SIMÓN LEVY
Contact information redacted in public copy
Submitter

UNITED STATES DEPARTMENT OF JUSTICE

CRIMINAL DIVISION

FEDERAL BUREAU OF INVESTIGATION

In re: Possible United States financial or property nexus of proceeds linked to Mexican electoral materials contracts.	**REFERRAL AND REQUEST FOR PRELIMINARY INQUIRY UNDER 18 U.S.C. §§ 1956, 1957, AND 981** **Submitted: September 23, 2026**

Simón Levy, an individual ("Submitter"), respectfully submits the following referral.

I. LIMITS OF THIS REFERRAL

The Submitter has not established that any proceeds described below entered the United States financial system or were used to acquire property in the United States, and does not allege that they did. This referral asks the Department to determine whether such a nexus exists. This submission provides information and requests review. It does not allege that any named person has been convicted of, or charged with, any crime. Every named person is entitled to the presumption of innocence. Facts drawn from published reporting are identified as such, and the submitter will supplement the record with the primary documents listed in the Exhibit Index.

II. REQUEST

1. That the Department and the Federal Bureau of Investigation conduct a preliminary inquiry into whether funds derived from the public contracts described in Section III, or funds of the companies and individuals identified there, were transmitted through United States financial institutions, correspondent accounts, or payment channels, or invested in United States real property, securities, or business interests.

2. That, if such a nexus is found, the Department evaluate the conduct under 18 U.S.C. § 1956, including § 1956(c)(7)(B)(iv) (an offense against a foreign nation involving bribery of a public official, or the misappropriation, theft, or embezzlement of public funds by or for the benefit of a public official), 18 U.S.C. § 1957, and civil forfeiture under 18 U.S.C. § 981.

III. FACTS

3. Cajas Graf, S.A. de C.V. ("Cajas Graf") and Corporativo Zeg ("Zeg") manufacture electoral materials, including ballot boxes and voting booths. Published reporting identifies Jesús Octavio García González as the legal representative of both companies when they received contracts from state electoral institutes. (Exh. B-1, B-2.)

4. Published reporting states that (a) in 2021, Guadalupe Taddei Zavala, then president of the Sonora electoral institute, awarded Cajas Graf a contract for MXN 46,879,383; (b) in 2021, Claudia Arlett Espino, then president of the Chihuahua electoral institute, awarded Cajas Graf a contract for MXN 33,881,653; and (c) in 2024 the Oaxaca electoral institute awarded Zeg a contract for MXN 32,426,445. These amounts are drawn from published reporting and have not yet been verified against primary contracts. (Exh. B-1, B-3.)

5. In February 2025, after declaring its tender void, INE made a direct award to Cajas Graf jointly with TOL Producciones, S.A. de C.V. for 432,745 special voting booths and 63,549 ballot boxes for the June 2025 judicial election, as reported from an INE procurement report. Reporting describes the award at up to MXN 198 million and TOL Producciones as tied to the same owners. (Exh. B-4, B-5.)

6. Mexico's Financial Intelligence Unit (Unidad de Inteligencia Financiera, "UIF") froze Zeg and Cajas Graf in 2023 on suspicion of money laundering. The companies and their owners obtained amparo rulings by mid-2024 on procedural grounds. No court ruled on whether the funds were lawful. (Exh. B-2.)

7. Council President Taddei appointed García González acting Executive Director of Administration of INE in September 2025, a post managing an annual budget

of approximately MXN 14 billion. Press reported his departure on April 27, 2026. Claudia Arlett Espino, appointed INE Executive Secretary on December 1, 2024, resigned on September 9, 2026, citing health reasons in her letter, the day before the 2026-2027 electoral process began. Her acting replacement, Roberto Félix, served as Executive Secretary of the Sonora electoral institute from 2014 to 2020. (Exh. B-6 to B-9.)

IV. SUGGESTED LINES OF INQUIRY

(a) Bank Secrecy Act records for the listed individuals and entities.

(b) Correspondent banking flows between the listed companies and any United States dollar accounts.

(c) Real property records in United States counties, with priority to border states and Florida, for the listed individuals, their immediate family members, and the listed companies.

(d) State business registries and Uniform Commercial Code filings for entities controlled by the listed persons.

(e) Import records of United States-origin materials used in ballot box and booth manufacturing.

V. PERSONS AND ENTITIES

(a) Guadalupe Taddei Zavala, Council President, INE; former president, Sonora electoral institute.

(b) Claudia Arlett Espino, former Executive Secretary, INE; former president, Chihuahua electoral institute.

(c) Jesús Octavio García González, former acting Director of Administration, INE.

(d) Cajas Graf, S.A. de C.V.; Corporativo Zeg; TOL Producciones, S.A. de C.V.

EXHIBIT INDEX

B-1 Latinus, "El club Taddei," Apr. 20, 2026.

B-2 El Imparcial, "UIF bloqueó en 2023 a Corporativo Zeg y Cajas Graf...," Feb. 4, 2026.

