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CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IOWA

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,	)	Criminal No. 4:26-cr-128
v.	)	INDICTMENT
KEVIN LOPEZ, and JOHN HENDRIS SARDINAS,	)	T. 18 U.S.C. § 2 T. 18 U.S.C. § 1956(h) T. 18 U.S.C. § 1957
Defendants.	)	

THE GRAND JURY CHARGES:

Introduction

At all times relevant to this Indictment:

1. Bank impersonation scams. A "bank impersonation scam" involved a conspirator or conspirators contacting a victim business or individual pretending to be an employee or affiliated with that business's or individual's bank. After making contact with the victim, conspirators would then solicit online banking information (such as account usernames and passwords) from the victim through social engineering. The social engineering often included conspirators claiming a victim's accounts were compromised or alleging fraudulent wires were being sent and then, after creating a sense of urgency to fix the "problem," offering to put a stop to the alleged elicit activity but requiring the victim to confirm various account information to do so. The conspirators then used this information to access the victim's financial account(s) without authorization and send fraudulent wire and ACH transfers out of the account(s). From there, the fraud proceeds were dispersed through a laundering

network.

2. Defendants. Defendants KEVIN LOPEZ and JOHN HENDRIS SARDINAS lived in Florida and were conspirators in a bank impersonation scam. Their role in the scam included recruiting individuals to receive fraud proceeds from victim businesses (colloquially referred to as "money mules") and receiving fraud proceeds themselves and then distributing that money to themselves and their co-conspirators.

3. Victims. The victims of the bank impersonation scam and other criminal activities described in this Indictment were businesses and individuals headquartered and living throughout the United States, including in the Southern District of Iowa. They include, but are not limited to, Victims #1 and #2.

4. **Victim #1.** In April 2025, a company headquartered in Davenport, Iowa, in the Southern District of Iowa, was the victim of a $7.1 million bank impersonation scam. Specifically, on April 22, 2025, an employee of Victim #1 received a telephone call from "Steven," who claimed he was with TBK Bank's Treasury Management group (Victim #1 banked with TBK Bank). "Steven" asked the employee about several supposed wire transfers and inquired if they were fraudulent. The employee informed "Steven" the wires would be fraudulent as Victim #1 only uses ACH payments, not wires. "Steven" stated he would cancel the wires and provided the employee with purported reference numbers.

5. "Steven" next informed the employee of additional supposed fraudulent activity on Victim #1's TBK Bank account. "Steven" asked for the employee's TBK

Bank user profile activation key, purportedly to better secure his/her account. The employee provided the activation key to "Steven" as well as a 6- or 7-digit code which was sent to the employee's email. "Steven" told the employee his/her account was being scanned and to stay off his/her system. Later that day, around 4:00 p.m., "Steven" called again to tell the employee to stay off his/her system.

6. The next day, April 23, 2025, at approximately 10:00 a.m., the employee received another call from "Steven" indicating Victim #1's accounts were still being scanned and to stay off the system. Later that day, the employee received a call from Victim #1's actual loan officer at TBK Bank notifying the employee that Victim #1's accounts had been over drafted. Around $7.1 million was fraudulently transferred from Victim #1's TBK Bank accounts in thirty-eight ACH batches.

7. One of these ACH transfers was a $70,000 transfer on April 23, 2025, from Victim #1's TBK Bank account to a Discover account held by an individual with the initials J.F. J.F. transferred the $70,000 the following day to an account he held at Truist Bank. J.F. then wrote LOPEZ a $40,000 official check out of the Truist Bank account. On April 28, 2025, LOPEZ deposited the $40,000 official check in his JP Morgan Chase Bank account ending in 7138.

8. Another of these ACH transfers was a $50,000 transfer on April 24, 2025, from Victim #1's TBK Bank account to a Discover account ending in 6117 held by an individual with the initials L.R. who LOPEZ and SARDINAS had recruited to participate in the scheme.

9. **Victim #2.** In September 2025, a company located in Council Bluffs, Iowa, in the Southern District of Iowa, was a victim of a $1.3 million bank impersonation scam. Specifically, on September 23, 2025, one of Victim #2's employees received a call from a spoofed number, which appeared to be from the company's bank, First National Bank of Omaha ("FNBO"). The caller claimed that two of Victim #2's employee FNBO accounts were compromised. Those two employees proceeded to work with the caller to purportedly secure their accounts. As part of the process, the employees provided the caller with their user IDs, a password, and a SureKey Code used to verify one of the employee's accounts. At the beginning of the process, the caller instructed one of the employees to dial a number the caller claimed would start the reset process. The number began with *72 which, unbeknownst to Victim #2's employees, forwarded all calls to the scammers.

