SIMÓN LEVY
Complainant, pro se

UNITED STATES DEPARTMENT OF JUSTICE (SOUTHERN DISTRICTS OF NEW YORK, TEXAS AND FLORIDA) · DEPARTMENT OF THE TREASURY (OFAC) · FINCEN · HOMELAND SECURITY INVESTIGATIONS · DEPARTMENT OF STATE

IN THE MATTER OF: LA BARREDORA (CJNG CELL IN TABASCO), THE INSTITUTIONAL PROTECTION IT RECEIVED AND THE CASINO PERMITS GRANTED BY MEXICO'S INTERIOR MINISTRY, 2017 TO 2024

CONFIDENTIAL COMPLAINT AND REQUEST FOR INVESTIGATION; REQUEST FOR WHISTLEBLOWER TREATMENT (31 U.S.C. 5323; 26 U.S.C. 7623)

Related matters: United States v. Rocha Moya et al., S9 23 Cr. 180 (KPF) (S.D.N.Y.); United States v. Campo et al. (S.D.N.Y., December 5, 2025); OFAC designation of Casino Centenario, Diamante Casino and CAMSA (April 14, 2026); FinCEN Section 311, Federal Register 2025-19927.

I. INTRODUCTION

1. Complainant submits this confidential complaint to request that United States authorities investigate La Barredora, a criminal cell operating in the state of Tabasco, United Mexican States, which Mexican military intelligence reports describe as an arm of the Cártel Jalisco Nueva Generación (CJNG), designated a Foreign Terrorist Organization and Specially Designated Global Terrorist on February 20, 2025 (Federal Register 2025-02870 and 2025-02873).

2. The complaint also requests review of the chain of casino permits granted or extended by the General Directorate of Games and Draws of Mexico's Interior Ministry, because two establishments that operated under the same permit used by a company of the alleged La Barredora leader's family were designated by OFAC on April 14, 2026 for serving the Cartel del Noreste.

3. This complaint separates at all times documented fact, source and analysis, and indicates the level of proof of each statement: A (public record), B (official document), C (documented by an identified source) and D (allegation without a document). It does not claim that any named person committed a crime. Every person named keeps the presumption of innocence. As of November 7, 2026 none of the natural persons named is charged in the United States or designated by OFAC.

II. COMPLAINANT

4. Complainant is Simón Levy. He submits this complaint pro se based on his personal review of the public records cited and of the official OFAC file downloaded on November 7, 2026.

III. PERSONS AND ENTITIES OF INTEREST

5. **Adán Augusto López Hernández.** Governor of Tabasco from January 1, 2019 to August 26, 2021; Interior Minister from August 26, 2021 to June 16, 2023; senator and leader of the Morena caucus from August 28, 2024 to February 1, 2026. Notary on leave of Notary Office 27 of Centro, Tabasco. Level A.

6. **Hernán Bermúdez Requena.** Named in 2019 director of the Investigative Police and in December 2019 Secretary of Security of Tabasco; resigned January 5, 2024. Charged in Tabasco on September 23, 2025 (case 213/2025) with criminal association, aggravated kidnapping and aggravated extortion; also prosecuted for embezzlement and enforced disappearance. The Tabasco prosecutor identifies him as the leader of La Barredora. Level B.

7. **Humberto Bermúdez Requena.** Brother of the above. Incorporated in 2017 the Controladora de Inversiones y Promociones del Sureste, S.A. de C.V., for casinos and nightclubs. His accounts were frozen by Mexico's Financial Intelligence Unit on July 25, 2025. Levels B and C.

8. **Manuel Marcué Díaz.** Director General of Games and Draws of the Interior Ministry from January 2022 to June 29, 2023, per his exit asset declaration cited by MCCI. Previously a public servant at Tabasco's Health Ministry. Press reports not confirmed by any authority indicate an arrest warrant exists against him in Tabasco. Level C.

9. **Entities:** Operadora de Coincidencias Numéricas, S.A. de C.V. (holder of permit DGJS/DGAAD/DCRCA/P-01/2017); PUR UMAZAL TOV; Superjuegos Robin, S.A. de C.V.; Operadora de Entretenimientos y Espectáculos Deportivos Luxury de México; Compañía Operadora Clíe, S.A. de C.V.; MPN906 LLC (Florida); and Comercializadora y Arrendadora de México, S.A. de C.V. (CAMSA), designated by OFAC.

