta and elsewhere since at least 2016. Del Villar is a Puerto Vallarta attorney who engages in debt collection and real estate fraud on behalf of CJNG.

Also today, OFAC sanctioned 13 Mexican companies pursuant to E.O. 14059. OFAC sanctioned **Grupo Empresarial Epta, S.A. de C.V.**, which is purported to be engaged in real estate activities, for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, CJNG.

OFAC sanctioned the following nine companies—listed with their purported activities—for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, Foubert, a person sanctioned pursuant to E.O. 14059: **Assis Realty And Vacation Club, S.A. de C.V.** (real estate activities), **Axis Sale & Maintenance Buildings, S.A. de C.V.** (real estate activities), **Comercializadora de Servicios Turisticos de Vallarta, S.A. de C.V.** (real estate activities), **Condos & Vacations Buildings Sale & Maintenance, S.A. de C.V.** (real estate activities), **Grupo Minera Barro Pacifico, S.A.P.I. de C.V.** (mining), **International Realty & Maintenance, S.A. de C.V.** (real estate activities), **Mega Comercial Ferrelectrica, S.A. de C.V.** (wholesale trade), **Real Estates & Holiday Cities, S.A. de C.V.** (real estate activities), and **Terra Minas e Inversiones del Pacifico, S.A.P.I. de C.V.** (mining).

OFAC sanctioned the following three Mexican companies—listed with their purported activities—for being owned, controlled, or directed by, or having acted or purported to act for or on behalf of, directly or indirectly, Del Villar, a person sanctioned pursuant to E.O. 14059: **Banlu Comercializadora, S.A. de C.V.** (a.k.a. **Cear Gym**) (wholesale trade; sports club), **Crowlands, S.A. de C.V.** (real estate activities), and **Skairu, S.A. de C.V.** (real estate activities).

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 sanctioned 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 sanctioned 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. Luis Armando Velazquez Baltazar; a.k.a. Cesar Hernandez Jimenez; 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 FBI issued a [public service announcement](#) to consumers concerning scammers targeting owners of timeshares in Mexico. Victims of this type of scam are encouraged to file a complaint with the FBI's Internet Crime Complaint Center by visiting <https://www.ic3.gov>.

At times, perpetrators of timeshare fraud misuse government agency names in attempts to appear legitimate. For example, perpetrators may call victims and claim to represent OFAC, demanding a payment in exchange for the release of funds that the perpetrator claims OFAC has "blocked." On March 2, 2023, OFAC issued an [alert](#) regarding such scams, warning that individuals may falsely claim to represent OFAC in furtherance of their fraud.

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.](#)

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