SIMÓN LEVY
Complainant

BEFORE THE UNITED STATES DEPARTMENT OF JUSTICE
NATIONAL SECURITY DIVISION AND CRIMINAL DIVISION
FEDERAL BUREAU OF INVESTIGATION · DRUG ENFORCEMENT ADMINISTRATION
BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
DEPARTMENT OF THE TREASURY · OFAC · FinCEN
DEPARTMENT OF STATE

In re: The assassination of Carlos Alberto Manzo Rodríguez, Mayor of Uruapan, Michoacán, Mexico, on November 1, 2025, attributed by Mexican authorities to the Jalisco New Generation Cartel (CJNG), a designated Foreign Terrorist Organization, and the network that ordered, financed, facilitated and concealed it.

CRIMINAL REFERRAL AND REQUEST FOR INVESTIGATION, DESIGNATION, TRANSFER, FINANCIAL AND FIREARMS TRACING, AND PRESERVATION OF EVIDENCE

18 U.S.C. §§ 2339B, 1956, 924, 933, 934 · 21 U.S.C. §§ 959, 960a, 963 · 50 U.S.C. § 1705 · E.O. 14059 · E.O. 13224 · 8 U.S.C. §§ 1182(a)(3)(B), 1182(a)(2)(C), 1201(i) · 22 U.S.C. §§ 2778, 2151n, 2304 · 31 U.S.C. § 5318

I. INTRODUCTION

1. Complainant respectfully submits this criminal referral concerning the assassination of Carlos Alberto Manzo Rodríguez, the independent mayor of Uruapan, Michoacán, Mexico, who was shot seven times in the city's main square on the night of November 1, 2025, during the Festival of Candles, in front of hundreds of residents.

2. Mexico's Secretariat of Security and Citizen Protection (SSPC) and the Michoacán State Attorney General's Office (FGE) attribute the killing to the Jalisco New Generation Cartel (CJNG). The Department of State designated the CJNG a Foreign Terrorist Organization and a Specially Designated Global Terrorist effective February 20, 2025.

3. One year later, Mexican authorities report 34 arrests and 29 defendants bound over for trial, and state that the masterminds are in custody and that there is no sign of a political motive. The public record shows the case is not closed. The man

Mexico names as the mastermind was released from federal prison in 2022 by an acquittal that Mexico's own government denounced. Members of the victim's inner circle allegedly sold his movements to the cell. The federal protection he requested at least eleven times was limited to the perimeter, and more than 200 federal troops were withdrawn from Uruapan 24 days before the killing.

4. The record also shows a political layer that the state case file does not address. The alleged mastermind's brother, a former mayor of Apatzingán and a Morena state councilor, was politically aligned with two of the three officials the victim named on video as responsible if he were harmed. The state attorney general who opened the case took leave, became Morena's candidate for governor, and now competes against the victim's widow, whom the office he led placed under investigation.

5. Because the CJNG is a designated FTO whose methamphetamine and cocaine trafficking targets the United States, the conduct described here falls within the reach of U.S. criminal, sanctions and immigration law. Complainant presents these facts to the United States so that its agencies investigate them, and requests the specific actions set out in Section V.

II. JURISDICTION AND UNITED STATES NEXUS

6. **Terrorist designation.** The CJNG has been a designated Foreign Terrorist Organization since February 20, 2025. Providing material support or resources to it, including services, personnel, lodging, communications and information, is a federal crime under 18 U.S.C. § 2339B, with extraterritorial jurisdiction under § 2339B(d), including where an offender is later brought into or found in the United States, or where the offense affects foreign commerce.

7. **Drug trafficking aimed at the United States.** On August 2, 2026, Mexico's Attorney General's Office (FGR) charged the alleged mastermind, Ramón Ángel Álvarez Ayala, known as R1, with weapons, methamphetamine and cocaine offenses. Narcotics trafficking that benefits a designated FTO is reached by 21 U.S.C. § 960a; international manufacturing and distribution intended for the United States, and

conspiracy to do so, by 21 U.S.C. §§ 959 and 963.

8. **Money.** According to the FGE, the cartel offered two million pesos for the mayor's life. Payments, transfers and laundering of proceeds that touch the U.S. financial system are reached by 18 U.S.C. § 1956, by Treasury's sanctions authorities under 50 U.S.C. § 1705 and Executive Orders 14059 and 13224, and by FinCEN's authorities under 31 U.S.C. § 5318.

9. **The weapon.** The mayor was killed with a 9 millimeter pistol. If the weapon is of U.S. origin, its acquisition and export implicate 22 U.S.C. § 2778, 18 U.S.C. § 924, and 18 U.S.C. §§ 933 and 934.