IV. FACTS

10. **A. Military intelligence reports.** In 2022 the Guacamaya collective released files of Mexico's Ministry of National Defense. At least 16 reports, from November 2019 to August 2022,

point at Hernán Bermúdez Requena. A "Regional Crime Diagnosis" of October 28, 2021 places him in the top tier of the CJNG structure in Tabasco and, per the files, was sent to the National Intelligence Center and the Presidency. A May 2021 report states he authorized La Barredora to take Huimanguillo and part of Cárdenas. An August 2022 report identifies him, with two police commanders, as a member of La Barredora. Bermúdez remained in office 799 days after the October 28, 2021 report (Complainant's calculation). Level C.

11. **B. Escape, capture and absence of a U.S. record.** Bermúdez left Mexico on January 26, 2025; a Tabasco judge issued an arrest warrant on February 14, 2025; Interpol issued a red notice on July 17, 2025; he was arrested in Paraguay on September 12, 2025 and expelled to Mexico on September 17, 2025. On March 10, 2026 a federal judge in Toluca dismissed an amparo against an eventual extradition because no formal U.S. request existed. OFAC's SDN file of November 7, 2026 (19,563 records) contains neither La Barredora, nor Bermúdez Requena, nor any address in Tabasco. Levels A and B.

12. **C. The notary office and permit P-01/2017.** According to the commercial registry cited by MCCI and journalistic investigations, in 2017 Humberto Bermúdez Requena incorporated the Controladora de Inversiones y Promociones del Sureste before Notary Office 27 of Centro, Tabasco, held by Adán Augusto López Hernández. In July 2018 the Interior Ministry authorized the Controladora to operate permit DGJS/DGAAD/DCRCA/P-01/2017 and in November 2018 betting at crowncitybets.mx. On April 27, 2026 the Interior Ministry publicly confirmed that Casino Centenario, Diamante Casino and crowncitybets.mx operated under that permit. Levels B and C.

13. **D. Designated casinos.** On April 14, 2026 OFAC designated Casino Centenario (Nuevo Laredo, established 2023), Diamante Casino (Tampico, established 2021) and CAMSA under Executive Orders 13224 and 14059 for serving the Cartel del Noreste, and stated that Centenario was used as a stash house for fentanyl pills and cocaine (press release sb0440; Federal Register 2026-07425). The establishment years match the period when Adán Augusto López Hernández led the Interior Ministry, which supervised the permit. Complainant does not claim any official knew of the criminal use. Level A.

14. **E. Extensions during Adán Augusto López Hernández's tenure at the Interior Ministry.** (1) On October 18, 2022, one day after the military reports on Hernán Bermúdez were published, the permit of PUR UMAZAL TOV was extended from 2029 to 2039; its financial statements filed with the ministry list three companies of Humberto Bermúdez Requena as suppliers. Signatory not located. (2) In March 2023 the permit of Superjuegos Robin was extended by 15 years, to September 24, 2039. (3) On May 12, 2023, at a presidential press conference with Adán Augusto López Hernández present, the ministry reported zero administrative permits during the term. (4) On June 28, 2023, 47 days later, online betting was authorized for Superjuegos Robin with Luxury de México (betwarrior.mx). According to records cited by MCCI, Luxury's statutory auditor was the accountant of Jorge Amílcar Olán Aparicio and a board member was his maternal grandfather. Level C.

15. **F. Warnings by Mexico's Federal Audit Office.** Audit 2019-0-04100-19-0006-2020 concluded that permit terms were granted "on a discretionary basis." Audit 2023-0-04100-07-0315-2024 reports 51 valid casino permits held by 36 companies with 422 establishments at the end of 2023. The regulatory reform published on November 16, 2023 limited permits to 15 years without extension. Level A.

