

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 18-CR-20685-WILLIAMS(s)
18 U.S.C. § 1956(h)
18 U.S.C. § 982(a)

UNITED STATES OF AMERICA

vs.

ABRAHAM EDGARDO ORTEGA,

Defendant.

SUPERSEDING INFORMATION

The United States charges that:

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

Beginning in or around November 2014, and continuing through in or around July 2018, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

ABRAHAM EDGARDO ORTEGA,

did knowingly and willfully combine, conspire, confederate, and agree with other persons, known and unknown to the United States, to violate Title 18, United States Code, Section 1957, that is, to knowingly engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity is:

- (a) A felony violation of the Foreign Corrupt Practices Act, in violation of Title 15, United States Code, Section 78dd-3, and

(b) An offense against a foreign nation involving bribery of a public official, and the misappropriation, theft, and embezzlement of public funds by and for the benefit of a public official.

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

FORFEITURE
(18 U.S.C. § 982(a)(1))

1. The allegations of this Superseding Information are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which the defendant, **ABRAHAM EDGARDO ORTEGA**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1956(h), as alleged in this Superseding Information, the defendant shall forfeit to the United States any property, real or personal, involved in such offense, and any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

3. If any property subject to forfeiture, 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 under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

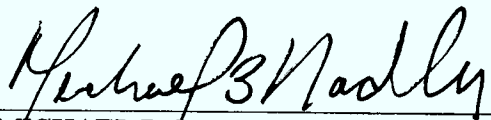
All pursuant to Title 18, United States Code, Section 982(a)(1) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 18, United States Code, Section 982(b)(1).




ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY



SANDRA L. MOSER
ACTING CHIEF, FRAUD SECTION
CRIMINAL DIVISION
DEPARTMENT OF JUSTICE

BY: 

MICHAEL B. NADLER
ASSISTANT UNITED STATES ATTORNEY

BY: 

GWENDOLYN A. STAMPER
TRIAL ATTORNEY

UNITED STATES OF AMERICA

CASE NO. 18-CR-20685-WILLIAMS(s)

v.

ABRAHAM EDGARDO ORTEGA

CERTIFICATE OF TRIAL ATTORNEY*

Defendant.

Superseding Case Information:

Court Division: (Select One)

X Miami _____ Key West
 _____ FTL _____ WPB _____ FTP

New Defendant(s) Yes _____ No X
 Number of New Defendants 0
 Total number of counts 1

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
3. Interpreter: (Yes or No) YES
 List language and/or dialect SPANISH
4. This case will take 0 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)

(Check only one)

I	0 to 5 days	<u>X(PLEA)</u>	Petty	_____
II	6 to 10 days	_____	Minor	_____
III	11 to 20 days	_____	Misdem.	_____
IV	21 to 60 days	_____	Felony	<u>X</u>
V	61 days and over	_____		

6. Has this case been previously filed in this District Court? (Yes or No) YES

If yes:

Judge:

Case No. 18-CR-20685-KMW

(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) YES

If yes:

Magistrate Case No. 18-MJ-03119-EGT

Related Miscellaneous numbers:

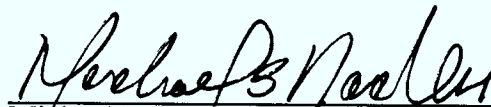
Defendant(s) in federal custody as of _____

Defendant(s) in state custody as of _____

Rule 20 from the District of _____

Is this a potential death penalty case? (Yes or No) NO

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes _____ No X


 Michael B. Nadler
 Assistant United States Attorney
 Florida Bar No.: 051264

*Penalty Sheet(s) attached

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: ABRAHAM EDGARDO ORTEGA

Case No: _____

Count #1:

Conspiracy to Commit Money Laundering

Title 18, United States Code, 1956(h)

***Max. Penalty:** Ten (10) years' imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

AO 455 (Rev. 01/09) Waiver of an Indictment

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

ABRAHAM EDGARDO ORTEGA

Defendant

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Case No.

WAIVER OF AN INDICTMENT

I understand that I have been accused of one or more offenses punishable by imprisonment for more than one year. I was advised in open court of my rights and the nature of the proposed charges against me.

After receiving this advice, I waive my right to prosecution by indictment and consent to prosecution by information.

Date: _____

Defendant's signature

Signature of defendant's attorney

Printed name of defendant's attorney

Judge's signature

Judge's printed name and title