10. **Transfers to the United States.** On January 20, 2026, Mexico transferred 37 high-profile detainees to the United States, its third such transfer (Associated Press, January 20, 2026). The defendants identified in this referral are eligible for the same mechanism or for formal extradition under the 1978 Extradition Treaty between the United States and Mexico.

III. STATEMENT OF FACTS

A. The victim and his warnings

11. Carlos Manzo, 40, was elected mayor of Uruapan in 2024 as an independent candidate with 95,381 votes, after serving as a federal deputy for Morena from 2021 to 2024. He founded the Sombrero Movement (Movimiento del Sombrero) and campaigned on confronting organized crime (Expansión, November 30, 2025).

12. Between March 1 and October 8, 2025, Manzo publicly requested federal support at least eleven times, including at the President's morning press conference on May 23, 2025, where he asked that Security Secretary Omar García Harfuch be sent to Uruapan (Animal Político, November 5, 2025).

13. On August 27, 2025, Uruapan municipal police arrested René Belmontes Aguilar, known as El Rhino, a CJNG plaza boss of Los Cannabis, a cell founded by R1. Manzo displayed the arrest on live video (N+, August 27, 2025; Milenio, July 31, 2026).

14. On October 8, 2025, Manzo denounced the withdrawal of more than 200 federal troops from Uruapan and wrote that the decision left the city vulnerable to organized crime. There was no public response. He was killed 24 days later (El Imparcial, July 31, 2026).

15. According to the Defense Ministry, the National Guard assigned Manzo six members and a vehicle on December 10, 2024, and eight more in May 2025, for a total of fourteen, providing perimeter security only. Close protection was provided by municipal police officers (press conference of November 2, 2025, reported by Infobae and El Financiero).

B. The night of November 1, 2025

16. According to the message timeline presented by the SSPC on November 19, 2025: at 4:00 p.m. the shooter checked into a downtown hotel and, at the same time, the city's Director of Public Relations and Protocol, Samuel García Rivero, sent the mayor's route through the festival to a taxi driver, Josué Eulogio, known as El Viejito; at 6:06 p.m. a cell member identified as Ramiro sent the group chat a video of the planter where the mayor would stand; at 7:00 p.m. Manzo opened the festival; at approximately 8:10 p.m. Víctor Manuel Ubaldo Vidales, 17, of Paracho, Michoacán, fired seven 9 millimeter rounds at close range, also wounding councilman Víctor Hugo de la Cruz; at 8:14 p.m. Ramiro asked the chat to pick up a second youth, Fernando Josué; and Manzo died at approximately 8:50 p.m. at the Fray Juan de San Miguel Hospital (SSPC via N+ and El Financiero, November 19, 2025; FGE, November 2 and 6, 2025).

17. The shooter was subdued at the scene and died there. On November 10, 2025, Ramiro and Fernando Josué, who according to the SSPC was 16 and had been recruited at a drug rehabilitation center, were found dead on the Uruapan to Paracho highway. The SSPC attributed their deaths to an attempt to obstruct the investigation (SSPC, November 19, 2025 and November 10, 2026).

C. The coordination

18. According to the SSPC, the attack was coordinated over encrypted messaging by Jorge Armando Gómez Sánchez, known as El Licenciado, who allegedly recruited the shooter at a rehabilitation center and pressed the cell to fire even if the mayor was accompanied. He was arrested in Morelia on November 18, 2025, sent to the Altiplano federal prison, denied any link to the cartel, alleged torture, and was bound over for trial (SSPC, November 19, 2025; El Imparcial, November 27, 2025).

19. His alleged successor in Uruapan, Alexis Jesús Medina García, known as El Brilloso, was arrested in Zapopan, Jalisco, and bound over on September 15, 2026. Authorities state that messages on his phone place him in the chat (Publimetro, September 16, 2026).

D. The order

20. The SSPC states that R1, leader of a CJNG faction known as Los Erres, ordered and financed the killing, that the cartel took the mayor's public accusations as a provocation, and that wiretaps indicate that CJNG leader Nemesio Oseguera Cervantes, El Mencho, knew of the plan (SSPC, July 31, 2026). El Mencho was killed by the Mexican Army on February 22, 2026, with U.S. intelligence support (Associated Press, February 22, 2026).

21. R1 was arrested in 2012 and held for ten years with his brother Rafael on kidnapping and organized crime charges. On November 19, 2022, a federal judge in Jalisco acquitted him and he was released from a federal prison in Sonora. The SSPC of that time called the release a sabadazo and announced a complaint against the judge (El Universal, November 2022; El Financiero, July 30, 2026). He was free for 1,078 days before the killing.