16. **G. U.S. nexus.** (1) On December 26, 2024, 31 days before Hernán Bermúdez's escape, MPN906 LLC, a company registered in Florida in November 2024 by the wife of Humberto Bermúdez Requena, acquired an apartment of approximately $1.3 million in North Miami Beach, Florida, according to documents reviewed by MCCI. Level C. (2) Adán Augusto López Hernández publicly stated in September 2025 that he collected an inheritance from Wells Fargo and PNC accounts in Houston, Texas. There is no public indication of illegality; verification of origin is requested. Level C. (3) On July 17, 2026 Código Magenta reported the revocation of his U.S. visa and a link to an investigation in the Southern District of Texas; no public case file was located. Level D.

17. **H. The senator's income.** Tax documents released on September 25, 2025 report about 79 million pesos received in 2023 and 2024 from private companies, including GH Servicios Empresariales, flagged by Mexico's Tax Administration Service as a company that simulates

transactions. His asset declaration of May 17, 2025 reports 625,793 pesos net with no private income. The senator maintains his income is lawful. Level C.

18. **I. U.S. actions against Mexican casinos.** By Complainant's calculation, the SDN file of November 7, 2026 contains nine Mexican gambling entities, eight designated since November 13, 2025. FinCEN proposed Section 311 measures against ten establishments, including Skampa Casino in Villahermosa, Tabasco (Federal Register 2025-19927). No U.S. action reaches the network described in this complaint. Level A.

19. **K. Contradiction between the Federal Audit Office and the Treasury record.** Audit 2023-0-04100-07-0315-2024 states that from 2022 the Interior Ministry authorized no new installations of remote betting centers and draw halls. OFAC's official record states that Casino Centenario was established in 2023, and the ministry confirmed it operated under permit P-01/2017. Therefore either the establishment opened without an installation authorization, or the information given to the Audit Office is incomplete. Complainant's cross-check. Levels A and B.

20. **L. Dates relevant to jurisdiction and limitations.** Hernán Bermúdez left Mexico on January 26, 2025, 25 days before the CJNG was designated a Foreign Terrorist Organization. The conduct documented in this complaint predates that designation. Under 18 U.S.C. 3282, the general limitation period is five years; Complainant calculates that as to the October 18, 2022 extension it would expire in October 2027, absent a continuing conspiracy or tolling for flight under 18 U.S.C. 3290. Complainant's analysis.

21. **J. Undocumented allegations.** Columns published in Mexico claim that monthly fees per machine and per table were collected from casino operators by the General Directorate of Games and Draws, with estimated totals of 1 to 2.5 billion pesos. Complainant presents these claims not as facts but as leads for verification. Level D.

V. APPLICABLE LAW FOR REVIEW

22. 21 U.S.C. 959, 960 and 963 (conspiracy to import controlled substances, with extraterritorial reach); 18 U.S.C. 2 (aiding and abetting); 18 U.S.C. 1956, including (a)(2), (c)(7)(B)(iv), (f) and (h), and 18 U.S.C. 1957 (international laundering with foreign bribery or embezzlement of

public funds as predicate); 18 U.S.C. 1962(d) (RICO); 21 U.S.C. 848 (continuing criminal enterprise); 18 U.S.C. 1352 (Foreign Extortion Prevention Act, to the extent applicable); 18 U.S.C. 981 (civil forfeiture).

23. For conduct after February 20, 2025: 18 U.S.C. 2339B (material support to a foreign terrorist organization) and 21 U.S.C. 960a (narco-terrorism). Administrative measures: Executive Orders 14059 and 13224 (OFAC); 31 U.S.C. 5318A (Section 311); Section 7031(c) of the State Department appropriations act; 8 U.S.C. 1182(a)(2)(C).

VI. REQUESTS

24. Complainant respectfully requests that the authorities:

(a) To the Department of Justice: open or expand an investigation into La Barredora as a CJNG cell and into the officials who protected it, for import conspiracy (21 U.S.C. 963), laundering (18 U.S.C. 1956) and RICO (18 U.S.C. 1962), to the extent a U.S. nexus exists.

(b) Evaluate material support (18 U.S.C. 2339B) and narco-terrorism (21 U.S.C. 960a) charges only for conduct after February 20, 2025.

(c) To OFAC: evaluate designating La Barredora and its financial network under Executive Orders 14059 and 13224. As of November 7, 2026 it is not on the SDN list.

