

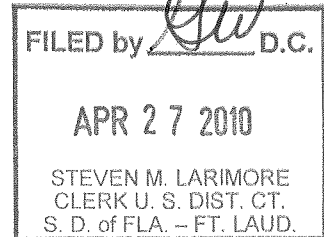
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.

10-60126 CR-ZLOCH

ROSENBAUM

18 U.S.C. §1956(h)
18 U.S.C. §982(a)(1)



UNITED STATES OF AMERICA,

Plaintiff,

v.

DEBRA VILLEGAS,

Defendant.

INFORMATION

The United States Attorney charges that at all times relevant to this Information:

GENERAL ALLEGATIONS

1. Debra Villegas was the Chief Operating Officer (COO) of Rothstein, Rosenfeldt and Adler, P.A.
2. Rothstein, Rosenfeldt and Adler, P.A. (hereinafter referred to as "RRA") was a law firm with offices located at 401 East Las Olas Boulevard, Fort Lauderdale, Florida and elsewhere. The law firm employed approximately seventy (70) attorneys and engaged in the practice of law involving a wide range of specialties, including labor and employment law.
3. TD Bank, N.A. (hereinafter referred to as "TD Bank") was a commercial bank with branch offices in thirteen 13 states, including a branch office in Weston, Florida. The executive offices of TD Bank were located in Portland, Maine and Cherry Hill, New Jersey. RRA maintained

multiple bank accounts at TD Bank which were utilized during the course of the “Ponzi” scheme, detailed below.

4. Gibraltar Private Bank and Trust (hereinafter referred to as “Gibraltar Bank”) was a commercial bank with seven (7) branch offices, including a branch office in Fort Lauderdale, Florida. RRA maintained several bank accounts at Gibraltar Bank which were utilized during the course of the “Ponzi” scheme, detailed below.

COUNT 1

(Money Laundering Conspiracy, 18 U.S.C. §1956(h))

1. The General Allegations portion of this Information is incorporated by reference as though fully set forth herein.

2. From in or about December 2007 and continuing thereafter through in or about November 2009, in Broward County, in the Southern District of Florida and elsewhere, the defendant,

DEBRA VILLEGAS,

did knowingly conspire, confederate and agree, with persons known and unknown to the United States Attorney, to commit an offense against the United States in violation of Title 18, United States Code, Section 1957, that is, to knowingly engage and attempt to engage in monetary transactions by, through or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, which property had been derived from a specified unlawful activity, that is, mail fraud and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343.

THE PURPOSE AND OBJECT OF THE CONSPIRACY

3. The purpose and object of the conspiracy was to obtain money from investors and then transfer the criminally derived proceeds between and among the accounts at TD Bank and Gibraltar Bank and other financial institutions in amounts in excess of \$10,000 in order to convert the money to the use and benefit of members of the conspiracy.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that defendant VILLEGAS and other co-conspirators participated in an investment scheme commonly known as a "Ponzi" scheme. The "Ponzi" scheme involved the sale of purported confidential settlement agreements in sexual harassment and/or whistle-blower cases.

5. It was further part of the conspiracy that the purported confidential settlement agreements were all fictitious.

6. It was further part of the conspiracy that defendant VILLEGAS would assist in fabricating the names of the fictitious plaintiffs and defendants and preparing the purported confidential settlement agreement documents that included the names of the fictitious plaintiffs and defendants.

7. It was further part of the conspiracy that defendant VILLEGAS would forge the names of the fictitious plaintiffs and defendants on the purported confidential settlement agreements.

8. It was further part of the conspiracy that funds from the fraudulent scheme would be sent by interstate wire transfer from investors to TD Bank and Gibraltar Bank.

9. It was further part of the conspiracy that the transfer of criminally derived proceeds from the fraudulent scheme in excess of \$10,000 were made between and among accounts at TD Bank and

Gibraltar Bank and other financial institutions in order to convert the money to the use and benefit of the coconspirators.

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

FORFEITURE ALLEGATIONS

1. The allegations of this Information are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America of certain property in which the defendant has an interest pursuant to 7(c)(2) and 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) and 981(a)(1)(C), as made applicable hereto by Title 28, United States Code, Section 2461.

2. Upon conviction of the offense of Money Laundering Conspiracy set forth in Count 1 of the Information, the defendant, DEBRA VILLEGAS, shall forfeit to the United States all property, real or personal, 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 Section 1956(h);
- 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.

3. The property subject to forfeiture, pursuant to Title 18, United States Code, Sections 982(a)(1) and 981(a)(1)(C), includes but is not limited to:

A. A sum of money equal to \$1,200,000,000 in United States currency.

B. Real Property:

380 Carrington Drive, Weston, Florida, including all buildings, improvements, fixtures, attachments and easements found therein or thereon and is more particularly described as: Sector 4 North 153-46, Lot 24 BLK A with a Folio Number of 503901020240;

C. Vehicle:

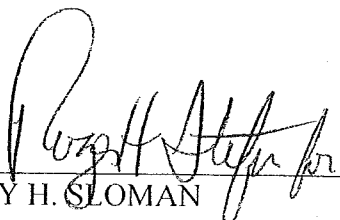
2009 Blue Gray Maserati Granturismo Coup, VIN ZAMGJ45A090042326.

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

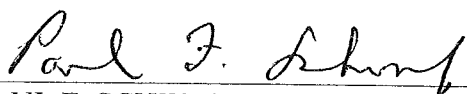
- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third party;
- iii. has been placed beyond the jurisdiction of the court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property which cannot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

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), and pursuant to Rule 32.2 Fed. R. Crim. P., to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

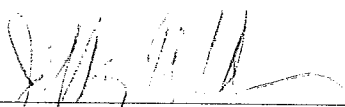
All pursuant to Title 18, United States Code, Section 982(a)(1) and Title 18, United States Code, Section 981(a)(1)(C) made applicable through Title 28, United States Code, Section 2461; and the procedures outlined at Title 21, United States Code, Section 853.



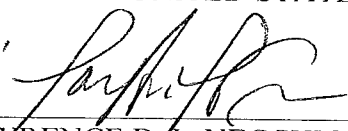
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