22. R1 was recaptured on July 30, 2026, in Atotonilco el Alto, Jalisco, held in pretrial detention by the FGR on weapons and drug charges, charged by the FGE with the homicide on August 4, 2026, and bound over on August 7, 2026 (FGR, August 2, 2026; N+, August 4, 2026; Animal Político, August 7, 2026). His brother Rafael, known as R2, was captured in Zapopan on November 8, 2026 (SSPC, November 10,

2026). The Security Secretary stated that authorities have information to locate Francisco, R1's son.

E. The door opened from inside

23. The taxi driver testified at the arraignment that García Rivero cooperated in exchange for two doses of drugs, and that both knew of the plan fifteen days in advance. Both were bound over in January 2026. García Rivero continued working at City Hall for two months after the killing (La Razón, January 14, 2026; Excélsior).

24. On November 21, 2025, seven municipal bodyguards were arrested for aggravated homicide by omission. Their chief, retired colonel José Manuel Jiménez Miranda, who selected them, escaped during the operation and remains a fugitive with a reward of 100,000 pesos. According to the mayor's brother, the colonel knew a month in advance of plans to attack the mayor (FGE; Zeta Tijuana, November 27, 2025; El Financiero, January 25, 2026).

25. On November 10, 2026, the Security Secretary stated that among those involved were people from the mayor's inner circle who knew his routines and used that closeness to help the killers (SSPC, November 10, 2026). Official statements identify only some of the 34 detainees by name.

F. The political layer

26. On February 17, 2026, the widow and current mayor of Uruapan, Grecia Quiroz, delivered to the FGE videos in which Manzo held former governor Leonel Godoy, Senator Raúl Morón and former Uruapan mayor Ignacio Campos, all of Morena, responsible if anything happened to him (Expansión, February 17, 2026). On February 19, 2026, State Attorney General Carlos Torres Piña stated that there was no formal complaint against them, only a request to investigate a political motive (El Financiero, February 19, 2026). Godoy and Morón deny any link to the crime (Uno TV, February 17, 2026; Infobae, February 18, 2026). None of them has been charged.

27. Roldán Álvarez Ayala is the brother of R1 and R2. Published reports state that he was mayor of Apatzingán from 2002 to 2004 for the PRD and a state legislator;

that from 2008 to 2011 he coordinated the State Watershed Management Commission in the government of Leonel Godoy; that in 2023 he joined Morena and publicly supported Godoy's reelection; that he was registered with the National Electoral Institute as a Morena state councilor; and that he publicly backed Raúl Morón in Morena's 2026 primary for governor, withdrawing from Morón's events after his brother was charged (Excélsior, November 10, 2026; Diario de Yucatán, July 31, 2026; Expansión, August 1, 2026).

28. Morena stated on August 1, 2026, that it had expelled Roldán Álvarez Ayala in November 2025, the month of the killing, a fact not disclosed until after R1's capture. Sources in Mexico's federal security cabinet told Milenio that he is included in the inquiries into the case. The FGE has issued no public statement about him.

G. The prosecutor and the ballot

29. Carlos Torres Piña, previously Michoacán's Secretary of Government under Governor Alfredo Ramírez Bedolla, was appointed State Attorney General on July 27, 2025, with 39 votes, for a nine-year term (El Financiero, November 3, 2025).

30. On May 27, 2026, the Michoacán legislature enacted Decree 476 with 34 votes, barring independent candidates from joint campaigns and shared images or slogans, the strategy of the Sombrero Movement (Official Gazette of Michoacán and El Financiero, May 27, 2026). On August 27, 2026, Mexico's Supreme Court upheld most of the decree (Action of Unconstitutionality 69/2026; Animal Político, August 27, 2026).

31. On June 22, 2026, Torres Piña took leave to compete in Morena's primary. R1 was captured 38 days later. On August 26, 2026, Deputy Attorney General Israel Vega opened a line of inquiry into a possible link between the widow and García Rivero, based on an expanded statement by the mayor's former private secretary, Yesenia Méndez, and on August 27 the FGE requested the mayor's phones (Expansión, August 26, 2026; Posta, August 28, 2026).

32. On September 14, 2026, nineteen days later, Morena named Torres Piña its state coordinator, its presumptive candidate for governor, and he resigned as Attorney General (Animal Político, September 14, 2026). On September 29, 2026, the acting prosecutor warned that the widow could be arrested if she did not hand over the phones (Uno TV, September 29, 2026). On September 30, 2026, the FGE stated it was reviewing with Mexico's Financial Intelligence Unit whether the CJNG funded the Sombrero Movement, while acknowledging it could not confirm a link to the killing (El Imparcial, September 30, 2026).