(d) To OFAC and FinCEN: review every establishment operating under permit DGJS/DGAAD/DCRCA/P-01/2017, given that two of them were designated on April 14, 2026.

(e) To FinCEN: cross U.S. casino and bank suspicious activity and currency reports with the people and companies in this file: Controladora de Inversiones y Promociones del Sureste, PUR UMAZAL TOV, Superjuegos Robin, Luxury de México and Compañía Operadora Clíe.

(f) To FinCEN and Homeland Security Investigations: examine the December 26, 2024 purchase of a North Miami Beach unit by MPN906 LLC, 31 days before Hernán Bermúdez's escape.

(g) Verify the origin of funds collected from Wells Fargo and PNC accounts in Houston, publicly declared by the senator as an inheritance, solely to confirm or rule out their lawfulness.

(h) Request from Mexico, through the mutual legal assistance treaty, the 2019-2022 military reports on Bermúdez and the records of case 213/2025.

(i) Evaluate a formal extradition request or U.S. prosecution of Hernán Bermúdez Requena. As of March 10, 2026 no formal request existed.

(j) To the State Department: evaluate designations under Section 7031(c) and section 212(a)(2)(C) of the Immigration Act against officials who protected La Barredora.

(k) Review the online betting permits granted on June 28, 2023 and the platforms that take players from the United States.

(l) Take into account the limitation periods of 18 U.S.C. 3282, the first of which expires in October 2027, and their suspension for flight under 18 U.S.C. 3290.

25. That Complainant be treated as an original whistleblower under 31 U.S.C. 5323 and 26 U.S.C. 7623 regarding any monetary sanction derived from the information presented herein, and that his identity be kept confidential.

VII. RESERVATION

26. Complainant reserves the right to supplement this complaint. Statements from press columns are presented as leads for verification, not as facts. No part of this complaint constitutes a determination of guilt.

VERIFICATION

I declare under penalty of perjury under the laws of the United States of America (28 U.S.C. 1746) that the foregoing is true and correct to the best of my knowledge, information and belief, based on my personal review of the public records cited.

Executed on November 7, 2026.

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SIMÓN LEVY

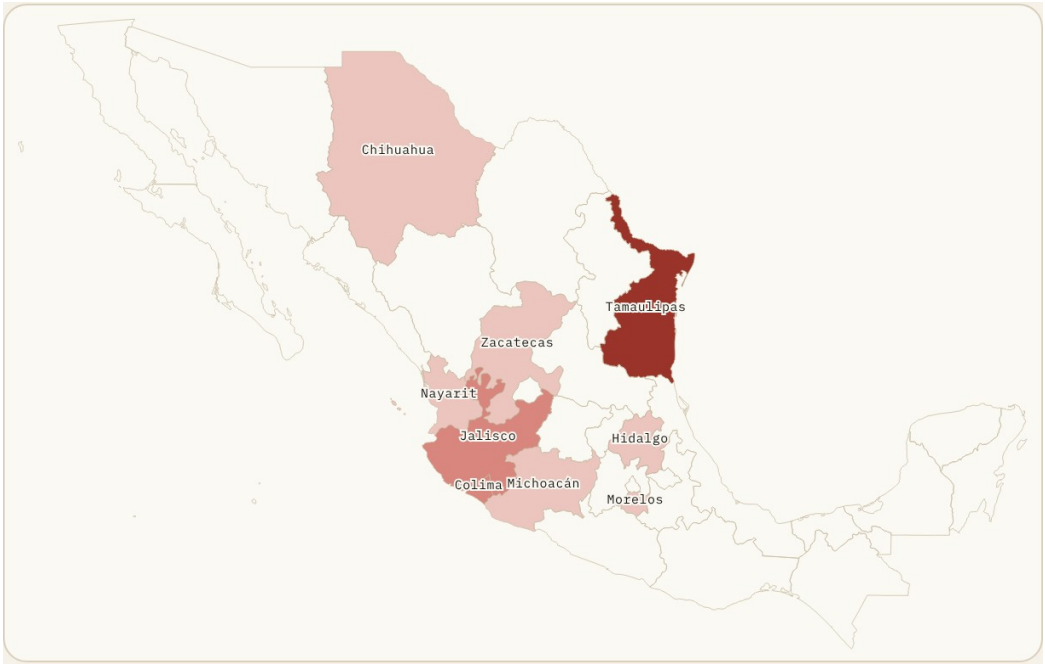
EXHIBIT A. TIMELINE OF PERMITS AND EVENTS AT THE GENERAL DIRECTORATE OF GAMES AND DRAWS, 2017 TO 2026

