

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

FILED

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CLERK, US DISTRICT COURT
MIDDLE DISTRICT FLORIDA
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 8:19 cr 466 T 33 AEP

RONALD CARAPPELLUCCI and
MANUEL PARRADO
a/k/a Manuel Medina

18 U.S.C. § 1349
18 U.S.C. § 1343
18 U.S.C. § 1028A

INDICTMENT

SEALED

The Grand Jury charges:

COUNT ONE
(Wire Fraud Conspiracy—18 U.S.C. § 1349)

Introduction

At times relevant to this Indictment:

1. Defendant RONALD CARAPPELLUCCI was a resident of the Middle District of Florida.
2. Defendant MANUEL PARRADO a/k/a Manuel Medina was a resident of the Middle District of Florida.
3. A “money services business” offered various financial services to customers for a fee. Such services included the sale of money orders and the wire transfer of funds from one location to another, both within the United States and abroad.

SEALED

4. Personally identifiable information (“PII”) included an individual’s name, address, telephone number, date of birth, social security number, and other information that could be used on its own or with other information to identify, contact, or locate the individual.

The Conspiracy

5. Beginning on an unknown date, but at least by in or around June 2015, and continuing through in or around July 2018, in the Middle District of Florida and elsewhere, the defendants,

RONALD CARAPPELLUCCI and
MANUEL PARRADO
a/k/a “Manuel Medina,”

did knowingly combine, conspire, confederate, and agree with each other and others, both known and unknown to the Grand Jury, to commit wire fraud in violation of 18 U.S.C. § 1343.

Manner and Means of the Conspiracy

6. The manner and means by which the conspirators sought to accomplish the objects of the conspiracy included, among others, the following:

a. It was a part of the conspiracy that conspirators would and did contact victims by telephone, and obtain money from said victims by falsely and fraudulently representing that the conspirators had located buyers

for the victims' respective real property and/or timeshares (collectively, "real property") and that the sales of the real property could and would commence upon the payment of an advance fee or fees;

b. It was further a part of the conspiracy that the conspirators would and did often falsely and fraudulently represent themselves to be attorneys or real estate professionals, and would and did often falsely and fraudulently impersonate actual attorneys and real estate professionals;

c. It was further a part of the conspiracy that the conspirators would and did call victims often using telephone numbers that could not be easily traced to the conspirators;

d. It was further a part of the conspiracy that the conspirators would and did, at times, share the telephone numbers to perpetuate the scheme;

e. It was further a part of the conspiracy that the conspirators, knowing there were no buyers for the victims' real property and knowing no sales would occur, would and did direct and instruct victims to transmit money to the conspirators using one or more interstate wire transmitter services, or to mail checks or money orders, in order to complete the payments of the advance fees;

f. It was further a part of the conspiracy that conspirators would and did direct and instruct victims to transmit the advance fees to the other conspirators using one or more interstate wire transmitter services, checks, or money orders, often to conceal from law enforcement officers the identities of the victims, the identities of the callers, and the nature and sources of the financial transactions;

g. It was further a part of the conspiracy that conspirators would and did convert to cash the fraudulently-obtained funds wired or mailed by the victims as advance fees;

h. It was further a part of the conspiracy that the conspirators would and did provide the fraud proceeds to other conspirators, including the defendants, in cash or via bank deposit;

i. It was further a part of the conspiracy that conspirators would and did share in the fraud scheme proceeds, usually receiving percentages commensurate with their respective roles, to promote and perpetuate the scheme;

j. It was further a part of the conspiracy that conspirators would and did use and cause to be used interstate and foreign wire communications; and

k. It was further a part of the conspiracy that conspirators would and did engage in multiple meetings, perform acts, and make statements to promote and achieve the objects of the conspiracy and to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

All in violation of 18 U.S.C. § 1349.

COUNTS TWO THROUGH FIFTEEN
(Wire Fraud—18 U.S.C. § 1343)

A. Introduction

1. The Grand Jury realleges and incorporates by reference Part A of Count One of this Indictment as if fully set forth herein.

B. The Scheme and Artifice

2. Beginning on an unknown date, but at least by in or around June 2015, and continuing through in or around July 2018, in the Middle District of Florida and elsewhere, the defendants,

RONALD CARAPELLUCCI and
MANUEL PARRADO,
a/k/a “Manuel Medina,”

knowingly devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises.

C. Manner and Means of the Scheme and Artifice

3. The manner and means of the scheme and artifice are set forth in Part C of Count One of this Indictment, the allegations of which are realleged and incorporated by reference as if fully set forth herein.