33. On September 8, 2026, the widow asked the FGR to take over the case. On October 7, 2026, she stated that the Security Secretary told her she did not need to hand over the phone; on October 8 he responded that the FGR would decide whether to take the case (Animal Político, October 7 and 8, 2026). On October 16 and 31, 2026, the FGE declared that there was no sign of a political motive (Uno TV). A poll published by Crónica on September 14, 2026 shows the widow and Torres Piña in a statistical tie for governor.

IV. APPLICABLE UNITED STATES LAW

34. **18 U.S.C. § 2339B.** Knowingly providing material support or resources to a designated FTO, including services, personnel, lodging, communications equipment and information used to locate a target, or attempting or conspiring to do so.

35. **21 U.S.C. § 960a.** Narco-terrorism: engaging in drug trafficking while knowing or intending to provide anything of pecuniary value to a person or organization that engages in terrorist activity.

36. **21 U.S.C. §§ 959 and 963.** Manufacture or distribution of controlled substances intending or knowing that they will be unlawfully imported into the United States, and conspiracy to do so.

37. **18 U.S.C. § 1956.** Laundering of monetary instruments, including the two million peso payment and the network's financial flows.

38. **50 U.S.C. § 1705; Executive Orders 14059 and 13224.** Designation and blocking of property and interests in property of persons involved in international drug trafficking and terrorism.

39. **8 U.S.C. §§ 1182(a)(3)(B), 1182(a)(2)(C) and 1201(i).** Inadmissibility for terrorist activity and drug trafficking, and revocation of visas.

40. **22 U.S.C. § 2778; 18 U.S.C. §§ 924, 933 and 934.** Unlawful export of defense articles, firearms offenses, trafficking in firearms and smuggling firearms out of the United States.

41. **22 U.S.C. §§ 2151n and 2304.** The Department of State's annual country reports on human rights practices.

V. REQUESTS

42. **Request 1, Department of Justice.** Open or expand an investigation into Ramón Ángel Álvarez Ayala, Rafael Álvarez Ayala and the Los Erres network as part of the CJNG, and evaluate charges under 18 U.S.C. § 2339B and 21 U.S.C. § 960a against them and against any person who provided support to the cell, including the leaking of the mayor's location.

43. **Request 2, Department of Justice and Department of State.** Ask the Government of Mexico to include R1 and R2 in the next transfer of detainees to the United States, as occurred on January 20, 2026, or pursue their extradition. A Mexican judge already released R1 once.

44. **Request 3, OFAC.** Evaluate the designation of Los Erres and of the persons Mexican authorities identify as its members and operators under Executive Orders 14059 and 13224.

45. **Request 4, FinCEN.** Cross-check accounts, wires and transactions of the Álvarez Ayala family network, including its political member, against the U.S. financial system, and trace the two million peso payment reported by the FGE.

46. **Request 5, Department of State.** Review the visas of any person, public official or not, who provided support to the cell or leaked information to the cartel,

under 8 U.S.C. §§ 1182(a)(3)(B) and 1201(i).

47. **Request 6, Department of State.** Document the case in the 2026 Country Report on Human Rights Practices for Mexico, and urge Mexican authorities to transfer the investigation to the FGR, given that the state attorney general who opened it now competes in an election against the victim's widow.

48. **Request 7, ATF.** Trace through eTrace the 9 millimeter pistol used on November 1, 2025, and if it is of U.S. origin, pursue the chain of acquisition and export.

49. **Request 8, FBI and DEA.** Receive this referral, preserve it, and cross-check it with information already in U.S. possession regarding R1's capture, the CJNG leadership and the operation of February 22, 2026.

VI. PRESERVATION

50. Complainant requests that the agencies preserve all records, communications and intelligence relating to the persons and events described in this referral, including any information shared with or received from Mexican authorities concerning the investigation of the killing of Carlos Manzo.

VII. PRESUMPTION OF INNOCENCE

51. Every person named in this referral is presumed innocent. Arrest, being bound over for trial or being named in a published report is not a conviction. The political figures named deny any link to the crime and none has been charged with it. This referral identifies facts of public record that warrant investigation by the United States.

I declare that the foregoing is true and correct to the best of my knowledge and belief, and that each factual statement in this referral is drawn from the official statements and published reports identified in the text and in Exhibit A.

Dated: November 28, 2026

Respectfully submitted,

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SIMÓN LEVY
Complainant

EXHIBIT A · PUBLIC SOURCES

A-1. Uno TV, Michoacán FGE: CJNG revenge, 34 arrests, 92% progress, no political motive, Oct. 31, 2026.