Date	Event
may-2017	Permit P-01/2017 to Operadora de Coincidencias Numéricas, 12 years, by a 2014 court order.
2017	Humberto Bermúdez incorporates the Controladora at Adán's Notary Office 27.
jul-2018	The ministry lets the Controladora operate P-01/2017. Nov 2018: crowncitybets.mx.
26-ago-2021	Adán arrives at the Interior Ministry.
2021	Diamante Casino established, Tampico (Treasury record).
ene-2022	Manuel Marcué Díaz arrives at Games and Draws.
18-oct-2022	PUR UMAZAL TOV: extension from 2029 to 2039. Suppliers: three Humberto Bermúdez companies.
mar-2023	Superjuegos Robin: 15-year extension, to Sep 24, 2039.
2023	Casino Centenario established, Nuevo Laredo (Treasury record).
12-may-2023	Ministry, with Adán present: "zero" administrative permits this term.
16-jun-2023	Adán leaves the Interior Ministry.
28-jun-2023	Online betting permit to Robin and Luxury de México (betwarrior.mx).
29-jun-2023	Marcué leaves Games and Draws.
16-nov-2023	Reform: 15-year cap, no extensions.
1-feb-2024	20 permits to Operadora Clíe, to 2039, by Administrative Court order.
14-abr-2026	Treasury designates Centenario, Diamante and CAMSA. Ministry suspends them.

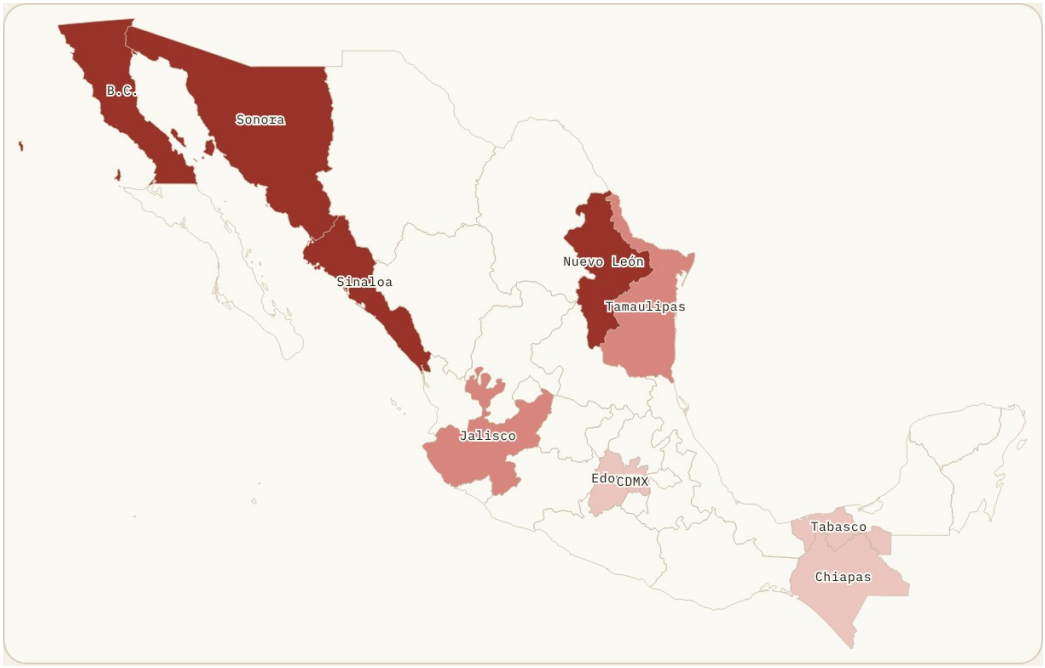
EXHIBIT B. MEXICAN GAMBLING ENTITIES IN OFAC AND FINCEN ACTIONS (SDN FILE OF NOV 7, 2026; FR 2025-19927)