10. The caller claimed the employees were waiting in a queue with the FNBO fraud department to finish resetting the employees' accounts and to set up multifactor authentication for future logins as an additional security measure. The caller placed the employees on hold several times. During the call, which lasted approximately two hours, the caller and his/her co-conspirators were initiating nineteen different fraudulent wire payments out of Victim #2's accounts that totaled over $1.3 million.

11. One of these wires was a $98,000 wire sent on September 23, 2025, to SARDINAS's Discover account ending in 7695.

COUNT 1
(Conspiracy to Commit Money Laundering)

12. Paragraphs 1 through 11 of this Indictment are realleged and incorporated as if set forth fully herein.

13. From a date unknown, but no later than in or about April 2025, and continuing to a date unknown, but until at least in or about December 2025, in the Southern District of Iowa and elsewhere, the defendants, KEVIN LOPEZ and JOHN HENDRIS SARDINAS, did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to commit Money Laundering in violation of Title 18, United States Code Section 1957, that is, to knowingly engage in and attempt to engage in monetary transactions by, through, and to financial institutions, affecting interstate and foreign commerce, in criminally derived property of a value greater than $10,000, such property having been derived from a specified unlawful activity, that is, Wire Fraud and Conspiracy to Commit Wire Fraud.

Object of the Conspiracy

14. It was the purpose and object of the conspiracy to liquidate, withdraw, and obtain for the use of the defendants and their uncharged co-conspirators fraudulently obtained funds from victims of bank impersonation scams.

Manner and Means

15. The manner and means by which the foregoing object of the conspiracy to commit money laundering was accomplished included, but was not limited to, the following:

a. LOPEZ and SARDINAS were members of a conspiracy operating bank impersonation scams in the Southern District of Iowa and elsewhere. LOPEZ's and SARDINAS's roles in the conspiracy were to recruit individuals ("money mules") to receive and launder proceeds of the bank impersonation scams.

b. During their recruitment of money mules, LOPEZ and SARDINAS obtained the money mules' financial account information. They then provided this information to their co-conspirators who initiated fraudulent wire or ACH transfers from bank impersonation scam victims to the money mules' accounts.

c. After the fraudulent wires or ACH transfers hit the money mules' accounts, LOPEZ and SARDINAS and their co-conspirators directed the money mules to send the fraud proceeds to themselves and their co-conspirators. In exchange, the money mules often kept a portion of the fraud proceeds.

d. In doing so, LOPEZ and SARDINAS and their co-conspirators conducted and attempted to conduct monetary transactions, including, but not limited to, monetary transactions in criminally derived property of a value greater than $10,000, to liquidate, withdraw, and obtain for their and their co-conspirators' use the funds obtained through completion of the specified unlawful activity, namely, wire fraud and conspiracy to commit wire fraud.

e. LOPEZ and SARDINAS and their co-conspirators then retained the criminally derived property and used said property for their own benefit and purposes.

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

THE GRAND JURY FURTHER CHARGES:

COUNTS 2-4
(Money Laundering Over $10,000)

16. Paragraphs 1 through 15 of this Indictment are realleged and incorporated as if set forth fully herein.

17. On or about the dates below, in the Southern District of Iowa and elsewhere, the defendants, KEVIN LOPEZ and JOHN HENDRIS SARDINAS, did

knowingly engage and attempt to engage in monetary transactions by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than $10,000, as set forth below, and did aid and abet the same, such property having been derived from a specified unlawful activity, that is, Wire Fraud and Conspiracy to Commit Wire Fraud:

Count	Date	Defendant(s)	Description of Transaction
2	April 24, 2025	LOPEZ and SARDINAS	A $50,000 ACH transfer from TBK Bank account ending 4461 to Discover account ending 6117.
3	April 28, 2025	LOPEZ	A deposit of a $40,000 Official Check, number 5304717362, payable to "KEVIN LOPEZ," into JP Morgan Chase account ending 7138.
4	Sept. 23, 2025	SARDINAS	A $98,000 wire transfer from First National Bank of Omaha account ending 2312 to Discover account ending 7695.

Each of the above counts is a violation of Title 18, United States Code, Sections 1957 and 2.

A TRUE BILL.

FOREPERSON

David C. Waterman
United States Attorney

By: _____
Joseph H. Lubben
Assistant United States Attorney