

10-60074

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. **CR-COHN**, MAGISTRATE JUDGE  
**SELTZER**

18 U.S.C. § 1956(a)(3)(B)  
18 U.S.C. § 2342(a)  
8 U.S.C. § 1325(c)  
18 U.S.C. § 2  
18 U.S.C. § 982(a)(1)  
18 U.S.C. § 981(a)(1)(C)

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FILED BY \_\_\_\_\_ D.C.  
2010 MAR -9 PM 12:55

**UNITED STATES OF AMERICA,**

**Plaintiff**

v.

**ANTONIO TRICAMO,**

**Defendant.** /

**INDICTMENT**

The Grand Jury charges that:

**COUNTS 1 TO 4**

Laundering of Monetary Instruments  
(18 U.S.C. § 1956(a)(3)(B))

On or about the dates, enumerated below, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

**ANTONIO TRICAMO,**

did knowingly attempt to conduct the financial transactions, enumerated below, affecting interstate and foreign commerce, which involved property represented by a Federal law enforcement officer to be proceeds of specified unlawful activity, that is, narcotics trafficking, in violation of Title 21, United States Code, Section 841, with the intent to conceal and disguise the nature, location, source, ownership, and control of the property believed to be the proceeds of specified unlawful activity, that

is, narcotics trafficking.

COUNT	DATE	FINANCIAL TRANSACTION
1	05/06/2009	Delivery of \$200,000 in U.S. Currency
2	05/14/2009	Delivery of \$250,000 in U.S. Currency
3	06/04/2009	Delivery of \$250,000 in U.S. Currency
4	07/23/2009	Delivery of \$250,000 in U.S. Currency

All in violation of Title 18, United States Code, Sections 1956(a)(3)(B) and 2.

**COUNTS 5 TO 10**  
Trafficking in Contraband Cigarettes  
(18 U.S.C. § 2342(a))

On or about the dates, enumerated below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**ANTONIO TRICAMO,**

did knowingly receive, possess, sell, distribute, and purchase contraband cigarettes, as that term is defined in Title 18, United States Code, Section 2341(a), that is, a quantity in excess of ten thousand (10,000) cigarettes, enumerated below, which bear no evidence of the payment of applicable state cigarette taxes in the State of Florida.

COUNT	DATE	QUANTITY OF CONTRABAND CIGARETTES
5	11/03/2009	12,000
6	12/04/2009	48,000
7	12/10/2009	72,000
8	12/22/2009	48,000
9	01/11/2010	48,000
10	01/12/2010	24,000

All in violation of Title 18, United States Code, Section 2342(a).

**COUNT 11**  
Marriage Fraud  
(8 U.S.C. § 1325(c))

On or about December 22, 2008, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**ANTONIO TRICAMO,**

did knowingly enter into a marriage for the purpose of evading provisions of the United States immigration laws.

All in violation of Title 8, United States Code, Section 1325(c).

**Forfeiture Allegations**

1. The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant has an interest pursuant to 32.2(a), Federal Rules of Criminal Procedure. Forfeiture is being sought pursuant to the provisions of Title 18, United States Code, Sections 982(a)(1), 2344(c), and 981(a)(1)(C).

2. Upon conviction of the offenses set forth in Counts 1 through 4 of the Indictment, the defendant, **ANTONIO TRICAMO**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1) all property, real or personal, which involved in or traceable to the offense which property shall include:

- i. all money and other property that was the subject of each transaction, transportation, transmission and transfer in violation of 1956(a)(3)(B);

- ii. all commissions, fees and other property constituting proceeds obtained as a result of those violations; and
- iii. all property used in any manner and part to commit and to facilitate the commission of those violations.

4. Upon conviction of the offenses set forth in Counts 5 to 10 of the Indictment, the defendant, **ANTONIO TRICAMO**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2344(c) and 981(a)(1)(C) any contraband cigarettes involved in the violations and all property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

5. The property subject to forfeiture, includes but is not limited to:

- A. A sum of money equal to at least \$13,500.00 in United States currency related to Counts 1 to 4; and
- B. A sum of money equal to at least \$16,871.40 in United States currency related to Counts 5 to 10.

6. If any of the property described above as being subject to forfeiture, as a result of any act and omission of the defendant -


- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third party;
- iii. has been placed beyond the jurisdiction of the court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property which cannot be divided without difficulty;


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), made applicable through Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1), Title 28, United States Code, Section 2461(c); and the procedures outlined at Title 21, United States Code, Section 853.

A TRUE BILL

 FOREPERSON

  
JEFFREY H. SLOMAN  
UNITED STATES ATTORNEY

  
CYNTHIA STONE  
ASSISTANT UNITED STATES ATTORNEY  
MARGARET HONRATH  
TRIAL ATTORNEY  
CRIMINAL DIVISION, ORGANIZED CRIME  
AND RACKETEERING SECTION