Name	State	Action	Date	Network
Grand Casino	Jalisco (Zapopan)	OFAC · Kingpin	older	SDNTK
Entretenimiento Palermo	Sonora	OFAC · TCO	13-nov-2025	Hysa · Sinaloa
Entretenimiento Villahermosa	Nuevo León	OFAC · TCO	13-nov-2025	Hysa · Sinaloa
Entretenimiento y Espectáculos B.C.	Baja California	OFAC · TCO	13-nov-2025	Hysa · Sinaloa
LH Pro-Gaming	Nuevo León	OFAC · TCO	13-nov-2025	Hysa · Sinaloa
Rosetta Gaming	Nuevo León	OFAC · TCO	13-nov-2025	Hysa · Sinaloa
Casino Centenario	Tamaulipas (Nuevo Laredo)	OFAC · SDGT · EO 14059	14-abr-2026	Cártel del Noreste
Diamante Casino	Tamaulipas (Tampico)	OFAC · SDGT · EO 14059	14-abr-2026	Cártel del Noreste
CAMSA	Tamaulipas (Cd. Madero)	OFAC · SDGT · EO 14059	14-abr-2026	Cártel del Noreste
Emine Casino	Sonora (San Luis Río Colorado)	FinCEN 311	13-nov-2025	Sinaloa
Casino Mirage	Sinaloa (Culiacán)	FinCEN 311	13-nov-2025	Sinaloa
Midas Casino ×5	Sonora, Sinaloa, Baja California	FinCEN 311	13-nov-2025	Sinaloa
Palermo Casino	Sonora (Nogales)	FinCEN 311	13-nov-2025	Sinaloa
Skampa Casino	Baja California (Ensenada)	FinCEN 311	13-nov-2025	Sinaloa
Skampa Casino	Tabasco (Villahermosa)	FinCEN 311	13-nov-2025	Sinaloa

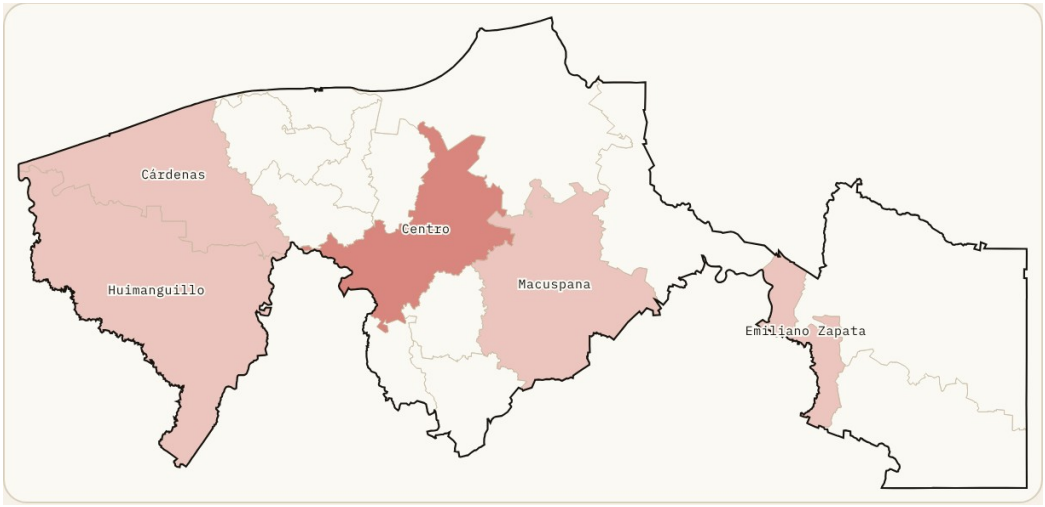
EXHIBIT C. MAPS (OFFICIAL STATE AND MUNICIPAL GEOMETRY; PREPARED BY COMPLAINANT)



C-1. States with brands operating under permit P-01/2017, per MCCI. Dark red: Tamaulipas, OFAC-designated casinos.



C-2. States with casinos in OFAC, FinCEN (Section 311) and Mexico Finance Ministry (Nov 11, 2025) actions.



C-3. Tabasco: municipalities cited in military reports, casinos in U.S. actions and arrests.