B-3 Político MX, "La red de Taddei," Apr. 21, 2026.

B-4 Milenio, "INE recurre a adjudicaciones directas...," Apr. 18, 2025.

B-5 Radio Fórmula, Feb. 27, 2025.

B-6 Diario.mx, "Sale directivo del INE tras señalamientos," Apr. 27, 2026.

B-7 INE, Central Electoral, resignation of the Executive Secretary, Sep. 9, 2026.

B-8 La Silla Rota, Sep. 9, 2026.

B-9 La Jornada, column of Sep. 10, 2026.

B-10 Primary contracts: Sonora (2021), Chihuahua (2021), Oaxaca (2024) and INE (Feb. 2025) (requested; to be supplemented).

DECLARATION

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief, and that facts drawn from published reporting are identified as such and accurately summarized. 28 U.S.C. § 1746.

Dated: September 23, 2026

/s/ Simón Levy [signature redacted in public copy]

SIMÓN LEVY

Contact information redacted in public copy

CERTIFICATE OF ELECTRONIC SUBMISSION

I, SIMÓN LEVY, certify that I am over 18 years of age and that my address is [redacted]. On September 23, 2026, I served the foregoing Referral and Request for Preliminary Inquiry under 18 U.S.C. §§ 1956, 1957, and 981, together with its exhibits, through the online portal indicated below on the following recipient:

Federal Bureau of Investigation
935 Pennsylvania Avenue NW
Washington, DC 20535
By electronic submission through the FBI online tip portal, tips.fbi.gov

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. 28 U.S.C. § 1746.

Executed on September 23, 2026.

/s/ Simón Levy [signature redacted in public copy]
SIMÓN LEVY
Contact information redacted in public copy

EXHIBITS B

Electoral materials procurement network

INDEX

B-1 El club Taddei: red de funcionarios y su proveedor se reencuentran en el INE. Latinus, April 20, 2026.

B-2 UIF bloqueó en 2023 a Corporativo Zeg y Cajas Graf por sospechas de lavado de dinero. El Imparcial, February 4, 2026.

B-3 La red de Taddei: funcionarios del INE repartieron contratos millonarios a su actual administrador. Político MX, April 21, 2026.

B-4 INE recurre a adjudicaciones directas para lograr equipar casillas en elección judicial. Milenio, April 18, 2025.

B-5 Elección Judicial se complica: INE sigue sin licitar urnas, mamparas y marcadores. Radio Fórmula, February 27, 2025.

B-6 Sale directivo del INE tras señalamientos. Diario.mx, April 27, 2026.

B-7 Renuncia Claudia Arlett Espino a la Secretaría Ejecutiva del INE (official INE statement). Instituto Nacional Electoral, Central Electoral, September 9, 2026.

B-8 Renuncia Claudia Espino al INE; Taddei designa a Roberto Félix. La Silla Rota, September 9, 2026.

B-9 Astillero (column): INE, ¿por qué la renuncia?. La Jornada, September 10, 2026.

B-10 Primary procurement records: Sonora (2021) and Chihuahua (2021) electoral institutes, Oaxaca electoral institute (2024), INE direct award to Cajas Graf and TOL Producciones (February 2025). Requested through Mexico's transparency channels, Pending.

EXHIBIT B-1

El club Taddei: red de funcionarios y su proveedor se reencuentran en el INE

Source: Latinus
Date: April 20, 2026
Location:
https://latinus.us/mexico/2026/4/20/el-club-taddei-red-de-funcionarios-su-proveedor-se-reencuentran-en-el-ine-170
Accessed: September 23, 2026

EXHIBIT B-2

UIF bloqueó en 2023 a Corporativo Zeg y Cajas Graf por sospechas de lavado de dinero

Source: El Imparcial
Date: February 4, 2026
Location:
https://www.elimparcial.com/mexico/2026/02/04/uif-bloqueo-en-2023-a-corporativo-zeg-y-cajas-graf-por-sospech
Accessed: September 23, 2026

EXHIBIT B-3

La red de Taddei: funcionarios del INE repartieron contratos millonarios a su actual administrador

Source: Político MX
Date: April 21, 2026
Location:
https://politico.mx/2026/04/21/la-red-de-taddei-funcionarios-del-ine-repartieron-contratos-millonarios-a-su-actual-
Accessed: September 23, 2026

EXHIBIT B-4

INE recurre a adjudicaciones directas para lograr equipar casillas en elección judicial

Source: Milenio
Date: April 18, 2025
Location:
https://www.milenio.com/politica/ine-recurre-contratos-equipar-casillas-eleccion-judicial
Accessed: September 23, 2026

EXHIBIT B-5

Elección Judicial se complica: INE sigue sin licitar urnas, mamparas y marcadores

Source: Radio Fórmula
Date: February 27, 2025
Location:
https://www.radioformula.com.mx/nacional/2025/2/27/eleccion-judicial-se-complica-ine-sigue-sin-licitar-urnas-m
Accessed: September 23, 2026