A-2. El Heraldo de México, SSPC: 34 arrests and the inner circle, Nov. 10, 2026.

A-3. La Razón, pending arrest warrants including the head of the security detail, Nov. 10, 2026.

A-4. Diario de Yucatán, capture of R2 on Nov. 8, Nov. 10, 2026.

A-5. N+, seven 9 mm shots at 8:10 p.m., Nov. 2, 2025.

A-6. Expansión, wounded councilman and time of death, Nov. 2, 2025.

A-7. N+, FGE identifies the 17-year-old shooter, Nov. 6, 2025.

A-8. N+, message timeline presented by the SSPC, Nov. 19, 2025.

A-9. El Financiero, El Licenciado's order, Nov. 19, 2025.

A-10. El Imparcial, El Licenciado denies ties and alleges torture, Nov. 27, 2025.

A-11. Crónica, second youth was 16 and recruited at a rehabilitation center, Nov. 10, 2026.

A-12. Excélsior, arrest of the director who leaked the mayor's movements, Jan. 2026.

A-13. La Razón, two doses of drugs for the mayor's information, Jan. 14, 2026.

A-14. N+, seven bodyguards arrested for omission, Nov. 21, 2025.

A-15. Zeta Tijuana, head of the detail escaped the operation, Nov. 27, 2025.

A-16. El Financiero, the fugitive colonel, Jan. 25, 2026.

A-17. TV Azteca, FGE reward of 100,000 pesos, 2026.

A-18. Proceso, Security Cabinet names R1 as mastermind, July 31, 2026.

A-19. Vanguardia, El Mencho knew; the provocation, July 31, 2026.

A-20. El Financiero, the 2022 release, July 30, 2026.

A-21. El Universal, SSPC calls the release a sabadazo, Nov. 2022.

A-22. N+, FGE charges R1 with homicide, Aug. 4, 2026.

A-23. Animal Político, R1 bound over for trial, Aug. 7, 2026.

A-24. El Imparcial, FGR weapons and methamphetamine charges against R1, Aug. 3, 2026.

A-25. Expansión, two million pesos for the mayor's life, Nov. 1, 2026.

A-26. N+, arrest of El Rhino, Aug. 27, 2025.

A-27. Diario de Yucatán, R1 is the brother of a Morena councilor, July 31, 2026.

A-28. Expansión, Morena and Roldán Álvarez Ayala, Aug. 1, 2026.

A-29. Excélsior, Los Erres, politics and crime in Apatzingán, Nov. 10, 2026.

A-30. Milenio, profile of Roldán Álvarez Ayala, 2026.

A-31. Expansión, Grecia Quiroz names Godoy, Morón and Campos, Feb. 17, 2026.

A-32. El Financiero, the Attorney General says there is no formal complaint, Feb. 19, 2026.

A-33. Uno TV, Godoy rejects the accusations, Feb. 17, 2026.

A-34. Infobae, Morón rejects any link, Feb. 18, 2026.

A-35. Animal Político, the mayor's requests for help, Nov. 5, 2025.

A-36. El Imparcial, withdrawal of more than 200 federal troops, July 31, 2026.

A-37. Infobae, Defense Ministry details the National Guard detail, Nov. 3, 2025.

A-38. El Financiero, the inner ring was municipal police, Nov. 2, 2025.

A-39. Uno TV, leave of the Attorney General from June 22, 2026.

A-40. Animal Político, Torres Piña named Morena coordinator, Sep. 14, 2026.

A-41. El Financiero, appointment with 39 votes, Nov. 3, 2025.

A-42. Expansión, FGE opens the inquiry into the widow, Aug. 26, 2026.

A-43. Uno TV, arrest warning, Sep. 29, 2026.

A-44. El Imparcial, inquiry into Sombrero Movement funding, Sep. 30, 2026.

A-45. Animal Político, the Security Secretary and the phone, Oct. 7 and 8, 2026.

A-46. Animal Político, Supreme Court upholds Decree 476, Aug. 27, 2026.

A-47. Federal Electoral Tribunal, opinion SUP-OP-3/2026, July 15, 2026.

A-48. El Financiero, electoral reform passes with 34 votes, May 27, 2026.

A-49. Crónica, statistical tie in Michoacán, Sep. 14, 2026.

A-50. Associated Press via PBS, Mexico sends 37 detainees to the United States, Jan. 20, 2026.

A-51. Associated Press via PBS, Mexican Army kills El Mencho, Feb. 22, 2026.

A-52. U.S. Department of State, Foreign Terrorist Organizations list, current.