D. Execution of the Scheme and Artifice

4. On or about the dates set forth below, in the Middle District of Florida and elsewhere, the defendant(s) named below in each count, for the purpose of executing the scheme and artifice described above, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce the writings, signs, signals, pictures, and sounds described below:

COUNT	DEFENDANT(S)	DATE	DESCRIPTION OF WIRE
TWO	RONALD CARAPELLUCCI and MANUEL PARRADO	April 29, 2016	\$890 transmitted via wire transmitter service from Springfield, Pennsylvania, to Largo, Florida
THREE	RONALD CARAPELLUCCI and MANUEL PARRADO	May 4, 2016	\$1,363 transmitted via wire transmitter service from Springfield, Pennsylvania, to Tampa, Florida
FOUR	RONALD CARAPELLUCCI	June 2, 2016	\$1,750 transmitted via wire transmitter service from Glen Burnie, Maryland, to Largo, Florida

COUNT	DEFENDANT(S)	DATE	DESCRIPTION OF WIRE
FIVE	RONALD CARAPELLUCCI	October 14, 2016	\$800 transmitted via wire transmitter service from Spring Valley, California, to St. Augustine, Florida
SIX	RONALD CARAPELLUCCI	October 17, 2016	\$750 transmitted via wire transmitter service from Spring Valley, California, to Ormond Beach, Florida
SEVEN	RONALD CARAPELLUCCI	October 20, 2016	\$750 transmitted via wire transmitter service from Spring Valley, California, to Palm Coast, Florida
EIGHT	RONALD CARAPELLUCCI and MANUEL PARRADO	November 15, 2016	\$790 transmitted via wire transmitter service from Jefferson, Missouri, to Pinellas Park, Florida
NINE	RONALD CARAPELLUCCI	January 25, 2017	\$700 transmitted via wire transmitter service from Livermore, California, to Largo, Florida
TEN	RONALD CARAPELLUCCI	January 25, 2017	\$625 transmitted via wire transmitter service from Plymouth, Indiana, to Seminole, Florida
ELEVEN	RONALD CARAPELLUCCI and MANUEL PARRADO	March 3, 2017	\$830 transmitted via wire transmitter service from Denver, North Carolina, to Largo, Florida
TWELVE	RONALD CARAPELLUCCI and MANUEL PARRADO	March 10, 2017	\$1,200 transmitted via wire transmitter service from Westland, Michigan, to Tarpon Springs, Florida
THIRTEEN	RONALD CARAPELLUCCI	March 15, 2017	\$900 transmitted via wire transmitter service from Davis, California, to Seminole, Florida

COUNT	DEFENDANT(S)	DATE	DESCRIPTION OF WIRE
FOURTEEN	MANUEL PARRADO	August 1, 2017	Telephone call from Middle District of Florida to victim in Davis, California
FIFTEEN	RONALD CARAPPELLUCCI and MANUEL PARRADO	August 22, 2017	\$680 transmitted via wire transmitter service from Jefferson, Missouri, to St. Petersburg, Florida

In violation of 18 U.S.C. §§ 1343 and 2.

COUNTS SIXTEEN THROUGH EIGHTEEN
(Aggravated Identity Theft—18 U.S.C. § 1028A)

1. The Grand Jury realleges and incorporates by reference Part A of Count One of this Indictment as if fully set forth herein.

2. On or about the dates listed below, in the Middle District of Florida and elsewhere, the defendant,

RONALD CARAPPELLUCCI,

did knowingly transfer, possess, and use, without lawful authority, and aided and abetted others in the transfer, possession, and use without lawful authority, a means of identification of another person, the name and professional identity of victim S.L., a person known to the Grand Jury, during and in relation to the felony offense of wire fraud, in violation of 18 U.S.C. § 1343, knowing that such means of identification belonged to an actual person:

COUNT	DATE
SIXTEEN	May 3, 2016
SEVENTEEN	March 3, 2017
EIGHTEEN	March 10, 2017

In violation of 18 U.S.C. §§ 1028A(a)(1) and 2.

FORFEITURE

1. The allegations contained in Counts One through Fifteen of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(1), and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 18 U.S.C. § 1343, or a conspiracy to violate 18 U.S.C. § 1343 (18 U.S.C. § 1349), the defendants,

RONALD CARAPPELLUCCI and
MANUEL PARRADO,
a/k/a “Manuel Medina,”

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

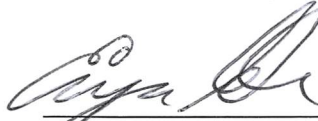
3. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,



Foreperson

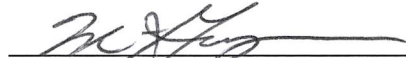
MARIA CHAPA LOPEZ
United States Attorney

By:



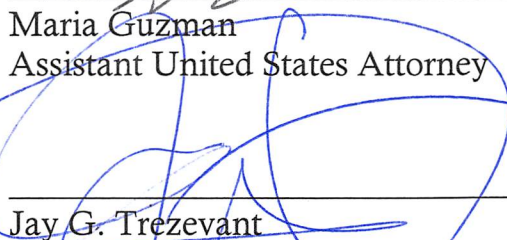
Rachel K. Jones
Assistant United States Attorney

By:



Maria Guzman
Assistant United States Attorney

By:



Jay G. Trezevant
Assistant United States Attorney
Chief, Economic Crimes Section

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

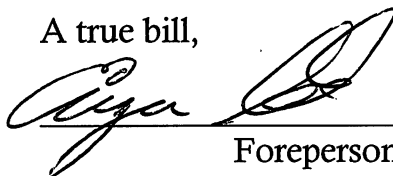
vs.

RONALD CARAPPELLUCCI, and
MANUEL PARRADO
a/k/a Manuel Medina

INDICTMENT

Violations: 18 U.S.C. §§ 1349, 1343, 1020A

A true bill,


Foreperson

Filed in open court this 3rd day
of October 2019.

Clerk

Bail \$ _____