EXHIBIT B-6

Sale directivo del INE tras señalamientos

Source: Diario.mx
Date: April 27, 2026
Location: https://diario.mx/nacional/2026/apr/27/sale-directivo-del-ine-tras-senalamientos-1115856.html
Accessed: September 23, 2026

EXHIBIT B-7

Renuncia Claudia Arlett Espino a la Secretaría Ejecutiva del INE (official INE statement)

Source: Instituto Nacional Electoral, Central Electoral
Date: September 9, 2026
Location: https://centralelectoral.ine.mx/2026/09/09/renuncia-claudia-arlett-espino-a-la-secretaria-ejecutiva-del-ine/
Accessed: September 23, 2026

Official public document reproduced in full or in relevant part.

Renuncia Claudia Arlett Espino a la Secretaría Ejecutiva del INE

Publicado el:

septiembre 9, 2026

Categoría:

Al día, Destacada INE, Noticias

Número: 376

- ***Al agradecer la confianza de la Consejera Presidenta, Guadalupe Taddei Zavala, Espino informó que su renuncia, presentada por motivos de salud, es irrevocable y surte efectos a partir del 9 de septiembre***



Claudia Arlett Espino, Secretaria Ejecutiva.

La Secretaria Ejecutiva del Instituto Nacional Electoral (INE), Claudia Arlett Espino, presentó ante la Consejera Presidenta del Instituto, Guadalupe Taddei Zavala, su renuncia irrevocable al cargo, con efectos a partir del día de hoy, 9 de septiembre de 2026.

En su escrito de renuncia, dirigido a la Consejera Presidenta, Espino precisó que su decisión obedece a motivos de salud, orientados a procurar un sano equilibrio entre su desarrollo profesional y personal,

ante el nivel de exigencia que implica la organización del Proceso Electoral Concurrente de 2026-2027, en el que se renovarán cargos federales y de las 32 entidades federativas.

“Considero que el nivel de exigencia que requiere la organización de una elección concurrente de los cargos federales y de las 32 entidades federativas que estarán en disputa en los procesos federal y local 2026-2027, no me permite en estos momentos fortalecer mi vínculo personal y familiar”, señaló la funcionaria en el documento entregado a la presidencia del Consejo General.

Espino agradeció a la Consejera Presidenta haberla propuesto ante el pleno del Consejo General para ocupar la Secretaría Ejecutiva y la Secretaría del Consejo General del Instituto, responsabilidad que le permitió cumplir con “una de mis más altas responsabilidades con aprendizajes significativos”, indicó.

La funcionaria concluyó su gestión al frente de la Secretaría Ejecutiva “con gratitud y satisfacción por el trabajo realizado”, y expresó un reconocimiento a las personas servidoras públicas del área que, con profesionalismo y compromiso institucional, contribuyeron al cumplimiento de las atribuciones encomendadas a dicha Secretaría.

Asimismo, manifestó su plena disposición para colaborar en las labores de transición correspondientes, con el propósito de evitar afectaciones en la operación de la Secretaría Ejecutiva y favorecer que ésta continúe desempeñando sus funciones con normalidad, profesionalismo y estricto apego a los principios que rigen la función electoral.

Al cierre de su comunicación, Claudia Arlett Espino reiteró su respeto a la Consejera Presidenta y expresó su agradecimiento a la institución.

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Categorías: Al día, Destacada INE, Noticias Etiquetas: Claudia Arlett Espino, Comunicados 2026, Comunicados de Prensa, INE Deja un comentario

INE Veracruz arranca Campaña Anual Intensa de cara al inicio del… Designa Guadalupe Taddei a Roberto Carlos Félix López como E…

Categorías

Al día

- Cultura Cívica
- Discursos
- Elecciones 2025
- Especiales
- Estados
- Multimedia
  - INE TV
  - INE Radio
  - Podcast
  - Galerías
  - Gráficos
- Internacional







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EXHIBIT B-8

Renuncia Claudia Espino al INE; Taddei designa a Roberto Félix

Source: La Silla Rota
Date: September 9, 2026
Location:
https://lasillarota.com/nacion/2026/9/9/renuncia-claudia-espino-al-ine-taddei-designa-a-roberto-felix-527881.html
Accessed: September 23, 2026

EXHIBIT B-9

Astillero (column): INE, ¿por qué la renuncia?

Source: La Jornada
Date: September 10, 2026
Location: https://www.jornada.com.mx/2026/09/10/opinion/008o1pol
Accessed: September 23, 2026

EXHIBIT B-10

Primary procurement records: Sonora (2021) and Chihuahua (2021) electoral institutes, Oaxaca electoral institute (2024), INE direct award to Cajas Graf and TOL Producciones (February 2025)

Source: Requested through Mexico's transparency channels
Date: Pending
Status: Requested through the respective transparency units; to be supplemented upon receipt.